FINAL DETERMINATION

PERMITTEE

Sugar Cane Growers Cooperative of Florida
1500 West Sugar House Road
Belle Glade, Florida 33430

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Engineering and Permitting Section
South District Office
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901-2549

PROJECT

Air Permit No. 0990026-020-AC
Air Construction Permit
Glades Sugar House

This project will replace Boiler Nos. 1 and 2's existing tube and tile design waterfalls with modern membrane style panels. Boiler Nos. 1 and 2's generating bank steam tubes will be replaced. Boilers Nos. 1 and 2's multi-cyclone collectors with be replaced with a low efficiency dust collectors consisting of a baffle. This project will modify the following emissions units.

NOTICE AND PUBLICATION

The Department distributed a draft minor source air construction permit package on May 21, 2013. The applicant published the Public Notice in the Palm Beach Post on May 23, 2013. The Department received the proof of publication on June 3, 2013.

COMMENTS

Applicant

On June 5, 2013, the Department received comments from David Buff, P.E. of Golder Associates. The following summarizes the comments and the Department's response.

1. *Comment:* A couple of typographical errors were requested to be corrected in the Technical Evaluation and Preliminary Determination.

   Response: The Department has made the corrections requested.

2. *Comment:* The last paragraph in Specific Condition No. 9, Section 2. Administrative Requirements, is incorrectly states that the actual annual emissions reports will be compared to the projected actual emissions from the application.

   Response: The last paragraph in Specific Condition No. 9, Section 2. Administrative Requirements has been changed as follows:

   9. Actual Emissions Reporting: This permit ……..For this project, the Department requires the annual reporting of actual **SO_2, NO_X, CO, PM, PM_{10}, $PM_{2.5}$** and **VOC** emissions for the following units: Boiler No. 1 (EU001) and Boiler No. 2 (EU002). The Technical Evaluation and Preliminary Determination provides the baseline actual and projected actual emissions for project 0990026-020-AC. The Department shall use ~~these~~ the project's baseline ~~and projected~~ actual emissions for the comparison to the actual annual emissions monitored, recorded and reported over the next five years pursuant to this condition. **If the the actual annual emissions for Boiler Nos. 1 and 2 in any of the five reporting years after completion of the proposed construction project for Boiler Nos. 1 and 2 exceed the ~~projected~~ baseline actual emissions plus the PSD significant emission rate, additional permitting actions will be required to**

address PSD applicability.

3. *Comment:* VOC testing should be removed from Specific Condition No. 3 in Section 3. Boiler Nos. 1 and 2 because it is not a NSPS Subpart Db regulated pollutant. A request was made to allow 60 days, instead of 45 days, for submittal of test results and NSPS applicability determination required by Specific Condition No. 3.

   Response: The Department shall grant the request to remove VOC testing from Specific Condition No. 3. The Department grants the request for 60 days for submittal of the applicability determination. However, the Department denies any request to provide for more days for submittal of annual stack test results. Rule 62-297.310(8)(b), F.A.C. requires submittal within 45 days. Specific Condition No. 3 is hereby changed as follows:

   3. Testing for NSPS Applicability Determination. In accordance with the methods and procedures specified in Appendix C of 40 CFR 60, each boiler shall be tested to determine whether or not a change resulted in the hourly emission rates of particulate matter (**PM**), nitrogen oxides (**NO_X**)~~, and volatile organic compounds (**VOC**)~~. Tests shall be conducted at permitted capacity and performed in accordance with the methods and procedures specified in the current Title V operation permit. Rule 62-297.310(2)(b), F.A.C. defines *permitted capacity* as "90 to 100 percent of the maximum operation rate allowed by the permit." Tests shall be conducted during the crop season immediately following the completion of the specific boiler's authorized construction. A summary of the tests conducted and the results for determining whether or not a change resulted in the hourly emission rates shall be provided within ~~45~~ 60 days of completing the tests~~.~~ and ~~These test reports and determination shall be~~ submitted to the South District's Permitting and Engineering Section for review. Note: Annual stack test reports shall be submitted within 45 days of completing the tests.

CONCLUSION

The final action is to issue the permit with the minor changes, corrections and clarifications as described above.