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PERMITTEE

Osceola Farms Company
Post Office Box 679
Pahokee, Florida 33476

Authorized Representative:
Jose Gonzalez, Vice President of
Industrial Operations

Air Permit No. 0990019-023-AC
Minor Air Construction Permit
Permit Expires: December 31, 2017
Osceola Farms Sugarcane Mill
Revision of Compliance Method - Facility-Wide Steam Cap
Palm Beach County, Florida

PROJECT

This is the final air construction permit which changes the compliance averaging method for the steam cap specified in previous Permit No 0990019-020-AC over the five existing boilers at the Osceola Farms Sugarcane Mill. No increase in the steam cap, unit capacities, operational limitations or any permitted emission limits are authorized by this project. The proposed work will be conducted at the existing Osceola Farms Company, which is a sugarcane mill categorized under Standard Industrial Classification No. 2061. The existing facility is located in Palm Beach County at U.S. Route 98 and Hatton Highway in Pahokee, Florida. The UTM coordinates are Zone 17, 544.2 kilometers (km) East and 2968.0 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

FINAL PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Jose Gonzalez, Osceola Farms Company: (Jose.Gonzalez@floridacrystals.com)

Matthew Capone, Osceola Farms Company: (Matthew.Capone@floridacrystals.com)

David Buff, P.E., Golder Associates, Inc.: (dbuff@golder.com)

Gary Maier, South District Office: (Gary.Maier@dep.state.fl.us)

Air Program Administrator, Southeast District: (sed.air@dep.state.fl.us)

Laxmana Tallam, Palm Beach County Health Department: (Laxmana.Tallam@flhealth.gov)

EPA Region 4 NSR/PSD: (NSRSubmittals@epa.gov)

Lynn Scarce, DEP OPC: (lynn.scarce@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

The existing facility consists of the following emissions units.

Facility ID No. 0990019	
ID No.	Emission Unit Description
002	Mill Boiler No. 2
003	Mill Boiler No. 3
004	Mill Boiler No. 4
005	Mill Boiler No. 5
006	Mill Boiler No. 6
007	Lime Silo
009	Bagasse Handling System (Sugarcane Processing Facility)
010	Emergency Reciprocating Internal Combustion Engine (RICE) – Fire Pump AG Shop
011	Emergency RICE – Sugar Mill Generator
025	Surface Coating Operations

PROPOSED PROJECT

This permit redefines the compliance averaging period for the steam cap imposed on the five existing boilers in Permit No 0990019-020-AC. This permit does not change the existing daily steam production cap of 17,280,000 pounds of steam per day, as a 24-hour block total, over the five boilers.

This project affects the following emissions units.

Facility ID No. 0990019	
ID No.	Emission Unit Description
002	Mill Boiler No. 2
003	Mill Boiler No. 3
004	Mill Boiler No. 4
005	Mill Boiler No. 5
006	Mill Boiler No. 6

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Department's South District at: 2295 Victoria Avenue, Suite 364, P.O. Box 2549, Fort Myers, Florida 33902-2549. The telephone number for the South District is 239-344-5600.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Palm Beach County Health Department at: 800 Clematis Street, West Palm Beach, Florida 33401. The telephone number for the Health Department is 561-837-5900.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms) and Appendix B (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]
8. Source Obligation:
 - a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

9. Application for Title V Permit: A Title V air operation permit is required to incorporate these changes for the permitted emissions units. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. A Title V source may immediately implement such changes after they have been incorporated into the terms and conditions of a new or revised construction permit issued pursuant to Chapter 62-212, F.A.C., and after the source provides to EPA, the Department, each affected state and any approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revision. [Rules 62-4.030, 62-4.050, Chapter 62-213.400 and 62-213.412(2), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Mill Boiler Nos. 2 through 6 (EU Nos. 002 through 006)

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
002	Mill Boiler No. 2
003	Mill Boiler No. 3
004	Mill Boiler No. 4
005	Mill Boiler No. 5
006	Mill Boiler No. 6

Mill Boiler No. 2: This emissions unit is an inclined grate 280 MMBtu/hr boiler. The maximum steam capacity is 140,000 lbs/hr. Two wet impingement scrubbers (Joy Turbulaire Type D-48) control particulate matter emissions. Each scrubber exhausts through a separate 90' stack. Each stack's actual volumetric flow rate is 48,000 acfm, the exit diameter is 5 feet and the exit temperature is 156 °F. This boiler's initial startup date was 10/01/65.

Mill Boiler No. 3: This emissions unit is an inclined grate 292 MMBtu/hr boiler fired by bagasse, No. 6 fuel oil, and wood chips. Particulate matter emissions from the unit are controlled by a single wet impingement scrubber (Joy Turbulaire Type D Size 90). The maximum steam capacity of the boiler is 150,000 lb/hr. The scrubber is vented through a single 90' stack with a nominal 91% control efficiency. The stack has an actual volumetric flow rate of 90,000 acfm, an exit diameter of 6.25 feet and an exit temperature of 147 °F. The initial startup date was 10/31/61.

Mill Boiler No. 4: Boiler No. 4 is an inclined pinhole grate 280 MMBtu/hr boiler. The maximum steam capacity is 140,000 lb/hr. Two single stack wet impingement scrubbers (Joy Turbulaire Type D-48) control particulate matter emissions. The two scrubbers exhaust through a common 90' stack. The stack's actual volumetric flow rate is 101,000 acfm and the exit temperature is 154 °F. The initial startup date was 10/31/62.

Mill Boiler No. 5: Boiler No. 5 is an inclined pinhole grate 330 MMBtu/hr boiler. The maximum steam capacity is 165,000 lbs/hr. Two wet impingement scrubbers (Joy Turbulaire Type D-40) control particulate matter emissions. Each scrubber exhausts to a separate 90' stack. The actual volumetric flow rate is 55,000 acfm for the west stack and 63,000 acfm for the east stack. The stacks' exit diameter is 5 feet and exit temperature is 150 °F. The startup date for the boiler was 11/1/1978.

Mill Boiler No. 6: This emissions unit is a traveling grate 379 MMBtu/hr boiler fired by bagasse, No. 6 fuel oil, and/or wood chips. Particulate matter emissions from the unit are controlled by a single wet impingement scrubber (Joy Turbulaire Type D Size 90). The scrubber exhausts through a single 90' stack with an actual volumetric flow rate of 101,000 acfm and an exit temperature of 151 °F.

The five boilers are fueled primarily with bagasse, but also burn No. 6 fuel oil, wood chips, firewood, lumber and diesel fuel.

PERFORMANCE RESTRICTIONS

- Previous Applicable Conditions:** This permit (No. 0990019-023-AC) replaces in its entirety Permit No. 0990019-020-AC where the annual steam cap for all five boilers was originally implemented. [Application No. 0990019-023-AC]
- Steam Production:** Total steam production from all five boilers shall not exceed 2,626,560,000 pounds based on a 12-month cap of the monthly moving 12-month averages, rolled monthly. The permittee shall demonstrate initial compliance with the steam cap within ten days following the month in which the final permit is issued, which will require a full 24 months of historic data. Compliance with the steam cap shall be determined each month and shall be calculated for the defined 12-month period by utilizing Equations 1 and 2 given below.

$$CD_M = \sum_{i=1}^{12} MA_{M_i} \qquad \text{Equation-1}$$

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Mill Boiler Nos. 2 through 6 (EU Nos. 002 through 006)

$$MA_M = \left[\sum_{i=1}^{12} SP_{M_i} \right] / 12 \quad \text{Equation-2}$$

Where:

CD_M means the monthly steam cap compliance demonstration for a given 12-month period and represents the sum of the calculated 12-month moving averages.

MA_M means the 12-month moving average monthly steam production over a given 12-month period.

SP_M means actual total steam produced for all five boilers in a given month.

[Application No. 0990019-023-AC; Permit No. 0990019-020-AC; and Rule 62-210.200(PTE), F.A.C.]

{Permitting Note: The normal crop season typically consists of 160 operating days (3,840 hours). Normally, the boilers do not operate commercially during a period from May 1 through October 1.}

3. **Operation:** Operation is constrained by the individual limits on each boiler as well as facility-wide steam cap stipulated in **Specific Condition 2**.

[Application No. 0990019-023-AC; Rule 62-210.200(PTE), F.A.C.; and Permit No. 0990019-020-AC]

MONITORING AND RECORDKEEPING REQUIREMENTS

4. **Monitoring of Steam Production:**

- a. The permittee shall monitor and record the daily steam production rates of the sugar mill boilers (24-hour block total, 8:00 a.m. to 8:00 a.m.) for each day of operation.
- b. The permittee shall monitor and record the monthly steam production for each boiler and the total steam production for all five boilers.
- c. Within 10 days following each calendar month, the permittee shall calculate and record the total steam production from the boilers for the month and the new 12-month cap of the monthly moving 12-month averages, rolled monthly steam production (see Equation-1) and the total steam production based on the moving averages during the preceding 12-months (see Equation-2).
- d. The permittee shall record and maintain records sufficient to demonstrate compliance with steam cap. Such records shall be available by the 10th day of each month. The permittee must demonstrate initial compliance with this cap within 10 days following the month in which the final permit is issued.

[Permit No. 0990019-023-AC and Rule 62-213.440(1)(b), F.A.C.]

RECORDS AND REPORTS

5. **Reporting of Steam Production Exceedances:** Any exceedance of the steam cap in **Specific Condition 2** shall be reported to the permitting and compliance authorities within one business day of discovery and within 10 days after the occurrence of the exceedance. [Rule 62-4.160, F.A.C. and Permit No. 0990019-023-AC]