

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

United States Sugar Corporation  
111 Ponce DeLeon Avenue  
Clewiston, FL 33440

Authorized Representative:


Mr. Neil Smith, V.P. of Sugar Processing Operations

Air Permit No. PSD-FL-346A  
Project No. 0510003-038-AC  
Clewiston Sugar Mill and Refinery  
New White Sugar Dryer  
Revised PM/PM<sub>10</sub> Standards

Enclosed is Final Air Permit No. PSD-FL-346A, which revises the PM/PM<sub>10</sub> emissions standards for the new white sugar dryer. This unit operates at the existing Clewiston Sugar Mill and Refinery (SIC Nos. 2061 and 2062), which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. This permit is issued pursuant to Chapter 403, Florida Statutes.

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 thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

Attachments

JK/tlv/jfk

CERTIFICATE OF SERVICE

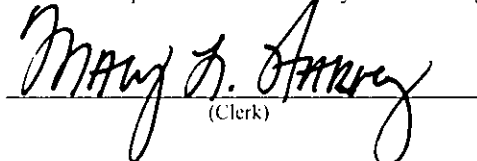
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit package (including the Final Permit) was sent by electronic mail (return receipt requested) before the close of business on 12/22/06 to the persons listed:

Mr. Neil Smith, USSC\*  
Mr. Don Griffin, USSC  
Mr. Peter Briggs, USSC

Mr. David Buff, Golder Associates Inc.  
Mr. Ron Blackburn, SD Office  
Mr. Gregg Worley, EPA Region 4

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk)

12/22/06  
(Date)

## Memorandum

# Florida Department of Environmental Protection

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TO: Joseph Kahn, Director - Division of Air Resource Management  
THROUGH: Trina Vielhauer, Chief - Bureau of Air Regulation *TV*  
FROM: Jeff Koerner, Air Permitting North Section *JK*  
DATE: December 20, 2006  
SUBJECT: Final Air Permit No. PSD-FL-346A  
Project No. 0510003-038-AC  
U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery  
New White Sugar Dryer – Revision of PM/PM<sub>10</sub> Standard

Attached for your review are the following items to revise the air construction permit for the recently installed fluidized bed white sugar dryer. This new unit is designed to remove moisture from refined sugar prior to storage in a conditioning silo. No fuel is combusted. Low-pressure steam supplies the heat necessary for drying. Sugar particles in the exhaust stream are removed with a set of four cyclone collectors followed by a wet atomizing venturi-type scrubber. Sugar captured by the cyclones is transferred to storage. Sugar captured by the scrubber water is recycled back to the refining process. The original project was subject to PSD preconstruction review and a determination of the Best Available Control Technology (BACT) for particulate matter (PM) and particulate matter less than 10 microns in diameter (PM<sub>10</sub>).

After completing construction, emissions tests showed low PM<sub>10</sub> emissions, but unexpectedly higher total PM emissions. Investigations indicate that large water droplets containing dissolved sugar are being re-entrained into the exhaust gas stream. Observations and estimation techniques indicate that the entrained droplets quickly settle to the ground and substantially remain on plant property near the discharge vent. Subsequent equipment modifications have improved performance and reduced PM emissions by approximately half, but total PM emissions remain relatively high due to the large droplets. The draft permit includes the following changes: retain the current standard of "4.2 lb/hour" as the PM<sub>10</sub> standard with compliance demonstrated by EPA Method 201A; add a new PM standard of "15 lb/hour" with compliance demonstrated by EPA Method 5; install a drain in the silencer ductwork to prevent re-entraining water droplets; reduce the maximum sugar concentration of the recycled scrubber water; conduct new compliance tests; and submit a report summarizing the additional improvements.

I recommend your approval of the attached final permit revision for this project.

Attachments

JK/tlv/jfk

# FINAL DETERMINATION

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## PERMITTEE

United States Sugar Corporation  
111 Ponce DeLeon Avenue  
Clewiston, FL 33440

## PERMITTING AUTHORITY

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation, Air Permitting North Program  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida, 32399-2400

## PROJECT

Air Permit No. PSD-FL-346A  
Project No. 0510003-038-AC  
U.S. Sugar Corporation, Clewiston Sugar Mill  
New White Sugar Dryer - Revision of PM/PM<sub>10</sub> Standard

This modification revises the original PM/PM<sub>10</sub> emissions standards for the new white sugar dryer. This unit operates at the existing Clewiston Sugar Mill and Refinery (SIC Nos. 2061 and 2062) located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida.

## NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on November 7, 2006. The Public Notice was published in the Clewiston News on November 16, 2006. The Bureau of Air Regulation received the proof of publication on December 11, 2006.

## COMMENTS/PETITIONS

No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed. Only the applicant provided comments on the draft permit. On the placard page, the applicant noted that only the PM standard was being revised and not the PM<sub>10</sub> standard. In response, the Department notes that the original particulate matter emissions standard is actually being separated into two standards: one for PM emissions and one for PM<sub>10</sub> emissions. No change to the draft permit was made in response to this comment.

## CONCLUSION

Only minor revisions were made to correct typographical errors, etc. The final action of the Department is to issue the permit with the minor changes described above.



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

## PERMITTEE

United States Sugar Corporation  
111 Ponce DeLeon Avenue  
Clewiston, FL 33440

*Authorized Representative:*

Mr. Neil Smith, V.P. of Sugar Processing Operations

Clewiston Sugar Mill and Refinery  
Air Permit No. PSD-FL-346A  
Project No. 0510003-038-AC  
Revised PM/PM<sub>10</sub> Standards  
Permit Expires: December 31, 2007

## FACILITY AND LOCATION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery (SIC Nos. 2061, 2062), which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar.

## STATEMENT OF BASIS

This modification revises the original PM/PM<sub>10</sub> emissions standards and 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 perform the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

## CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

  
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Joseph Kahn, Director  
Division of Air Resource Management

12/22/2006  
\_\_\_\_\_  
Effective Date

"More Protection, Less Process"

Printed on recycled paper.

## SECTION 1. GENERAL INFORMATION

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### PROJECT DESCRIPTION

The United States Sugar Corporation installed new White Sugar Dryer No. 2 (EU-029) to support the existing refinery operations. Particulate matter emissions are controlled by a set of four high efficiency cyclone collectors in parallel followed by a wet atomizing venturi-type scrubber. Initial testing shows water droplets containing dissolved sugar in the exhaust stream. This permit modification revises the permit and requires following actions: retain the current standard of "4.2 lb/hour" as the PM<sub>10</sub> standard with compliance demonstrated by EPA Method 201A; add a new PM standard of "15 lb/hour" with compliance demonstrated by EPA Method 5; install a drain in the silencer ductwork to prevent re-entraining water droplets; reduce the maximum sugar concentration of the recycled scrubber water; conduct new compliance tests; and submit a report detailing the costs of several possible additional improvements. Based on the cost information and addition test data, the Department may modify this permit to reduce the particulate matter emissions standards.

### REGULATORY CLASSIFICATION

Title III: The existing facility is a potential major source of hazardous air pollutants (HAP).

Title IV: The existing facility has no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major facility as defined in Rule 62-212.400, F.A.C.

### APPENDICES

The following Appendices are attached as part of this permit.

Appendix A. Citation Formats

Appendix B. General Conditions

Appendix C. Common Requirements

### RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection's Bureau of Air Regulation. The mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida, 33901-3381.
3. Citation Formats: Appendix A identifies the methods used to cite rules, regulations, and permits.
4. General Conditions: The permittee shall comply with the general conditions specified in Appendix B.
5. Common Requirements: Common regulatory requirements are specified in Appendix C.
6. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
7. Source Obligation:
  - (a) Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.
  - (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 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.
  - (c) 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.]
8. 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.]
9. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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construction or modification. [Rule 62-4.030 and Chapters 62-210 and 62-212, F.A.C.]

10. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V 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 Department's South District Office. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. White Sugar Dryer No. 2 (EU-029)

This section of the permit addresses the following new emissions unit.

ID	Emission Unit Description
029	<p>The new white sugar dryer will be a fluidized bed-type dryer/cooler with a rated capacity of 85 tons per hour of refined sugar. After wet refined sugar is centrifuged, the dryer will be used to drive off remaining moisture. Sugar with a moisture content of approximately 1.5% by weight will enter the dryer between 120° - 140° F and be suspended in a fluidized bed with jets of hot, conditioned air. A maximum of 11,000 pounds per hour of low pressure steam (12 psig) from the existing mill boilers will supply heat for the process. Sugar will exit the dryer with a moisture content of approximately 0.03% by weight and a temperature between 92° F - 102° F. The refined sugar is then transferred to the conditioning silos. No fuel will be fired and no other new equipment is being added.</p> <p>Particulate matter emissions from the dryer will be controlled by a set of four high efficiency cyclone collectors in parallel followed by a wet scrubber. Exhaust at 110° F will leave a stack approximately 78 82 feet above ground level with a with a volumetric flow rate of 92,000 acfm. The rectangular stack will be 7.0 feet by 6.0 feet. The scrubber pressure drop and scrubber water recirculation flow rate will be continuously monitored.</p>

{Permitting Note: The particulate matter emissions standards for the new dryer are established pursuant to Rule 62-212.400, F.A.C (BACT).}

EQUIPMENT

1. New White Sugar Dryer No. 2: The permittee is authorized to construct a new fluidized bed white sugar dryer/cooler (BMA or equivalent) with a rated capacity of 85 tons per hour. Jets of hot conditioned air will be used in the dryer to suspend sugar in a fluidized bed to drive off excess moisture. Low pressure steam will be used to heat the conditioned air; no fuel will be fired. [Design]
2. Air Pollution Control Equipment: To comply with the standards of this permit, the permittee shall install the following air pollution control equipment.
  - a. Cyclone Collectors: In accordance with the manufacturer's recommendations, the permittee shall install, operate, and maintain a set of four high efficiency cyclone collectors (Entoleter, LLC Model 6600 or equivalent) in parallel with a design removal efficiency of at least 99% of the particulate loading from the new white sugar dryer. The design control efficiency is based on the following inlet conditions: inlet temperature of 110° F; inlet flow rate of 92,000 acfm; inlet dust loading of 14 grains per dscf of inlet gas (11,760 lb/hour); and a pressure drop across the cyclone collectors of 4 - 6 inches of water column.
  - b. Wet Scrubber: In accordance with the manufacturer's recommendations, the permittee shall install, operate, and maintain a wet scrubber (Entoleter, LLC Centrifield Vortex Model 1500 or equivalent) with a design removal efficiency of at least 96% of the particulate loading from the new cyclone collectors. The design control efficiency is based on the following inlet conditions: inlet temperature of 113° F; inlet flow rate of 92,000 acfm; inlet dust loading of 0.14 grains per dscf of inlet gas (118 lb/hour); a scrubber water recirculation flow rate of 500 gpm; a scrubber make-up water flow rate of 12 gpm; and a pressure drop of 8 - 10 inches of water column.

The combined design removal efficiency of the two particulate control devices shall be no less than 99.96% based on the above conditions.

[Design; Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]



## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. White Sugar Dryer No. 2 (EU-029)

#### PERFORMANCE REQUIREMENTS

3. Permitted Capacity: The maximum design capacity of the new sugar dryer is 85 tons per hour of sugar. [Design; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
4. Wet Scrubber: The owner or operator shall maintain 3-hour block averages of the scrubber water recirculation rate (gpm) and pressure drop across the wet scrubber (inches of water column) above the 3-hour averages established during a satisfactory compliance test for particulate matter conducted at permitted capacity. If either monitored parameter drops below the specified level, the permittee shall investigate, take corrective actions to regain the specified operating level, and record the incident in a written log. Operation outside of the specified operating range for any monitored parameter is not a violation of this permit, in and of itself. However, continued operation outside of the specified operating range for any monitored parameter without taking corrective action may be considered circumvention of the air pollution control equipment. *{Permitting Note: For informational purposes, the nominal operating ranges are 500 gpm and 8 - 10 inches of water column.}* [Design; Rule 62-4.070(3), F.A.C.]

#### EMISSIONS STANDARDS

5. Particulate Matter: As determined by EPA Method 201A stack test, particulate matter emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.005 grains per dscf and 4.2 pounds per hour based on the average of three test runs. As determined by EPA Method 5 stack test, particulate matter emissions shall not exceed 15.0 pounds per hour based on the average of three test runs. [Design; Rule 62-212.400(BACT), F.A.C.]
6. Visible Emissions: Excluding water vapor, visible emissions from the wet scrubber stack shall not exceed 10% opacity. [Rule 62-212.400(BACT), F.A.C.]

#### TESTING REQUIREMENTS

7. Compliance Stack Tests – Revised: The permittee shall conduct initial stack tests to demonstrate compliance with the particulate matter emissions standards within 90 days after issuance of this final permit and after installing the drain(s) in the ductwork with the silencer vanes to remove collected water. The permittee shall conduct one series of three, 1-hour test runs to demonstrate compliance with the PM<sub>10</sub> and visible emissions standards. The permittee shall conduct two series of three, 1-hour test runs to demonstrate compliance with the PM and visible emissions standards. For the PM tests, one series shall be conducted at a recirculation flow rate of 500 gpm and the second series shall be conducted at a recirculation flow rate of 750 gpm. The permittee shall also conduct subsequent stack tests to demonstrate compliance with the particulate matter emissions standards during the 12-month period prior to the expiration date of any air operation permit. Tests shall be conducted in accordance with EPA Method 201A (PM<sub>10</sub>), EPA Method 5 (PM), EPA Methods 1 - 4 (as necessary to support EPA Methods 201A and 5), and EPA Method 9 (visible emissions). The EPA test methods and procedures are specified in Appendix A of 40 CFR 60 and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. In accordance with Rule 62-297.310(2), F.A.C., all tests shall be conducted at permitted capacity. The Department may require the permittee to repeat some or all of these initial stack tests after major replacement or major repair of any air pollution control or process equipment. [Rules 62-204.800, 62-212.400(BACT) and 62-297.310(7)(a) and (b), F.A.C.; 40 CFR 60.8; 40 CFR 60, Appendix A]

#### MONITORING REQUIREMENTS

8. Cyclone Collectors: In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate and maintain a manometer (or equivalent) to monitor the pressure differential across each cyclone collector. *{Permitting Note: The design pressure differential for the cyclone collectors is 4 - 6*

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. White Sugar Dryer No. 2 (EU-029)

*inches of water column. Although no periodic records of the pressure differential are required, the devices shall be properly maintained and functional to provide operational data for evaluating problems.* [Rule 62-4.070(3), F.A.C.]

9. Wet Scrubber Parameters: In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate and maintain devices to continuously monitor and record the wet scrubber water recirculation rate (gpm) and the pressure differential across the wet scrubber (inches of water column). Data shall also be reduced to 3-hour block averages. Records shall be maintained on site and made available upon request. [Design; Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

#### RECORDS AND REPORTS

10. Stack Test Reports: In addition to the information required in Rule 62-297.310(8), F.A.C., each stack test report shall also include the following information: sugar processing rate through the dryer (tons per hour); the air flow rate; the scrubber water recirculation rate (gpm); the scrubber water sugar content in brix; and the pressure differential across the wet scrubber (inches of water column). In addition, the permittee shall record and report the pressure differential across each cyclone collector at the beginning and end of each test run. The stack test report shall clearly indicate the 3-hour averages of the wet scrubber water recirculation rate and pressure differential and that these operating parameters will be complied with based on a 3-hour block average. [Rule 62-4.070(3), F.A.C.]

#### ADDITIONAL REQUIREMENTS – PM/PM<sub>10</sub> REVISION

11. Drain: Within 30 days of issuance of this final permit, the permittee shall install a drain(s) in the ductwork with the silencer vanes to remove collected water. The permittee shall notify the Bureau of Air Regulation and the Compliance Authority when the drain is installed. [Rule 62-4.070(3), F.A.C.]
12. Sugar Content of Recirculating Scrubber Water: Within 30 days of issuance of this final permit, the scrubber system shall be reset to operate so that fresh makeup water will be added to maintain a maximum sugar content of 15 brix in the recirculated scrubber water. [Rule 62-4.070(3), F.A.C.]
13. Additional Report: In conjunction with the required PM/PM<sub>10</sub> stack test report, the permittee shall provide individual cost estimates based on bids and a detailed description of the necessary work for: redesigning and modifying the cyclone system (possibly adding a cyclone) to accept all of the dryer exhaust; moving the I.D.fan from after the scrubber to between the cyclones and the scrubber; and removing the mitered elbow and installing a properly sized vertical duct at the scrubber outlet. Based on the cost information and additional test data, the Department may modify this permit to reduce the particulate matter emissions standards. [Rules 62-4.070(3) and 62-212.400(PSD), F.A.C.]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**B. Miscellaneous Particulate Sources (EU-015, 016, 018, 019, 020, 022, and 029)**

This section of the permit addresses the following emissions units.

<b>EU No.</b>	<b>Emissions Unit Description</b>
015	VHP sugar dryer with baghouse (S-11)
016	White sugar dryer No. 1 with baghouse (S-10)
018	Vacuum Systems: Screening/distribution vacuum with baghouse (S-1); 100 lb bagging vacuum with baghouse (S-2); 5 lb bagging vacuum with baghouse (S-3)
019	Six conditioning silos with baghouses (S-7, S-8, and S-9)
020	Screening/distribution and powdered sugar/starch bins with baghouses (S-5 and S-6)
022	Packaging baghouse (S-4)
029	White sugar dryer No. 2 with wet scrubber (S-13)

**MODIFIED CONDITION**

Condition 2 (Section III, Subsection F) in Permit No. PSD-FL-272A is changed to:

2. Production Restrictions: No more than 2000 tons of refined sugar per day and no more than 730,000 tons of refined sugar per consecutive 12 months shall be packaged at this facility. In addition, no more than 2250 tons of refined sugar per day and no more than 803,000 tons of refined sugar per consecutive 12 months shall be loaded out from this facility. [Applicant Request; Rules 62-210.200 (PTE) and 62-212.400(12), F.A.C., F.A.C.; Air Permit No. PSD-FL-346A]

All other conditions in Permit No. PSD-FL-272A shall remain unchanged.

*Filename: PSD-FL-346A - Sugar Dryer - Final Permit*

## SECTION 4. APPENDICES

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### Contents

Appendix A. Citation Formats

Appendix B. General Conditions

Appendix C. Common Requirements

## SECTION 4. APPENDIX A

### Citation Formats

*The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.*

#### REFERENCES TO PREVIOUS PERMITTING ACTIONS

##### Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

##### New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number  
“001” identifies the specific permit project  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a Title V Major Source Air Operation Permit

##### PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project

#### RULE CITATION FORMATS

##### Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

##### Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7 or §60.7]

*Means:* Title 40, Part 60, Section 7

## SECTION 4. APPENDIX B

### General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

## SECTION 4. APPENDIX B

### General Conditions

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (Yes);
  - b. Determination of Prevention of Significant Deterioration (Yes); and
  - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

## SECTION 4. APPENDIX C

### Common Requirements

Unless otherwise specified by permit, the following conditions apply to all emissions units and activities at this facility.

#### Definitions

1. **Excess Emissions:** Emissions of pollutants in excess of those allowed by any applicable air pollution rule of the Department, or by a permit issued pursuant to any such rule or Chapter 62-4, F.A.C. The term applies only to conditions which occur during startup, shutdown, soot-blowing, load changing or malfunction. [Rule 62-210.200(106), F.A.C.]
2. **Shutdown:** The cessation of the operation of an emissions unit for any purpose. [Rule 62-210.200(231), F.A.C.]
3. **Startup:** The commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions. [Rule 62-210.200(246), F.A.C.]
4. **Malfunction:** Any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner. [Rule 62-210.200(160), F.A.C.]

#### Emissions and Controls

5. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
6. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
7. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
8. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
9. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
10. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
11. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
12. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as confining, containing, covering, and/or applying water to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

#### TESTING REQUIREMENTS

13. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three



## SECTION 4. APPENDIX C

### Common Requirements

complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

14. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
15. **Calculation of Emission Rate:** For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
16. **Test Procedures:** Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
  - a. **Required Sampling Time.** Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
  - b. **Minimum Sample Volume.** Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
  - c. **Calibration of Sampling Equipment.** Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

17. **Determination of Process Variables**
  - a. **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
  - b. **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

18. **Sampling Facilities:** The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
19. **Test Notification:** The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

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### Common Requirements

20. **Special Compliance Tests:** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
21. **Test Reports:** The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
  2. The facility at which the emissions unit is located.
  3. The owner or operator of the emissions unit.
  4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  8. The date, starting time and duration of each sampling run.
  9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
  10. The number of points sampled and configuration and location of the sampling plane.
  11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
  12. The type, manufacturer and configuration of the sampling equipment used.
  13. Data related to the required calibration of the test equipment.
  14. Data on the identification, processing and weights of all filters used.
  15. Data on the types and amounts of any chemical solutions used.
  16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
  17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
  18. All measured and calculated data required to be determined by each applicable test procedure for each run.
  19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
  20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
  21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

## SECTION 4. APPENDIX C

### Common Requirements

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#### RECORDS AND REPORTS

22. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. Information recorded and stored as an electronic file shall be made available within at least three days of a request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
23. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]