

Mutual Funds Brace for Possibility Of a Very Large Muni-Bond Default

By CHARLES GASPARENO
Staff Reporter of THE WALL STREET JOURNAL

Several large mutual-fund companies are bracing for what could rank as one of the largest defaults in municipal-bond market history after two electricity generating plants filed for bankruptcy in Palm Beach County, Fla.

The filing by the Oweelanta Power and Gator Generating Co., both limited partnerships, in the U.S. Bankruptcy Court for the Southern District of Florida, is roiling the \$1.3 trillion muni-bond market. Experts say it throws into jeopardy \$286 million of high-risk municipal debt that financed the facilities. The bonds are held by funds including Dreyfus Co., Eaton Vance Management Corp. and Franklin Resources Inc.

If the bonds do fall into default, as many market pundits expect, the event will certainly be the largest default of a bond issuer in the state of Florida, and would mark one of the largest municipal-

bond defaults since such statistics have been kept. According to data compiled by the Bond Investors Association, the meltdown would be rivaled only by such muni-bond disasters as the default of the Washington Public Power Supply System in 1983, New York City in the mid-1970s, and the 1994 bankruptcy filing of Orange County, Calif. The association has been tracking such issues since 1980.

The bonds in question financed the construction of two plants that produce power by burning waste products from the refining of sugar. On Wednesday, the partnerships that own the plants filed for Chapter 11 bankruptcy protection. The move came after Florida Power & Light Co., which under federal law was required to purchase power from the plants, filed suit in January in state court in Palm Beach County to terminate the arrangement. In May, Florida Power terminated an agreement that had frozen the litigation.

Dennis Coyle, Florida Power & Light's

general counsel, said Florida Power & Light acted in the best interests of its customers, who, he said, were paying exorbitant prices to purchase electricity from the facilities. The plants, he said, are plagued with problems; they have had breakdowns and missed a Jan. 1, 1997, deadline to become fully operational. Mr. Coyle said the cost of purchasing electricity from the plants is "80% to 100% more expensive than what we can get" from other power sources or by generating the electricity itself.

But the partnerships, comprising affiliates of PE&G Corp., Bechtel Enterprises and Flo-Sun Inc., said in a statement that the bankruptcy filing was designed to protect bond holders and others from Florida Power's move. Flo-Sun, one of the nation's largest sugar growers, is owned by the Fanjul family.

"Given the uncertainty created by FPL's litigation and its efforts to avoid its contractual obligation, we have reluctantly concluded that our most prudent course of action is a Chapter 11 filing," the statement said.

Dreyfus and Eaton Vance confirmed they own the bonds; Franklin refused to comment, but people close to the matter say the fund company also has holdings in the debt. Nancy Mitchell, a lawyer representing several of the big mutual-fund companies holding the debt, said bondholders "are supportive of the Chapter 11 filing."

While the partnerships haven't missed interest payments, the bankruptcy filing has cast a pall over the securities. Municipal-bond executives says the filing is tantamount to a default in the eyes of market participants, and will hurt the prices of the securities. On Friday, a spokesman for the partnerships wouldn't say if the next interest-rate payments due in July and August will be met. "It's too early in the process" to know, said spokesman John Sullivan. He added: "The plants have met the terms of the contract," and that the partnerships are willing to "go to the mat to defend the plants and the con-

Northern States and Wisconsin Energy Scrap Merger Plan After FERC Ruling

By JAMES P. MILLER
AND BENJAMIN A. HOLDEN
Staff Reporters of THE WALL STREET JOURNAL

Northern States Power Co. and Wisconsin Energy Corp. called off their planned merger, citing the unexpected regulatory complications they have encountered.

The two big Midwestern utilities, which have a combined market value of about \$6 billion, scrapped the merger plan Friday evening, two days after the Federal Energy Regulatory Commission refused to approve it. The companies said they had spent \$29 million apiece in the abortive two-year effort to combine into a company to be called Primergy Corp.

Given "the current regulatory climate," said James Abdo, Wisconsin Energy's chairman, president and chief executive officer, pushing ahead with the effort "is not in the best interests of our stockholders, customers and employees."

The transaction's collapse jarred the electric-power industry, where, with deregulation looming, an increasing number of companies have come to consider mergers the best way to improve their competitive position. Not surprisingly, industry reaction Friday was almost uniformly critical of FERC.

"This should be a real wake-up call, when two blue-chip companies like this say, 'Hey, it's not worth it,'" said Turner White, a vice president with Kansas City Power & Light. KCP&L is awaiting FERC approval of its \$2.1 billion plan to merge with Western Resources of Topeka, Kan. Eight other major utility deals, with a total value of about \$22 billion, are also

stretched the approval process out another six months or more.

But on their face, FERC's suggestions for mitigating its concerns over market dominance weren't seen as necessarily derailing the merger. Indeed, even though the commission issued guidelines in December aimed at clarifying merger issues, both companies contended that the reason they threw in the towel on Primergy was continuing uncertainty over just what FERC will countenance in a merger and what it won't.

FERC's recent actions make it clear that the commission's policies "are still being developed," asserted James J. Howard, chairman, president and CEO of Northern States, Minneapolis. "There is simply no end to this process in sight."

Northern States and Milwaukee-based Wisconsin Energy still hadn't cleared the scrutiny of regulators in their home states. Nor was state clearance a sure thing: The plan had sparked vociferous opposition from energy consumers and rival Wisconsin utility Madison Gas & Electric Co., which contended that the merger would be anticompetitive.

Analysts and industry insiders agreed that among the deals still pending before FERC, none are burdened with anticompetitive concerns as significant as those in the Primergy transaction. Equipment-related constraints on energy transmission in the region made the Primergy situation unique, said Merrill Lynch & Co. analyst Steven I. Fleishman. "There really isn't another one that's nearly as bad on the wholesale-transmission issue."

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To (Recipient's Name) Please Print: Mr. Al Linero
Recipient's Phone Number (Very Important): (904) 488-1344

Company: AIR CONSULTING & ENGINEERING
Street Address: 2106 NW 67TH PLACE STE 4
City: GAINESVILLE FL
State: FL
ZIP Required: 32606

Company: FDEP Northwest District Office
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2106 N.W. 67th Place • Suite 4 • Gainesville, Florida • 32606
(904) 335-1889 FAX (904) 335-1891

June 29, 1995

Mr. Al Linero
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

**Re: Policy Guideline Request for PM
versus PM 10 Compliance Emission Testing**

Dear Mr. Linero:

I am enclosing a recent operating permit for the Okeelanta Corporation for your review. As you will note the permit has separate emission values for PM and PM 10. It also has EPA-5 as the stated compliance method for PM and EPA-201 or 201A as the compliance method for PM 10.

My question is "Does the permittee have the option of using only EPA-5 to show compliance with both standards?" In other words, if the EPA-5 test results meet the PM 10 emission limit, is it still necessary to perform EPA-201 or 201A? Use of both methods could add considerable costs to a compliance test and this would be eliminated if the permittee feels comfortable with the lower PM 10 standard. Because more permits are being issued with similar language, I believe a policy guideline is appropriate.

A second issue to this permit concerns Volatile Organic Compound (VOC) testing. The specified test method is EPA 25. My analysis of this specific source reveals that compliance VOC emissions would be around 250 ppm as carbon. We expect actual emissions to be well under 50 ppm. After reviewing FDEP policy memos on this subject, am I correct in assuming the following course of action:

1. Perform Initial Compliance Test with both EPA-25 and EPA-25A.
2. If both test methods reveal results less than 50 ppm carbon, then;
3. Apply for a permit modification allowing use of EPA-25A as the compliance tool.

We are scheduling compliance testing on the subject source for July 20, 1995. Please advise me on the Department's posture in these matters.

Respectfully,

AIR CONSULTING AND ENGINEERING, INC.

A handwritten signature in black ink that reads "Stephen L. Neck". The signature is written in a cursive style with a large, prominent "S" and "N".

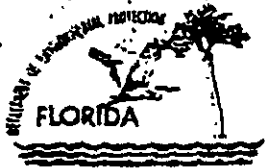
Stephen L. Neck, P.E.

PFB/mjd

Enclosures

cc: Matt Capone, Okeelanta Corporation
David Knowles, FDEP Fort Myers
Ajaya Satyal, Palm Beach City Health Department

ACE File: 103 95 01



Department of Environmental Protection

Matt

F44-15B

cc. A. Alcantara

Lawson Chiles
Governor

Virginia B. Wechsell
Secretary

NOTICE OF PERMIT ISSUANCE

November 29, 1994

RECEIVED
DEC - 2 1994
OKEELANTA
ADMINISTRATION

**CERTIFIED MAIL #2 054 062 432
RETURN RECEIPT REQUESTED**

In the Matter of an Application
for Permit by:

Ricardo Lima
Vice President & General Manager
Okeelanta Corporation
Post Office BOX 86
South Bay, Florida 33493

DEP File No. A050-257065
Palm Beach County - AP

Enclosed is Permit Number A050-257065 to operate a 150,000 lbs steam/hour, No. 2 oil fired, 205 MMBtu/hr heat input boiler issued pursuant to Section(s) 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S..

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

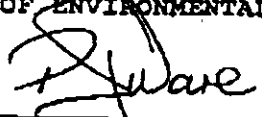
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code (F.A.C.).

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C.. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Peter J. Ware
Director of
District Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed by certified mail before the close of business on November 30, 1994 to the listed persons.

Clerk Stamp

ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is heraby acknowledged. FILING AND

Karen L. Mialy 11-30-94
(Clerk) (Date)

PJW/AEL/jw

Enclosures

Copies furnished to:

David A. Buff, P.E.
Palm Beach County Public Health Unit



Department of Environmental Protection

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

PERMITTEE:
Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

I.D. No: 52FTMS0000514
Permit/Certification
Number: A050-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999
County: Palm Beach
Latitude: 26° 35' 00" N
Longitude: 80° 45' 00" W
Section/Town/Range: 16/45S/36E
Project: Boiler No. 16

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of a 150,000 lbs steam/hr, No. 2 oil fired, 205 MMBtu/hr heat input Babcock & Wilcox Model FM 120-97 package boiler using Coen's LO-NO_x burners and designed for 40% flue gas recirculation.

The boiler is located at the permittee's existing sugar mill that is approximately 6 miles south of South Bay, Palm Beach County, Florida, off of U.S. Highway 27.

Pertinent Documents

	<u>Dated</u>
BACT	
PSD	PSD-FL-169
NSPS	40 CFR Part 60 Subpart D _b
Construction Permit AC50-191876	29 July 1991
Revision of AC50-191876	18 Feb. 1993
DEP Form 62-1.202(3) CoCoC	31 Aug. 1994

Title V Permit
SIC Number 2061
SCC Numbers 1-02-005-01

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: A050-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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 any 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 of 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 any 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 and 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.

PERMITTEE:
Okaalanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: A050-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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 any 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 non-compliance, 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 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 Section 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: A050-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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 62-30.300, 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:

- (X) Determination of Best Available Control Technology (BACT)
- (X) Determination of Prevention of Significant Deterioration (PSD)
- (X) Compliance with New Source Performance Standards (NSPS)

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 for 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:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: AO50-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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 the 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.

SPECIFIC CONDITIONS:

FACILITY OPERATIONS:

1. All fugitive dust generated at this site shall be adequately controlled. [Reference Rule 62-296.310(3), F.A.C.]
2. This facility shall be operated in such a fashion so as to preclude objectionable odors. [Reference Rule 62-296.320(2), F.A.C.]
3. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.

Mike Harley

CONDITIONS OF COMPLIANCE:

4. Stack sampling facilities provided by the owner shall be in accordance with the requirements of Chapter 62-297.345, F.A.C.
5. The boiler shall be equipped with instruments to measure the opacity of the stack emissions and the steam production, temperature, and pressure.
6. Air pollutant emissions shall not exceed any of the quantities listed below:

Pollutant	lbs/MMBtu	Emissions		Compliance Test Method EPA Test Methods (July 1, 1990)
		lbs/hr	TPY**	
PM	0.054	11.0	23.1	5
Pm10	0.027	5.5	11.6	201 or 201A
SO2	0.51	105.5	132.9	Certified Fuel Analysis
NOx	0.18*	36.9	77.5	7, 7A, 7E
CO	0.20	41.0	86.1	10, 10.5
VOC	0.09	18.5	38.7	25
VE	20% opacity (6-minute average) except 27% (max.) for 1 6-minute period/hr.			9

* 30-day rolling average as determined from the NOx monitor data.
** Emissions during the period from March 1 to October 31.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTMS0000514
Permit/Cert. No.: AO50-257065
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SPECIFIC CONDITIONS:

CONDITIONS OF COMPLIANCE:

7. Boiler No. 16 shall comply with all applicable requirements of 40 CFR 60, including Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Unit (December 18, 1989).

40 CFR 60.7, Notification and record keeping. Timely notification of the items listed to the Department (South District), Palm Beach County Public Health Unit (PBCPHU), and EPA.

40 CFR 60.42b, Standard for sulfur dioxide. Sulfur content of the No. 2 distillation oil fuel shall not exceed 0.5%. Annual off-season average shall not exceed 0.3% sulfur. The Permittee shall maintain fuel analysis or receipts to confirm compliance with this condition.

40 CFR 60.43b, Standard for particulate matter. Visible emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

40 CFR 60.44b, Standard for nitrogen oxides for high heat release boiler No. 16, expressed as NO₂, is 0.20 lbs/MMBtu.

40 CFR 60.45b, Sulfur dioxide compliance tests, fuel receipts or analysis for sulfur content is required to confirm compliance with this condition.

40 CFR 60.46b, Particulate and nitrogen oxides compliance tests. Method 9 test required to determine compliance with the opacity standard. Method 7, 7A, or 7E test for nitrogen oxides.

40 CFR 60.47b, Sulfur dioxide monitoring. Fuel analysis or receipts required to confirm compliance with this condition.

40 CFR 60.48b, Particulate and nitrogen oxides monitoring. Continuous emissions monitor required to measure opacity.

40 CFR 60.49b, Reporting and record keeping requirements. Permittee required to report date of initial start up, design heat input capacity, fuels used, annual capacity factor, performance test data, plan to monitor NO_x, nitrogen content of the distillate oil, opacity, nitrogen dioxide emissions, monitor down time, "F" factor, exceedances, and other information required by this paragraph.

8. Only No. 2 fuel oil containing a maximum of 0.5% sulfur (off-season average of 0.3% sulfur) shall be used as fuel.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
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Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

SPECIFIC CONDITIONS:

CONDITIONS OF COMPLIANCE:

9. Maximum heat input to the boiler shall not exceed 1,463 gallons per hour of No. 2 distillate fuel oil (205 MMBtu/hr). = 7.14 ^{MMBTU}

10. The boiler shall not operate more than 175 days (4,200 hours) during the off-season months of March through October. During the crop season (November through February), the heat input to boiler No. 16 is limited to the equivalent reduction in heat input from No. 6 fuel oil for the existing bagasse/No. 6 fuel oil fired boilers at this facility. It is not to be operated as a replacement to a functional bagasse fired boiler when bagasse fuel is available. Total oil consumption (fuel oils No. 2 and No. 6) by all boilers at this facility (boilers Nos. 4,5,6,10,11,12,14,15, and 16) shall not exceed 3.2 million gallons during the crop season (November through February) and total maximum steam production shall not exceed 1.012 million pounds per hour.
175 max
245 1/11
270 1062
175 max
10 1/11
7000

11. Steam production shall not exceed 150,000 lbs/hr.

REQUIRED TESTING:

12. Various emission tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Test shall be conducted in accordance with the EPA Methods specified in Specific Condition 6 and as published in 40 CFR-60, Appendix A, or State approved equivalent method. Such tests shall be conducted once per year within 60 days prior to August 4th. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

13. Particulate matter, visible emissions, and nitrogen oxides emissions tests shall be conducted annually while the boiler is operating between 90-100% of its permitted capacity (135-150,000 lbs steam/hr). The volume and sulfur content of each fuel oil delivery shall be kept in a log for a minimum of 3 years. The continuous emissions monitoring data will be evaluated to determine the highest concentration of NO_x in lbs/MMBTU for any 30-day rolling average during the proceeding year. Tests for other pollutants may be required when the Department has good reason to believe the emission standard is being exceeded.

REPORTS AND RECORDKEEPING:

14. The permittee shall maintain a log that shows the boiler's operation time, steam production, and fuel consumption.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTMS0000514
Permit/Cert. No.: A050-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

SPECIFIC CONDITIONS:

REPORTS AND RECORDKEEPING:

15. Stack test results shall be submitted to the Department and the PBCPHU within 45 days of the test.

16. An annual operation report (DER Form 62-210.900(4) attached) shall be submitted by March 1st each year. The attached form shall be reproduced by the permittee and used for future annual submittals. [Reference Rule 62-4.070(3), and Rule 62-210.370(2), F.A.C.]

NOTE: In the event of an emergency the permittee shall contact the Department by calling (904) 413-9911 for "call back immediately", or (904) 413-9912 for "call back quickly, but not necessarily immediately". During normal business hours, the permittee shall call (813) 312-6975.

Issued this 29th day of November, 1991.

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL PROTECTION



Peter J. Ware
Director of
District Management

PJW/AEL/jw

11 Pages Attached

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

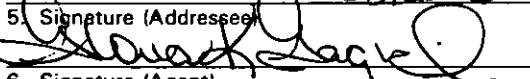
Consult postmaster for fee.

3. Article Addressed to:
 Stephen Neck, PE
 Air Consulting & Eng.
 2106 NW 67th Place, S. 4
 Gainesville, FL 32606

4a. Article Number
 Z 392 979 055

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 7-14-95

5. Signature (Addressee)


8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.

Z 392 979 055

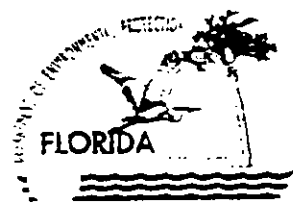


Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Service	Stere Neck
Street	ACE
P.O., State and ZIP Code	Gainesville FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	AC50-191876 7-12-95 PSD-F1-109



read file

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia E. Wetherell
Secretary

July 7, 1995

Mr. Stephen L. Neck, P.E.
Air Consulting & Engineering, Inc.
2106 N. W. 67th Place Suite 4
Gainesville, Florida 32606

RE: Particulate Testing at Okeelanta Boiler #16 and VOC Testing Procedures.
AC50-191876, PSD-FL-169

Dear Mr. Neck,

We have reviewed your letter of June 29, 1995 requesting acceptance of EPA Method 5 to demonstrate compliance with both PM and PM10 limits in the above referenced permit.

Per our discussion with David Knowles, Air Program Administrator for the South District performing only the EPA-5 compliance test is acceptable. The results from that test must show that the PM10 standard, which is lower than the PM standard, has been met.

Pursuant to my discussion with Mike Harley, P.E. Administrator, Emissions Monitoring Section, an Alternative Sampling Procedure (ASP) must be requested prior to initiation of the test program described in your letter.

If you have any questions regarding this matter, please call me at (904)488-1344, Mike Harley at (904)488-6140 or David Knowles at (813)332-6975.

Sincerely,

A. A. Linero, P.E.
Administrator
Bureau of Air Regulation

AAL/kkw

cc: Matt Capone, Okeelanta Corporation
David Knowles, FDEP Fort Meyers
Ajaya Satyal, Palm Beach County Public Health Unit
Mike Harley, P.E.

PS Form 3811, July 1983 447-945

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.

2. Restricted Delivery.

3. Article Addressed to
Pablo Carrero
Okeelanta Corp
P.O. Box 86
South Bay, FL 33493

4. Type of Service: Registered Insured
 Certified COD
 Express Mail

Article Number: **P062 921 904**

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X

6. Signature - Agent
 X **D. McPherson**

7. Date of Delivery
10-19-92

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

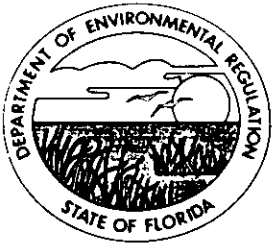
P 062 921 904



Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sender	Pablo Carrero
Sender's Address	Okeelanta Corp
P.O. Station and ZIP Code	South Bay, FL 33493
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
Total Postage & Fees	\$
Postmark or Date	10-15-92 Box # 16

PS Form 3800, June 1991



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 15, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Pablo Carreno
Okeelanta Corporation
P. O. Box 86
South Bay, Florida 33493

Dear Mr. Carreno:

Re: Okeelanta Corp., Boiler No. 16

Your September 25, 1992, letter requesting authorization to use boiler No. 16 during the sugar cane season when one of the existing bagasse fired boilers is down has been discussed with EPA. There are two ways to process this request.

If your engineer can show that the ambient air increments and standards for sulfur dioxide and nitrogen oxides will not be exceeded when boiler No. 16 is operating during the sugar cane processing season, the Department can amend your permits to remove the seasonal limitation on the operation of this boiler. Boiler No. 16 will still be restricted to 175 days (4200 hours) operation during any 12 month period.

To authorize an increase in the hours per year operation of this boiler, the Department will require a new application. Rule applicability would be based on the difference in emissions of sulfur dioxide and nitrogen oxides from the burning of No. 2 fuel oil in boiler No. 16 when compared to the burning of bagasse in the bagasse/oil fired boilers. Both the modeling and the Best Available Control Technology determination would need to be revised if the relaxation of this restriction results in an increase in emissions of any pollutant.

Please review these options and let the Department know if you plan to pursue a modification to the operation restrictions in the construction permit for boiler No. 16. If you have any questions on this matter, write to me or call Willard Hanks at (904)488-1344.

Mr. Pablo Carreno
October 15, 1992
Page 2 of 2
Okeelanta Corporation-Boiler No. 16

Sincerely,

A handwritten signature in black ink, appearing to read "C. H. Fancy". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/WH/plm

cc: David Knowles, SD
Gregg Worley, EPA
David Buff, KBN

OKEELANTA CORPORATION

6 MILES SOUTH OF SOUTH BAY
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

TELEPHONE: (407) 996-9072

TELEX: 803444

September 25, 1992

Mr. Willard Hanks
Department of Environmental Regulations
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ref: Boiler No. 16
Permit No. AC-50-191876

Dear Mr. Hanks,

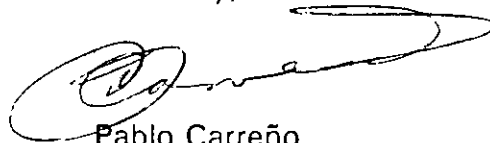
This is in reference to our telephone conversation of this past Tuesday, September 22, concerning the matter of subject, about our intentions to use this boiler during the crop days.

As per attached information, by working this boiler that burns No. 2 diesel fuel in lieu of the No. 6 (Bunker "C") that we are presently burning in our bagasse burning boiler we are diminishing the SO₂ emissions. In addition if one of our bagasse burning boilers gets out of line and is substituted by this No. 16 boiler the particulate emissions for the corresponding bagasse will also go down.

If you need any additional data please call me or Mr. Roger King.

Waiting to hear from you, we remain,

Sincerely,



Pablo Carreño
Director of Mill &
Refinery Operations

PAC:slc

xc: Mr. David Knowls, DER Ft. Myers
Mr. Ricardo Lima
Mr. Roger King

FILE:BO116USE

RECEIVED

SEP 30 1992

Division of Air
Resources Management

OKEELANTA CORPORATION
P.O. BOX 86
SOUTH BAY, FLORIDA 33493

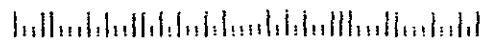
Fold at line over top of envelope to the
right of the return address

CERTIFIED

P 258 613 690

MAIL

MR. WILLARD HANKS
DEPARTMENT OF ENVIRONMENTAL REGULATIONS
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399-2400



COMPARISON OF SO2 EMISSIONS

9/23/92

	<u>1990/91</u>	<u>1991/92</u>	<u>Average</u>
Oil used (gals)	3,160,529	2,937,979	3,049,254
Crop days	166	162	164
Average/day	19,039	18,136	18,593
Steam @ 55% effic	1,416,337	1,349,161	1,383,158
Avg steam/hr	59,014	56,215	57,632
SO2 crop (tons)	248	230	239
#2 fuel equiv/day	13,348	12,715	13,035
#2 fuel/crop gals	2,215,768	2,059,830	2,137,740
SO2 equiv (tons)	87	81	84

Notes on the above

- 1) Oil used figures are actuals from crop year.
- 2) Calorific value of #6 oil, 2.5% sulfur is 150,000 BTU/gal.
- 3) Wet scrubbers are assumed to remove 60% of SO2 from flue gases of existing bagasse/#6 oil boilers.
- 4) Existing boilers are assumed to burn #6 oil at 55% efficiency.
- 5) Calorific value of #2 fuel is assumed to be 140,090 BTU/gal.
- 6) For calculation purposes maximum sulfur content (0.5%) of #2 fuel has been used, with no removal.
- 7) Above assumes total replacement of #6 oil by #2 oil.
- 8) #2 fuel is burned in #16 boiler with 84% efficiency.

POSSIBLE SCENARIOS REQUIRING #16 BOILER 09/23/92

#6 vs #2 Fuel Oil - Differing Ratios

The table on the attached sheet assumes no #6 oil is used and all supplementary fuel oil used is #2 oil. Since #6 oil will be burned in the old boilers as supplementary fuel the table below shows SO2 emissions for various ratios of #6 and #2 oil usage based on the average usage '90/'91 and '91/'92.

	RATIO #6/#2 FUEL OIL			
	<u>25/75</u>	<u>40/60</u>	<u>60/40</u>	<u>75/25</u>
#6 fuel oil (gals)	762,314	1,219,702	1,829,552	2,286,941
#2 fuel oil (gals)	1,603,305	1,282,644	855,096	534,435
SO2 from #6 (tons)	60	96	144	179
SO2 from #2 (tons)	63	50	34	21
Total SO2 (tons)	123	146	178	200
Avg SO2 '90/'91/'92			239 tons	

Loss of one (1) boiler - substitution with #16 boiler

In the event it is necessary to shut down one of the old boilers for repairs during the crop the load is normally shared by the remaining seven (7) bagasse burning boilers until the unit can be returned to service. Under this situation, and with bagasse of variable quality, it is usually necessary to fire #6 oil in some of the seven boilers which are operating at loads nearer to their MCR than normal.

It is proposed that, under these conditions, the package boiler (#16) be put into operation, using #2 oil. It is estimated that this will provide more stability to the operation (by reducing the average load per boiler) while reducing SO2 emissions.

For both of the above scenarios it must be remembered that there is a financial incentive for Okeelanta to operate as in the past, that is supplementing bagasse with #6 oil. This is illustrated by the calculation following.

	<u>#6 oil</u>	<u>#2 oil</u>
Calorif value BTU/gal	150,000	140,090
Combustion efficiency	55%	84%
Heat added/# water BTU	1,109	1,109
Cost per gal (\$)	0.40	0.60
# steam per \$ fuel	186	177

Conclusion

Any substitution of #2 fuel oil in #16 boiler for #6 oil in the other boilers thus reduces the total SO₂ emissions from Okeelanta.

PARTICULATE EMISSIONS

While no calculations have been prepared for particulate emissions it is logical that particulate emissions from #16 boiler must be less than those from the other boilers due to permit restrictions and fuel used.



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

Clair
willard

RECEIVED

APR 13 1992

Division of Air
Resources Management

April 7, 1992

Mr. David Knowles, P.E.
District Air Program Administrator
South Florida District Office
Florida Department of Environmental Regulation
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901

Subject: Notice of Permit Issuance, File No. AO-50-207415

Dear Mr. Knowles:

This is to bring to your attention a matter which we are very concerned about. Recently, we received a copy of the referenced notice issued to the Okeelanta Corporation for boilers No. 12 and 14 to allow the use of wood chips as a supplemental fuel. In reviewing our files it appears that we had not received a copy of this permit request, and therefore, we did not have an opportunity to provide comments.

As with other air pollution sources, we are very concerned with the operations and permitting of sugar mills located in Palm Beach County. It is our policy to submit written comments, or a statement of no comment, in all instances for the permitting of these facilities. In the absence of such comments we hope that your staff would be aware of this policy and contact our office. Such coordination is essential if we are to jointly regulate the sugar industry in an effective manner.

With regards to the referenced permit to Okeelanta Corporation, we are concerned that the conditions do not specifically prohibit wood chips that contain paint or derived from creosote and pressure treated lumber. Additionally, we would like to have for our files copies of the permit request and any related DER correspondence.

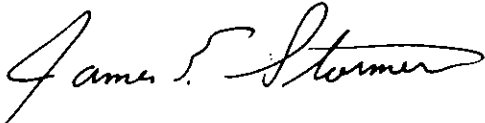
Page 2
Mr. Knowles..

We would appreciate hearing from you on how to avoid future instances of this nature, and any other suggestions you may have on how to better coordinate activities between our offices in regulating the sugar industry.

Please feel free to call me at Suncom 273-2070 if you wish to discuss these matters.

Sincerely,

For the Division Director
Environmental Science and Engineering

A handwritten signature in cursive script that reads "James E. Stormer". The signature is written in dark ink and is positioned above the typed name.

James E. Stormer, Administrator
Air Pollution Control Section

FJG/JES/lh

cc: Steve Smallwood, Director, DARM, DER



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 26, 1994

Certified Mail—Return Receipt Requested

Mr. Matthew Capone
Environmental Engineer
Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

RE: Request for Alternate Monitoring Plan for NO_x and Opacity
Boiler No. 16 - Permit #: AC 50-191876/PSD-FL-169

Dear Mr. Capone:

The above referenced request has been reviewed by the Department and the Region IV Office of EPA. A copy of EPA's response is attached for your review. However, there is still a question as to whether the request was submitted within the 360-day time frame required by the federal rule. We have sent an additional letter asking EPA to clarify whether the time frame is based on calendar days or operating days. If EPA determines that the request was submitted within the 360-day time frame, the following information will be needed to evaluate your request:

1. A copy of each of the test reports for the 12/4/92, 7/14/94, and 8/4/94 emission tests. Each of the reports should include all of the information required by Rule 62-297.570(3), F.A.C., a certified ultimate analysis of the fuel burned during each test, the high heating value of the fuel burned during each test, a description of the quality assurance procedures, and supporting documentation.
2. The identities of the Department personnel that were present during the tests.
3. A description of the company's acceptance sampling program for fuel shipments and the analytical procedures used.
4. The sampling frequency and the analytical procedures used to test the fuels being burned.
5. The gravimetric percentage of carbon, hydrogen, sulfur, nitrogen, oxygen, and ash contained in; and the high heating value of each oil shipment burned in the boiler during the last two years.
6. The oxygen concentrations to which the concentrations (ppmv) of NO_x and CO (ppmv) in Table 6-1 of the submission entitled 'Plan for Predicting Nitrogen Oxide Emissions and

"Protect, Conserve, and Manage Florida's Environment and Natural Resources"

Printed on recycled paper

Opacity by Monitoring Boiler Operating Conditions' have been corrected. Also, explain whether the NO_x and CO concentrations in Table 6-1 are expressed on a wet or a dry basis.

7. A copy of the visible emission reader's certification showing the smoke reader was qualified to perform the EPA Method 9 test in Florida on 7/14/94.
8. A copy of the visible emission evaluations that were conducted during the 12/4/92 and 8/4/94 emission tests. The copies should be accompanied by a copy of the observer's certification credentials as they existed on the dates of the tests.
9. A copy of the initial compliance test report.
10. A copy of the test report for the maximum heat input capacity tests required pursuant to 40 CFR 60.46b(g).
11. A description of the qualifications of the individuals who would perform the EPA Method 9 visible emission evaluation and the procedure for selecting the time periods during which the evaluations would be performed.
12. An explanation of how visible emissions will be evaluated between the hours of sunset and sunrise, and during periods of inclement weather.
13. A copy of the COEN paper which is referred to on page 11 of the 'Plan for Predicting Nitrogen Oxide Emissions and Opacity by Monitoring Boiler Operating Conditions.'
14. The procedure that will be used to conduct the quarterly relative accuracy audits and the annual relative accuracy test audit in accordance with the requirements of 40 CFR 60 Appendix F.
15. The quantity of data that was provided is inadequate to support the request so additional simultaneous emission test and alternate parameter data is needed. The data must be sufficient to demonstrate a consistent relationship between variations in alternate parameters and actual emissions. A full gravimetric analysis of the fuel being burned during each additional test run, the high heating value of the fuel being burned during each additional test run, and the actual measured fuel flow during the run will be needed. Also, the company needs to demonstrate that the proposed alternate monitoring system will meet the same relative accuracy standards as a NO_x CEM. The demonstration of comparable relative accuracy standards must be achieved by conducting a relative accuracy test audit (RATA) in accordance with Performance Specification 2 described in Appendix B of 40 CFR Part 60 (Specifications and Test Procedures for SO_2 and NO_x Continuous Emission Monitoring Systems in Stationary Sources).
16. The equation that the company proposes to use to calculate the NO_x concentrations, the records that the company proposes to maintain, and the format of the proposed records.

Mr. Matthew Capone
September 26, 1994
Page 3

You will also need to address each of the issues contained in the attached letter from the Region IV Office of EPA. The Department's review will continue upon receipt of the requested information and the \$250 permit amendment fee required by Rule 62-4.050(4)(q)5., F.A.C. If you have any questions, please call Ramesh Menon at (904) 488-1344 or write to me.

Sincerely,



Michael D. Harley, P.E., DEE
P. E. Administrator
Emissions Monitoring Section

Enclosure

cc: C.Fancy
J. Brown
J. Pennington
D. Knowles



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 26, 1994

Mr. Brian L. Beals, Chief
Source Evaluation Unit
Air Enforcement Branch
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

RE: Okeelanta Corporation—Permit # AC 50-191876/PSD-FL-169
Request for Approval of Alternate Monitoring Plan for NO_x and Opacity Measurement

Dear Mr. Beals:

Thank you for replying to our request for comments about the above referenced request so quickly.

There is one additional issue associated with the the company's request for approval of an alternate monitoring approach. The provisions of 40 CFR 60.49b(c) state, "...This plan shall be submitted to the Administrator for approval within 360 days of initial startup of the affected facility." The Department has traditionally interpreted the phrase "within 'x' days of initial startup" to mean calendar days. This interpretation has been applied in previous enforcement cases where the Department has prevailed.

The company would like the 360-day window for submission of a request for approval of an alternate monitoring plan to be interpreted to mean "steam generating unit operating days." The construction of the language in the subpart would appear to support the Department's traditional interpretation because the terms "steam generating unit operating days" and "within 'x' days of initial startup" do not appear to be used interchangeably.

Please provide guidance concerning the correct interpretation of the term "within 'x' days of initial startup" as it is used in Subparts 51, 52, 60, and 61 in Title 40. We would appreciate a response by October 26, 1994. If you have any questions about the above please call me at (904) 488-1344.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Harley".

Michael D. Harley, P.E., DEE
P. E. Administrator
Emissions Monitoring Section

cc: C. Fancy
J. Pennington
J. Brown
D. McNeal

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

OKEELANTA CORPORATION

6 MILES SOUTH OF SOUTH BAY
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

TELEPHONE: (407) 996-9072

TELEX: 803444

RECEIVED

September 1, 1994

SEP 6 1994

Mr. Ronald D. Blackburn
Acting Director of District Management
Department of Environmental Protection
South District
2295 Victoria Avenue, Suite 364
Fort Myers, FL 33901

Bureau of
Air Regulation

Re: Okeelanta Corporation Boiler No. 16
DEP permit #: AC50-191876; PSD-FL-169

Dear Mr. Blackburn:

Please find enclosed the Certificate of Completion of Construction for the above referenced source at Okeelanta Corporation. A copy of the initial stack test report and the existing construction permit is also enclosed. Since the initial stack test was not performed within ninety percent of the rated capacity of the boiler, a second compliance test was performed at higher operating rates on August 4, 1994. That test report will be forwarded as soon as it is available.

Please consider the enclosed documents to serve as our application for a permit to operate. Since Okeelanta pays annual fees as a major source and is subject to Title V of the Clean Air Act, it is our understanding that additional fees are not required for this application. Please contact us if further information is required.

Sincerely,

R.L. by Matthew Capone

Ricardo Lima
Vice President
General Manager

enclosures

cc: David Buff, KBN w/o enclosure
Matt Capone, Okeelanta
C.H. Fancy, DEP
Roger King, Okeelanta
David Knowles, DEP w/o enclosure
Ajaya Satyal, HRS PBCPHU

3 copies 100

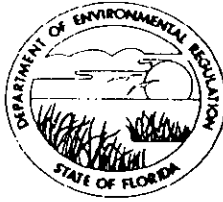
931113

Skillard

9/6

FYI - If you think Mike
Harley should see this, please
pass it on to him. Otherwise,
return to me for the file

9-7-94.
File. Distmer will review and
request Mike to check books
to see if they have any
questions on it. Patty
wmb



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTION SOURCES
CERTIFICATE OF COMPLETION OF CONSTRUCTION*

PERMIT NO. AC50-191876; PSD-FL-169 DATE: August 26, 1994

Company Name: Okeelanta Corporation County: Palm Beach

Source Identification(s): Boiler No. 16

Actual costs of serving pollution control purpose: \$ 200,000

Operating Rates: 125-205 MMBtu/hr Design Capacity: 150,000 lb/hr steam; 205 MMBtu/hr

Expected Normal 130,000 lb/hr steam; 180 MMBtu/hr During Compliance Test 120,000 - 140,000 lb/hr steam

Date of Compliance Tests July 14, 1994; August 4, 1994 (Attach detailed test report)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge
	<u>PM</u>	<u>0.008 lb/MMBtu; 1.4 lb/hr</u>	<u>0.054 lb/MMBtu; 11.0 lb/hr</u>
	<u>PM10</u>	<u><0.008 lb/MMBtu; <1.4 lb/hr</u>	<u>0.027 lb/MMBtu; 5.5 lb/hr</u>
	<u>NO_x</u>	<u>0.161 lb/MMBtu; 28.1 lb/hr</u>	<u>0.18 lb/MMBtu; 36.9 lb/hr</u>
	<u>Visible emissions</u>	<u>0% Opacity</u>	<u>20% Opacity</u>

Date plant placed in operation: July 23, 1992

This is to certify that, with the exception of deviations noted", the construction of the project has been completed in accordance with the application to construct and Construction Permit No. AC50-191876; PSD-FL-169 dated July 30, 1991.

A. Applicant:
Ricardo Lima, Vice President-General Manager
Name of Person Signing (Type)

R. A. L. by Melissa Capone
Signature of Owner or Authorized Representative and Title

Date: 9/1/94 Telephone: _____

(407) 996-9072

B: Professional Engineer:
David A. Buff
Name of Person Signing (Type)

David A. Buff
Signature of Professional Engineer

KBN Engineering and Applied Sciences, Inc.
Company Name

Florida Registration No. 19011

1034 NW 57th Street, Gainesville, FL 32605
Mailing Address

Date: August 31, 1994
(Seal)

(904) 331-9000
Telephone Number

*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

**As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

DEVIATIONS FROM CONSTRUCTION PERMIT

The description of the source as contained on Page 1 of the construction permit states that the boiler is "designed for 12% flue gas recirculation." The boiler FGR system is actually capable of up to 40% flue gas recirculation. It is requested that the operating permit be written to reflect this change.

File copy

Florida Department of
Environmental Protection

Memorandum

To: Clair Fancy, Bureau of Air Regulation
Isidore Goldman, Southeast District
David Knowles, South District
Jim Stormer, Palm Beach County Health Department

From: Willard Hanks *whmh*

Date: February 15, 1994

Subject: Okeelanta/Osceola Power Limited Partnership

The construction permits for Okeelanta/Osceola Power L.P. were processed by the Bureau of Air Regulation. The APIS data was entered under the Southeast District code. A question has been raised on whether this is the appropriate District to track these operations.

As the facilities are in Palm Beach County, the Palm Beach County Health Department will be involved in monitoring their operations. They will also monitor the sugar mills in Palm Beach County. By Department policy, sugar mills are handled by the South District. Thus the County will have to coordinate their activities with both Districts (sugar mills with the South District and other sources with the Southeast District).

The cogeneration facilities, although not technically part of the sugar mills, are associated with them because of the bagasse fuel they burn. As the South District staff inspects the sugar mills, it seems more logical for them to observe the cogeneration facility operations. Otherwise, someone from the Southeast District office may have to drive over to look at only the cogeneration facilities.

We would like your comments and suggestions by March 1, 1994, on which District office should be assigned these facilities. If desirable, the facilities can be reassigned to the South District.

c: Preston Lewis
Tom Tittle

OKEELANTA CORPORATION

6 MILES SOUTH OF SOUTH BAY
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

0001941

TELEPHONE: (407) 996-9072

TELEX: 803444

RECEIVED
DER. MAIL ROOM
1994 FEB 14 AM 11:18

February 10, 1994

Mr. C.H. Fancy
Dept. of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL

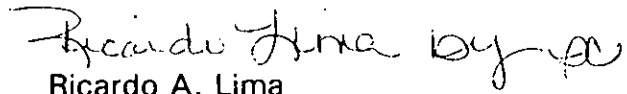
Ref: AC 50-191876

Dear Mr. Fancy:

In reference to your letter dated February 2, 1994, please find enclosed our check in the amount of \$50.00 for processing fees.

Should you require any further information please feel free to contact myself or Roger King at 407-996-9072.

Sincerely,



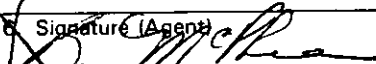
Ricardo A. Lima
Vice President -
General Manager

RAL:slc

xc: Roger King

FILE PROCFEE

Is your RETURN ADDRESS completed on the reverse side?

SENDER: <ul style="list-style-type: none"> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered. 		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. Ricardo A. Lima Vice President - General Manager Okeelanta Corporation P. O. Box 86 South Bay, Florida 33493	4a. Article Number P 872 562 588	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature (Addressee) 	7. Date of Delivery 2-7-94	
6. Signature (Agent)	8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

P 872 562 588



Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. Ricardo A. Lima	
Street and No. P. O. Box 86	
P.O., State and ZIP Code South Bay, Florida 33493	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$

PS Form 3800, JUNE 1991

Postmark or Date
 Mailed: 2/2/94
 AC 50-191876, Request for Permit Extension



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

February 2, 1994

CERTIFIED MAIL-RETURN RECEIPT

Mr. Ricardo A. Lima
Vice President - General Manager
Okeelanta Corporation
P. O. Box 86
South Bay, Florida 33493

Dear Mr. Lima:

RE: AC 50-191876, Request for Permit Extension

The Bureau of Air Regulation received your December 21, 1993, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$50 processing fee for a permit extension; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904) 488-1344.

Sincerely,

Patricia H. Adams

for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

cc: Willard Hanks

OKEELANTA CORPORATION

6 MILES SOUTH OF SOUTH BAY
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

ORIGINAL TO CLAIR
XC: HKR
12/28

TELEPHONE: (407) 996-9072

TELEX: 803444

December 21, 1993

RECEIVED

DEC 28 1993

Mr Howard Rhodes
Director, Division of Air
Resources Management
FDER
2600 Blair Stone Road
Tallahassee, FL 32399

Division of Air
Resources Management

Re: Permit No. AC50-191876

Dear Mr Rhodes:

By letter to Mr Pablo Carreño dated March 19, 1993 the above permit was extended to Dec 31st this year to allow additional time for stack testing.


We operated this boiler from late July to end of September for the summer ('93) operation of our sugar refinery. The atomization of fuel using steam (as designed) was unsuccessful despite various visits by technical representatives of the manufacturers. We were able to operate satisfactorily with air atomization.

The difficulty experienced tuning the burner system (for steam atomization) requires the boiler to operate at various steam loads between 0 and 100% MCR. During the summer we are not able to do this as this is the only boiler in operation. Since the sugar crop has settled down we are currently trying to arrange a visit by the manufacturer's technician since we are now able to vary the load as necessary.

Due to the above we are kindly requesting a further extension of this permit to October 30th 1994. By this means the stack testing will be arranged during the summer ('94) operation of our refinery.

Please contact the writer or Roger King at 407-996-9072 if you need any further information.

Sincerely,


Ricardo A. Lima
Vice President -
General Manager

RAL:slc

FILED 1993

cc: H. Hanks
D. Knowles, SDist.
J. Hester, BBCHD