

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> <ul style="list-style-type: none"> <li>• Complete items 1 and/or 2 for additional services.</li> <li>• Complete items 3, and 4a &amp; b.</li> <li>• Print your name and address on the reverse of this form so that we can return this card to you.</li> <li>• Attach this form to the front of the mailpiece, or on the back if space does not permit.</li> <li>• Write "Return Receipt Requested" on the mailpiece below the article number.</li> <li>• The Return Receipt will show to whom the article was delivered and the date delivered.</li> </ul>		I also wish to receive the following services (for an extra fee): <ol style="list-style-type: none"> <li><input type="checkbox"/> Addressee's Address</li> <li><input type="checkbox"/> Restricted Delivery</li> </ol> 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 872 563 628	
		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	
		7. Date of Delivery 3-19-94	
5. Signature (Addressee)		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent) 			

Thank you for using Return Receipt Service.

P 872 563 628



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

PS Form 3800, JUNE 1991

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	\$
Postmark or Date	
Mailed: 3/15/94	
AC 50-191876	



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

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

Virginia B. Wetherell  
Secretary

March 7, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Lima:

Re: Amendment of Permit No. AC 50-191876  
Boiler No. 16

The Department is in receipt of your letter requesting that the referenced permit to construct the No. 2 fuel oil fired boiler No. 16 be extended. The extension is needed to adjust the burner system, conduct the compliance tests, and submit the application for permit to operate. This request is acceptable and the expiration date of permit No. AC 50-191976 is extended from December 31, 1993, to October 30, 1994.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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, Florida Statutes.

Mr. Ricardo A. Lima  
AC 50-191876  
Permit Amendment  
March 7, 1994  
Page 2 of 3

The Petition shall contain the following information:

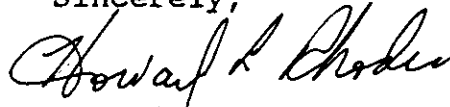
- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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;
- (g) A statement of the relief sought by petitioner, stating precisely the action the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/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 amendment 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, F.A.C.

Mr. Ricardo A. Lima  
AC 50-191876  
Permit Amendment  
March 7, 1994  
Page 3 of 3

A copy of this letter must be filed with the referenced construction permit and shall become a condition of that permit.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/WH/bjb

Attachment: Okeelanta's December 21, 1993, letter

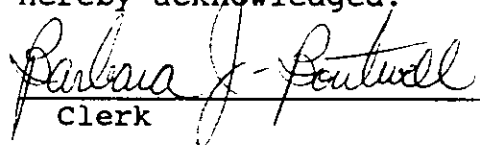
cc: David Knowles, SD  
David Buff, KBN  
Jim Stormer, PBCHD

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 3/15/94 to the listed persons.

Clerk Stamp

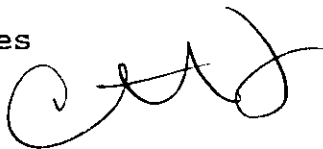
**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to  
120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is  
hereby acknowledged.

  
Clerk 3/15/94  
Date

Florida Department of  
**Environmental Protection**

**Memorandum**

PATTY

TO: Howard L. Rhodes  
FROM: Clair H. Fancy   
DATE: March 7, 1994  
SUBJ: Amendment of Permit  
Okeelanta Corporation

Attached for your approval and signature is a letter that will extend the construction permit for a No. 2 oil fired boiler at a sugar mill in Palm Beach County. The additional time is needed for the permittee to adjust the burners on this boiler and conduct the compliance tests.

I recommend your approval and signature.

CHF/WH/bjb

Attachment

**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 Fee will provide you the signature of the person delivered to and the date of delivery.

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:  
 Pablo Carrero  
 Keelanta Corp.  
 PO Box 86  
 S. Bay, FL 33493

4a. Article Number  
 P 062 921 980

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

7. Date of Delivery  
 3-24-93

5. Signature (Addressee)

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

6. Signature (Agent)  
*[Signature]*

P 062 921 980

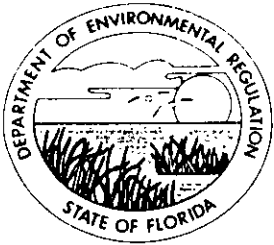


**Receipt for Certified Mail**

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

Sender's Name Pablo Carrero	
Receiver's Name Keelanta Corp	
P.O. State and ZIP Code S. Bay, FL	
Postage	\$
Certainty 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 Date AC 50-191876	

Form 3800, June 1991



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

March 19, 1993 -

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Pablo Carreño  
Director of Mill Operations  
Okeelanta Corporation  
Post Office Box 86  
South Bay, Florida 33493

Dear Mr. Carreño:

Re: Amendment of Permit  
Boiler No. 16, Permit No. AC50-191876

The Department is in receipt of your February 24, 1993, letter requesting that the referenced permit be extended to allow additional time for the compliance tests and that you be allowed to substitute annual stack tests for the continuous monitoring of opacity and nitrogen oxides.

The request for additional time to complete the compliance tests is acceptable. The expiration date for Permit No. AC50-191876 is hereby extended from March 1, 1993, to December 31, 1993.

The Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db, requires the installation, calculation, maintenance, and operation of a continuous emissions monitor for opacity (40 CFR 60.48b). Boiler No. 16 is subject to these regulations. A continuous emissions monitor for opacity must be installed on boiler No. 16.

These regulations, 40 CFR 60, Subpart Db, also require the continuous monitoring of nitrogen oxides (NO<sub>x</sub>) emissions by either an instrument or by monitoring boiler operation conditions under an approved plan described in 40 CFR 60.49b(c). The nitrogen oxide emissions from boiler No. 16 must be monitored by one of these methods. Nitrogen oxides monitoring data collected by either method will satisfy the monitoring requirements of Specific Condition No. 5 of the referenced permit.

A copy of this letter shall be filed with the referenced construction permit and shall become a part of that permit.

Mr. Pablo Carreño  
March 19, 1993  
Page Two

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of receipt of this amendment. 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, Florida Statutes.

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.

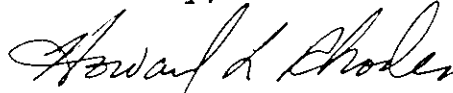
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard 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 amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a



Mr. Pablo Carreño  
March 19, 1993  
Page Three

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, F.A.C.

Sincerely,

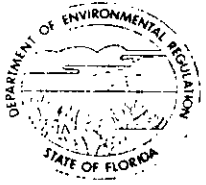


Howard L. Rhodes  
Director  
Division of Air Resources  
Management

CF/WH/w

Attach: Okeelanta Comp., February 24, 1993, letter

cc: David Knowles, SFD  
Isidore Goldman, SED  
James Stormer, PBC



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Howard L. Rhodes  
FROM: Clair H. Fancy *CHF*  
DATE: March 19, 1993  
SUBJ: Amendment of Permit No. AC50-191876  
Okeelanta Corporation

Attached for your approval and signature is a letter that will extend the expiration date of a construction permit issued to Okeelanta Corporation for a No. 2 fuel oil fired boiler. In response to the permittee's request to delete the continuous emissions monitoring requirements in the permit, the letter says continuous monitoring is required by the new source performance standards.

I recommend your approval and signature.

HR/CF/wh

Attachments

*OK*  
*GPL*  
*3/19/93*

**OKEELANTA CORPORATION**

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

TELEPHONE: (407) 996-9072

TELEX: 803444

February 24, 1993

RECEIVED

Mr. Willard Hanks  
Florida Dept of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

FEB 25 1993

Division of Air  
Resources Management

Subject: Permit #AC 50-191876 (Okeelanta Boiler #16)  
PSD-FL-169

Dear Mr. Hanks,

The construction permit referenced above is due to expire on March 1st 1993.

1. After experiencing numerous delays and difficulties with the start up of this boiler, consistent operation was finally achieved on August 30th 1992. The boiler was shut down in early October 1992 when the summer refinery operation was terminated prior to the start of the 1992/93 sugar crop. It was therefore not practical to schedule stack testing of the boiler in the short period of consistent operation and to afford yourselves and other governmental agencies the 30 day notice specified in the permit.

We expect the refinery to be in operation during summer 1993 but the exact dates have not been determined as yet. We trust that when scheduling has been completed stack testing may be arranged. In the event this is not possible during the summer it could be arranged in the early part of the 1993/94 crop. Based on the above we hereby request extension of the construction permit to December 1st 1993.

2. In reference to the continuous monitoring equipment, the permit specifies that an opacity monitor is required - please refer to Specific Condition # 4. With the firing of #2 fuel there is, in our limited experience, no opacity to monitor. It would therefore seem to be an unreasonable burden for such monitoring equipment to be installed and maintained. We therefore respectfully request that this specific condition be deleted from the permit.

We have sought bids from three (3) suppliers of suitable equipment for continuous monitoring of NOx and opacity. Quotations received have been outrageously expensive:-

Continuous Monitoring Equipment (continued)

Supplier #1 - \$138,800 + various services at start up,  
with total being about \$150,000 + tax.

Supplier #2 - \$ 81,000 + installation and provision of  
various facilities, or \$130,000 total.

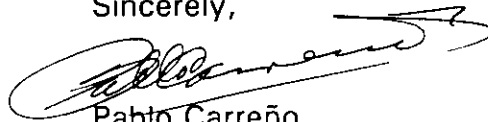
Supplier #3 - \$100,000 + various services at start up,  
with total being about \$115,000 + tax.

For NOx monitoring we are hereby requesting that this be determined in annual  
stack tests while other procedures are taking place.

No objection to the permit conditions (concerning continuous monitoring) was  
registered when originally issued as we had no idea of the exorbitant cost of this  
equipment. Now that pricing has been obtained the costs involved in purchase,  
installation and maintenance of this equipment places us at a disadvantage vis-a-vis  
our competition.

We trust you will consider our request favorably and withdraw the requirement for  
continuous monitoring equipment.

Sincerely,



Pablo Carreño  
Director of Mill  
Operations

PAC:slc

xc: Mr. Ricardo Lima  
Mr. David Buff - KBN  
Mr. Roger King

FILE:BLR16DER