



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4APT-AEB

AUG 13 1991

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Okeelanta Corporation (PSD-FL-169)

Dear Mr. Fancy:

This is to acknowledge receipt of your final determination and permit for the above referenced facility's proposed modification by your letter dated July 30, 1991. The modification consists of adding a steam boiler (No. 16) to be operated only during the off-season which will be fired with No. 2 fuel oil. Your determination proposes to limit SO₂ emissions through limiting the sulfur content of the fuel and to limit NO_x emissions through requiring flue gas recirculation along with low-NO_x burners.

We have reviewed the package as submitted and have no adverse comments. Thank you for the opportunity to review and comment on the package. If you have any questions or comments, please contact Mr. Gregg Worley of my staff at (404) 347-5014.

Sincerely yours,

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: W. Nantz
C. Halladay
P. Lewis
D. Krawles
G. Stanner, PBCHD
D. Cuff, KBN
CHF/BA

RECEIVED

AUG 15 1991

Division of Air
Resources Management



July 9, 1991

Mr. Willard Hanks
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL

Re: Okeelanta Corp. Draft Permit- Boiler 16
PSD-FL-169

RECEIVED

JUL 10 1991

Division of Air
Resources Management

Dear Willard:

Please find below my comments concerning the National Park Service's comments dated July 1, 1991, on the draft permit for Okeelanta.

1. BACT for SO₂

While it is true that for some recently permitted gas turbines in Florida BACT has been established as 0.20% sulfur oil (maximum), the Okeelanta boiler should be evaluated on its own merits and site-specific considerations. DER has limited some facilities to very low sulfur oil based on significant operating time on oil and resulting significant SO₂ emissions.

Okeelanta will be limited to 0.3% sulfur on an annual basis, and since the boiler will operate no more than 4,200 hr/yr, maximum SO₂ emissions will only be 133 tons per year. This is a very small SO₂ source compared to power plants such as the City of Lakeland, and therefore a lower sulfur oil is not warranted as BACT.

2. Modeling Analysis

NPS's main comment is that an AQRV analysis and cumulative air modeling analysis of all sources in the area were not performed for the Everglades National Park (ENP). Although it is agreed there may be a necessity to perform a total ambient impact assessment on the ENP, a small project such as Okeelanta's does not warrant such an effort. As presented in the permit application, Okeelanta's maximum annual average impact upon the ENP Class I area is 0.03 $\mu\text{g}/\text{m}^3$. This is indeed a very small impact, reflecting the very low SO₂ emissions of 133 TPY.

Please call if you have any questions concerning these comments.

Sincerely,

David A. Buff, M.E., P.E.
Principal Engineer

cc: Mr. Carreno
Mr. Cunningham

90121A1/10

KBN ENGINEERING AND APPLIED SCIENCES, INC.
1034 Northwest 57th Street Gainesville, Florida 32605 904/331-9000 FAX: 904/332-4189

File Copy



United States Department of the Interior

NATIONAL PARK SERVICE
SOUTHEAST REGIONAL OFFICE

75 Spring Street, S.W.
Atlanta, Georgia 30303



RECEIVED

JUL 03 1991

Division of Air
Resources Management

IN REPLY REFER TO

N3615 (SER-ODN)

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We have reviewed your Technical Evaluation and Preliminary Determination Document regarding Okeelanta Corporation's proposal to construct an oil-fired steam boiler at their South Bay sugar mill. The Okeelanta facility is located approximately 91 km north of Everglades National Park (EVER), a class I air quality area administered by the National Park Service. Our comments on the best available control technology (BACT), air quality, and air quality related values (AQRVs) analyses with respect to the proposed project's potential impacts on EVER are discussed below. We ask that you consider these comments before making a final determination regarding the proposed project.

With respect to your BACT analysis, we do not agree that the proposed 0.5 percent maximum sulfur content oil is consistent with what has been established as BACT for other oil-fired units. The Florida Department of Environmental Regulation (FDER) recently determined that BACT for a combustion turbine proposed by the City of Lakeland is burning a fuel oil with a maximum sulfur content of 0.20 percent. Also, we have reviewed other projects that were permitted to burn No. 2 fuel oil with a maximum sulfur content of 0.20 percent. Therefore, we recommend that the FDER lower the maximum sulfur content for the Okeelanta boiler from 0.5 percent to 0.2 percent. By lowering the maximum sulfur content of the oil to 0.2 percent, potential impacts on EVER would be minimized.

Regarding the air quality modeling analysis, Okeelanta modeled its impacts, combined with other PSD increment-consuming sources within 100 km of EVER. You may recall that in our recent comments on Florida Power and Light's (FPL) Martin facility, we expressed concern about limiting the class I increment analysis to sources within 100 km. In response to our comments, in your May 31, 1991, final determination regarding the FPL project, you state that a long range transport class I analysis will be

required for Phase II of the Martin facility. The FPL analysis will provide a more complete assessment of the class I sulfur dioxide (SO₂) and nitrogen dioxide (NO_x) increment consumed at EVER. Considering the relatively small amount of SO₂ and NO_x emissions from the Okeelanta boiler compared to the FPL emissions, and the fact that FPL has several other facilities in South Florida, we believe it is reasonable for you to require FPL to perform the cumulative modeling analysis. The incremental impacts, when added to the impacts from all other background sources, should then be used to evaluate the effects on the sensitive air quality related values in EVER.

Regarding potential impacts on AQRVs at EVER, the FDER concludes that since the proposed project would not cause any exceedances of the secondary National Ambient Air Quality Standards (NAAQS), which were designed to protect vegetation from the adverse impacts of air pollutants, there would not be any effect on vegetation. We wish to again clarify that there are documented effects below the NAAQS, and that compliance with the NAAQS does not ensure that there will be no negative impacts. There may be instances, and ongoing studies are confirming this, where adverse effects to AQRVs can occur at levels below the NAAQS.

It is important to note that AQRVs are affected not only by the incremental impacts of a proposed source, but by the total pollutant concentrations that they will experience. Therefore, to perform a proper AQRV analysis, permit applicants should perform a cumulative air quality modeling analysis of all sources in the area, which incorporates any measured ambient levels. Okeelanta prepared no such analysis.

We appreciate the opportunity to comment on the Okeelanta application. If you have any questions regarding this matter, please call John Notar of our Air Quality Division in Denver at (303) 969-2071.

Sincerely,

C. W. Ogle

FOR
Robert M. Baker
Regional Director
Southeast Region

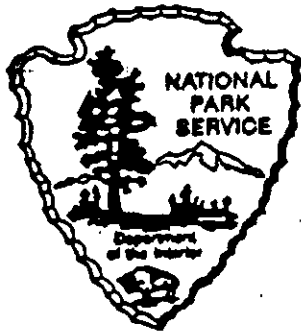
FAX red 7-1-91 and distributed RAN

RECEIVED

JUL 0 1 1991

Division of Air
Resources Management

**FAX TELECOMMUNICATION
FROM THE SOUTHEAST REGIONAL OFFICE
Office of the Regional Chief Scientist**



National Park Service
75 Spring Street SW
Atlanta, GA 30303

DESTINATION (phone #) 904 922 6979

-TO: MR. C. H. FANCY

ORGANIZATION: Bureau of Air Quality Mgmt. FL Dept of Env Regulation

FROM: Robert M. Baker

ORGANIZATION: National Park Service

SUBJECT: Okeelanta Permit

NUMBER OF PAGES TO FOLLOW: 2

REMARKS OR INSTRUCTIONS: Original mailed 7/1/91

FAX Phone: 404/331-4943
FTS 841-4943

For assistance with the FAX
Call 404/331-4916

FAX operator, complete the following before returning form to originator:

Date & time transmitted: 3:45 PM 7-1-91

Transmitted by: Julie Thomas



United States Department of the Interior

NATIONAL PARK SERVICE
SOUTHEAST REGIONAL OFFICE75 Spring Street, S.W.
Atlanta, Georgia 30303

IN REPLY REFER TO

N3615 (SER-ODN)

JUL 18 1991

Mr. C.H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Sincerely,

C. W. Ogle

FOR
Robert M. Baker
Regional Director
Southeast Region

cc:

BA/CHF

Preston Lewis

Willard Hanks

Cleve Holladay

David Knowles, SF Dist.

} 7-1-91 RAN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4APT-AEB

JUN 17 1991

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

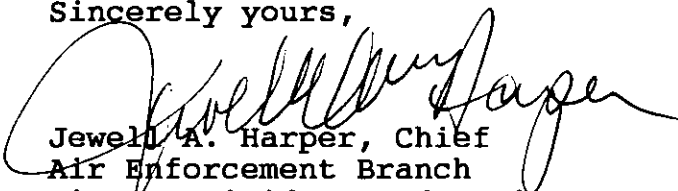
RE: Okeelanta Corporation (PSD-FL-169)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft permit for the above referenced facility's proposed modification by your letter dated May 17, 1991. The modification consists of adding a steam boiler (No. 16) to be operated only during the off-season which will be fired with No. 2 fuel oil. Your determination proposes to limit SO₂ emissions through limiting the sulfur content of the fuel and to limit NO_x emissions through requiring flue gas recirculation along with low-NO_x burners.

We have reviewed the package as submitted and have no adverse comments. Thank you for the opportunity to review and comment on the package. If you have any questions or comments, please contact Mr. Gregg Worley of my staff at (404) 347-5014.

Sincerely yours,


Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: A. Hanks
C. Halladay
P. Lewis
D. Starnes PBC/HU
D. Knowles SF Dist
D. Ruff, AE



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

RECEIVED

JUN 10 1991

Division of Air
Resources Management

PBCPHU-ESE
Air Pollution Control Section

June 5, 1991

Barry Andrews
Bureau of Air Regulation
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Re: Okeelanta Corporation (PSD-FL-169) Boiler No. 16

Dear Mr. Fancy:

The Palm Beach County Public Health Unit received the above referenced application on May 21, 1991, and offers the following comments:

We would appreciate the inclusion of a specific condition stating that notification and reporting requirements of this permit shall also be sent to the Palm Beach County Public Health Unit.

Specific condition #6 requires annual stack testing conducted while the boiler is operating at least within 90% of the permitted capacity. If a stack test is not conducted within at least 90% of capacity (average production rate during test period), does this automatically void the stack test? No other comments.

Sincerely,

For the Division Director
Environmental Science and Engineering

Jeffery F. Koerner
Engineer II, PBCPHU

FJG/JES/JFK/lh

cc: St. Hanks

DISTRICT IX

PALM BEACH COUNTY PUBLIC HEALTH UNIT • P.O. BOX 29 • WEST PALM BEACH, FLORIDA 33402

LAWTON CHILES, GOVERNOR

File Copy

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(904) 222-7500
FAX (904) 224-8551

CARLOS ALVAREZ
JAMES S. ALVES
BRIAN H. BIBEAU
ELIZABETH C. BOWMAN
WILLIAM L. BOYD, IV
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
THOMAS M. DeROSE
WILLIAM H. GREEN
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OF COUNSEL
W. ROBERT FOKES

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JUN 07 1991

Division of Air
Resources Management

June 7, 1991

BY HAND DELIVERY

Patty Adams
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 338
Tallahassee, Florida 32399-2400

Re: Okeelanta Corporation
New Package Boiler

Dear Patty:

Enclosed please find the affidavit of proof of publication from The Palm Beach Post acknowledging publication of DER's Notice of Intent to Issue in the May 31st issue of that newspaper.

Sincerely,


Peter C. Cunningham

/gbb

Enclosure

cc'd:

Willard Hanks
Clem Holladay
Beverly Andrews
F. W. Harper, ESR
Chris Shaw, NPS

6-11-91 PCH

THE PALM BEACH POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

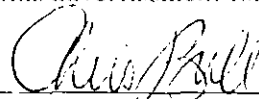
STATE OF FLORIDA

COUNTY OF PALM BEACH

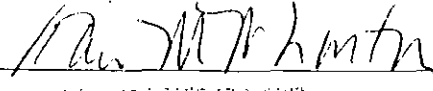
Before the undersigned authority personally appeared Chris Bull
who on oath says that she/he is Class. Sales Mgr. of The Palm Beach Post,
a daily and Sunday newspaper published at West Palm Beach in Palm Beach County,
Florida; that the attached copy of advertising, being a _____

_____ Notice
in the matter of _____ intent to issue
in the _____ Court, was published in said newspaper in
the issues of _____ May 31, 1991

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before me this 31 day of May A.D. 19 91



NOTARY PUBLIC
STATE OF FLORIDA
COMMISSION EXPIRES 12/31/92
MAY 31, 1991

NO. 376421
State of Florida
Department of
Environmental Regulation
Notice of Intent to Issue
The Department of Environmental Regulation hereby gives notice of its intent to issue an air pollution construction permit to Okeastanta Corporation, P. O. Box 85, South Bay, Florida 33493. The permit will authorize the construction of a new 205 MMBtu/hr No. 2 oil fired steam boiler (No. 16) at their existing sugar mill that is located off from U.S. Highway 27, 6 miles south of South Bay in Palm Beach County, Florida. Boiler No. 16 will emit: 105.5 lbs/hr (221.6 TPY) sulfur dioxide; 11.0 lbs/hr (23.1 TPY) particulate; 36.9 lbs/hr (77.5 TPY) nitrogen oxides; 41.0 lbs/hr (86.1 TYP) carbon monoxide; and 18.5 lbs/hr (38.7 TYP) volatile organic compounds. The boiler is subject to the Prevention of Significant Deterioration (PSD) regulations for nitrogen oxides and sulfur dioxide. Best Available Control Technology (BACT) determinations was required for particulates; sulfur dioxide and nitrogen oxides. For sulfur dioxide, the maximum predicted concentrations due to this new source and other increment-consuming sources are below the PSD Class I and II increments. The maximum Everglades National Park Class I increment consumption is 17.3 vs 25.0 ug/m3 allowable 3-hr average (68% of the Class I increment), 1.8 vs 5.0 ug/m3 allowable 24-hr average (76% of increment), and 0.4 vs 2 allowable annual average (20% of increment). The maximum PSD Class II increment consumption is 91 vs 512 ug/m3 allowable 3-hr average (18% of the Class II increment), 19 vs 91 ug/m3 allowable 24-hr average (21% of increment), and 1.8 vs 20 ug/m3 allowable annual average (9% of increment). The maximum predicted annual ambient air quality impact for nitrogen oxides (0.33 ug/m3) is below the significant impact level. These impacts will not cause a violation of the ambient air quality standards. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination. 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, within fourteen (14) days of publication of this notice. 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; and (b) A statement of how and when each petitioner received notice of the Department's action or proposed action.

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(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 Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to be a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication 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 28-6.207, F.A.C. The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation offices located at: 2600 Blair Stone Road, Tallahassee, FL 32399-2400, 2269 Bay Street, Fort Myers, FL 33901-2896, 1900 S. Congress Avenue, Suite A, West Palm Beach, FL 33408 and Palm Beach County environmental office located at: 901 E. Everline Street, West Palm Beach, FL 33402. Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination. Furthermore, a public hearing can be requested by any person. Such request must be submitted within 30 days of this notice.
PUB: Palm Beach Post
May 31, 1991



RECEIVED

June 5, 1991

JUN 06 1991

Mr. Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Division of Air
Resources Management

RE: Okeelanta Corporation
Oil-Fired Boiler
AC50-191876
PSD-FL-169

Dear Mr. Fancy:

On behalf of Okeelanta Corporation, I have reviewed the Technical Evaluation and Preliminary Determination for the above referenced construction permit and offer the following comments:

1. In Specific Condition 5 of the draft permit, the maximum allowable air emission rates are presented. In the case of NO_x , it is requested that the limit of 0.18 lb/MM Btu be based upon a 30-day rolling average, which is consistent with the New Source Performance Standards, 40 CFR 60, Subpart Db. Since a continuous NO_x monitor will be used for compliance, a 30-day rolling average can be readily determined.
2. In Specific Condition 10, it is stated that the boiler shall only operate during the off-season months (April through October). This should be corrected to "(March through October)". The permit application and modeling analysis addressed the situation that the boiler may start up as early as March 1, depending on the length of the crop season.
3. In Specific Condition 11, the word "at" should be inserted before the words "380 psig".

Thank you for consideration of these comments.

Sincerely,

David A. Buff, M.E., P.E.
Principal Engineer

cc: Pablo Carreno
Peter Cunningham

90121A1/8

KBN ENGINEERING AND APPLIED SCIENCES, INC.

1034 Northwest 57th Street Gainesville, Florida 32605 904/331-9000 FAX: 904/332-4189

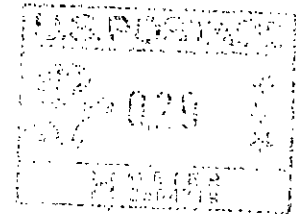


90121

KBN ENGINEERING AND APPLIED SCIENCES, INC.

1034 Northwest 57th Street

Gainesville, Florida 32605



Mr. Clair H. Fancy, P.E.
Florida Depart. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

