

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Received by (Please Print Clearly) <i>D. McPhie</i> B. Date of Delivery <i>11-5-01</i></p> <p>C. Signature <i>X D. McPhie</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr. Ricardo Lima Vice President & General Manager Okeelanta Corporation 21250 US Highway 27 South Bay, FL 33493</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Copy from service label) 7000 2870 0000 7028 2768</p>	
<p>PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789</p>	

Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

7000 2870 0000 7028 2768

Sent To
Ricardo Lima
Street, Apt. No., or PO Box No.
21250 U.S. Highway 27
City, State, ZIP+4
South Bay, FL 33493

PS Form 3800, May 2000 See Reverse for Instructions

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Okeelanta Corporation
21250 U.S. Highway 27
South Bay, FL 33493

Project No. 0990005-009-AC
Air Permit No. PSD-FL-169A
Okeelanta Boiler No. 16
Conversion to Natural Gas

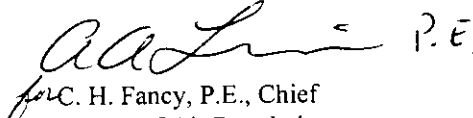
Authorized Representative:

Mr. Ricardo Lima, Vice President and General Manager

Enclosed is Final Air Permit No. PSD-FL-169A, which authorizes modification of the burner system on existing Boiler No. 16 that will allow the firing of natural gas and very low sulfur distillate oil. As noted in the Final Determination (attached), only minor changes were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.


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

CERTIFICATE OF SERVICE

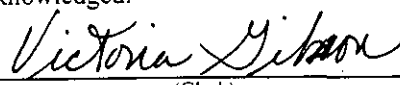
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10/30/01 to the person(s) listed:

Mr. Ricardo Lima, Okeelanta Corp.*
Mr. Matthew Capone, Okeelanta Corp.
Mr. James Meriwether, Okeelanta Power L.P.
Mr. David Buff, Golder Associates

Mr. James Stormer, PBCHD
Mr. Ron Blackburn, SED
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Clerk Stamp

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



(Clerk)

10/30/01
(Date)

FINAL DETERMINATION

PERMITTEE

Okeelanta Corporation
21250 U.S. Highway 27
South Bay, FL 33493

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400

PROJECT

Project No. 0990005-009-AC
Air Permit No. PSD-FL-169A

This permit authorizes the modification of existing mill Boiler No. 16 to fire natural gas and very low sulfur distillate oil. The project is associated with Okeelanta Corporation's existing sugar mill (SIC No. 2061) and sugar refinery (SIC No. 2062), which are located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida.

NOTICE AND PUBLICATION

The Department distributed a revised "Intent to Issue Permit" package on September 25, 2001. The applicant published the "Public Notice of Intent to Issue" in The Palm Beach Post on September 29, 2001. The Department received the proof of publication on October 5, 2001. No requests for administrative hearings were filed.

COMMENTS

No comments on the Draft Permit were received from the public, EPA Region 4, the National Park Service, or the Department's South District Office. The following summarizes comments received from the applicant and the Palm Beach County Health Department as well as the Department's response.

Comments from the Applicant

Technical Evaluation, Section 1.7: The applicant points out that their calculation of the potential annual emissions increase for NO_x is 94 TPY, and for SO₂ is 39.6 TPY. The Department estimated annual emissions to be 96 TPY of NO_x and 35 TPY of SO₂. The Notice of Intent to Issue published by Okeelanta actually stated a potential SO₂ emission rate of 39.38 TPY and a potential NO_x emission of 113.77 TPY based on the calculations in the application.

Response: The difference between the Department's and applicant's potential annual emissions estimates is due to the distillate oil fuel consumption limit, the fuel oil heating value, and the fuel oil density as well as the fuel sulfur content of pipeline quality natural gas. The differences with the published NO_x and SO₂ emissions rates are small and do not change the outcome for the project.

Technical Evaluation, Section 2.2: The applicant points out that the reference to "NSPS Subpart Db" relates to "Industrial, Commercial and Institutional Steam Generating Units" and not "stationary gas turbines".

Response: The Department agrees and revised the text.

FINAL DETERMINATION

Technical Evaluation, Section 3.6: The applicant notes that NSPS Subpart Db does not allow the exclusion of CEMS data for periods of startup, shutdown and malfunction in determining compliance with the 30-day NOx standard [see 40 CFR 60.44b(h), 60.44b(i), and 60.46b(a)]. The applicant requests clarification of the permit condition to state that such data may be excluded for 24-hour block average.

Response: The Department's intent was to allow up to two hours of CEMS data to be excluded from both the 24-hour block and 30-day rolling BACT standards. The technical evaluation and permit will be revised to add the 30-day rolling NSPS emission standard, which does not allow this data to be excluded.

Draft Permit, Condition III.4: The applicant notes that the steam production limit is based on a 24-hour block average, but the heat input limitation is based on a 1-hour average. The applicant requests that either both limitations reflect a 24-hour average or that the heat input rate be indicated as a design specification.

Response: The Department revised the condition to, "The maximum design heat input rates to the boiler are 211 mmBTU per hour when firing natural gas and 202 mmBTU per hour when firing very low sulfur distillate oil. The maximum steam production rate shall not exceed 150,000 pounds per hour based on a 24-hour block average of the last 24 boiler operating hours."

Draft Permit, Condition III.11a: The applicant requests that a 6-minute "block average" be specified in the opacity limitation consistent with Condition III.6c.

Response: The Department agrees and inserted "block average".

Draft Permit, Condition III.11b: The applicant requests replacing the text "continuous NOx" in the second sentence with "24-hour block average" to clarify that NOx hourly averages may be excluded only from the 24-hour block average due to startups, shutdowns, and unavoidable malfunctions.

Response: As previously mentioned, the technical evaluation and permit were revised to allow data exclusion to show compliance with the 24-hour block and 30-day rolling BACT standards, but no exclusion is allowed for showing compliance with the 30-day rolling NSPS emission standard.

Appendix BD, Page BD-1: The applicant requests that footnote "b" be revised to, "Compliance is based on a 30-day rolling average and a 24-hour block average as determined ..."

Response: As previously mentioned, the technical evaluation and permit were revised to allow data exclusion to show compliance with the 24-hour block and 30-day rolling BACT standards, but no exclusion is allowed for showing compliance with the 30-day rolling NSPS emission standard.

Appendix Db, Page Db-2: The applicant notes that Section 60.44b(h) and 60.46b(a) indicate that the 30-day rolling NOx standard applies at all times, including periods of startup, shutdown and malfunction.

Response: As previously mentioned, the technical evaluation and permit were revised to allow data exclusion to show compliance with the 24-hour block and 30-day rolling BACT standards, but no exclusion is allowed for showing compliance with the 30-day rolling NSPS emission standard.

Appendix Db, Page Db-2: The applicant requests addition of a note after Section 60.44b(h) stating that this provision applies only to the 30-day rolling standard and that up to two hourly average NOx emission rate values may be excluded in any 24-hour period due to startup, shutdown, or unavoidable malfunctions for compliance determinations with the 24-hour block standard.

Response: As previously mentioned, the technical evaluation and permit were revised to allow data exclusion to show compliance with the 24-hour block and 30-day rolling BACT standards, but no exclusion is allowed for showing compliance with the 30-day rolling NSPS emission standard.

Appendix Db, Page Db-2: The applicant requests revising the note after Section 60.44b(i) to clarify that the 24-hour average is a "block" average.

Response: The Department agrees and the note was revised.

FINAL DETERMINATION

Appendix Db, Page Db-2: The applicant requests deletion of the PM testing requirements of Section 60.46b(b) because the PM standard does not apply.

Response: As discussed in the note after Section 60.43b(b), the PM emission standards do not apply. Therefore, the testing requirements of Section 60.46b(b) were deleted.

Appendix Db, Page Db-4: The applicant requests that the note after Section 60.48b(f) be revised to clarify that the 24-hour average is a “block average”.

Response: As previously mentioned, the technical evaluation and permit were revised to allow data exclusion to show compliance with the 24-hour block and 30-day rolling BACT standards, but no exclusion is allowed for showing compliance with the 30-day rolling NSPS emission standard.

Appendix Db, Page Db-5: The applicant requests that the note after Section 60.49b(g) be revised to clarify that the 24-hour average is a “block average”.

Response: The Department agrees and revised the note to, “The permit also specifies NOx BACT standards based on a 24-hour block average and a 30-day rolling average.”

Comments from the Palm Beach County Health Department (PBCHD)

Technical Evaluation, Section 1.7, Note b: The PBCHD indicates that applicant’s assumption regarding the baseline emissions is incorrect. Baseline emissions were set to zero because the project reflects a relaxation of the federally enforceable permit conditions (restriction on hours of operation).

Response: The Department acknowledges the comment.

Technical Evaluation, Section 2.2: The PBCHD notes that the reference to NSPS Db should be for a boiler and not a gas turbine.

Response: The Department agrees and revised the description.

Technical Evaluation, Section 3.2 Note d: The PBCHD suggests establishing the base case on the existing federally enforceable emission limitation and not actual emissions.

Response: On a case-by-case basis, modifications to existing units have been allowed to estimate baseline emissions on “actual” emissions to reflect realistic reductions. The Department notes that “actual NOx emissions” were based on CEMS data for the existing boiler.

Technical Evaluation, Section 3.3: The PBCHD notes that both the technical evaluation and the Public Notice indicate that PSD does not apply to the unit’s CO emissions because potential emissions are below 100 tons per year. If possible, the PBCHD requests that the permit be conditioned upon the initial performance test to require a lower limit that would reduce potentials to levels below 80% of the PSD significant emission rate. Otherwise, the PBCHD believes that either parametric monitoring or a CEMS should be specified.

Response: The Department agrees that potential CO emissions (96 TPY) are just below the PSD significant emission rate of 100 TPY. However, the Department notes that the boiler is intended as a backup unit to support the sugar mill and refinery, which operate only a portion of the year. In addition, while the maximum CO mass emission rate is likely to occur at 100% load, it is very unlikely that the unit will operate at this mass emission rate for the full 8760 hours per year. Based on the initial emissions performance test, the Title V permitting authority (South District Office) could require either parametric monitoring or a CEMS for purposes of “periodic monitoring” requirements. No changes were made.

Technical Evaluation, Section 3.4: The PBCHD notes that the SO₂ BACT sulfur limit on natural gas is questionable given that the state tariff on natural gas is 5 times higher. This causes some concern with the use of the lower value and questions regarding reasonable assurances when no test method or sampling procedures are specified.

Response: The Department notes that firing pipeline-quality natural gas whether it contains 10 grains per

FINAL DETERMINATION

100 SCF or 0.5 grains per 100 SCF is BACT for this size boiler (either PSD BACT or small boiler BACT). In addition, the permittee has little control over the sulfur content for the gas being supplied. The permit was revised to require only that "pipeline-quality" natural gas or very low sulfur distillate oil be fired.

Technical Evaluation, Section 3.5: The PBCHD notes that the VOC levels are less than 80% of the significant rate, not subject to PSD/BACT, nor any other emission standards at this time. The PBCHD recommends that the technical evaluation address potential VOC emissions in terms of expected rates and annual emissions and determine that VOC emissions are unregulated.

Response: The permit notes that VOC emissions are limited by the efficient combustion of clean fuels and does not specify a VOC limit.

Technical Evaluation, Section 3.6: The PBCHD suggests clarifying that excess emissions associated with startup, shutdown, and malfunctions may be excluded from the short-term limits, but must be included with the long-term limits.

Response: As previously mentioned, the technical evaluation and permit were revised to allow data exclusion to show compliance with the 24-hour block and 30-day rolling BACT standards, but no exclusion is allowed for showing compliance with the 30-day rolling NSPS emission standard.

Permit Condition III.3: The PBCHD requests a test method and sampling frequency to demonstrate compliance with the fuel sulfur specification, which is below the state tariff for natural gas.

Response: As previously mentioned, "pipeline-quality natural gas is the only fuel specification.

Permit Condition III.6: The PBCHD recommends annual emission caps on NO_x and CO because of allowed excess emissions.

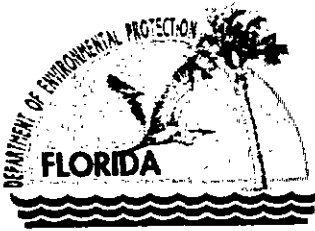
Response: As previously mentioned, the technical evaluation and permit were revised to allow data exclusion to show compliance with the 24-hour block and 30-day rolling BACT standards, but no exclusion is allowed for showing compliance with the 30-day rolling NSPS emission standard. No emissions caps were required because there is no information available regarding startup and shutdown emissions for this existing unit that will be modified.

Other Changes

- The permit expiration date was revised to November 1, 2003.
- The "initial" NO_x limit in Condition No. 6 was removed because the emissions standards are based on long term CEMS data.
- Condition 7d was revised to clarify that data could only be excluded in accordance with Condition 11.
- Consistent with 40 CFR 60, the monitor availability was revised to 95% in Condition 9.
- As previously mentioned, Condition 11b was revised to, "NO_x emissions data shall be recorded by the CEMS during all episodes of startup, shutdown and malfunction. When determining compliance with the 24-hour block and 30-day rolling NO_x BACT standards, up to two 1-hour averages due to startups, shutdowns, or unavoidable malfunctions may be excluded from each 24-hour period. The 30-day rolling NO_x NSPS standard applies at all times and data may not be excluded."

CONCLUSION

The Department made the above-referenced revisions as well as the correction of typographical errors. The final action of the Department is to issue the permit with the changes described above.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE:

Okeelanta Corporation
21250 U.S. Highway 27
South Bay, FL 33493

Authorized Representative:
Mr. Ricardo Lima
Vice President and General Manager

Okeelanta Sugar Mill and Refinery Facility ID No. 0990005 Emissions Unit No. 014 (Boiler No. 16) Project No. 0990005-009-AC Air Permit No. PSD-FL-169A Expires: November 1, 2003
--

PROJECT AND LOCATION

The project is associated with Okeelanta Corporation's existing sugar mill (SIC No. 2061) and sugar refinery (SIC No. 2062) located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida. The UTM coordinates are Zone 17, 524.9 km East, and 2940.1 km North. This permit authorizes modification of the burner system on existing Boiler No. 16 that will allow the firing of natural gas and very low sulfur distillate oil.

STATEMENT OF BASIS

This PSD air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 52, Section 21 of the Code of Federal Regulations. Specifically, this permit is issued pursuant to the requirements for the Prevention of Significant Deterioration (PSD) of Air Quality, Rule 62-212.400, F.A.C. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

- Section I. General Information
- Section II. Administrative Requirements
- Section III. Emissions Units Specific Conditions
- Section IV. Appendices

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

"More Protection, Less Process"

Printed on recycled paper.

SECTION I. GENERAL INFORMATION

FACILITY DESCRIPTION

The facility consists of two adjacent plants. Okeelanta Corporation operates a sugar mill (SIC No. 2061) and sugar refinery (SIC No. 2062) including packaging and transshipment activities. Okeelanta Power L.P. operates a cogeneration plant that provides process steam for the sugar mill and refinery and generates electricity for sale to the power grid (SIC 4911).

NEW EMISSIONS UNITS

This permit authorizes modification of the following existing emissions unit.

ID	Emission Unit Description
014	Mill Boiler No. 16 is a 211/202 mmBTU per hour package boiler fired with natural gas/distillate oil.

REGULATORY CLASSIFICATION

Title III: The facility may have emissions of individual hazardous air pollutants (HAPs) at levels greater than 10 tons per year and emissions of total HAPs greater than 25 tons per year.

Title IV: The facility is not subject to the acid rain provisions of the Clean Air Act.

Title V: Because potential emissions of at least one regulated pollutant exceed 100 tons per year, the facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

PSD: The facility is located in an area designated as "attainment" or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. The facility is considered a "fossil fuel fired steam electric plant of more than 250 million BTU per hour of heat input", which is one of the 28 PSD source categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year. Therefore, the facility is classified as a major source of air pollution with respect to Rule 62-212.400, F.A.C., the Prevention of Significant Deterioration (PSD) of Air Quality.

NSPS: The facility operates emissions units subject to the New Source Performance Standards of 40 CFR 60, including Subparts Da and Db (boilers) and Subpart Kb (fuel storage tanks).

PERMITTING AUTHORITY

All documents related to applications for permits to construct or modify an emissions unit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Air Resources Section at the South District Office of the Florida Department of Environmental Protection (DEP) at 2295 Victoria Avenue, Suite 364 in Fort Myers, Florida 33902-2549.

COMPLIANCE AUTHORITIES

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section at the South District Office of the Florida Department of Environmental Protection (DEP) at 2295 Victoria Avenue, Suite 364 in Fort Myers, Florida 33902-2549. Copies of all such documents shall be submitted to the Air Pollution Control Section of the Palm Beach County Health Department at P.O. Box 29, West Palm Beach, Florida 33402-0029.

SECTION I. GENERAL INFORMATION

APPENDICES

The following Appendices are attached in Section IV as part of this permit.

Appendix BD. Final BACT Determinations and Emissions Standards

Appendix CF. Citation Format

Appendix Db. NSPS Subpart Db Requirements for Boilers

Appendix GC. General Conditions

Appendix SC. Standard Conditions

Appendix XS. Continuous Monitor Systems Quarterly Report

RELEVANT DOCUMENTS

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action and are on file with the Department.

- Permit application received on 03/23/01 and all related correspondence to make complete.
- Initial draft permit package issued on June 4, 2001.
- Revised draft permit package issued on September 25, 2001.

CITATION FORMAT

Appendix CF of this permit describes the format used to cite applicable rules and regulations as well as previous permitting actions.

SECTION II. ADMINISTRATIVE REQUIREMENTS

1. General Conditions: The permittee is subject to, and shall operate under, the attached General Conditions listed in Appendix GC of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
2. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and the Title 40, Parts 51, 52, and 60 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
3. PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)]
4. Permit Expiration: For good cause, the permittee may request that this PSD air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, and 62-210.300(1), F.A.C.]
5. BACT Determination: In conjunction with an extension of the 18-month period to commence or continue construction, phasing of the project, or an extension of the permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of Best Available Control Technology (BACT) for the source. [Rule 62-212.400(6)(b), F.A.C. and 40 CFR 51.166(j)(4)]
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Bureau of Air Regulation, and copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. MILL BOILER NO. 16

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

Emissions Unit 014: Mill Boiler No. 16

Description: This unit is Babcock and Wilcox Model No. FM 120-97 package boiler with a maximum steam production rate of 150,000 pounds per hour (24-hour average). The design heat release rate for this unit is greater than 70,000 BTU/hour-ft³.

Fuels: This unit is fired with pipeline-quality natural gas or very low sulfur distillate oil.

Capacity: The heat input rate is 211 mmBTU per hour when firing natural gas, which is approximately 0.207 million cubic feet of gas per hour based on a heat content of 1020 mmBTU per million SCF. The heat input rate is 202 mmBTU per hour when firing very low sulfur distillate oil, which is approximately 1433 gallons per hour based on a heat content of 141 mmBTU per thousand gallons.

Controls: The efficient combustion of clean fuels minimizes emissions of CO, PM/PM₁₀, SO₂, and VOC. Emissions of NO_x are reduced with low NO_x burners and flue gas recirculation (approximately 15%).

Stack Parameters: Exhaust gases exit a 75 feet tall stack that is 5.0 feet in diameter with a volumetric flow rate of approximately 88,200 acfm at 410° F.

APPLICABLE STANDARDS AND REGULATIONS

1. BACT: The emissions standards specified for this unit represent determinations of the Best Available Control Technology (BACT) for nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), and sulfur dioxide (SO₂). Appendix BD of this permit lists the final BACT determinations for this project. [Rules 62-212.400(BACT) and 62-296.406 (BACT for small boilers), F.A.C.]

CONTROL EQUIPMENT

2. Low NO_x Burners: The permittee is authorized to install, tune, maintain and operate a modified burner system to include Coen low-NO_x burners (or equivalent) with flue gas recirculation capable of achieving the emissions standards specified in this permit. The system shall be capable of firing pipeline-quality natural gas and very low sulfur distillate oil. [Rule 62-212.400(BACT), F.A.C.]

PERFORMANCE RESTRICTIONS

3. Authorized Fuel: The boiler shall fire only pipeline-quality natural gas or very low sulfur No. 2 distillate oil with a maximum sulfur content of 0.05% sulfur by weight. [Applicant Request; Rules 62-210.200(PTE) and 62-212.400(BACT), F.A.C.]
4. Permitted Capacity: The maximum design heat input rates to the boiler are 211 mmBTU per hour when firing natural gas and 202 mmBTU per hour when firing very low sulfur distillate oil. The maximum steam production rate shall not exceed 150,000 pounds per hour based on a 24-hour block average of the last 24 boiler operating hours. The boiler shall be equipped with integrating fuel flow meters to monitor the consumption of natural gas and distillate oil. The boiler shall be equipped with instruments to continuously monitor the steam production rate (pounds per hour), steam temperature (° F), and steam pressure (psig). [Rule 62-210.200(PTE), F.A.C.]
5. Restricted Operation: The hours of operation are not limited (8760 hours per year). The boiler shall fire no more than 10,000,000 gallons of very low sulfur distillate oil during any consecutive 12 months. [Applicant Request and Rule 62-210.200(PTE), F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. MILL BOILER NO. 16

EMISSIONS STANDARDS

(Permitting Note: Appendix BD lists the BACT determinations for this project.)

6. **Emissions Standards:** Emissions from the boiler shall not exceed the following limits for carbon monoxide (CO), nitrogen oxides (NOx), opacity, particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

Pollutant	Natural Gas Firing		Distillate Oil Firing		Rule Citation (F.A.C.)
	lb/mmBTU	lb/hour ^g	lb/mmBTU	lb/hour ^g	
CO ^a	0.10	21.1	0.11	22.2	Avoid Rule 62-212.400 (BACT)
NOx ^b		12.7		24.2	
24-hour block	0.10	NA	0.20	NA	Rule 62-212.400 (BACT)
30-day rolling	0.06	NA	0.12	NA	Rule 62-212.400 (BACT)
30-day rolling	0.20	NA	0.20	NA	NSPS Subpart Db
Opacity ^c	10% opacity, except for one 6-minute period per hour that does not exceed 27% opacity				Rule 62-212.400 (BACT)
PM/PM ₁₀ ^d	Efficient combustion of natural gas		Firing of very low sulfur distillate oil		Rule 62-212.400 (BACT), and Rule 62-296.406 (BACT)
SO ₂ ^e	Firing of natural gas		Firing of very low sulfur distillate oil		Rule 62-296.406 (BACT)
VOC ^f	Efficient combustion of natural gas		Efficient combustion of very low sulfur distillate oil		Avoid Rule 62-212.400 (BACT)

- Compliance with the CO standards shall be based on the average of three test runs conducted at permitted capacity as determined by EPA Method 10.
- As determined by the certified NOx CEMS, compliance with the 24-hour NOx standards shall be based on the block average of the last 24 boiler operating hours. The 30-day average NOx emissions shall be calculated at the end of each steam generating unit operating day from the measured hourly NOx emission rates for the preceding 30 steam generating unit operating days.
- The opacity standard is based on a 6-minute block average, as determined by the certified continuous opacity monitoring system (COMS). EPA Method 9 may also be used to determine compliance with the opacity standard.
- When firing natural gas, the expected maximum PM emissions are 0.002 lb/mmBTU (0.4 lb/hour). When firing very low sulfur distillate oil, the maximum expected PM emissions are 0.03 lb/mmBTU (6.1 lb/hour). Compliance with the CO and opacity standards shall serve as indicators of good combustion. No testing is required.
- The fuel specifications of this permit effectively limit the potential SO₂ emissions. No testing is required. When firing natural gas, the expected maximum SO₂ emissions are 0.001 lb/mmBTU (0.2 lb/hour). When firing very low sulfur distillate oil, the expected maximum SO₂ emissions are 0.06 lb/mmBTU (12.1 lb/hour).
- When firing natural gas, the expected maximum VOC emissions are 0.03 lb/mmBTU (6.3 lb/hour). When low sulfur distillate oil, the expected maximum VOC emissions are 0.03 lb/mmBTU (6.1

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. MILL BOILER NO. 16

lb/hour). Compliance with the CO and opacity standards shall serve as indicators of good combustion. No testing is required.

- g. Maximum hourly emissions are based on the emissions standards and the maximum allowable heat input from each fuel.

CONTINUOUS MONITORING REQUIREMENTS

7. **NO_x CEMS:** The permittee shall install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) to measure and record the emissions of NO_x from the boiler in a manner sufficient to demonstrate continuous compliance with the emission standards of this permit. The emission rate (pounds per mmBTU) shall be calculated by the CEMS using F-factors that are appropriate for each fuel fired. For purposes of determining compliance with the emission standards of this permit, missing or excluded data shall not be substituted. The monitoring system shall be installed, calibrated, and properly functioning prior to the initial emissions compliance tests and shall be used to demonstrate continuous compliance with the specified NO_x emissions standards. [Rule 62-212.400(BACT), F.A.C.]
 - a. **Monitor Certification.** The NO_x CEMS shall: be certified in accordance with Performance Specification 2 in Appendix B of 40 CFR 60; comply with the monitoring requirements of 40 CFR 60.13; have dual span capability with a "low" span no greater than "0.18 pounds per mmBTU" (or equivalent) and a "high" span no greater than 0.60 pounds per mmBTU" (or equivalent); and comply with the quality assurance procedures in Appendix F of 40 CFR 60. The required RATA test shall be performed prior to the initial emissions compliance tests using EPA Method 7E of Appendix A in 40 CFR 60.
 - b. **Data Collection.** The NO_x CEMS shall be designed and operated to sample, analyze, and record data evenly spaced over the hour. Each hourly value shall be computed using at least one data point in each fifteen-minute quadrant of an hour, where the unit combusted fuel during that quadrant of an hour. Notwithstanding this requirement, an hourly value shall be computed from at least two data points separated by a minimum of 15 minutes (where the unit operates for more than one quadrant of an hour). The permittee shall use all valid measurements or data points collected during an hour to calculate the hourly averages.
 - c. **Emission Rate:** Compliance with the 24-hour NO_x standards shall be based on the average of the CEMS data collected during each block of 24 boiler operating hours. Data for each 24-hour block shall be exclusive from data in other 24-hour blocks. A "boiler operating hour" means a 1-hour block of time during which the boiler combusted any fuel. It is not necessary for fuel to have been combusted continuously for the entire hour. Compliance with the 30-day NO_x standards shall be based on the average of the CEMS data collected during the last 30 boiler operating days, rolled for each new boiler operating day in accordance with 40 CFR 60.49a. A "boiler operating day" means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the boiler. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.
 - d. **Data Exclusion.** NO_x emissions data shall be recorded by the CEMS during all episodes of startup, shutdown, and malfunction. Individual NO_x hourly average emission rate values may be excluded only in accordance with Condition No. 11. The permittee shall minimize the duration of data excluded for startup, shutdown and malfunctions, to the extent practicable. Data recorded during startup, shutdown or malfunction events shall not be excluded if the startup, shutdown or malfunction episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented. Best operational practices shall be used to minimize hourly emissions that occur during episodes of startup, shutdown and malfunction.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. MILL BOILER NO. 16

{Permitting Note: Compliance with these requirements will ensure compliance with other applicable CEMS requirements, such as: Rule 62-297.520, F.A.C.; 40 CFR Part 51, Appendix P; 40 CFR 60.7(a)(5); 40 CFR 60.13; 40 CFR 60.48b; 40 CFR 60.49b; 40 CFR 60, Appendix B; and 40 CFR 60, Appendix F.} [40 CFR 60.48b; Rule 62-212.400(BACT), F.A.C.]

8. Opacity COMS: The permittee shall install, calibrate, maintain, and operate continuous opacity monitoring system (COMS) to measure and record the opacity from the boiler in a manner sufficient to demonstrate continuous compliance with the emission standards of this permit. The COMS shall: be certified in accordance with Performance Specification 1 in Appendix B of 40 CFR 60; comply with the monitoring requirements of 40 CFR 60.13; and comply with the quality assurance procedures in Appendix F of 40 CFR 60. It shall be installed and functioning properly prior to the initial emissions compliance tests. The COMS shall be used to demonstrate continuous compliance with the corresponding opacity standards specified in this permit based on a 6-minute average. [40 CFR 60.48b; Rule 62-212.400(BACT), F.A.C.]
9. Monitor Availability: The availability of each required monitor shall not be less than 95% in any calendar quarter. The quarterly report required in Appendix XS shall be used to demonstrate monitor availability. In the event 95% availability is not achieved, the permittee shall submit a report to each Compliance Authority that identifies the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. The Department may require additional testing for failure to maintain at least 95% monitor availability. [40 CFR 60.48b; Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

EXCESS EMISSIONS

10. Excess Emissions - Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. All such emissions shall be included in the calculation of the continuous compliance averages for opacity and NO_x emissions. [Rule 62-210.700(4), F.A.C.]
11. Startup, Shutdown and Malfunction Plan: In accordance with Rule 62-210.700(5), F.A.C., the following permit conditions define alternate opacity standards and allow the exclusion of NO_x monitoring data during specified periods of startup, shutdown, and unavoidable malfunction. These conditions shall only apply if operators employ the best operational practices to minimize the amount and duration of emissions during these incidents.
 - a. Visible Emissions: Opacity shall be recorded by the COMS during all episodes of startup, shutdown and malfunction. During startup and shutdown, visible emissions shall not exceed 20% opacity except for one 6-minute period per hour that does not exceed 27% opacity, based on 6-minute block averages.
 - b. CEM System Data Exclusion: NO_x emissions data shall be recorded by the CEMS during all episodes of startup, shutdown and malfunction. When determining compliance with the 24-hour block and 30-day rolling NO_x BACT standards, up to two 1-hour averages due to startups, shutdowns, or unavoidable malfunctions may be excluded from each 24-hour period. The 30-day rolling NO_x NSPS standard applies at all times and data may not be excluded.
 - c. Notification: Within three days of recording emissions in excess of a standard, the permittee shall notify the Compliance Authority by telephone or facsimile.

These conditions are established in place of the provisions specified in Rule 62-210.700(1), F.A.C.

[Design; Rules 62-4.070(3), 62-4.130, 62-210.700(5), and 62-212.400 (BACT), F.A.C.]