

OKEELANTA CORPORATION
ONE NORTH CLEMATIS STREET, SUITE 200
WEST PALM BEACH, FLORIDA 33401

William F. Tarr
Telephone: 561-366-5157
Telecopier: 561-651-1280

Mailing Address:
P.O. Box 3435
West Palm Beach, Florida 33402

March 28, 2006

VIA FEDERAL EXPRESS

Trina Vielhauer, Chief
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
MS# 5505
Tallahassee, Florida 32399-2400


Re: Okeelanta Corporation
Notice of Intent to Issue Permit
Proof of Publication

Dear Ms. Vielhauer:

Enclosed is the original Proof of Publication from The Palm Beach Post dated March 17, 2006, for No. 5453426 Public Notice of Intent to Issue Air Permits.

If you have any questions, please give me a call. With kind regards, I remain,

Yours very truly,



William F. Tarr

/jcd
Enclosure
Copy to: Ricardo Lima
David Buff

Copy w/encl. to Matt Capone

RECEIVED
MAR 29 2006
BUREAU OF AIR REGULATION

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 **Kristi Morrow**, who on oath says that she is **Customer Service Supervisor** 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 for a **Notice** in the matter of **Intent to Issue Air Permits** was published in said newspaper in the issues of **March 17, 2006**. 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.

Kristi Morrow

Sworn to and subscribed before 17th day of March, A.D. 2006

[Signature]

Personally known XX or Produced Identification _____
Type of Identification Produced _____



Karen M. McLinton
Commission #DD359565
Expires: NOV 15, 2009
Bonded Thru
Atlantic Bonding Co., Inc.

REC

MAR 17 2006

BUREAU OF AIR REGULATION

NO. 5453426
PUBLIC NOTICE OF
INTENT TO ISSUE AIR
PERMITS
Florida Department of
Environmental Protection
Okeelanta Corporation -
Okeelanta Sugar Mill and
Refinery
Draft Air Permit No.
0990005-018-AC -
Revised Boiler 16 Permit
Draft Air Permit No.
0990005-019-AC -
Railcar Unloading
Expansion Project
Palm Beach County, Florida
Applicant: The applicant's
name and mailing address
are: Okeelanta Corporation;
2250 U.S. Highway 27;
South Bay, FL 33493. The
applicant's authorized repre-
sentative is Mr. Richardo
Lima, V.P. and General
Manager.
Facility Location: Okeelanta
Corporation operated the
existing Okeelanta Sugar
Mill and Refinery, which is
located approximately six
miles south of South Bay on
U.S. Highway 27 in Palm
Beach County, Florida.
Projects: The applicant pro-
posed two air permit pro-
jects. Project No. 0990005-
018-AC establishes an
enforceable restriction on
existing Boiler 16 such that
the annual capacity factor
will be no more than 10%.
The boiler fires only natural
gas and distillate oil. This
reduces potential emissions
of all pollutants well below
the PSD significant emis-
sion rates (10 tons/year of
carbon monoxide; 19 tons/
year of nitrogen oxides; 3
tons/year of particulate
matter; 5 tons/year of sulfur
dioxide; and 3 tons/year of
volatile organic compounds).
Therefore, the boiler is no
longer subject to PSD pre-
construction review. In addi-
tion, the revision substan-
tially reduces the federal
emissions standards and
monitoring requirements of
Subpart D to 40 CFR 60.
Project No. 0990005-019-AC
authorizes construction of a
new railcar unloading oper-
ation in the existing trans-
shipment facility. The trans-
shipment facility handles,
stores, and packages
refined sugar. The pro-
posed project will add pack-
aging line "0" and two rail-
car unloading receivers. The
trans-shipment facility has
been permitted such that
total potential particulate
matter emissions from all
emissions units (12 tons/
year) are below the PSD
significant emission rate of
15 tons per year of PM10.
Therefore, the project is not
subject to PSD preconstruction
review.
Permitting Authority: Applica-
tions for air construction
permits are subject to
review in accordance with
the provisions of Chapter
403, Florida Statutes (F.S.)
and Chapters 62-4, 62-210,
and 62-212 of the Florida
Administrative Code
(F.A.C.). The proposed pro-
jects are not exempt from
air permitting requirements
and air permits are required
to perform the proposed
work. The Bureau of Air
Regulation is the Permitting
Authority responsible for
making a permit determi-
nation for these projects.
The Permitting Authority's
physical address is: 111
South Magnolia Drive, Suite
#4, Tallahassee, Florida.
The Permitting Authority's
mailing address is: 2600
Blair Stone Road, MS
#5505, Tallahassee, Florida
32399-2400. The Permitting
Authority's telephone num-
ber is 850/488-0114.
Project Files: Complete
project files are available for
public inspection during the
normal business hours of
8:00 a.m. to 5:00 p.m., Mon-
day through Friday (except
legal holidays), at address
indicated above for the
Permitting Authority. A com-
plete project file includes the
Draft Permit, the Technical
Evaluation and Preliminary
Determination, the applica-
tion, and the information
submitted by the applicant,
exclusive of confidential

records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permits: The Permitting Authority gives notice of its intent to issue air permits to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue Final Permits in accordance with the conditions of the proposed Draft Permits unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Section 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petition filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at that time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number

of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to issue Air Permits. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding. In accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

PUB: The Palm Beach Post
March 17, 2006



RECEIVED

MAR 16 2006

BUREAU OF AIR REGULATION

March 15, 2006

Trina Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS # 5505
Tallahassee, Florida 32399-2400

**RE: Comments Concerning Draft Air Permit No. 0990005-019-AC
Okeelanta Corporation Railcar Unloading Expansion Project**

Dear Ms. Vielhauer:

Okeelanta Corporation received Draft Air Permit No. 0990005-019-AC on March 1, 2006. Please incorporate the following comments into the final permit.

Draft Permit Cover Page (page 1 of 7)

PROJECT AND LOCATION

The description of the two new sugar receivers should be changed from "separate" baghouses to "integral" or "built-in" baghouses. Describing the baghouses as separate is not consistent with the system description provided in Attachment A to the Application For Air Permit submitted by Okeelanta Corporation.

Draft Permit Section 1 (Page 2 of 7)

FACILITY AND PROJECT DESCRIPTION

This section provides a table listing each emission unit ID and corresponding emission unit description for the transshipment facility. Consistent with prior requests Okeelanta has made to revise the Title V operating permit, existing emission units 026, 027, and 028 should be combined into a single emissions unit (026) with three controlled exhaust points. The reason Okeelanta has made this request is because Sugar Silo's No. 1, No. 2, and No. 3 are components of a single operational system. Sugar received into the silos and drawn from the silos automatically switches from one silo to the next depending on silo levels, unloading rate and production demands. The administrative change of combining the three emission units into one will ensure that the permits and daily production throughput recordkeeping required for the annual operating report are consistent with the installed system.

Conversely, Okeelanta requests that the two new railcar unloading receivers be listed as separate emission units. In this case, Receiver No. 1 and No. 2 will be independently receiving sugar and feeding the product into separate systems that are downstream emissions units (the sugar silos or packaging lines 0 through 9). Because each receiver will be feeding separate systems, the daily production throughput recordkeeping required by the operating permit for the annual operating report will need to be tracked separately.

With the revisions requested, the FACILITY AND PROJECT DESCRIPTION table on page 2 of 7 would include the following unit ID's and descriptions:

ID	Emission Unit Description	ID	Emission Unit Description
018	Central vacuum system No. 1	045	Powdered sugar dryer/cooler
019	Sugar packaging lines (0-9)	046	Powdered sugar hopper
020	Sugar grinder	047	Sugar packaging lines (11-14)
026	Sugar silos No. 1, No. 2, & No. 3	049	Railcar sugar unloading receiver No. 1
----		050	Railcar sugar unloading receiver No. 2

Draft Permit Section 3 (Page 4 of 7)

EMISSION UNITS

For the reasons described above, Okeelanta requests that Sugar Silos No. 1, No. 2, and No. 3 be combined into a single emissions unit and that the two new railcar unloading receivers be listed as individual emissions units. With these requested revisions, the emissions units table on page 4 of 7 would be revised as illustrated above.

EQUIPMENT

1. Existing Equipment: Add sugar silo numbers 2 & 3 to the description of emission unit 026 and delete emission units 027 & 028.
3. New Railcar Sugar Unloading Receivers: In reference to the description of the baghouses for these units, delete the word "separate" and replace it with "built-in" or "integral".
4. Baghouse Design Specifications: Add sugar silo numbers 2 & 3 to the description of emission unit 026 and delete emission units 027 & 028. Add specification note c. With these requested revisions, the baghouse design specifications table on page 4 of 7 would be revised as follows.

ID	Emission Unit Description	Baghouse Specification ^a (grains/scf)	Exhaust Rate scfm	Maximum Emissions ^b	
				lb/hour	tons/year
018	Central vacuum system No. 1	0.01	280	0.024	0.11
019	Sugar packaging lines (0-9)	0.01	9869	0.86	3.75
020	Sugar grinder	0.0005	2961	0.013	0.06
026	Sugar silo's No. 1, No. 2, & No. 3	0.02	1500 ^c	0.258 ^c	1.14 ^c
045	Powdered sugar dryer/cooler	0.01	8640	0.77	3.38
046	Powdered sugar hopper	0.01	1728	0.15	0.68
047	Sugar packaging lines (11-14)	0.01	5760	0.51	2.25
049	Railcar unloading receiver No. 1	0.02	615	0.11	0.46
050	Railcar unloading receiver No. 2	0.02	615	0.11	0.46
				Total	12.29

- a. New and replacement bags shall meet these specifications based on vendor information. No particulate matter emissions tests are required.
- b. These rates represent the maximum expected emissions based on the baghouse design specification, the maximum exhaust flow rates, and 8760 hours of operation per year. These rates are not enforceable emissions standards.
- c. Combined rates for silo No.'s 1, 2, & 3.

If the Department has any questions concerning the above requests and comments, please call Matthew Capone at (561) 993-1658.

Sincerely,



Ricardo A. Lima
 Vice President & General Manager
 Okeelanta Corporation

- c: J. Koerner, Florida DEP
 A. Satyal, Palm Beach County
 D. Buff, Golder Associates
 J. Sommers, Florida Crystals
 M. Capone, Okeelanta Corp.