cc: Kerner

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL USA 32653
Telephone (352) 336-5600
Fax (352) 336-6603
www.golder.com

January 19, 2006

0637507

RECEIVED
JAN 30 2006
BUREAU OF AIR REGULATION

Florida Department of Environmental Protection
South District
2295 Victoria Avenue, Suite 364W
Fort Myers, FL 33902-2549

Attention: Mr. Ron Blackburn, Air Programs Manager

RE: OKEELANTA CORPORATION/NEW HOPE POWER PARTNERSHIP
AIR CONSTRUCTION PERMIT APPLICATION
TRANS-SHIPMENT FACILITY EXPANSION

Dear Mr. Blackburn:

Please find enclosed four (4) copies of the Air Construction Permit Application for the expansion of the trans-shipment facility at the Okeelanta Corporation's sugar refinery. Thank you for consideration of this information. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

DB/all

Enclosures

cc: Matt Capone
J. Kerner, PBC.
Y:\Projects\2006\0637507 Okeelanta Transhipment\4.1\L011906.doc

APPLICATION FOR
AIR CONSTRUCTION PERMIT
TRANS-SHIPMENT FACILITY EXPANSION

OKEELANTA CORPORATION
SOUTH BAY, FLORIDA

Prepared For:
Okeelanta Corporation
21250 U.S. Highway 27 South
South Bay, Florida 33493

Prepared By:
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

January 2006

0637507

DISTRIBUTION:
4 Copies – FDEP
2 Copies – Okeelanta Corporation
1 Copy – Golder Associates Inc.

APPLICATION FOR AIR PERMIT – LONG FORM

Department of Environmental Protection

Division of Air Resource Management

RECEIVED
JAN 30 2006
BUREAU OF AIR REGULATION

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **Okeelanta Corporation**	
2. Site Name: **Okeelanta Sugar Mill & New Hope Power Partnership Facilities**	
3. Facility Identification Number: **0990005 and 0990332**	
4. Facility Location...: Street Address or Other Locator: **21250 U.S. Highway 27 South** City: **South Bay** County: **Palm Beach** Zip Code: **33493**	
5. Relocatable Facility? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Matt Capone, Director of Environmental Programs**
2. Application Contact Mailing Address... Organization/Firm: **Okeelanta Corporation** Street Address: **21250 U.S. Highway 27** City: **South Bay** State: **FL** Zip Code: **33493**
3. Application Contact Telephone Numbers... Telephone: **(561) 993-1658** ext. Fax: **(561) 992-7326**
4. Application Contact Email Address: **Matthew_Capone@floridacrystals.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	1-30-06
2. Project Number(s):	0990005-019-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

☒ Air construction permit.

Air Operation Permit

☐ Initial Title V air operation permit.
☐ Title V air operation permit revision.
☐ Title V air operation permit renewal.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

☐ Air construction permit and Title V permit revision, incorporating the proposed project.
☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Application to construct two sugar receivers to pneumatically unload sugar from railcars and increase sugar packaging capacity of the Trans-Shipment facility from 865 tons per day to 1,300 tons per day.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
018-020, 026-028, 045-047	Okeelanta Sugar Trans-Shipment Facility	ACIF	

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
   Ricardo A. Lima, Vice President and General Manager
2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **Okeelanta Corporation**
   Street Address: **21250 U.S. Highway 27 South**
   City: **South Bay** State: **FL** Zip Code: **33493**
3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(561)993-1600** ext. Fax: **(561)992-7326**
4. Owner/Authorized Representative Email Address: **Ricardo_Lima@floridacrystals.com**
5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

   Signature Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
   Ricardo A. Lima, Vice President and General Manager

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
   - ☐ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
   - ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
   - ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
   - ☐ The designated representative at an Acid Rain source.

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **Okeelanta Corporation**
   Street Address: **21250 U.S. Highway 27**
   City: **South Bay** State: **FL** Zip Code: **33493**

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(561) 993-1600** ext. Fax: **(561) 992-7326**

4. Owner/Authorized Representative Email Address: **ricardo_lima@floridacrystals.com**

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

   R A Lima — Signature

   1-14-06 — Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **David A. Buff**
   Registration Number: **19011**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Golder Associates Inc.****
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext.**545** Fax: **(352) 336-6603**
4. Professional Engineer Email Address: **dbuff@golder.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

_____ _____
Signature Date

(seal)

* Attach any exception to certification statement.
** **Board of Professional Engineers Certificate of Authorization #00001670**

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **David A. Buff**
   Registration Number: **19011**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Golder Associates Inc.****
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext.**545** Fax: **(352) 336-6603**
4. Professional Engineer Email Address: **dbuff@golder.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

David A. Buff — Signature

1/19/06 — Date

(seal)

* Attach any exception to certification statement.

** Board of Professional Engineers Certificate of Authorization #00001670

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone **17** East (km) **524.90** North (km) **2940.10**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) **26°35'00"** Longitude (DD/MM/SS) **80°45'00"**	
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **20, 49**	6. Facility SIC(s): **2061, 2062, 4911**
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: **Matt Capone, Director of Environmental Programs**
2. Facility Contact Mailing Address... Organization/Firm: **Okeelanta Corporation** Street Address: **21250 U.S. Highway 27 South** City: **South Bay** State: **FL** Zip Code: **33493**
3. Facility Contact Telephone Numbers: Telephone: **(561) 993-1658** ext. Fax: **(561) 992-7326**
4. Facility Contact Email Address:

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. ☒ Title V Source	
4. ☒ Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☒ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☒ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☒ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Particulate Matter Total - PM	A	N
Particulate Matter - PM_{10}	A	N
Sulfur Dioxide - SO_2	A	N
Nitrogen Oxides - NO_x	A	N
Carbon Monoxide - CO	A	N
Volatile Organic Compounds - VOC	A	N
Lead - Pb	B	N
Hydrogen Chloride - H106	A	N
Mercury Compounds - H114	B	N
Total Hazardous Air Pollutants - HAPs	A	N

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID Nos. Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☒ Attached, Document ID:**OC-FI-C1** ☐ Previously Submitted, Date:____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☒ Attached, Document ID:**OC-FI-C2** ☐ Previously Submitted, Date:____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:____ ☒ Previously Submitted, Date: **April, 2005**

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: ☒ Attached, Document ID:**Attachment A** ☐ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: ☒ Attached, Document ID:**Attachment A**
3. Rule Applicability Analysis: ☒ Attached, Document ID:**OC-FI-CC3**
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): ☒ Attached, Document ID:**Attachment A** ☐ Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): ☐ Attached, Document ID:____ ☒ Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): ☐ Attached, Document ID:_____ ☐ Not Applicable (no exempt units at facility)

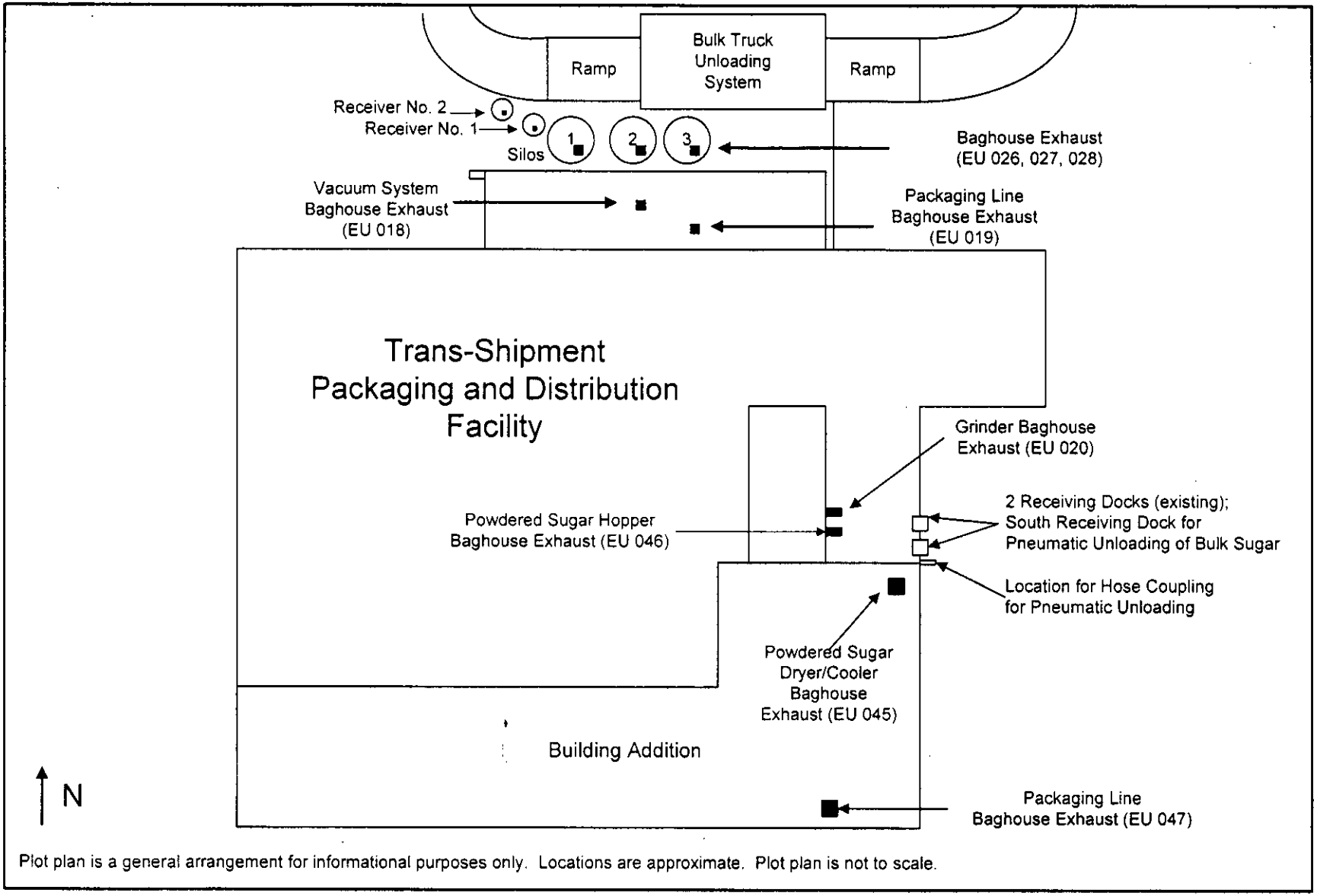
Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only): ☐ Attached, Document ID:_____ ☐ Not Applicable (revision application)
2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought): ☐ Attached, Document ID:_____ ☐ Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan (Required for all initial/revision/renewal applications): ☐ Attached, Document ID:_____ Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only): ☐ Attached, Document ID:_____ ☐ Equipment/Activities On site but Not Required to be Individually Listed ☐ Not Applicable
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) : ☐ Attached, Document ID:_____ ☐ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit: ☐ Attached, Document ID:_____ ☐ Not Applicable

Additional Requirements Comment

ATTACHMENT OC-FI-C1

FACILITY PLOT PLAN



Plot plan is a general arrangement for informational purposes only. Locations are approximate. Plot plan is not to scale.

Attachment OC-FI-C1a
Trans-Shipment Packaging and Distribution
Facility Plot Plan
Okeelanta Corporation

0637507/4.4/OC-FI-C1a.vsd

Golder Associates

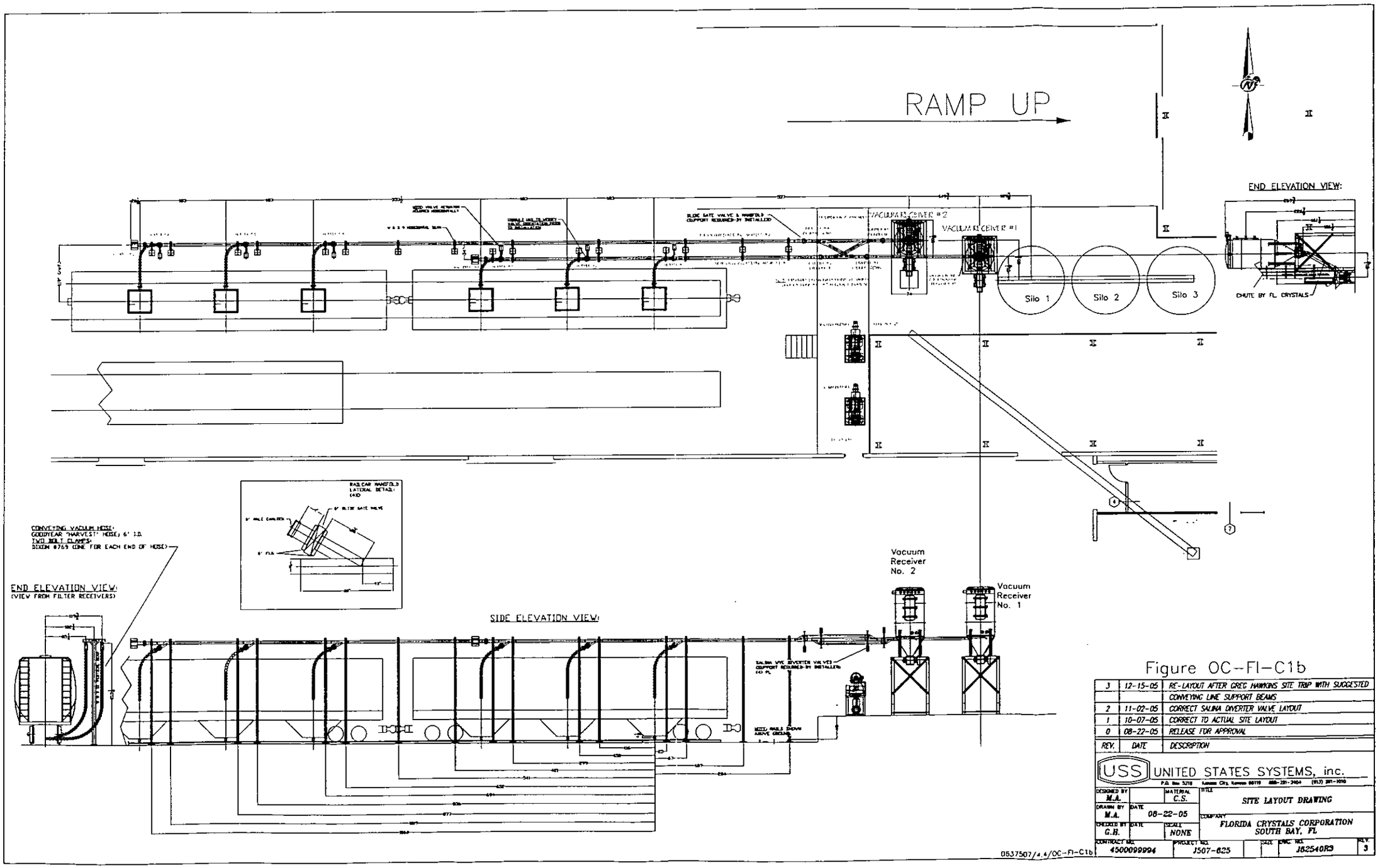


Figure OC-FI-C1b

REV.	DATE	DESCRIPTION
3	12-15-05	RE-LAYOUT AFTER GREG HAWKINS SITE TRIP WITH SUGGESTED CONVEYING LINE SUPPORT BEAMS
2	11-02-05	CORRECT SALINA DIVERTER VALVE LAYOUT
1	10-07-05	CORRECT TO ACTUAL SITE LAYOUT
0	08-22-05	RELEASE FOR APPROVAL

USS UNITED STATES SYSTEMS, inc.

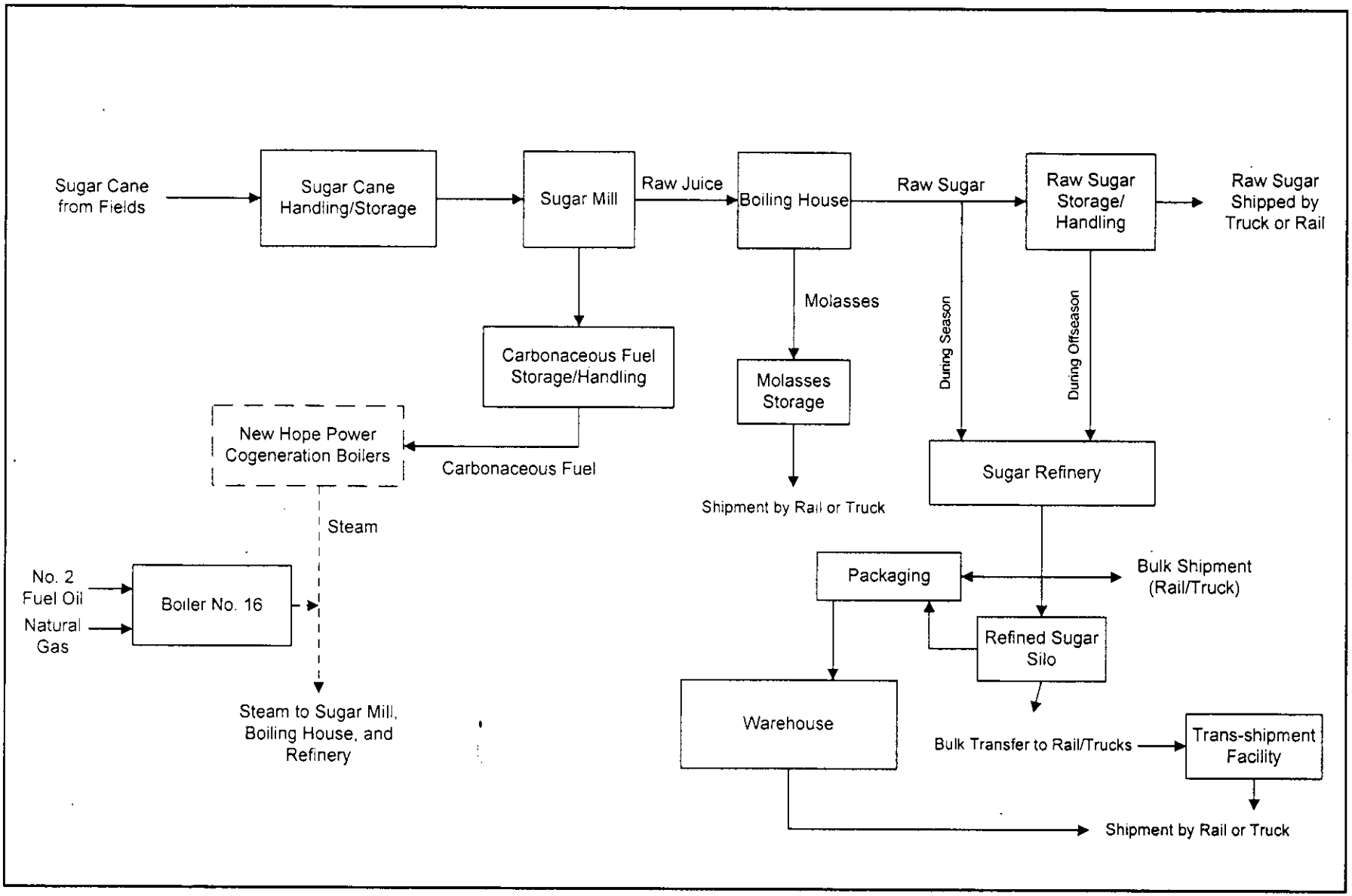
P.O. Box 5218 Kansas City, Kansas 66119 888-291-2464 (913) 391-1090

DESIGNED BY M.A.		MATERIAL C.S.	TITLE: SITE LAYOUT DRAWING
DRAWN BY M.A.	DATE 08-22-05		COMPANY: FLORIDA CRYSTALS CORPORATION SOUTH BAY, FL
CHECKED BY G.H.	DATE	SCALE NONE	
CONTRACT NO. 4500099994		PROJECT NO. J507-625	SIZE: DWG. NO. J82540R3 REV. 3

0537507/4.4/OC-FI-C1b

ATTACHMENT OC-FI-C2

PROCESS FLOW DIAGRAM



Attachment OC-FI-C2
Sugar Manufacturing
Process Flow Diagram
Okeelanta Corporation
South Bay, FL

Overall Sugar Mill - Facility Flow Diagram

Process Flow Legend
Solid/Liquid
Steam
Gas

Golder Associates

0637507/4.4/OC-FI-C2.vsd

ATTACHMENT OC-FI-CC3

IDENTIFICATION OF APPLICABLE REQUIREMENTS FOR THE TRANSHIPMENT FACILITY

ATTACHMENT OC-FI-CC3

SUGAR TRANS-SHIPMENT FACILITY RULE APPLICABILITY FOR OKEELANTA CORPORATION

APPLIC STAT	RULE DESCRIP	RULE NUMBER	RULE TITLE
APPLICABLE	62-297	62-297	STATIONARY SOURCES - EMISSIONS MONITORING
APPLICABLE	62-297	62-297.310	General Compliance Test Requirements.
APPLICABLE	62-297	62-297.310(1)	required number of test runs.
APPLICABLE	62-297	62-297.310(2)	Operating rate during testing.
APPLICABLE	62-297	62-297.310(2)b	
APPLICABLE	62-297	62-297.310(3)	Calculation of emission rate.
APPLICABLE	62-297	62-297.310(4)	Applicable test procedures.
APPLICABLE	62-297	62-297.310(5)	Determination of process variables.
APPLICABLE	62-297	62-297.310(6)	Required stack sampling facilities.
APPLICABLE	62-297	62-297.310(7)	Frequency of compliance tests.
APPLICABLE	62-297	62-297.310(7)(a)1	
APPLICABLE	62-297	62-297.310(7)(a)3	
APPLICABLE	62-297	62-297.310(7)(a)4.a	
APPLICABLE	62-297	62-297.310(7)(a)9	
APPLICABLE	62-297	62-297.310(7)(c)	
APPLICABLE	62-297	62-297.310(8)	Test reports.
APPLICABLE	62-297	62-297.401	Compliance Test Methods.
APPLICABLE	62-297	62-297.401(5)	EPA Method 5 - Determination of Particulate Emissions from Stationary Sources - 40 CFR 60 Appendix A
APPLICABLE	62-297	62-297.401(9)	EPA Test Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources - 40 CFR 60, Appendix A
APPLICABLE	62-297	62-297.620	Exceptions and Approval of Alternate Procedures and Requirements.
APPLICABLE	62-296	62-296.320	General Pollutant Emission Limiting Standards
APPLICABLE	62-296	62-296.320(4)(a)	General Particulate Emission Limiting Standards - Process weight table

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION
Section [1] of [1]
Sugar Trans-Shipment Facility

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☐ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

☒ This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

☐ This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

☐ This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Sugar Trans-Shipment Facility

3. Emissions Unit Identification Number: **018, 019, 020, 026, 027, 028, 045, 046, 047**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A			**20**	☐ Yes ☒ No

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
This emission unit consists of Multiple Emission Points: The Vacuum System Baghouse (EU 018), the Packaging Lines Baghouse (EU 019), the Grinder Baghouse (EU 020), the three Sugar Silo Baghouses (EU 026, 027, and 028), the Powdered Sugar Dryer/Cooler Baghouse (EU 045), the Powdered Sugar Hopper Baghouse (EU 046), the new Packaging Lines Baghouse (EU 047), and two new emission points consisting of the railcar unloading receivers Nos. 1 and 2 baghouses.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

1 baghouse (Vacuum System)

2 baghouses (Packaging Lines)

1 baghouse (Grinder & Hopper)

3 baghouses (One for each of 3 Storage Silos)

1 baghouse (Powdered Sugar dryer/cooler)

Cyclonic Separator (Inlet side of vacuum pump of Vacuum System)

1 baghouse (Powdered Sugar Hopper)

1 baghouse (Railcar Unloading Receiver No. 1)

1 baghouse (Railcar Unloading Receiver No. 2)

2. Control Device or Method Code(s): **018, 007**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **1,300 tons/day of sugar**	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8,760** hours/year
6. Operating Capacity/Schedule Comment:	
Maximum throughput relates to the maximum refined sugar production rate.	

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **Trans-Shipment Facility**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: **Eleven baghouses: Packaging Lines; Vacuum System; Grinder & Hopper; Sugar Silos (3); Powdered Sugar Dryer/Cooler; New Packaging Lines; Powdered Sugar Hopper; Railcar Unloading Receiver No. 1; and Railcar Unloading Receiver No. 2.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **27** feet	7. Exit Diameter: **1.50** feet
8. Exit Temperature: **75** °F	9. Actual Volumetric Flow Rate: **10,000** acfm	10. Water Vapor: **0.025** %
11. Maximum Dry Standard Flow Rate: **9,868** dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: **Parameters shown are for the existing Packaging Lines Baghouse (EU-019). See Table A-2 for stack/vent information on each separate emission point contained in this EU.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **Food and Agriculture, Food and Agriculture-Sugar Cane Processing, General**		
2. Source Classification Code (SCC): **3-02-015-01**	3. SCC Units: **Tons Sugar Produced or Manufactured**	
4. Maximum Hourly Rate: **81.5**	5. Maximum Annual Rate: **474,500**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Maximum annual rate based on permitted rate of 1,300 tons/day of refined sugar.**		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	018		EL

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **2.8** lb/hour **12.28** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference: **See Table A-1.**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **See Table A-1 for calculations.**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **12.28 TPY**	4. Equivalent Allowable Emissions: **2.8** lb/hour **12.28** tons/year
5. Method of Compliance: **EPA Method 9**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on requested allowable emissions.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE05**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Existing permit condition. Rule 62-297.620(4), F.A.C.**	

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **OC-EU1-I1** ☐ Previously Submitted, Date _____

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **OC-EU1-I3** ☐ Previously Submitted, Date _____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☒ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☒ Not Applicable

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ Previously Submitted, Date: _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☒ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute
   ☐ Attached, Document ID: _____ ☒ Not Applicable

EMISSIONS UNIT INFORMATION
Section [1] of [1]
Sugar Trans-Shipment Facility

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID: _____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

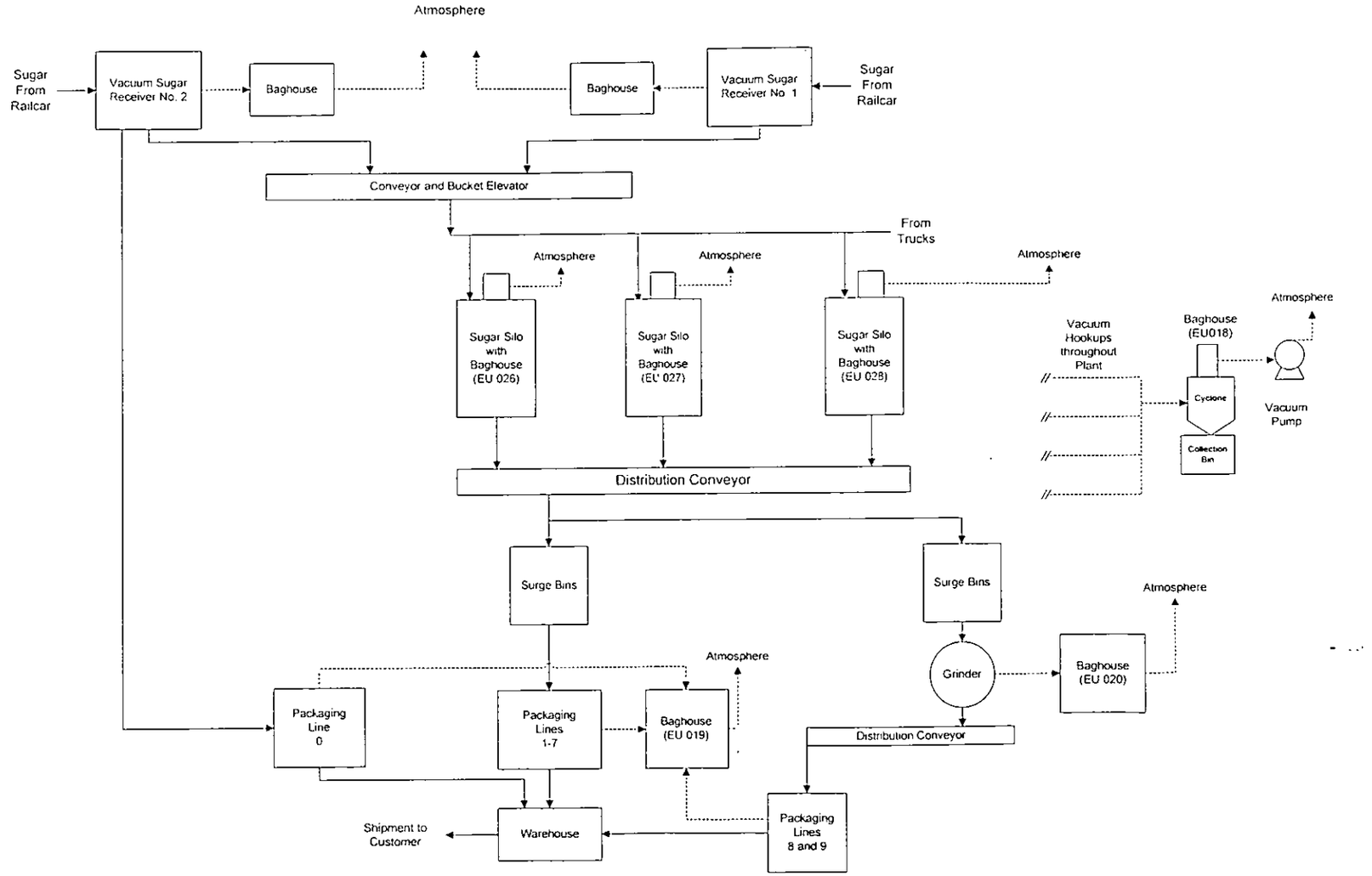
1. Identification of Applicable Requirements
   ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: _____ ☐ Not Applicable
4. Alternative Modes of Operation (Emissions Trading)
   ☐ Attached, Document ID: _____ ☐ Not Applicable
5. Acid Rain Part Application
   ☐ Certificate of Representation (EPA Form No. 7610-1)
      ☐ Copy Attached, Document ID: _____
   ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Not Applicable

Additional Requirements Comment

Trans-Shipment facility permit No. 0990005-008-AC presented in Attachment B.

ATTACHMENT OC-EU1-I1

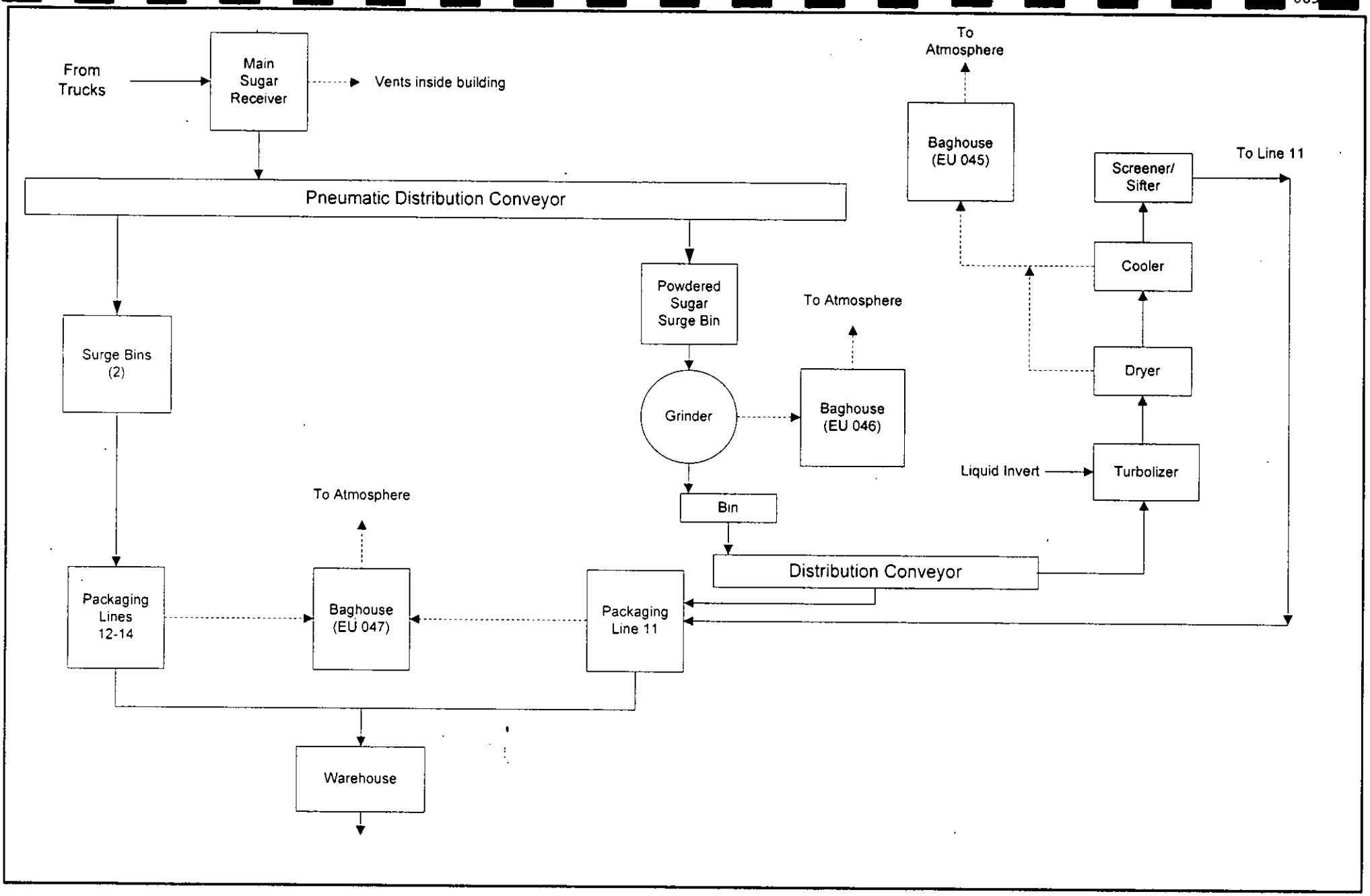
PROCESS FLOW DIAGRAMS



Attachment OC-EU1-I1a. Process Flow Diagram
Trans-Shipment Facility - Phase 1 and Increased Capacity
Okeelanta Corporation Refinery
South Bay, Florida

Process Flow Legend
Solid/Liquid ——→
Gas ·····→

Golder Associates



Attachment OC-EU1-I1b. Process Flow Diagram
Trans-Shipment Facility - Phase II Expansion
Okeelanta Corporation Refinery
South Bay, Florida

Process Flow Legend
Solid/Liquid ——→
Gas ·····→

0637507/4.4/OC-EU1-I1b

Golder Associates

ATTACHMENT OC-EU1-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT OC-EU1-I3a

CONTROL EQUIPMENT PARAMETERS FOR THE VACUUM SYSTEM BAGHOUSE (EU 018) AT THE TRANS-SHIPMENT FACILITY

Vacuum System		
Manufacturer and Model No.	Ross Cook Model RC30HBFBX-PJ	
Outlet Gas Temp (°F)		75
Outlet Gas Flow Rate (acfm)		284
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		280
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Polyfelt
Total Area of Filter Media (sq. ft)		72
Air to Cloth Ratio		3.9
Manufacturer's Guaranteed Outlet Loading (grains/scf)		0.01

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.024

Note: Parameters based on manufacturers design specifications.
Exit temperature from construction permit application.
Percent water vapor content represents typical content of "Kathbar" treated air.

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X
outlet loading rate (grains/dscf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-13b

CONTROL EQUIPMENT PARAMETERS FOR THE PACKAGING LINES 0-9 BAGHOUSE (EU 019) AT THE TRANS-SHIPMENT FACILITY

Packaging Lines 0-9		
Manufacturer and Model No.	MAC Environmental Model 55AVSC64 Style III	
Outlet Gas Temp (°F)		75
Outlet Gas Flow Rate (acfm)		10,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		9,869
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Polyester Pleated
Total Area of Filter Media (sq. ft)		3,520
Air to Cloth Ratio		2.84
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.857

Note: Parameters based on manufacturers design specifications.
Exit temperature from construction permit application.
Percent water vapor content represents typical content of "Kathbar" treated air.

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X
outlet loading rate (grains/acfm) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3c

CONTROL EQUIPMENT PARAMETERS FOR THE GRINDER BAGHOUSE (EU 020) AT THE TRANS-SHIPMENT FACILITY

Grinder System		
Manufacturer and Model No.	Reimelt Corp. Model	
Outlet Gas Temp (°F)		75
Outlet Gas Flow Rate (acfm)		3,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		2,961
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Gor-Tex Polyester
Total Area of Filter Media (sq. ft)		800
Air to Cloth Ratio		3.75
Manufacturer's Guaranteed Outlet Loading (grains/scf)		0.0005

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.013

Note: Parameters based on manufacturers design specifications.
Exit temperature from construction permit application.
Percent water vapor content represents typical content of "Kathbar" treated air.

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (dscfm) X
outlet loading rate (grains/dscf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3d

CONTROL EQUIPMENT PARAMETERS FOR THE SUGAR STORAGE SILOS BAGHOUSES (EU 026, 027, AND 028) AT THE TRANS-SHIPMENT FACILITY

Each Storage Silo		
Manufacturer and Model No.	Reimelt Corp. Model JF795-14P-7.5-5	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		521
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		500
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Polyester
Total Area of Filter Media (sq. ft)		81
Air to Cloth Ratio		6.17
Manufacturer's Guaranteed Outlet Loading (grains/scf)		0.02
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.0857

Note: Parameters based on manufacturers design specifications.
Exit temperature from construction permit application.
Percent water vapor content represents typical content of "Kathbar" treated air.

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (dscfm) X
outlet loading rate (grains/dscf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3e

CONTROL EQUIPMENT PARAMETERS FOR THE POWDERED SUGAR DRYER/COOLER (EU 045) AT THE TRANS-SHIPMENT FACILITY

Powdered Sugar Dryer/Cooler		
Manufacturer and Model No.	Reimelt Corp. Model SL3-18	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		9,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		8,640
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Duratex II (pleated cartridges)
Total Area of Filter Media (sq. ft)		4,824
Air to Cloth Ratio		1.87
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.771

Note: Parameters based on manufacturers design specifications.
Percent water vapor content represents typical content of "Kathbar" treated air.

Sample calculations:
Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X
outlet loading rate (grains/acf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3f

CONTROL EQUIPMENT PARAMETERS FOR THE POWDERED SUGAR HOPPER BAGHOUSE (EU 046) AT THE TRANS-SHIPMENT FACILITY

Powdered Sugar Hopper Baghouse		
Manufacturer and Model No.	Reimelt Corp. Model 24TB-FRIP-32:S6	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		1,800
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		1,728
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Spun Bond Polyester (pleated elements)
Total Area of Filter Media (sq. ft)		325
Air to Cloth Ratio		5.54
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.154

Note: Parameters based on manufacturers design specifications.
Percent water vapor content represents typical content of "Kathbar" treated air.

Sample calculations:
Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X
outlet loading rate (grains/acf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3g

CONTROL EQUIPMENT PARAMETERS FOR THE PACKAGING LINES 11-14 BAGHOUSE (EU 047) AT THE TRANS-SHIPMENT FACILITY

Packaging Lines 11-14	
Manufacturer and Model No.	MAC Equipment Inc. 55RTC52
Outlet Gas Temp (°F)	90
Outlet Gas Flow Rate (acfm)	6,000
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	5,760
Cleaning Method	Pulse Jet cleaning (Timer Actuated)
Bag Material	Polyester (pleated tubular cartridge)
Total Area of Filter Media (sq. ft)	2,662
Air to Cloth Ratio	2.25
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.01

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.514

Note: Parameters based on manufacturers design specifications.
Percent water vapor content represents typical content of "Kathbar" treated air.

Sample calculations:
Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X
outlet loading rate (grains/acf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3h

CONTROL EQUIPMENT PARAMETERS FOR THE VACUUM RECEIVER NOS. 1 AND 2 BAGHOUSES AT THE TRANS-SHIPMENT FACILITY

Each of Vacuum Receiver Nos. 1 and 2	
Manufacturer and Model No.	United States Systems 84AVR36:60S
Outlet Gas Temp (°F)	90
Outlet Gas Flow Rate (acfm)	641
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	615
Cleaning Method	--
Bag Material	Polyester (Scrim supported felt type)
Total Area of Filter Media (sq. ft)	408
Air to Cloth Ratio	1.57
Manufacturer's Guaranteed Outlet Loading (grains/scf)	0.02

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.105

Note: Parameters based on manufacturers design specifications.
Percent water vapor content represents typical content of "Kathbar" treated air.

Sample calculations:
Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X
outlet loading rate (grains/acf) ÷ 7000 grains/lb X 60 min/hr

UNITED STATES SYSTEMS
P.O. Box 5218 • Kansas City, Kansas 66119
Phone: 913/281-1010 • Fax 913/281-2901
www.unitedstatessystems.com

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1969 - 2006

MESSAGE TRANSMITTAL

TO: Matthew Capone	e-mail: Matthew_Capone@floridacrystals.com
COMPANY: Florida Crystals	PHONE:
FAX NO:	PHONE:
FROM: Greg Hawkins	DATE: 1-9-06
NUMBER OF PAGES INCLUDING COVER: 1	
SUBJECT: USS Vacuum Filter Efficiency	

Dear Matthew,

United States Systems guarantees that the maximum particulate emissions for our filters will not exceed 0.02 grains per standard cubic foot of exhaust air, or 99.9% on particles 2 micron or greater. The specifics on our media are as follows:

media: polyester

weight: 16 oz./sq yd

construction: scrim supported felt

mullen burst strength: 375 psi

thermal stability: 2% maximum at 275 degrees F for 2 hours

operating temp.: 240 degrees F

finish: heat set and calendered

permeability: 17-40cfm/sq ft @ 0.5" w.c.

Sincerely,

Greg Hawkins
Sales Manager

cc: Mark Aron -- United States Systems

ATTACHMENT A

1.0 INTRODUCTION

Okeelanta Corporation is proposing to modify the existing Packaging and Distribution Facility (also known as the Trans-Shipment Facility) at the Okeelanta sugar complex located near South Bay, Florida. The facility location is shown in Figure A-1 Area Map. The proposed modification will increase the amount of refined sugar packaged at the Trans-Shipment Facility from 865 to 1,300 tons per day (TPD). The construction of two new sugar receivers and one new sugar packaging line will be required to accomplish the increase. Sugar dust from each receiver will be controlled by an integral baghouse.

2.0 FACILITY DESCRIPTION

2.1 Existing Facility

The Trans-Shipment Facility is located approximately 2,500 feet south of the Okeelanta sugar mill and refinery. A detailed facility plot plan showing the Trans-Shipment Facility is presented in Attachment OC-FI-C1. Granulated, refined sugar is transported by trucks from the refinery to the Trans-Shipment Facility, where the sugar is packaged according to customer's requirements. The packaged sugar is then shipped by rail or truck to market.

The initial Trans-Shipment Facility construction in 1996 consisted of four primary areas; truck unloading, packaging, warehouse, and office/administration areas. The packaging area consisted of nine packaging lines (1 through 9). The initial building area occupied approximately 143,000 square feet of space. An expansion of the facility in 2000 added approximately 39,000 square feet of packaging and raw material storage area, a new pneumatic main sugar receiver (storage bin), and four new packaging lines (11 through 14).

At the refinery, extra-fine granulated (EFG) sugar is loaded into 80,000 pound gross weight trucks and is transported from the refinery to the Trans-Shipment Facility. Currently, the trucks are unloaded at two locations – the bulk truck unloading system at the north end of Trans-Shipment Facility and a receiving dock at the east side of the facility. The bulk truck unloading system at the north end of the facility consists of two stations, each capable of unloading 87,500 pounds per hour (lb/hr) of refined sugar. The receiving dock at the east side of the facility is a pneumatic unloading station with a capacity of 30,000 lb/hr of refined sugar.

When receiving product at the bulk truck unloading station, a hydraulically operated boot mechanism locks pneumatically against the truck's hopper. The EFG sugar is fed from the truck into a screw

conveyor, to a bucket elevator, and then into one of the three storage silos. The design capacity for the conveyors feeding the silos is 205,000 lb/hr.

From the silos, the sugar is transported by screw conveyor into surge bins located above packaging lines 1 through 9. The EFG sugar is metered from the surge bins into the nine packaging lines, where various size packages and containers are filled with the sugar for wholesale and retail distribution. A portion of the EFG sugar is conveyed to the grinder, where starch is added to produce powdered sugar at a design capacity of 8,000 lb/hr. Brown sugar is also produced at the Trans-Shipment Facility by mixing either light or dark molasses with the EFG sugar. Brown sugar can be produced at a design rate of 8,000 lb/hr.

The pneumatic unloading system at the east side of the facility unloads sugar into the main sugar receiver for packaging lines 11 through 14. From the main sugar receiver, the sugar is transported by pneumatic distribution conveyor into surge bins above packaging lines 12, 13, and 14. The EFG sugar is metered from the surge bins into the three packaging lines, where various size packages and containers are filled with the sugar for wholesale and retail distribution. A portion of the EFG sugar from the main sugar receiver is conveyed to the powdered sugar surge bin above the grinder. The grinder produces powdered sugar, which is conveyed to packaging line 11 for packaging.

After being packaged, the filled containers are palletized and wrapped in a plastic stretch wrap in the warehouse area. Shipping can be by rail or truck. See Attachment OC-EU1-I1, Trans-Shipment Facility Flow Diagram, for details.

The office and administration area has offices, lockers, conference rooms, and employee break rooms.

2.2 Facility Modification

Okeelanta is proposing to add two new sugar receivers to unload bulk sugar from railcars, and a new packaging line designated line 0, at the Trans-Shipment Facility. This expansion will increase the nominal packaging rate from 865 TPD to 1,300 TPD.

The new sugar receivers will be located immediately west of the three existing silos on the north side of the facility. A plot plan showing the locations of the new receivers is presented in Attachment OC-FI-C1. Refined sugar from the refinery will be pneumatically unloaded from railcars into the two new sugar receivers. Sugar from the receivers will be conveyed to the silos via conveyors and bucket

elevators. The west receiver will also transfer sugar directly to the new packaging line 0. Dust from each of the receivers will be controlled by a United States Systems baghouse. Packaging line 0 will be used to fill totes north of line 1 in the existing packaging room. Sugar dust from the filling station will be controlled by suction ventilation ductwork added to the existing baghouse controlling emissions from packaging lines 1 through 9.

3.0 EMISSION ESTIMATES

The emissions from the Trans-Shipment Facility consist of particulate matter (PM) in the form of sugar dust, all of which is assumed to be particulate matter of less than 10 microns (PM_{10}). Currently, emissions at the Trans-Shipment Facility are controlled by nine baghouses. Two integral baghouses will be used to control emissions from the two new sugar receivers. Sugar dust from the new packaging line 0 will be controlled by the existing baghouse for packaging lines 1 through 9 (emissions unit 019).

Based on the baghouse manufacturer's data, the maximum particulate emissions from the Trans-Shipment Facility after the expansion is completed will be 12.28 tons per year (TPY), an increase of less than 1 TPY from the current emission limit of 11.35 TPY. See Table A-1, Summary of Particulate Emissions, for the Trans-Shipment Facility for emission calculations. Stack data are presented in Table A-2. See Attachment OC-EU1-I3 for information on the future emissions control equipment to be used at the Trans-Shipment Facility.

TABLE A-1
SUMMARY OF PARTICULATE EMISSIONS FOR THE TRANS-SHIPMENT FACILITY

Emission Segment Source	Point ID	Baghouse Guaranteed Manufacturer's Emission Rate	Baghouse Gas Flow Rate	Hourly Emissions (lb/hr)	Annual Emissions [a] (TPY)
Vacuum System 1	018	0.01 gr/scf	280 scfm	0.024	0.105
Packaging Lines 0-9	019	0.01 gr/acf	10,000 acfm	0.857	3.754
Grinder	020	0.0005 gr/scf	2,961 scfm	0.013	0.060
Silo No. 1	026	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 2	027	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 3	028	0.02 gr/scf	500 scfm	0.0857	0.375
Powdered Sugar Dryer/Cooler	045	0.01 gr/acf	9,000 acfm	0.771	3.379
Powdered Sugar Hopper	046	0.01 gr/acf	1,800 acfm	0.154	0.676
Packaging Lines 11-14	047	0.01 gr/acf	6,000 acfm	0.514	2.253
Railcar Unloading Receiver #1	--	0.02 gr/scf	615 scfm [b]	0.105	0.462
Railcar Unloading Receiver #2	--	0.02 gr/scf	615 scfm [b]	0.105	0.462
		Total Particulate Emissions All So		2.802 lb/hr	12.276 TPY

[a] Based on 8,760 hr/yr operation.

[b] Vendor provided 1,150 scfm at 16" Hg Data shown is corrected to 1 atmosphere pressure (29.9" Hg).

TABLE A-2
STACK PARAMETER SUMMARY TABLE FOR THE TRANS-SHIPMENT FACILITY

Emission Source	Control Device	Point ID	Discharge Type	Stack Height (ft)	Exit Diameter (ft)	Exit Temperature (° F)	Actual Volumetric Flow Rate (acfm)	Percent Water Vapor (%) [a]	Maximum Standard Flow Rate (scfm)
Vacuum System	Baghouse	018	Horizontal	8	0.33	75	284	0.025	280
Packaging Lines 0-9	Baghouse	019	Vertical	27	1.5	75	10,000	0.025	9,869
Grinder	Baghouse	020	Horizontal	39	1.0 [b]	75	3,000	0.025	2,961
Silo No. 1	Baghouse	026	Horizontal	65	0.5	90	521	0.025	500
Silo No. 2	Baghouse	027	Horizontal	65	0.5	90	521	0.025	500
Silo No. 3	Baghouse	028	Horizontal	65	0.5	90	521	0.025	500
Powdered Sugar Dryer/Cooler	Baghouse	045	Vertical	48	2.0	90	9,000	0.025	8,640
Powdered Sugar Hopper	Baghouse	046	Horizontal	48	0.75	90	1,800	0.025	1,728
Packaging Lines 11-14	Baghouse	047	Vertical	48	1.75	90	6,000	0.025	5,760
Railcar Unloading Receiver #1	Baghouse	--	Horizontal	5.0	0.50	90	641	0.025	615
Railcar Unloading Receiver #2	Baghouse	--	Horizontal	5.0	0.50	90	641	0.025	615

Footnotes:

[a] Percent water vapor content represents typical content of "Kathbar" treated air.

[b] Equivalent exit diameter based on a rectangular exhaust duct (10 inches by 11 inches) cross sectional area of 0.7638 sq. ft.
Equivalent diameter = 0.9862 ft.

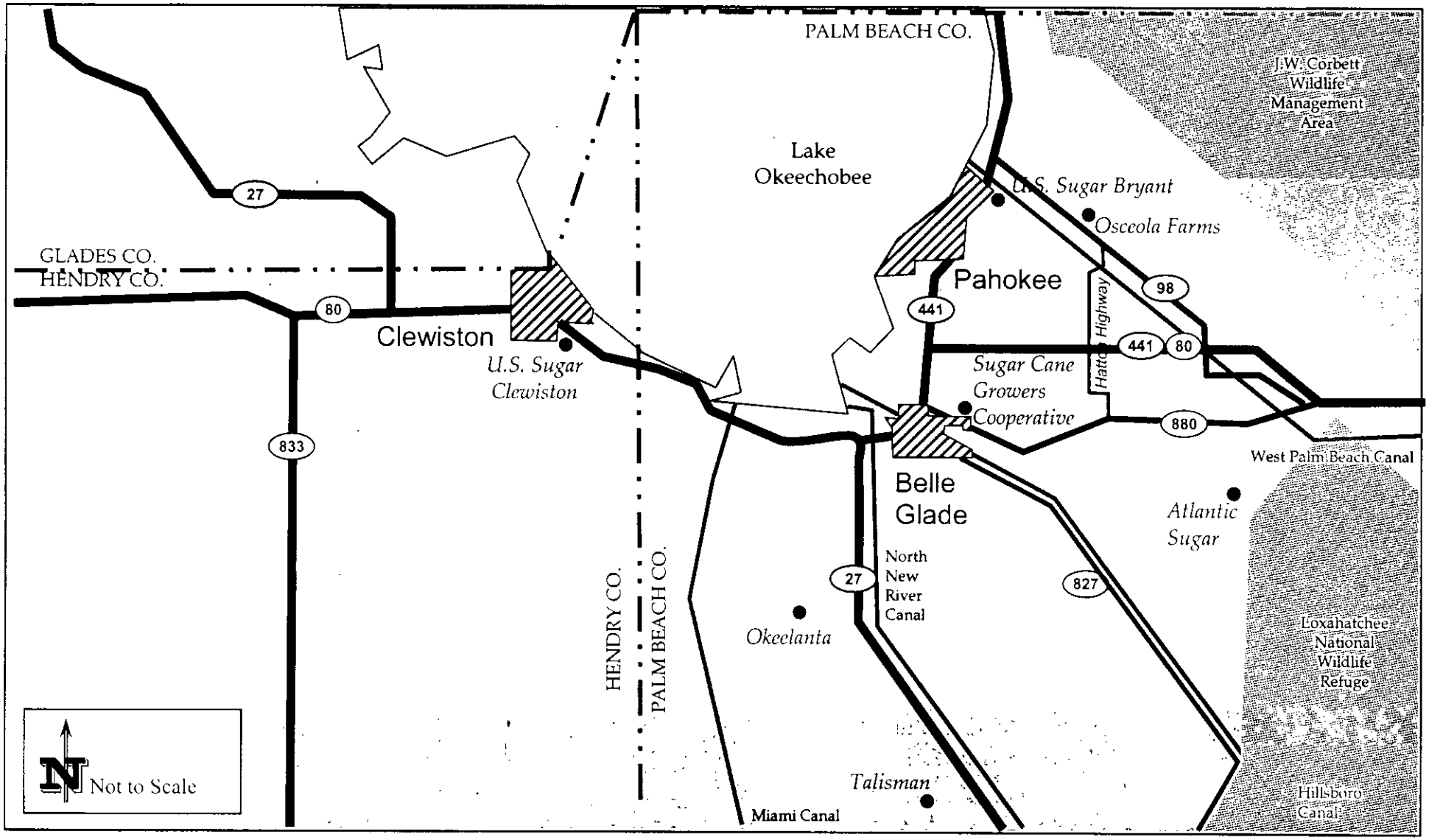

Figure A-1
Location of Florida Sugar Mills

Source: Golder Associates Inc., 2006

0637507/4.4/Figure A-1.doc

Golder Associates

ATTACHMENT B

TRANS-SHIPMENT FACILITY PERMIT NO. 0990005-008-AC

Department of Environmental Protection

Jeb Bush
Governor

South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

David B. Struhs
Secretary

NOTICE OF PERMIT ISSUANCE

May 10, 2001

CERTIFIED MAIL 7000 0600 0024 1469 9439
RETURN RECEIPT REQUESTED

In the Matter of an Application
for Permit by:

Mr. Ricardo A. Lima
Vice President and General Manager
Okeelanta Corporation
21250 U.S. Highway 27
South Bay, Florida 33493

Re: Palm Beach County - AP
Okeelanta Corporation
Transhipment Facility
DEP File No. 0990005-008-AC
South Florida EMA

Enclosed is Permit Number 0990005-008-AC to install a new baghouse on the main sugar receiver, a new sugar grinder with baghouse and new packaging lines with baghouse. These changes will be made a the transhipment facility located about 0.5 mil south of the sugar refinery, west of U.S. Highway 27, south of South Bay Florida. This permit is issued under section(s) 403.087, of the Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, 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 of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell

Richard W. Cantrell
Director of
District Management
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901-3881
(941) 332-6975

"More Protection, Less Process"

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on May 10, 2001 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Lucie Kaufe 5/10/01
(Clerk) (Date)

RWC/DMK/jw

Enclosures

Copies furnished to:

Matthew Capone, Okeelanta Corporation
David A. Buff, P.E., Golder Associates, Inc.
Palm Beach County Health Department
Jeff Koerner, P.E., DEP, Tallahassee

2001 MAY 11 AM

Department of Environmental Protection

Jeb Bush
Governor

South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

David B. Struhs
Secretary

PERMITTEE:
Okeelanta Corporation
21250 U.S. Highway 27
South Bay, Florida 33493

I.D. No.: 0990005
Permit/Certification
Number: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006
County: Palm Beach
Latitude: 26° 34' 16" N
Longitude: 80° 44' 45" W
Section/Town/Range: 16/45S/36E
Project: New Sugar Grinder and Packaging Lines

This permit is issued under the provisions of Chapter 403.087, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Install a new baghouse on the main sugar receiver, a new sugar grinder with baghouse and new packaging lines with baghouse. These changes will be made at the transhipment facility located about 0.5 mile south of the sugar refinery, west of U.S. Highway 27, south of South Bay, Florida.

SPECIFIC CONDITIONS:

1. The hours of operation of this facility are not restricted.

2. This facility shall be operated in such a fashion so as to preclude objectionable odors. [Rule 62-296.320(2), F.A.C.]

3. Copies of all applications, reports, tests, and notifications shall also be submitted to the Air Pollution Control Section of the Palm Beach County Public Health Unit located at 901 Evernia Street (Post Office Box 29), West Palm Beach, Florida 33402-0029.

4. All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions may include, but not be limited to, the following:

A. Paving and maintenance of roads, parking areas, and yards.
B. Application of water when necessary to control emissions.
C. Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent reentrainment, and from buildings or work areas to prevent particulate.
D. Enclosure or covering of conveyor systems.
E. Posting of vehicle (or truck) speed limits.

[Rule 62-296.320(3), F.A.C.]

5. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Conditions of Compliance:

6. The applicant shall retain a registered professional engineer for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. [Rule 62-4.050(3), F.A.C.]

7. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction.

8. Each of the emission units has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse. Therefore the Department waives any particulate matter compliance test requirements for such emissions unit specified in any otherwise applicable rule, and specify an alternative standard of 5% opacity.

SPECIFIC CONDITIONS:

If the Department has reason to believe that the particulate weight emission standard applicable to such an emissions unit is not being met, it shall require that compliance be demonstrated by the test method specified in the applicable rule.
[Rule 62-297.620(4), F.A.C.]

9. Okeelanta Corporation, the Permittee, has requested lower emissions limits than what is allowed in the Process Weight Tables. Based on baghouse manufacturer's guarantees, these emissions would be the basis for the Title V fees and are shown in the attached Table A-1.

10. The nominal sugar packaging rate will be 865 tons/day.

Required Testing:

11. Visible emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA Method Nine as published in 40 CFR-60 Appendix A, or State approved equivalent method. Such test shall be conducted within 30 days of initial operation. The Department shall be notified at least 15 days prior to testing to allow witnessing.
[Rule 62-297.310, F.A.C.]

12. Testing of emissions should be conducted with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so subsequent source operation is limited to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for purposes of additional compliance testing to regain rated capacity in the permit with prior notification to the Department's South District.

13. Notification of the Department prior to any required testing shall include as a minimum: the date and time of the test, the exact location of the test, and the name and telephone number of the contact person on site.
[Rule 62-297.310, F.A.C.]

Reports and Recordkeeping:

14. An annual operation report shall be submitted by March 1st each year.
[Rule 62-4.070(3), and Rule 62-210.370(2), F.A.C.]

General Conditions:

15. An integral part of this permit is the attached 15 General Conditions.
[Rule 62-4.160, F.A.C.]

PERMITTEE:
Okeelanta Corporation

I.D. No.: 0990005
Permit/Cert. No.: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006

SPECIFIC CONDITIONS:

General Conditions:

NOTE: In the event of an emergency the permittee shall contact the Department by calling (850) 413-9911. During normal business hours, the permittee shall call **(941) 332-6975.**

Issued this 10th day of May, 2001.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell

Richard W. Cantrell
Director of
District Management

RWC/DMK/jw

9 Pages Attached

PERMITTEE:
Okeelanta Corporation

I.D. No.: 0990005
Permit/Cert. No.: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5) Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by any order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

a. Have access to and copy any records that must be kept under the conditions of the permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. a description of and cause of non-compliance; and

b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-30.300, F.A.C. as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically, unless otherwise stipulated by the Department.

(b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

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

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Table A-1. Summary of Particulate Emissions for the Transhipment Facility, Florida Crystals Food Corporation

Emission Segment Source	Point ID	Baghouse Guaranteed Manufacturer's Emission Rate	Baghouse Gas Flow Rate	Hourly Emissions (lb/hr)	Annual Emissions[a] (TPY)
Existing Sources					
Vacuum System 1 Baghouse	018	0.01 gr/scf	280 scfm	0.024	0.105
Packaging Lines Baghouse	019	0.01 gr/acf	10,000 acfm	0.857	3.754
Grinder Baghouse	020	0.0005 gr/scf	2,960 scfm	0.013	0.060
Silo No. 1 Baghouse	026	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 2 Baghouse	027	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 3 Baghouse	028	0.02 gr/scf	500 scfm	0.0857	0.375
			Subtotal Existing Sources	1.151 lb/hr	5.044 TPY
New Sources					
Main Sugar Receiver Baghouse		0.01 gr/acf	9,000 acfm	0.771	3.379
Powdered Sugar Hopper Baghouse		0.01 gr/acf	1,800 acfm	0.154	0.676
Packaging Lines Baghouse		0.01 gr/acf	6,000 acfm	0.514	2.253
			Subtotal New Sources	1.440 lb/hr	6.308 TPY
			Total Particulate Emissions All Sources	2.591 lb/hr	11.352 TPY

Note: Compliance with the PM Emission rates will be demonstrated through a visible emissions test using EPA Method 9.
[a] Based on current construction permit for existing sources and 8,760 hr/yr operation for new sources.