MEMO

TO: Mara Nasca
David Knowles

CC: Darrel Graziani
Scott Sheplak

FROM: Jonathan Holtom

DATE: 5/19/00

RE: Pre-DRAFT Review For Okeelanta Corporation, 0990005-003-AV

This memo is being sent in order to provide comments on the pre-DRAFT Title V permit for Okeelanta Corporation. Overall, the permit is nicely laid out and well structured. The following comments are being offered to help provide additional clarity in certain areas. If, after reviewing these comments, you would care to discuss any of them, please contact me at SunCom 291-9531.

1. Table of contents. The NSPS appendices that are referenced in the permit and listed in the "referenced Attachments" section on page 1 of the permit are not listed in the Table of contents.
2. Has there been a Statement of Basis document created yet? It was not in the package that I reviewed.
3. Page 1, Referenced Attachments. Why is Appendix NSPS-Ea a part of this permit? Section I also mentions it, but goes on to preclude garbage from being burned.
4. Facility condition 11. The correct telephone and fax numbers for EPA are: Tele. 404/562-9155, fax 404/562-9163 or 404/562-9164.
5. Page 9, Permitting note following condition 10.(d). Please add a cross-reference to the specific condition to which this note is referring. I could not find the condition is implied.
6. Page 10, Condition 15.E. First line, 04 should be 004 (15.A. also).
7. Page 11, Condition 15.E., Third sentence. Consider rewording, i.e. "Steam generated in the cogeneration boilers in excess of 910,836 lb/hr (24 hour average) must be sent to the Okeelanta sugarcane processing facility, ..."
8. Page 12, Details. Are boilers 4, 5 and 6 considered to be inactive or in long term reserve? If so, the permit should contain a compliance plan that requires testing within a reasonable period of restarting (15 days) in order to demonstrate their continued ability to meet their compliance limits.
9. Page 15, Condition A.8.(c). This condition is not acceptable. If the facility wishes a limit for fee purposes that is less than the RACT limit, they must also accept that limit for compliance. A demonstrated violation of the established limit during the annual compliance test is an enforceable violation. Furthermore, if they were to wish an increase in their allowable limit because they failed their compliance test, the increase would need to be looked at for new source review. The actual emissions form a facility that has been inactive for a number of years is considered to be zero. Even if they had been operating at 1.5 lb/MMBtu, this would define their actual emissions. Any increase above this would still need to be looked at for NSR/PSD applicability. In fact, at the permitted rate of operation, an increase to 1.53 lb/MMBtu would equate to a significant increase of 40 tons of VOC. Limits should not be established for fee purposes. The fees are a secondary result of the federally enforceable compliance limit.
10. Page 15, Condition A.9. Remove the [Not federally Enforceable] and replace with [Rule 62-213.440, F.A.C.].

11. Page 17, Condition A.17.(b). How is the 55% thermal efficiency rating demonstrated? Any testing required?.
12. Page 20, Details. See comment 8. The same comment applies to boilers 10 and 11.
13. Page 22, Condition B.8. See comment 9.
14. Page 22, Condition B.9. See comment 10.
15. Page 27, Details. See comment 8.
16. Page 27, Condition C.1. If these boilers would be subject to PSD upon reactivation, a new source review evaluation and corresponding construction permit must be issued prior to resuming operation. The Title V permit is not a tool to allow someone to violate PSD requirements during the re-permitting process.
17. Page 30, Condition C.9. See comment 9.
18. Page 35, Construction Requirements. Is unit not yet built? Why are construction requirements included here? If unit is built, permit should contain operation requirements and the design specifications imposed by the AC permit could be reflected in a permitting note. If it is not yet built, a compliance plan must be included in the Title V permit in order to outline all of the future compliance dates and required tests, reports, etc.
19. Page 37, Condition D.3.(d). Condition specifies units 003, 004, 005, 006 010, 012, 013 and 016, then discusses boiler 16. Boiler 16 is unit 014, unit 016 is a tank. Please make appropriate corrections. Also, in the last sentence, the April 1, 1998 date is not needed since it has already passed. The phrase "After April 1, 1998," could be deleted.
20. Page 38, Condition D.7. Does Okeelanta have separately designated tanks for the different types of fuel? If the fuel is being mixed in the tank, as-fired sampling would be required.
21. Page 39, Condition D.19.(a). The reference to condition III.D.19.(c) does not appear correct.
22. Page 40, Condition D.19.(c). Does this waiver pertain to all required tests or just specific tests?
23. Page 40, Condition D.20.(c). See comment 20.
24. Page 42, Details. Paragraph refers to three (3) boilers, however, brief description refers to four tanks. Should –033 be listed here, or only in the unregulated section?
25. Page 46, Construction Restrictions. See comment 18. Construction requirements do not belong in the operation permit.
26. Page 51, Construction Restrictions. See comment 18. Construction requirements do not belong in the operation permit.
27. Page 55, Condition G.10. Initial testing is a compliance requirement of a construction permit prior to obtaining an operation permit. If this is a future compliance requirement, a compliance plan should be included. Please verify the rule citings for this condition.
28. Page 56, Details. Since emissions limits are in terms of gr/dscf, please provide the design flow rate in a permitting note to the description. This helps for confirming annual emission fee calculations.
29. Page 59, Condition H.10. Either make O&M plans part of the permit now or include a compliance plan if the units are not operating properly. These are not new units, O&M plans should have been submitted with the application.
30. Page 62, Condition I.1. This is an operation permit. The design specifications should already have been imposed through a construction permit. This information is nice to have in a permitting note, but should not be new for the AV permit. Consider changing this to operational design/capacity requirements.
31. Page 64, Condition I.1.(j). See comment 29.
32. Page 66. Emission limit for lead/biomass/lb/hr of 0.018. Should this have a footnote of (b)?
33. Page 67, Condition I.7. Please insert the following permitting note prior to this condition:
    {Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS or NESHAP provision.}
34. Page 67, Condition I.7.(b). ...after steam generation drops below 150,000...??
35. Condition I.7.(d)2. & (g). Rule 62-210.700 generally allows excess emissions due to start-up for up to 2 hours in any 24-hour period. Also, EPA has indicated (for NSPS sources) that, while excess emissions are

allowed during startup, the associated emissions are not to be excluded from the data averaging. Are these conditions consistent with the PSD permit? There appears to be some potential conflicts here.

36. Page 71, Condition I.13. Appendix OP-001 is not included in permit or referenced in the attachment list.
37. Page 71, NSPS. Why is Subpart Ea included here? It is not included in the unit description on page 62. In addition, condition I.3.(b) specifically precludes the combustion of garbage.
38. Page 72, Condition I.19. See comment 37.
39. Appendix FMP-001. Did the applicant supply this, or did the Department create it? Parts of it are written as construction requirements rather than operational requirements. It sounds as if they are proposing to build something new rather than tell how they are operating something that currently exists. Please review the language and change where appropriate.
40. Appendix FMP-001, Page 3. The two paragraphs above "D. Fuel Oil" Reference Osceola rather than Okeelanta.
41. Wood-Waste and Ash Inspection and Testing Plan, Introduction paragraph. The primary function of these procedures is to keep...household garbage...from being burned. This document adds to my confusion as to why Subpart Ea is imposed on this source.
42. Wood-Waste and Ash Inspection and Testing Plan, 3.2.1 and 3.2.2. Bold for consistency.
43. Appendix H-1, Page 10, Permitting note. The full permitting note should be as follows:
    {Rule 62-213.420(1)(b)2., F.A.C., allows Title V Sources to operate under existing valid permits that were in effect at the time of application until the Title V permit becomes effective}
44. Appendices OMP-001, 002, and 003. The requirement to submit and/or comply with something in the future needs to be written into a Title V permit as a compliance plan that satisfies all of the requirements of Rule 62-213.440(2), F.A.C.
45. Tables 1-1 and 2-1. Consider adding a footnote to provide a better reference to the explanation of the fuel types.

Please feel free to call me to discuss these comments.

PRE - DRAFT

CERTIFIED MAIL #Z
RETURN RECEIPT REQUESTED

Mr. Ricardo A. Lima
Vice President/General Manager
Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

Re: Palm Beach County - AP
DRAFT Title V Permit No.: 0990005-003-AV
Okeelanta Corporation

Dear Mr. Lima:

One copy of the DRAFT Title V Air Operation Permit for the Okeelanta Corporation's Sugarcane Processing, Sugar Refining, and Power Generation facilities, located approximately 6 miles south of South Bay on U.S. Highway 27, South Bay, Palm Beach County, Florida, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to David M. Knowles, P.E., Air Program Administrator, at the above letterhead address. If you have any other questions, please contact Mara G. Nasca at 941/332-6975, Ext. 188.

Sincerely,

Richard W. Cantrell
Director of
District Management

RWC/DJG/jw

In the Matter of an
Application for Permit by:

Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

DRAFT Permit No.: 0990005-003-AV
Okeelanta Corporation
Palm Beach County

_____/

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Florida Department of Environmental Protection (permitting authority), gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Okeelanta Corporation, applied on June 17, 1996, to the permitting authority for a Title V air operation permit for its Sugarcane Processing, Sugar Refining, and Power Generation facilities, located approximately 6 miles south of South Bay on U.S. Highway 27, Palm Beach County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.), Chapters 62-4, 62-210, and 62-213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facilities.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, Florida Department of Environmental Protection, Post Office Box 2549, Fort Myers, Florida, 33902-2549 (Telephone: (941) 332-6975; Fax: (941) 332-6969), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the attached Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall process a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000 (Telephone: (850) 488-9314, Fax: (850) 487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, 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 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 the 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 interests will be affected by the agency determination;

(c) A statement of how and when each 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 indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(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 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 notice of intent. 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 will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any city or federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;
(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
(c) Each rule or portion of a rule from which a variance or waiver is requested;
(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
(e) The type of action requested;
(f) The specific facts that would justify a variance or waiver for the petitioner;
(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Permitting Authority will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency (EPA), and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at United States Environmental Protection Agency, 401 M Street SW, Washington, D.C. 20460.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

_____

Richard W. Cantrell
Director of
District Management

RWC/DJG/jw

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on _____ to the person(s) listed:

Mr. Ricardo A. Lima, Vice President/General Manager, Okeelanta Corporation

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail or Internet E-mail on the same date to the person(s) listed or as otherwise noted:

Mr. David Buff, P.E., Golder & Associates Inc.
Ms. Barbara Boutwell, Bureau of Air Regulation (INTERNET E-mail Memorandum)
Ms. Elizabeth Bartlett, USEPA, Region IV (Internet E-mail Memorandum)
Mr. Greg Worley, USEPA, Region IV (Internet E-mail memorandum)
Mr. Gregory Radlinski, OGC, Environmental Law Section (Internet E-mail)
Mr. James Stormer, Palm Beach County Health Department (Internet E-mail)

Clerk Stamp

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

_____ _____
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V DRAFT Permit No.: 0990005-003-AV
Okeelanta Corporation
Palm Beach County

The State of Florida Department of Environmental Protection (permitting authority), gives notice of its intent to issue a Title V air operation permit to Okeelanta Corporation for the operation of its Sugarcane Processing, Sugar Refining, and Power Generation facilities, located approximately 6 miles south of South Bay, Palm Beach County, Florida. The applicant's name and address are: Mr. Ricardo Lima, Vice President/General Manager, Okeelanta Corporation, Post Office Box 86, South Bay, Florida 33493.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the permitting authority's office Florida Department of Environmental Protection, Post Office Box 2549, Fort Myers, Florida, 33902-2549. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000 (Telephone: (850) 488-9314, Fax: (850) 487-4938).Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, 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 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 the time of filing. The failure of any person to file a petition within the applicable 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 presidingofficer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (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; 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 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, as well as the rules and statutes which entitle petitioner to relief;
(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 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 notice of intent. 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 is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority
Department of Environmental Protection
2295 Victoria Avenue, Suite 364W
Fort Myers, Florida 33902-2549
Telephone: 941-332-6975
Fax: 941-332-6969

Affected Local Program
Palm Beach County Health Department
Post Office Box 29 (901 Evernia Street)
West Palm Beach, Florida 33402-0029
Telephone: 561-355-3136
Fax: 561-355-2442

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mara G. Nasca at the above address, or call 941/332-6975, ext. 188, for additional information.

OKEELANTA CORPORATION
Facility ID No.: 0990005
Palm Beach County

Initial Title V Air Operation Permit
DRAFT Permit No.: 0990005-003-AV

Permitting Authority:
State of Florida Department of Environmental Protection
Post Office Box 2549
Fort Myers, Florida 33902-2549
Telephone: (941) 332-6975
Fax: (941) 332-6969

Drafted on

Initial Title V Air Operation Permit
Draft Permit No.: 0990005-003-AV

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Appendix U-1, List of Unregulated Emissions Units and/or Activities
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Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

PERMITTEE:
Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005
SIC No.: 2062 & 4911
Project: Initial Title V Air Operation Permit

This permit is for the operation of the Okeelanta Corporation's Sugarcane Processing (AIRS ID NO. 0990005), Sugar Refining (AIRS ID NO. 0990005) and Power Generation (AIRS ID NO. 00990332) facilities located approximately 6 miles south of South Bay on U.S. Highway 27, Palm Beach County, FL; UTM Coordinates Zone 17, 524.9 km East and 2940.1 km North; Latitude: 26° 35' 00" North and Longitude: 80° 45' 00" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (FS), and Florida Administrative Code (F.A.C.), Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facilities shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix AC-001, Annual Certification Checklist
Appendix AMP-001, Ash Management Plan
Appendix ASP-001, Approved Alternate Sampling Procedures
Appendix CO-001, Consent Order - OGC FILE No. 99-2079-50-AP
Appendix FMP-001, Fuel Management Plan
Appendix FMTP-001, Wood-Waste and Ash Inspection And Testing Plan
Appendix H-1, Permit History/ID Number Changes
Appendix NSPS-A, 40 CFR 60 Subpart A-General Provisions
Appendix NSPS-Da, 40 CFR 60 Subpart Da—Standards of Performance for Electric Utility Steam Generating Units for Which Construction Is Commenced After September 18, 1978
Appendix NSPS-Db, 40 CFR 60 Subpart Db—Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Appendix NSPS-E, 40 CFR 60 Subpart E—Standards of Performance for Incinerators
Appendix NSPS-Ea, 40 CFR 60 Subpart Ea—Standards of Performance for Municipal Waste Combustors
Appendix NSPS-Kb, 40 CFR 60 Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

Appendix NSPS-Y, 40 CFR 60 Subpart Y—Standards of Performance for Coal Preparation Plants
Appendix OMP-001, Operation and Maintenance Plan for the Fly Ash Silo Baghouse
Appendix OMP-002, Operation and Maintenance Plan for the Mercury Control Agent Silo Baghouse(s)
Appendix OMP-003, Operation and Maintenance Plan for the Cogeneration Facility Boilers' Air Quality Control Systems (AQCSs)
Appendix RBL-001, RACT, BACT and LAER Determinations
Appendix SS-1, Stack Sampling Facilities
Appendix TV-3, Title V CONDITIONS (version dated 04/30/99)
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Figure 1, Summary Report – Gaseous and Opacity Excess Emission and Monitoring System Performance
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

Effective Date:
Renewal Application Due Date:
Expiration Date:

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

DRAFT

_____

Richard W. Cantrell
Director of
District Management

RWC/DJG/jw

SECTION I. Facility Information.

Subsection A. Facility Description.

This facility consists of the sugarcane processing and sugar refining operation (AIRS ID No. 0990005 – Okeelanta Corporation) and the power generating operation (AIRS ID No.: 0990332 – Okeelanta Power L.P.) under the common control of the Okeelanta Corporation. The facilities have been combined into a single major Title V Source in accordance with Rule 62-210.200(126), F.A.C. based on the location of the two facilities.

The Title V Source includes Steam Generating Units, Materials Handling and Storage Operations, and Volatile Organic Liquid Handling and Storage Operations associated with the processing and refining of sugarcane and the cogeneration of power.

The Title V Source is classified as a modified-major source under the Prevention of Significant Deterioration (PSD) and New Source Review for Nonattainment Area (NSR-NAA) programs. The source includes existing, modified and new emissions units having undergone PSD review. The source is a major facility under the category "Fossil fuel fired boilers (or combinations thereof) totaling more than 250 million Btu/hr of heat input" as listed in Table 212.400-1, F.A.C. Facility-wide restrictions are addressed within Section II, Facility-wide Conditions.

The Title V Source is classified as a major VOC and NOx emitting facility and is subject to the Reasonably Available Control Technology (RACT) requirements of Rule 62-296.570, F.A.C. for the existing boilers. The RACT requirements are addressed within Section III, Emissions Unit Conditions.

The Title V Source includes several emissions units subject to New Source Performance Standards (NSPS) including 40 CFR 60 Subparts A, Da, Db, E, Ea, Kb and Y. The NSPS requirements are addressed within Section III, Emissions Unit Conditions.

The Title V Source does not include any emissions units subject to a National Emission Standard for Hazardous Air Pollutants (NESHAP). The source has reported emissions of individual hazardous air pollutants (HAPs) at levels greater than 10 tons per year and emissions of total HAPs greater than 25 tons per year. Other HAPS, are listed as regulated based on a Best Available Control Technology (BACT) determination under the PSD program.

Subsection B. Summary of Emission Unit ID Nos. and Brief Descriptions

E.U. ID No.	Status	Brief Description
001	N/A	Shutdown
002	N/A	Shutdown
003	Regulated	Mill Boiler No. 4
004	Regulated	Mill Boiler No. 5
005	Regulated	Mill Boiler No. 6
006	N/A	Shutdown
007	N/A	Shutdown

E.U. ID No.	Status	Brief Description
008	N/A	Shutdown
009	Regulated	Mill Boiler No. 10
010	Regulated	Mill Boiler No. 11
011	Regulated	Mill Boiler No. 12
012	Regulated	Mill Boiler No. 14
013	Regulated	Mill Boiler No. 15
014	Regulated	Mill Boiler No. 16
015	Regulated	Sugar Mill NSPS Storage Tank
016	Regulated	Sugar Mill NSPS Storage Tank
017	Regulated	Sugar Mill NSPS Storage Tank
018	Regulated	Central Vacuum System for the Trans-Shipment Facility
019	Regulated	Packaging Lines
020	Regulated	Sugar Grinder and Hopper
021	Regulated	Central Dust Collection System No. 1 (Wet Rotoclone #1)
022	Regulated	Central Dust Collection System No. 2 (Wet Rotoclone #2)
023	Regulated	Cooler No. 1 (Cyclone No. 1)
024	Regulated	Cooler No. 2 (Cyclone No. 2)
025	Regulated	Fluidized Bed Dryer/Cooler
026	Regulated	Sugar Silo (S1101)
027	Regulated	Sugar Silo (S1102)
028	Regulated	Sugar Silo (S1103)
029	Regulated	Materials Handling and Storage Operations (Cogeneration Facility)
030	Regulated	Cogeneration Boiler No. 1
031	Regulated	Cogeneration Boiler No. 2
032	Regulated	Cogeneration Boiler No. 3
033	Unregulated	Cogeneration Facility NSPS Storage Tank

Please reference the Permit No., Facility ID No., and appropriate Emission Unit ID No(s), on all correspondence, test report submittal, applications, etc.

Subsection C. Relevant Documents

The documents listed below are not a part of this permit, however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History / ID Number Changes

These documents are on file with the permitting authority:

Title V Operating Permit

Initial Title V Permit Application received June 17, 1996

Mill Boiler No. 4 (EU ID No. 003)

AO50-2053, Initial Air Operating Permit
AC50-2054A, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6585 & AO50-169210, Permit Amendment for VOC/NOx RACT Requirements

Mill Boiler No. 5 (EU ID No. 004)

AO50-2055, Initial Air Operating Permit
AC50-2055A, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6595, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6595 & AO50-190690, Permit Amendment for VOC/NOx RACT Requirements

Mill Boiler No. 6 (EU ID No. 005)

AO50-2056, Initial Air Operating Permit
AC50-2056A, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6013, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6013 & AO50-175414, Permit Amendment for VOC/NOx RACT Requirements

Mill Boiler No. 10 (EU ID No. 009)

AC50-6014, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6963, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6963 & AO50-190693, Permit Amendment for VOC/NOx RACT Requirements

Mill Boiler No. 11 (EU ID No. 010)

AC50-2332, Initial Air Construction Permit
AC50-5225, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6015, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-6015 & AO50-175411, Permit Amendment for VOC/NOx RACT Requirements

Mill Boiler No. 12 (EU ID No. 011)

AC50-2238, Initial Air Construction Permit
AC50-2238A, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-2338A & AO50-169215, Permit Amendment for VOC/NOx RACT Requirements

Mill Boiler No. 14 (EU ID No. 012)

AC50-2560, Initial Air Construction Permit
AC50-2650 & AO50-189904, Permit Amendment for VOC/NOx RACT Requirements

Mill Boiler No. 15 (EU ID No. 013)

AC50-5225, Initial Air Construction Permit
AC50-7575, Air Construction Permit for the Air Quality Control System (AQCS)
AC50-2650 & AO50-209094, Permit Amendment for VOC/NOx RACT Requirements

Mill Boiler No. 16 (EU ID No. 014)

AC50-191876 & PSD-FL-169, Initial Air Construction Permits
AC50-191876 & PSD-FL-169, 2/18/93 Modification
AC50-191876 & PSD-FL-169, 3/19/93 Modification
AC50-191876 & PSD-FL-169, 3/7/94 Modification
AO50-257065, Initial Operating Permit

Sugar Mill NSPS Storage Tanks (EU ID Nos.: 015, 016, & 017)
AC50-265485, Initial Air Construction Permit (After-the-Fact)
Central Vacuum System for the Trans-Shipment Facility (EU ID No. 018)
0990005-001-AC, Initial Construction Permit (After-the-Fact)
Packaging Lines (EU ID No. 019)
0990005-001-AC, Initial Construction Permit (After-the-Fact)
Sugar Grinder & Hopper (EU ID No. 020)
0990005-001-AC, Initial Construction Permit (After-the-Fact)
Central Dust Collection System No. 1 (EU ID No. 021)
0990005-002-AC, Initial Construction Permit (After-the-Fact)
Central Dust Collection System No. 2 (EU ID No. 022)
0990005-002-AC, Initial Construction Permit (After-the-Fact)
Cooler No. 1 (Cyclone No. 1) (EU ID No. 023)
0990005-002-AC, Initial Construction Permit (After-the-Fact)
Cooler No. 2 (Cyclone No. 2) (EU ID No. 024)
0990005-002-AC, Initial Construction Permit (After-the-Fact)
Fluidized Bed Dryer/Cooler (EU ID No. 025)
0990005-002-AC, Initial Construction Permit
Sugar Silos S1101, S1102, & S1103 (EU ID Nos. 026, 027, & 28)
0990005-001-AC, Initial Construction Permit (After-the-Fact)
Materials Handling and Storage Operations (Cogeneration Facility) (EU ID No. 029)
AC50-219413 & PSD-FL-196, Initial Air Construction Permits
Cogeneration Facility Boilers (EU ID Nos. 030, 031, & 032)
AC50-219413 & PSD-FL-196, Initial Air Construction Permits
AC50-219413 & PSD-FL-196A-F, Permit Amendments
Cogeneration Facility NSPS Storage Tank (EU ID No. 033)
AC50-219413 & PSD-FL-196, Initial Air Construction Permits

SECTION II. Facility Wide Conditions.

The following conditions apply facility-wide.

1. APPENDIX TV-3, TITLE V CONDITIONS, is a part of this permit.
{Permitting Note: APPENDIX TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested, or otherwise appropriate.}

2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited: The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

{Permitting note: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rule 62-210.200, F.A.C.]

3. General Particulate Emission Limiting Standards: General Visible Emissions Standard.

(a) No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as No. 1 on the Ringelmann Chart (20 percent opacity).
[Rule 62-296.320(4)(b)1., F.A.C.]

(b) If the presence of uncombined water is the only reason for failure to meet the visible emissions standards given in Rule 62-296.320(4)1, F.A.C., such failure shall not be a violation of the rule.
[Rule 62-296.320(4)(b)3, F.A.C.]

(c) All visible emissions test performed pursuant to the requirements of Rule 62-296.320(b)(4)1, F.A.C. shall use EPA Method 9, and shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)4, F.A.C.]

{Permitting Note: The general opacity standard applies in all cases except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit.}

4. Prevention of Accidental Releases (Section 11(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such a requirement becomes applicable; and
b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Unregulated Emissions Units and/or Activities: Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

{Permitting note: Within the initial Title V permit application, the applicant grouped all exempt, insignificant, and unregulated emissions units and activities into a single-unregulated emissions unit.}

6. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), F.A.C.]

7. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

8. The permittee shall submit all compliance-related notifications and reports required by this permit to South District Office of the Department of Environmental Protection and the Palm Beach County Health Department at:

Department of Environmental Protection
South District Office
Post Office Box 2549
Fort Myers, Florida 33902-2549
Telephone: (941) 332-6975
Fax: (941) 332-6969

Palm Beach County Health Department
Air Pollution Control Section
Post Office Box 29
West Palm Beach, Florida 33402-0029
Telephone: (561) 355-3136
Fax: (561) 355-2442

9. Any reports, data, notification, certifications, and requests required to be sent to the United States Environmental Protection Agency (EPA) should be sent to:

United States Environmental Protection Agency
Region 4
Air and EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, GA 30303
Telephone: 404/562-9055
Fax: 404/562-9164

10. Excess Emissions Requirements:
(a) Excess emissions resulting from startup, shutdown, or malfunction of any emission unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

(b) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

(c) Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust the maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.
[Rule 62-210.700(5), F.A.C.]

(d) In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C.. A full written report on the malfunctions shall be submitted to the Compliance Authority in a quarterly report, if requested by the Permitting or Compliance Authority.
[Rule 62-210.700(6), F.A.C.]

{Permitting note: The permittee has requested authorization for periods of excess emissions greater than 2 hours in any 24-hour period for specific emissions units within the Initial Title V application. The procedures for approving the request in accordance with Rule 62-210.700(5), F.A.C. are identified in the common conditions of Section III of this permit.}

11. Air Emissions Bubble: Within Attachment OC-FA-7 of the initial Title V application, the permittee notified the Permitting Authority of its intent to use an air emissions bubble to locate a temporary steam generator at the source. The permittee's intent would be to use the temporary steam generator during major malfunctions of the existing steam generators. The permittee shall submit a complete application and receive a permit in accordance with the requirements of Rule 62-212.710, F.A.C. prior to implementing any changes.
[Rule 62-210.300(1) and 62-212.710, F.A.C.]

12. Alternate Sampling Procedures: Within Attachment OC-EU1-I4 of the initial Title V application, the permittee requested an alternate sampling procedure (ASP) for determining compliance with the visible emissions limitation for Emissions Units 003, 004, 005, 009, 010, 012, and 013. Approval of the ASP for the proposed purpose is subject to approval by the Permitting Authority. The permittee shall submit a request for the ASP in accordance with the requirements of Rule 62-297.620, F.A.C. prior to implementing any changes in the testing procedures.
[Rule 62-297.620, F.A.C.]

13. Annual Statement of Compliance: The permittee shall provide an annual statement of compliance to the Permitting Authority and Compliance Authority on or before March 1 each year covering the period for the previous calendar year. The permittee may use the checklist provided in Appendix AC-001.
[40 CFR 70.6 and Rule 62-213.440, F.A.C.]

{Permitting Note: See Condition No. 51, Appendix TV-3, Title V Conditions}

14. Facility Wide Recordkeeping and Monitoring Requirements: The following facility wide recordkeeping and monitoring requirements apply:
[Rule 62-213.440(1)(b), F.A.C]

(a) The permittee shall generate a daily operations report for each day that a regulated emissions unit operates. The daily operations report shall be formatted to address the various facility wide restrictions identified in Section II, Subsection A, Specific Condition No. 13.

(b) The permittee shall monitor and record the hourly electrical power generation (1-hour block averages) from the cogeneration facility for each day of operation.

(c) The permittee shall monitor and record the hourly steam production rates of the sugar mill boilers (24-hour block average, 8:00 a.m. to 8:00 a.m.) and the cogeneration facility boilers (24-hour average) for each day of operation.

(d) The permittee shall monitor and record the fuel oil consumption rates for the sugar mill boilers on a daily basis for each day of operation.

(e) The permittee shall monitor and record the type and quantities of fuels fired in each emissions unit for each day of operation.

15. Facility Wide Operating Restrictions

A. The following multi-unit operating restrictions apply to Emissions Units 003, 04, 005, 009, 010, 011, 012, 013, and 014 (Sugar Mill Boilers).
[PSD-FL-169, as amended and AC50-191876, as amended]

(a) Fuel Oil Limitation: Total oil consumption (Fuel Oils No. 2 and No. 6) shall not exceed 3.2 million gallons during the crop season (November through February).

(b) Steam Production: Total maximum steam production shall not exceed 1.012 million pounds per hour.

B. The following multi-unit operating restrictions apply to Emissions Units 030, 031 and 032 (Cogeneration Boilers) and the Cogeneration Facility.
[PSD-FL-196 and AC50-219413, as amended]

(a) Electrical power generation from the cogeneration facility shall not exceed 74.9 (gross) megawatts on any 1-hour average.

(b) Total heat input to Emissions Units 030, 031 and 032 shall not exceed 11.5 X 10^{12} Btu/year.

C. Emissions Unit Nos. 011 and 012 (Sugar Mill Boiler Nos. 12 & 14) are authorized to use wood chips during the off season hours but not simultaneously.
[Not Federally Enforceable, Permit Amendments – March 25, 1992]

D. VOC emissions from the Sugar Refinery shall not exceed 39.9 tons per year.

E. Simultaneous Operations: The existing Mill Boilers (Emissions Units 003, 04, 005, 009, 010, 011, 012, 013, and 014) may be retained for standby operation until the interconnections (bagasse fuel and steam systems) between the cogeneration facility and the sugarcane processing facility are commercially and operationally reliable.

During the period from initial firing through April 1, 2000, all three cogeneration boilers can be operated simultaneously with the existing boilers. Only biomass and No. 2 fuel oil may be used in the cogeneration boilers during periods of simultaneous operation. If more than 910,836 lb/hr (24-hour average) is generated in the cogeneration boilers, steam in excess 910,836 lb/hr (24-hour average) must be sent to the Okeelanta sugarcane processing facility, and the existing sugar mill boilers' steam production reduced by an equivalent amount. During operation, the existing sugar mill boilers must meet all requirements in the most recent construction and operation permits for the boilers. The existing boilers shall be shutdown and rendered incapable of operation when the interconnected operations are commercially and operationally reliable, but no later than April 1, 2001.

{Permitting note(s): "New oil" means oil that has been refined from crude oil and has not been used in any manner that may contaminate it. The construction permits authorized the simultaneous operation of the cogeneration facility boilers and the existing sugar mill boilers for the initial period (3-years) following startup. The initial three-year period ended January 1, 1999. The Permitting Authority has authorized an extension to the April 1, 2001 compliance date allowing continued operation of the existing sugar mill boilers. The extension period is being classified as the "Commercial Demonstration" of the project.}

SECTION III. Emissions Units And Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U ID No.	Brief Description
-003	Mill Boiler No. 4
-004	Mill Boiler No. 5
-005	Mill Boiler No. 6

Emissions Unit(s) Details:

Mill Boiler No. 4, designated Emissions Unit 003, is a cell boiler fired by bagasse and blended Bunker C fuel oil, manufactured by Babcock & Wilcox (Type Class #32 N° 54 drum Sterling Boiler). The boiler is equipped with four (4) Ward Furnaces to fire carbonaceous fuels and three (3) National Oil burners to fire No. 6 fuel oil. Particulate matter emissions from the unit are controlled by use of a wet scrubber (Ducou Multivane Wet Scrubber Model 2, Size 180). The scrubber exhausts through a 75'stack. The boiler was last operated 11/23/98.

Mill Boiler No. 5, designated Emissions Unit 004, is a Dumping Grate boiler fired by bagasse and blended Bunker C fuel oil, manufactured by Babcock & Wilcox (Type Class #32 N° 60 four drum Sterling Boiler). The boiler is equipped with a Detroit Stoker Company dump grate (installed in 1983). Particulate matter emissions from the unit are controlled by use of a wet scrubber (Ducou Multivane Wet Scrubber Model 2, Size 180). The scrubber exhausts through a 75'stack. The boiler was last operated on 11/24/98.

Mill Boiler No. 6, designated Emissions Unit 005, is a inclined grate boiler fired by bagasse and blended Bunker C fuel oil, manufactured by Bigelow (F-48 Boiler). The boiler is equipped with five (5) Bigelow Liptak Moist Fuel Cells to fire carbonaceous fuels and two (2) Peabody Type M-20 burners to fire No. 6 fuel oil. Particulate matter emissions from the unit are controlled by use of a wet scrubber (Ducou Multivane Wet Scrubber Model 2, Size 180). The scrubber exhausts through a 75'stack. The boiler was last operated on 1/26/99.

{Permitting note(s): Each unit is classified as an existing major facility under the PSD Program for particulate matter (PM), sulfur dioxide (SO_2), nitrogen oxides (NOx), volatile organic compounds (VOC), and carbon monoxide (CO). As a major source of VOC and NOx, each unit is subject to the Reasonably Available Control Technology (RACT) requirements of Rule 62-296.570, F.A.C. For these units, the permittee has requested and received VOC and NOx emission limits lower than the applicable regulation. The units are classified as existing facilities under the New Source Performance Standards (40 CFR 60 Subpart Db) and under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burners.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

A.1. Permitted Capacity: The permittee shall not allow, cause, suffer or permit the operation of the units in excess of the following capacities without prior authorization from the Permitting Authority.

EU ID No.	Steam Production	Maximum Heat Input
-003	90,000 pounds per hour (24-hour average) of steam at 350-psig and 650°F. [Not Federally Enforceable]	182 mmBtu/hr (3-hour average). [Not Federally Enforceable]
-004	116,800 pounds per hour (24-hour average) of steam at 350-psig and 650°F. [Not Federally Enforceable]	260 mmBtu/hr (3-hour average). [Not Federally Enforceable]
-005	125,000 pounds per hour (24-hour average) of steam at 350-psig and 650°F. [Not Federally Enforceable]	260 mmBtu/hr (3-hour average). [Not Federally Enforceable]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

{Permitting note(s): Prior authorization includes the issuance of construction, reconstruction, or modification permits or a determination by the Permitting Authority that the action is not subject to 62-210.300(1), F.A.C.}

A.2. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the method(s) of operation resulting in increased short-term or long-term emissions, without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Steam Generator Operation: The permittee is authorized to operate the emissions unit as a Carbonaceous Fuel Burner[(1)]. [Not Federally Enforceable]

(b) Carbonaceous Fuels[(1)]: The permittee is authorized to fire bagasse as the primary fuel. [Not Federally Enforceable]

(c) Fossil Fuels: The permittee is authorized to fire No. 6 fuel oil with a maximum sulfur content of 2.5 percent by weight. [Not Federally Enforceable]

(d) Total Heat Input Rates: The permittee is authorized to operate the units at the maximum heat input rate specified in Specific Condition **A.1.** of this permit. The maximum heat input includes the sum of the carbonaceous fuels and fossil fuels fired. The annual average heat input from fuel oil shall not exceed 10 percent (3-year average, calendar year) nor 15 percent (1-year average, calendar year) of the total heat input. The total heat input may include the following: [Not Federally Enforceable]

Maximum Heat Input Rates		
E.U. ID. No.	**Bagasse**	**Fuel Oil**
-003	182 mmBtu/hr	35.7 mmBtu/hr
-004	182 mmBtu/hr	35.7 mmBtu/hr
-005	260 mmBtu/hr	86.3 mmBtu/hr

[Rules 62-4.160(2), 62-210.200(228) and 62-210.300, F.A.C.]

A.3. Hours of Operation: The permittee is authorized to operate the units continuously. [Not Federally Enforceable]

{Permitting note(s): The following notes address the Operating Restrictions:[(1)] The Department has classified the units as a Carbonaceous Fuel Burners under Rule 62-296.410, F.A.C. versus Fossil-Fuel Fired Steam Generators under Rule 62-296.406, F.A.C. based on the definition of carbonaceous fuel fired equipment and the regulation which allows for the co-firing of fossil fuels. The annual limits on fuel oil heat input reflect the definition of "Oil Fired" contained in Rule 62-210.200, F.A.C. Operation of a unit with fossil fuels above the oil-fired levels would subject it to the requirements of Rule 62-296.406, F.A.C.}

Emission Limitations And Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.4. Visible Emissions[(1)]: The permittee shall not allow visible emissions that exceed 30 percent opacity from any unit except that 40 percent opacity is allowed for two minutes in any one hour. [Rule 62-296.410(1)(b)1., F.A.C.]

A.5. Particulate Matter: The permittee shall not allow particulate matter emissions in excess of the following emission limiting standards:

E. U. ID No.	**Emission Limiting Standard**
-003	0.30 pounds per million Btu (3-hour average) of heat input from carbonaceous fuel plus 0.10 pounds per million Btu (3-hour average) of heat input from fossil fuel from any unit. [Rule 62-296.410(1)(b)2., F.A.C.]
-004	0.30 pounds per million Btu (3-hour average) of heat input from carbonaceous fuel plus 0.10 pounds per million Btu (3-hour average) of heat input from fossil fuel from any unit. [AC50-6595]
-005	0.30 pounds per million Btu (3-hour average) of heat input from carbonaceous fuel plus 0.10 pounds per million Btu (3-hour average) of heat input from fossil fuel from any unit. [Rule 62-296.410(1)(b)2., F.A.C.]

A.6. Volatile Organic Compounds (VOC)[2] - The permittee shall not allow VOC emissions greater than 5.0 pounds per million Btu (3-hour average) of total heat input from any unit.
[Rule 62-296.570(4)(b)6, F.A.C.]

A.7. Nitrogen Oxides (NOx)[2] The permittee shall not allow NOx emissions greater than 0.9 pounds per million Btu (3-hour average) from any unit.
[Rule 62-296.570(4)(b)6, F.A.C.]

A.8. VOC & NOx RACT Limits: The permittee has assumed more stringent VOC and NOx emissions limit than the RACT emissions limit established in Rule 62-296.570(4), F.A.C., for the applicable emissions unit category. Compliance with these VOC and NOx emissions limits shall be considered compliance with RACT for purposes of the rule. The specific VOC and NOx limits assumed by the permittee and the conditions on these limits include the following:

(a) Volatile Organic Compounds (VOCs): Emissions of VOC shall not exceed 1.5 pounds per million Btu (3-hour average) of total heat input.

(b) Nitrogen Oxides (NOx): Emissions of NOx shall not exceed 0.45 pounds per million Btu (3-hour average) of total heat input.

(c) VOC RACT Limit Revision: The VOC RACT limit of this condition shall be revised based on actual stack test results obtained during the 1998-1999 and 1999-2000 crop seasons if testing demonstrates VOC emissions in the range of 1.5 to 5.0 lb/mmBtu. During the testing period, VOC emissions greater than 1.5 lb/mmBtu but less than 5.0 lb/mmBtu shall not constitute a violation. Upon completion of the testing period, the Permitting Authority shall revise the limit upwards, but shall not exceed 5.0 lb/mmBtu, if required.
[Not Federally Enforceable. Rule 62-296.570(2), F.A.C.]

A.9. Sulfur Dioxide. The permittee shall not allow the firing of fuel oil with a sulfur content greater than 2.5 percent by weight.
[Not Federally Enforceable]

{Permitting note(s): The following notes address the Emission Limitations and Standards: [1] The visible emissions limitation remains in effect until after the Permitting Authority acts upon the request for the Alternate Sampling Procedure. [2] VOC and NOx limits reflect the federally enforceable standards contained in the Rule.}

Test Methods And Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.10. Visible Emissions: All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

(a) Test Method: The test method for visible emissions shall be DEP Method 9, incorporated in Rule 62-297.401(9)(c), F.A.C.
[Rule 62-296.410(3)(a), F.A.C]

(b) Test Procedures: Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.410(3)(c), F.A.C.]

(c) Opacity Compliance Tests: DEP Method 9 is specified as the applicable opacity test method and the required minimum period of observation for a compliance test shall be sixty (60) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310(4)(a)2., F.A.C.]

A.11. Particulate Matter: All particulate matter tests performed pursuant to the requirements of this permit shall comply with the following:

(a) Test Method: The test methods for particulate matter shall be EPA Methods 1, 2, 3, 4, and 5, described in 40 CFR 60, Appendix A, Rules 62-297.401(1) through (5), F.A.C.
[Rule 62-296.410(3)(b), F.A.C.]

(b) Test Procedures: The test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.410(3)(c), F.A.C.]

A.12. Volatile Organic Compounds: All volatile organic compound tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 25, or 25A, incorporated in Rule 62-297.401(25) and (25)(a), F.A.C., modified to incorporate a dilution system as approved by the Department under the provisions of Rule 62-297.620, F.A.C. If EPA Method 25A is employed, EPA Method 18, Rule 62-297.401(18), F.A.C. may be used to quantify and subtract the methane fraction in the exhaust gases. Methods 25, 25A and 18 are described in 40 CFR 60, Appendix A.
[Rule 62-297.401, F.A.C.]

A.13. Nitrogen Oxides: All nitrogen oxides tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 7, or 7E, incorporated in Rules 62-297.401(7) and (7)(e), F.A.C. Methods 7 and 7E are described in 40 CFR 60, Appendix A.
[Rule 62-297.401, F.A.C.]

A.14. Fuel Oil Sulfur Content: All fuel oil sulfur content tests performed pursuant to the requirements of this permit shall be determined using ASTM D129-91, ASTM D2662-94, or ASTM D4294-90 , Rule 62-297.440(1)(h), (1)(i), or (1)(j), F.A.C. Copies of the documents are available from ASTM.
[Rule 62-297.401, F.A.C.]

Compliance Demonstrations And Periodic Monitoring

A.15. Compliance Demonstrations: The permittee shall have a formal compliance test conducted for the emissions unit annually during each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, for the following pollutants:

(a) Visible Emissions;

(b) Particulate Matter;

(c) Volatile Organic Compounds;

(d) Nitrogen Oxides; and

(e) Fuel Oil Sulfur Content.

[Rule 62-297.310(7), F.A.C. and AO50-203679, as amended]

A.16 Waiver of Compliance Test Requirements: For fuel oil sulfur content, the Compliance Authority may waive the compliance test requirement, unless a Special Compliance test is required under Rule 62-297.310(7)(b), F.A.C., provided the permittee complies with the requirements of Specific Condition **A.17(e)** of this permit and submits copies of the fuel purchase records with the annual compliance test report.
[Rule 62-297.310(7)(c), F.A.C.]

{Permitting note(s): Appendix ASP-001 contains the Florida Department of Environmental Protection (FDEP)'s March 26, 1999 Order (ASP No. 98-E-01) addressing annual compliance testing during years when the units operate less than 400 hours.}

A.17. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with the Specific Conditions **A.1**, **A.2**, and **A.3** of this permit:

(a) Steam Production: The permittee shall install and continuously monitor steam production (lb/hr), recording the maximum production (3-hour average) and daily production (24-hour block average) during each day of operation for each unit. Permittee shall record and log steam production (totalizer), temperature and pressure at least once during each hour of operation. All instrumentation shall be properly maintained and functional at all times.

(b) Maximum Heat Input: The permittee shall use the steam production data required under Specific Condition **A.17(a)** of this permit to determine the heat input rate on an hourly basis. The permittee shall assume a Thermal Efficiency Rating of 55% for each unit. The permittee shall determine and log the total maximum heat input rate (3-hour average) during each day of operation.

(c) Fuel Types: The permittee shall monitor the types of fuel fired in the emissions unit during each day of operation recording the heat input percentage for each fuel.

(d) Fuel Oil Usage: The permittee shall monitor fuel oil consumed in each unit during each day of operation recording the maximum hourly rate (24-hour block average) and daily rate (midnight to midnight). All instrumentation shall be properly maintained and functional at all times.

(e) Fuel Oil Sulfur Content: The permittee shall perform fuel oil sampling each day an emissions unit fires fuel oil analyzing the sample for sulfur content and recording the results of the analysis. In lieu of daily sampling, the permittee may determine compliance with the sulfur content limitation based on a certification from the fuel supplier. The certification must include the following:

  (a) Fuel Oil Supplier: Name, address and phone number;

  (b) Fuel Oil Lot Number: Lot number for delivery;

  (c) Fuel Oil Sulfur Content: Sulfur content and method of analysis;

  (d) Fuel Oil Density: Density and method used of analysis; and

  (e) Fuel Oil Heat Content: Heat and method of analysis.

(f) Hours of Operation: The permittee shall log the hours of operation for each day of operation.
[Rule 62-213.440(1)(b), F.A.C]

A.18. Air Quality Control System: The permittee shall implement the following periodic monitoring requirements to ensure compliance with Specific Conditions **A.4** and **A.5** of this permit:

(a) Total Pressure Drop: The permittee shall monitor and record the total pressure drop across each scrubber a minimum of once per 8-hour shift during each day of operation. All instrumentation shall be properly maintained and functional at all times.

(b) Scrubber Water Pressure: The permittee shall monitor and record the scrubber water inlet pressure to each scrubber a minimum of once per 8-hour shift during each day of operation. All instrumentation shall be properly maintained and functional at all times.

(c) Scrubber Water Flow: The permittee shall visually monitor and note feed water flow at each scrubber outlet a minimum of once per 8-hour shift during each day of operation.

(d) Scrubber Water Quality: The permittee shall sample and analyze the feed water to the scrubber for pH, total solids and undissolved solids a minimum of once per month.

(e) Design Criteria: The permittee's periodic monitoring results shall be compared to the design criteria of each scrubber.

E.U. ID No.	**Air Quality Control System Design Criteria**			
	Pressure Drop	**Water Pressure**	**Water Flow**	**Water Quality**
-003	4 – 8 inches of H_2O	15 – 25 psig	Minimum 305 gpm	6.5 – 8.5 pH
-004	4 – 8 inches of H_2O	15 – 25 psig	Minimum 420 gpm	6.5 – 8.5 pH
-005	4 – 8 inches of H_2O	15 – 25 psig	Minimum 340 gpm	6.5 – 8.5 pH

[Rule 62-213.440(1)(b), F.A.C]

A.19. Emissions Unit Performance: The permittee shall establish and set the proper air-to-fuel ratio for each unit prior to the annual compliance test to ensure compliance with Specific Conditions **A.6**, **A.7**, and **A.8** of this permit. Once established and set, the permittee may adjust or modify the combustion air system provided notification is provided to the Compliance Authority within 10-days of the change. The Compliance Authority may require additional testing in accordance with Rule 62-297.310(7)(b), F.A.C. based on the changes.
[Rule 62-213.440(1)(b), F.A.C]

New Source Performance Standards – 40 CFR 60

{Permitting note(s): The emissions units are each classified as an existing unit under 40 CFR 60 Subpart Db. The following conditions address reconstruction and modification requirements for informational purposes.}

A.20 Modification: Upon modification, each emissions unit shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere in accordance with 40 CFR 60.14 contained in Appendix NSPS-A.
[40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

A.21 Emission Rate Increases: When a determination of an emission rate increase is required and is based on results from manual emission tests or continuous monitoring systems, the procedures specified in 40 CFR 60 Appendix C shall be used to determine whether an increase in emission rate has occurred in accordance with 40 CFR 60.14 contained in Appendix NSPS-A. [40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

A.22 Reconstruction: Upon reconstruction, each emissions unit shall become an affected facility, irrespective of any change in emission rate in accordance with 40 CFR 60.15 contained in Appendix NSPS-A.
[40 CFR 60.15 and Rule 62-204.800(7)(d), F.A.C.]

Common Conditions

A.23. Common Conditions: This emissions unit is also subject to **Specific Conditions J.1. through J.20.** contained in Subsection **J. Common Conditions.**

Subsection B. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-009	Mill Boiler No. 10
-010	Mill Boiler No. 11

Emissions Unit(S) Details

Mill Boiler No. 10, designated Emissions Unit 009, is a Cell boiler fired by bagasse and blended Bunker C fuel oil. Particulate matter emissions from the unit are controlled by use of a Turbulaire Wet Impingement Scrubber (Ducon Vertical Oriclone (venturi) Wet Scrubber Type VVO, Size 174). The scrubber exhausts through a 75'stack. The boiler was last operated on 11/23/98.

Mill Boiler No. 11, designated Emissions Unit 010, is a Traveling Grate boiler fired by bagasse and blended Bunker C fuel oil. The unit is a Bigelow FHC-35SP boiler equipped with Detroit Stokers to burn bagasse and two (2) Peabody Type M-20 Oil Burners. Particulate matter emissions from the unit are controlled by use of a Ducon Multivane Wet Scrubber, Model 2, Size 180 (Installed after 3/12/90). The scrubber exhausts through a 75'stack. The boiler was last operated on 1/26/99

{Permitting note(s): The units are classified as existing major facilities under the PSD Program for particulate matter (PM), sulfur dioxide (SO_2), nitrogen oxides (NOx), volatile organic compounds (VOC), and carbon monoxide (CO). As major sources of VOC and NOx, each unit is subject to the Reasonably Available Control Technology (RACT) requirements of Rule 62-296.570, F.A.C. For these units, the permittee has requested and received VOC and NOx emission limits lower than the applicable regulation. Each unit is classified as an existing facility under the New Source Performance Standards (40 CFR 60 Subpart Db) and a new source under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burners.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

B.1. Permitted Capacity: The permittee shall not allow, cause, suffer or permit the operation of the units in excess of the following capacities without prior authorization from the Permitting Authority:

E.U. ID No.	Steam Production	Maximum Heat Input
-009	125,000 pounds per hour (24-hour average) of steam at 350-psig and 650°F. [Not Federally Enforceable]	285 mmBtu/hr (3-hour average). [Not Federally Enforceable]
-010	125,000 pounds per hour (24-hour average) of steam at 350-psig and 650°F. [Not Federally Enforceable]	279 mmBtu/hr (3-hour average). [Not Federally Enforceable]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

{Permitting note(s): Prior authorization includes the issuance of construction, reconstruction, or modification permits or a determination by the Permitting Authority that the action is not subject to 62-210.300(1), F.A.C.}

B.2. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the method(s) of operation resulting in increased short-term or long-term emissions, without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Steam Generator Operation: The permittee is authorized to operate the emissions units as Carbonaceous Fuel Burners (1). [Not Federally Enforceable]

(b) Carbonaceous Fuels (1): The permittee is authorized to fire bagasse as the primary fuel. [Not Federally Enforceable]

(c) Fossil Fuels: The permittee is authorized to fire No. 6 fuel oil with a maximum sulfur content of 2.5 percent by weight. [Not Federally Enforceable]

(d) Total Heat Input Rates: The permittee is authorized to operate the units at the total heat input rate specified in Specific Condition **B.1.** of this permit. The total heat input includes the sum of the carbonaceous fuels and fossil fuels fired. The annual average heat input from fuel oil shall not exceed 10 percent (3-year average, calendar year) nor 15 percent (1-year average, calendar year) of the total heat input. The total heat input may include the following: [Not Federally Enforceable]

Maximum Heat Input Rates		
E.U. ID No.	**Bagasse**	**Fuel Oil**
-009	285 mmBtu/hr	122.9 mmBtu/hr
-010	279 mmBtu/hr	83.3 mmBtu/hr

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

B.3. Hours of Operation: The permittee is authorized to operate the units continuously. [Not Federally Enforceable]

{Permitting note(s): The following notes address the Operating Restrictions: (1) The Department has classified the units as Carbonaceous Fuel Burners under Rule 62-296.410, F.A.C. versus Fossil-Fuel Fired Steam Generators under Rule 62-296.406, F.A.C. based on the definition of carbonaceous fuel fired equipment and the regulation which allows for the co-firing of fossil fuels. The annual limits on fuel oil heat input reflect the definition of "Oil Fired" contained in Rule 62-210.200, F.A.C. Operation of a unit with fossil fuels above the oil-fired levels would subject the unit to the requirements of Rule 62-296.406, F.A.C.}

Emission Limitations And Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

$285 \frac{MMBTU}{h} \times 1.5 \frac{lb}{MMBTU} = 427.5 \frac{lb}{h}$

$\approx$ 1872.45 TPY

$\times 5 \frac{lb}{MMBTU} = 1425 \, lb/h$

$\approx$ 6241.5

1912.45 TPY $= 436.63 \, lb/h$

↳ $1.53 \frac{lb}{MMBTU}$

$+ 0.03 \frac{lb}{MMBTU} \Rightarrow$ PSD.

B.4. Visible Emissions[1]: The permittee shall not allow visible emissions that exceed 30 percent opacity from any unit except that 40 percent opacity is allowed for two minutes in any one hour. [Rule 62-296.410(1)(b)1., F.A.C. and AC50-6963]

B.5. Particulate Matter: The permittee shall not allow particulate matter emissions in excess of the following emission limiting standards:

E.U. ID No.	Emission Limiting Standard
-009	0.20 pounds per million Btu (3-hour average) of heat input from carbonaceous fuel plus 0.10 pounds per million Btu (3-hour average) of heat input from fossil fuel from any unit. [AC50-6963]
-010	0.20 pounds per million Btu (3-hour average) of heat input from carbonaceous fuel plus 0.1 pounds per million Btu (3-hour average) of heat input from fossil fuel from any unit. [Rule 62-296.410(2)(b)2., F.A.C.]

B.6. Volatile Organic Compounds (VOC)[2] - The permittee shall not allow VOC emissions greater than 5.0 pounds per million Btu (3-hour average) of total heat input from any unit.
[Rule 62-296.570(4)(b)6, F.A.C.]

B.7. Nitrogen Oxides (NOx)[2] The permittee shall not allow NOx emissions greater than 0.9 pounds per million Btu (3-hour average) from any unit.
[Rule 62-296.570(4)(b)6, F.A.C.]

B.8. VOC & NOx RACT Limits: The permittee has assumed more stringent VOC and NOx emissions limit than the RACT emissions limit established in Rule 62-296.570(4), F.A.C., for the applicable emissions unit category. Compliance with these VOC and NOx emissions limits shall be considered compliance with RACT for purposes of the rule. The specific VOC and NOx limits assumed by the permittee and the conditions on these limits include the following:

(a) Volatile Organic Compounds (VOCs): Emissions of VOC shall not exceed 1.5 pounds per million Btu (3-hour average) of total heat input.

(b) Nitrogen Oxides (NOx): Emissions of NOx shall not exceed 0.45 pounds per million Btu (3-hour average) of total heat input.

(c) VOC RACT Limit Revision: The VOC RACT limit of this condition shall be revised based on actual stack test results obtained during the 1998-1999 and 1999-2000 crop seasons if testing demonstrates VOC emissions in the range of 1.5 to 5.0 lb/mmBtu. During the testing period, VOC emissions greater than 1.5 lb/mmBtu but less than 5.0 lb/mmBtu shall not constitute a violation. Upon completion of the testing period, the Permitting Authority shall revise the limit upwards, but shall not exceed 5.0 lb/mmBtu, if required.
[Not Federally Enforceable. Rule 62-296.570(2), F.A.C.]

B.9. Sulfur Dioxide: The permittee shall not allow the firing of fuel oil with a sulfur content greater than 2.5 percent by weight.
[Not Federally Enforceable]

{Permitting note(s): The following notes address the Emission Limitations and Standards: [(1)] The visible emissions limitation remains in effect until after the Permitting Authority acts upon the request for the Alternate Sampling Procedure. [(2)] VOC and NOx limits reflect the federally enforceable standards contained in the Rule.}

Test Methods And Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.10. Visible Emissions: All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

(a) Test Method: The test method for visible emissions shall be DEP Method 9, incorporated in Rule 62-297.401(9)(c), F.A.C.
[Rule 62-296.410(3)(a), F.A.C]

(b) Test Procedures: Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.410(3)(c), F.A.C.]

(c) Opacity Compliance Tests: The DEP Method 9 is specified as the applicable opacity test method and the required minimum period of observation for a compliance test shall be sixty (60) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310(4)(a)2., F.A.C.]

B.11. Particulate Matter: All particulate matter tests performed pursuant to the requirements of this permit shall comply with the following:

(a) Test Method: The test methods for particulate matter shall be EPA Methods 1, 2, 3, 4, and 5, described in 40 CFR 60, Appendix A, Rules 62-297.401(1) through (5), F.A.C.
[Rule 62-296.410(3)(b), F.A.C.]

(b) Test Procedures: The test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.410(3)(c), F.A.C.]

B.12. Volatile Organic Compounds: All volatile organic compound tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 25, or 25A incorporated in Rule 62-297.401(25) and (25)(a), F.A.C., modified to incorporate a dilution system as approved by the Department under the provisions of Rule 62-297.620, F.A.C. If EPA Method 25A is employed, EPA Method 18, Rule 62-297.401(18), F.A.C. may be used to quantify and subtract the methane fraction in the exhaust gases. Methods 25, 25A and 18 are described in 40 CFR 60, Appendix A.
[Rule 62-297.401, F.A.C.]

B.13. Nitrogen Oxides: All nitrogen oxides tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 7, or 7E, incorporated in Rules 62-297.401(7) and (7)(e), F.A.C. Methods 7 and 7E are described in 40 CFR 60, Appendix A.
[Rule 62-297.401, F.A.C.]

B.14. Fuel Oil Sulfur Content: All fuel oil sulfur content tests performed pursuant to the requirements of this permit shall be determined using ASTM D129-91, ASTM D2662-94, or ASTM D4294-90 , Rule 62-297.440(1)(h), (1)(i), or (1)(j), F.A.C. Copies of the documents are available from ASTM.
[Rule 62-297.401, F.A.C.]

Compliance Demonstrations And Periodic Monitoring

B.15. Compliance Demonstrations: The permittee shall have a formal compliance test conducted for the emissions unit annually during each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, for the following pollutants:

(a) Visible Emissions;
(b) Particulate Matter;
(c) Volatile Organic Compounds;
(d) Nitrogen Oxides; and
(e) Fuel Oil Sulfur Content.

[Rule 62-297.310(7), F.A.C. and AO50-203679, as amended]

B.16 Waiver of Compliance Test Requirements: For fuel oil sulfur content, the Compliance Authority may waive the compliance test requirement, unless a Special Compliance test is required under Rule 62-297.310(7)(b), F.A.C., provided the permittee complies with the requirements of Specific Condition **B.17(e)** of this permit and keeps copies of the fuel purchase records available for inspection. [Rule 62-297.310(7)(c), F.A.C.]

{Permitting note)s): Appendix ASP-001 contains the Florida Department of Environmental Protection (FDEP)'s March 26, 1999 Order (ASP No. 98-E-01) addressing annual compliance testing during years when the units operate less than 400 hours.}

B.17. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with the Specific Conditions **B.1**, **B.2**, and **B.3** of this permit:

(a) Steam Production: The permittee shall install and continuously monitor steam production (lb/hr), recording the maximum production (3-hour average) and daily production (24-hour block average) during each day of operation for each unit. Permittee shall record and log steam production (totalizer), temperature and pressure at least once during each hour of operation. All instrumentation shall be properly maintained and functional at all times.

(b) Maximum Heat Input: The permittee shall use the steam production data required under Specific Condition **B.17(a)** of this permit to determine the heat input rate on an hourly basis. The permittee shall assume a Thermal Efficiency Rating of 55% for each unit. The permittee shall determine and log the total maximum heat input rate (3-hour average) during each day of operation.

(c) Fuel Types: The permittee shall monitor the types of fuel fired in the emissions unit during each day of operation recording the heat input percentage for each fuel.

(d) Fuel Oil Usage: The permittee shall monitor fuel oil consumed in each unit during each day of operation recording the maximum hourly rate (24-hour block average) and daily rate (midnight to midnight). All instrumentation shall be properly maintained and functional at all times.

(e) Fuel Oil Sulfur Content: The permittee shall perform fuel oil sampling each day an emissions unit fires fuel oil analyzing the sample for sulfur content and recording the results of the analysis. In lieu of daily sampling, the permittee may determine compliance with the sulfur content limitation based on a certification from the fuel supplier. The certification must include the following:

1. Fuel Oil Supplier: Name, address and phone number;
2. Fuel Oil Lot Number: Lot number for delivery;
3. Fuel Oil Sulfur Content: Sulfur content and method of analysis;
4. Fuel Oil Density: Density and method used of analysis; and
5. Fuel Oil Heat Content: Heat and method of analysis.

(f) Hours of Operation: The permittee shall log the hours of operation for each day of operation.

[Rule 62-213.440(1)(b), F.A.C]

B.18. Air Quality Control System: The permittee shall implement the following periodic monitoring requirements to ensure compliance with Specific Conditions **B.4** and **B.5** of this permit:

(a) Total Pressure Drop: The permittee shall monitor and record the total pressure drop across each scrubber a minimum of once per 8-hour shift during each day of operation. All instrumentation shall be properly maintained and functional at all times.

(b) Scrubber Water Pressure: The permittee shall monitor and record the scrubber water inlet pressure to each scrubber a minimum of once per 8-hour shift during each day of operation. All instrumentation shall be properly maintained and functional at all times.

(c) Scrubber Water Flow: The permittee shall install and maintain orifice flow indicators for feed water flow on each scrubber and log flow rate a minimum of once per 8-hour shift during each day of operation (Consent Order dated 07/11/80).

(d) Scrubber Water Quality: The permittee shall sample and analyze the feed water to the scrubber for pH, total solids and undissolved solids a minimum of once per month.

(e) Design Criteria: The permittee's periodic monitoring results shall be compared to the design criteria of each scrubber.

Air Quality Control System Design Criteria				
E.U. ID No.	**Pressure Drop**	**Water Pressure**	**Water Flow**	**Water Quality**
-009	15-20 inches of H_2O	15 – 25 psig	Minimum 920 gpm	6.5 – 8.5 pH
-010	15-20 inches of H_2O	15 – 25 psig	Minimum 535 gpm	6.5 – 8.5 pH

[Rule 62-213.440(1)(b), F.A.C]

B.19. Emissions Unit Performance: The permittee shall establish and set the proper air-to-fuel ratio for each unit prior to the annual compliance test to ensure compliance with Specific Conditions **B.6.**, **B.7**, and **B.8** of this permit. Once established and set, the permittee may adjust or modify the combustion air system provided notification is provided to the Compliance Authority within 10-days of the change. The Compliance Authority may require additional testing in accordance with Rule 62-297.310(7)(b), F.A.C. based on the changes.
[Rule 62-213.440(1)(b), F.A.C]

New Source Performance Standards – 40 CFR 60

{Permitting note(s): The emissions units are each classified as an existing unit under 40 CFR 60 Subpart Db. The following conditions address reconstruction and modification requirements for informational purposes.}

B.20 Modification: Upon modification, each emissions unit shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere in accordance with 40 CFR 60.14 contained in Appendix NSPS-A.
[40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

B.21 Emission Rate Increases: When a determination of an emission rate increase is required and is based on results from manual emission tests or continuous monitoring systems, the procedures specified in 40 CFR 60 Appendix C shall be used to determine whether an increase in emission rate has occurred in accordance with 40 CFR 60.14 contained in Appendix NSPS-A. [40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

B.22 Reconstruction: Upon reconstruction, each emissions unit shall become an affected facility, irrespective of any change in emission rate in accordance with 40 CFR 60.15 contained in Appendix NSPS-A.
[40 CFR 60.15 and Rule 62-204.800(7)(d), F.A.C.]

Common Conditions

B.23. Common Conditions: This emissions unit is also subject to **Specific Conditions J.1. through J.20.** contained in Subsection **J. Common Conditions.**

SUBSECTION C. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-011	Mill Boiler No. 12
-012	Mill Boiler No. 14
-013	Mill Boiler No. 15

Emissions Unit(S) Details

Mill Boiler Nos. 12 and 14, designated Emissions Units 011 and 012, are Traveling Grate boilers fired by bagasse, blended Bunker C fuel oil, and/or wood chips. The units are Babcock & Wilcox Type SPB Mark II boilers each equipped with a Detroit Discharge Spreader Stoker, three (3) pneumatic type distributors, three (3) bagasse metering conveyor feeders, and one (1) B&W Force Draft Oil Burner. Particulate matter emissions from the units are controlled by separate Ducou Multivane Wet Scrubber, Model 2, Size 180. The scrubbers exhaust through separate 75'stack. The boilers were last operated on 11/22/98 and 11/23/98, respectively.

Mill Boiler No. 15, designated Emissions Units 013, is a Traveling Grate boiler fired by bagasse, blended Bunker C fuel oil, and/or wood chips. Particulate matter emissions from the unit is controlled by a Ducon Vertical Venturi Oriclone Wet Scrubber Type VVO, Size 174. The scrubber exhausts through a 75'stack. The boiler was last operated on 3/4/99.

{Permitting note(s): The units are classified as *new major facilities* under the PSD Program for particulate matter (PM), sulfur dioxide (SO_2), volatile organic compounds (VOC), and carbon monoxide (CO) and as existing major facilities for nitrogen oxides (NOx). As major sources of VOC and NOx, each unit is currently subject to the Reasonably Available Control Technology (RACT) requirements of Rule 62-296.570, F.A.C. For these units, the permittee has requested and received VOC and NOx emission limits lower than the applicable regulation. Each unit is classified as an existing facility under the New Source Performance Standards (40 CFR 60 Subpart Db) and a new source under Rule 62-296.410, F.A.C., Carbonaceous Fuel Burners.}

Permitting Requirements

The following specific conditions apply to the emissions unit(s) listed above:

C.1 After-the Fact PSD Applications: Within ninety (90) days of the effective date of this permit or ninety (90) days of reactivation of a unit, which ever is later, the permittee shall submit after-the fact construction permit applications in accordance with Rule 62-212.400, F.A.C. for each Section III, Subsection C Emissions Unit.
[Rules 62-210.300 and 62-212.400, F.A.C.]

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

C.2. Permitted Capacity: The permittee shall not allow, cause, suffer or permit the operation of the units in excess of the following capacities without prior authorization from the Permitting Authority:

E.U. ID No.	Steam Production	Maximum Heat Input
-011	150,000 pounds per hour (24-hour average) of steam at 350-psig and 650°F. [Not Federally Enforceable]	342 mmBtu/hr (3-hour average). [Not Federally Enforceable]
-012	150,000 pounds per hour (24-hour average) of steam at 350-psig and 650°F. [Not Federally Enforceable]	333 mmBtu/hr (3-hour average). [Not Federally Enforceable]
-013	125,000 pounds per hour (24-hour average) of steam at 350-psig and 650°F. [Not Federally Enforceable]	279 mmBtu/hr (3-hour average). [Not Federally Enforceable]

[Rules 62-4.160(2), 62-210.200(228) and 62-210.300, F.A.C.]

{Permitting note(s): Prior authorization includes the issuance of construction, reconstruction, or modification permits or a determination by the Permitting Authority that the action is not subject to 62-210.300(1), F.A.C.}

C.3. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the method(s) of operation resulting in increased short-term or long-term emissions, without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Steam Generator Operation: The permittee is authorized to operate the emissions units as Carbonaceous Fuel Burners [(1)].
[Not Federally Enforceable]

(b) Carbonaceous Fuels [(1)]: The permittee is authorized to fire bagasse and clean wood chips (as authorized in Appendix Wood-001of this permit) as the primary fuels.
[Not Federally Enforceable]

(c) Fossil Fuels: The permittee is authorized to fire No. 6 fuel oil with a maximum sulfur content of 2.5 percent by weight.
[Not Federally Enforceable]

(d) Total Heat Input Rates: The permittee is authorized to operate the units at the total heat input rate specified in Specific Condition **C.1.** of this permit. The total heat input includes the sum of the carbonaceous fuels and fossil fuels fired. The annual average heat input from fuel oil shall not exceed 10 percent (3-year average, calendar year) nor 15 percent (1-year average, calendar year) of the total heat input. The total heat input may include the following:
[Not Federally Enforceable]

Maximum Heat Input Rates			
E.U. ID No.	**Bagasse**	**Wood Chips**	**Fuel Oil**
-011	342 mmBtu/hr	342 mmBtu/hr	150.6 mmBtu/hr
-012	333 mmBtu/hr	333 mmBtu/hr	150.6 mmBtu/hr
-013	279 mmBtu/hr	-	86.3 mmBtu/hr

[Rules 62-4.160(2), 62-210.200(228) and 62-210.300, F.A.C.]

C.4. Hours of Operation: The permittee is authorized to operate the units continuously. [Not Federally Enforceable]

{Permitting note(s): The following notes address the Operating Restrictions: (1) The Department has classified the units as Carbonaceous Fuel Burners under Rule 62-296.410, F.A.C. versus Fossil-Fuel Fired Steam Generators under Rule 62-296.406, F.A.C. based on the definition of carbonaceous fuel fired equipment and the regulation which allows for the co-firing of fossil fuels. The annual limits on fuel oil heat input reflect the definition of "Oil Fired" contained in Rule 62-210.200, F.A.C. Operation of a unit with fossil fuels above the oil-fired levels would subject the unit to the requirements of Rule 62-296.406, F.A.C.}

Emission Limitations And Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.5. Visible Emissions(1): The permittee shall not allow visible emissions that exceed 30 percent opacity from any unit except that 40 percent opacity is allowed for two minutes in any one hour. [Rule 62-296.410(2)(b)1., F.A.C.]

C.6. Particulate Matter: The permittee shall not allow particulate matter emissions in excess of the following emission limiting standards:

E.U. ID No.	**Emission Limiting Standard**
-011	0.20 pounds per million Btu (3-hour average) of heat input from carbonaceous fuel plus 0.10 pounds per million Btu (3-hour average) of heat input from fossil fuel from any unit. [Rule 62-296.410(2)(b)2., F.A.C.]
-012	0.20 pounds per million Btu (3-hour average) of heat input from carbonaceous fuel plus 0.10 pounds per million Btu (3-hour average) of heat input from fossil fuel from any unit. [Rule 62-296.410(2)(b)2., F.A.C.]
-013	0.20 pounds per million Btu (3-hour average) of heat input from carbonaceous fuel plus 0.10 pounds per million Btu (3-hour average) of heat input from fossil fuel from any unit. [Rule 62-296.410(2)(b)2., F.A.C.]

C.7. Volatile Organic Compounds (VOC)[2]: The permittee shall not allow VOC emissions greater than 5.0 pounds per million Btu (3-hour average) of total heat input from any unit.
[Rule 62-296.570(4)(b)6, F.A.C.]

C.8. Nitrogen Oxides (NOx) [2]: The permittee shall not allow NOx emissions greater than 0.9 pounds per million Btu (3-hour average) from any unit.
[Rule 62-296.570(4)(b)6, F.A.C.]

C.9. VOC & NOx RACT Limits: The permittee has assumed more stringent VOC and NOx emissions limit than the RACT emissions limit established in Rule 62-296.570(4), F.A.C., for the applicable emissions unit category. Compliance with these VOC and NOx emissions limits shall be considered compliance with RACT for purposes of the rule. The specific VOC and NOx limits assumed by the permittee and the conditions on these limits include the following:
[Not Federally Enforceable]

(a) Volatile Organic Compounds (VOCs): Emissions of VOC shall not exceed 1.5 pounds per million Btu (3-hour average) of total heat input.

(b) Nitrogen Oxides (NOx): Emissions of NOx shall not exceed 0.45 pounds per million Btu (3-hour average) of total heat input.

(c) VOC RACT Limit Revision: The VOC RACT limit of this condition shall be revised based on actual stack test results obtained during the 1998-1999 and 1999-2000 crop seasons if testing demonstrates VOC emissions in the range of 1.5 to 5.0 lb/mmBtu. During the testing period, VOC emissions greater than 1.5 lb/mmBtu but less than 5.0 lb/mmBtu shall not constitute a violation. Upon completion of the testing period, the Permitting Authority shall revise the limit upwards, but shall not exceed 5.0 lb/mmBtu, if required.

[Rule 62-296.570(2), F.A.C.]

C.10. Sulfur Dioxide: The permittee shall not allow the firing of fuel oil with a sulfur content greater than 2.5 percent by weight.
[Not Federally Enforceable]

{Permitting note(s): The following notes address the Emission Limitations and Standards: [1] The visible emissions limitation remains in effect until after the Permitting Authority acts upon the request for the Alternate Sampling Procedure. [2] VOC and NOx limits reflect the federally enforceable standards contained in the Rule.}

Test Methods And Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.11. Visible Emissions: All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

(a) Test Method: The test method for visible emissions shall be DEP Method 9, incorporated in Rule 62-297.401(9)(c), F.A.C.
[Rule 62-296.410(3)(a), F.A.C]

(b) Test Procedures: Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.410(3)(c), F.A.C.]

(c) Opacity Compliance Tests: DEP Method 9 is specified as the applicable opacity test method and the required minimum period of observation for a compliance test shall be sixty (60) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310(4)(a)2., F.A.C.]

C.12. Particulate Matter: All particulate matter tests performed pursuant to the requirements of this permit shall comply with the following:

(a) Test Method: The test methods for particulate matter shall be EPA Methods 1, 2, 3, 4, and 5, described in 40 CFR 60, Appendix A, Rules 62-297.401(1) through (5), F.A.C.
[Rule 62-296.410(3)(b), F.A.C.]

(b) Test Procedures: The test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.410(3)(c), F.A.C.]

C.13. Volatile Organic Compounds: All volatile organic compound tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 25, or 25A, incorporated in Rule 62-297.401(25) and (25)(a), F.A.C., modified to incorporate a dilution system as approved by the Department under the provisions of Rule 62-297.620, F.A.C. If EPA Method 25A is employed, EPA Method 18, Rule 62-297.401(18), F.A.C. may be used to quantify and subtract the methane fraction in the exhaust gases. Methods 25, 25A and 18 are described in 40 CFR 60, Appendix A.
[Rule 62-297.401, F.A.C.]

C.14. Nitrogen Oxides: All nitrogen oxides tests performed pursuant to the requirements of this permit shall be determined using EPA Methods 7, or 7E, incorporated in Rules 62-297.401(7) and (7)(e), F.A.C. Methods 7 and 7E are described in 40 CFR 60, Appendix A.
[Rule 62-297.401, F.A.C.]

C.15. Fuel Oil Sulfur Content: All fuel oil sulfur content tests performed pursuant to the requirements of this permit shall be determined using ASTM D129-91, ASTM D2662-94, or ASTM D4294-90 , Rule 62-297.440(1)(h), (1)(i), or (1)(j), F.A.C. Copies of the documents are available from ASTM.
[Rule 62-297.401, F.A.C.]

Compliance Demonstrations And Periodic Monitoring

C.16. Compliance Demonstrations: The permittee shall have a formal compliance test conducted for the emissions unit annually during each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, for the following pollutants:

(a) Visible Emissions;

(b) Particulate Matter;

(c) Volatile Organic Compounds;

(d) Nitrogen Oxides; and

(e) Fuel Oil Sulfur Content.

[Rule 62-297.310(7), F.A.C. and AO50-203679, as amended]

C.17 Waiver of Compliance Test Requirements: For fuel oil sulfur content, the Compliance Authority may waive the compliance test requirement, unless a Special Compliance test is required under Rule 62-297.310(7)(b), F.A.C., provided the permittee complies with the requirements of Specific Condition **C.18(e)** of this permit and submits copies of the fuel purchase records with the annual compliance test report.

[Rule 62-297.310(7)(c), F.A.C.]

{Permitting note(s): Appendix ASP-001 contains the Florida Department of Environmental Protection (FDEP)'s March 26, 1999 Order (ASP No. 98-E-01) addressing annual compliance testing during years when the units operate less than 400 hours.}

C.18. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with the Specific Conditions **C.2**, **C.3.**, and **C.4.** of this permit:

(a) Steam Production: The permittee shall install and continuously monitor steam production (lb/hr), recording the maximum production (3-hour average) and daily production (24-hour block average) during each day of operation for each unit. Permittee shall record and log steam production (totalizer), temperature and pressure at least once during each hour of operation. All instrumentation shall be properly maintained and functional at all times.

(b) Maximum Heat Input: The permittee shall use the steam production data required under Specific Condition **C.18(a)** of this permit to determine the heat input rate on an hourly basis. The permittee shall assume a Thermal Efficiency Rating of 55% for each unit. The permittee shall determine and log the total maximum heat input rate (3-hour average) during each day of operation.

(c) Fuel Types: The permittee shall monitor the types of fuel fired in the emissions unit during each day of operation recording the heat input percentage for each fuel.

(d) Fuel Oil Usage: The permittee shall monitor fuel oil consumed in each unit during each day of operation recording the maximum hourly rate (24-hour block average) and daily rate (midnight to midnight). All instrumentation shall be properly maintained and functional at all times.

(e) Fuel Oil Sulfur Content: The permittee shall perform fuel oil sampling each day an emissions unit fires fuel oil analyzing the sample for sulfur content and recording the results of the analysis. In lieu of daily sampling, the permittee may determine compliance with the sulfur content limitation based on a certification from the fuel supplier. The certification must include the following:

1. Fuel Oil Supplier: Name, address and phone number;
2. Fuel Oil Lot Number: Lot number for delivery;
3. Fuel Oil Sulfur Content: Sulfur content and method of analysis;
4. Fuel Oil Density: Density and method used of analysis; and
5. Fuel Oil Heat Content: Heat and method of analysis.

(f) Hours of Operation: The permittee shall log the hours of operation for each day of operation.

[Rule 62-213.440(1)(b), F.A.C]

C.19. Air Quality Control System: The permittee shall implement the following periodic monitoring requirements to ensure compliance with Specific Conditions **C.5.** and **C.6.** of this permit:

(a) Total Pressure Drop: The permittee shall monitor and record the total pressure drop across each scrubber a minimum of once per 8-hour shift during each day of operation. All instrumentation shall be properly maintained and functional at all times.

(b) Scrubber Water Pressure: The permittee shall monitor and record the scrubber water inlet pressure to each scrubber a minimum of once per 8-hour shift during each day of operation. All instrumentation shall be properly maintained and functional at all times.

(c) Scrubber Water Flow: The permittee shall install and maintain orifice flow indicators for feed water flow on each scrubber and log flow rate a minimum of once per 8-hour shift during each day of operation (Consent Order dated 07/11/80).

(d) Scrubber Water Quality: The permittee shall sample and analyze the feed water to the scrubber for pH, total solids and undissolved solids a minimum of once per month.

(e) Design Criteria: The permittee's periodic monitoring results shall be compared to the design criteria of each scrubber.

Air Quality Control System Design Criteria				
E. U. ID No.	**Pressure Drop**	**Water Pressure**	**Water Flow**	**Water Quality**
-011	4-8 inches of H_2O	15 – 25 psig	Minimum 535 gpm	6.5 – 8.5 pH
-012	4-8 inches of H_2O	15 – 25 psig	Minimum 345 gpm	6.5 – 8.5 pH
-013	15-20 inches of H_2O	15 – 25 psig	Minimum 700 gpm	6.5 – 8.5 pH

[Rule 62-213.440(1)(b), F.A.C]

C.20. Emissions Unit Performance: The permittee shall establish and set the proper air-to-fuel ratio for each unit prior to the annual compliance test to ensure compliance with Specific Conditions **C.7.**, **C.8.**, and **C.9.** of this permit. Once established and set, the permittee may adjust or modify the combustion air system provided notification is provided to the Compliance Authority within 10-days of the change. The Compliance Authority may require additional testing in accordance with Rule 62-297.310(7)(b), F.A.C. based on the changes.
[Rule 62-213.440(1)(b), F.A.C]

New Source Performance Standards – 40 CFR 60

{Permitting note(s): The emissions units are each classified as an existing unit under 40 CFR 60 Subpart Db. The following conditions address reconstruction and modification requirements for informational purposes.}

C.21. Modification: Upon modification, each emissions unit shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere in accordance with 40 CFR 60.14 contained in Appendix NSPS-A.
[40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

C.22. Emission Rate Increases: When a determination of an emission rate increase is required and is based on results from manual emission tests or continuous monitoring systems, the procedures specified in 40 CFR 60 Appendix C shall be used to determine whether an increase in emission rate has occurred in accordance with 40 CFR 60.14 contained in Appendix NSPS-A. [40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

C.23. Reconstruction: Upon reconstruction, each emissions unit shall become an affected facility, irrespective of any change in emission rate in accordance with 40 CFR 60.15 contained in Appendix NSPS-A. [40 CFR 60.15 and Rule 62-204.800(7)(d), F.A.C.]Modification: Upon modification, each emissions unit shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere.
[40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

Common Conditions

C.24. Common Conditions: This emissions unit is also subject to **Specific Conditions J.1. through J.20.** contained in Subsection **J. Common Conditions.**

Subsection D. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-014	Mill Boiler No. 16

Emissions Unit(S) Details

Mill Boiler No. 16, designated Emissions Unit 014, is a Package Boiler manufactured by Babcock & Wilcox, Model No. FM 120-97. The air quality control system or strategy includes use of very low sulfur distillate fuel oil (Grade No. 2), Low NOx Burners (Coen) and a flue gas recirculation system. The boiler exhausts through a 75-foot stack.

{Permitting note(s): The unit is classified as a new major facility under the PSD Program for sulfur dioxide (SO_2) and nitrogen oxides (NOx), and as a synthetic minor source for particulate matter (PM), volatile organic compounds (VOC), and carbon monoxide (CO). As a synthetic minor source of VOC and NOx, the unit is subject to the Reasonably Available Control Technology (RACT) emission limiting standards of Rule 62-296.570, F.A.C. The unit is classified as a new facility under the New Source Performance Standards (40 CFR 60 Subpart Db) and Rule 62-296.406, F.A.C., Fossil Fuel Fired Steam Generators with less than 250 mmBtu/hr of Heat Input.}

Construction Requirements

The following specific conditions apply to the emissions unit(s) listed above:

D.1. Design Specifications: The permittee shall not allow any changes to the design of the unit without prior authorization from the Permitting Authority. The design requirements include the following:

(a) Heat Release Rate: The unit shall be designed for a heat release rate of greater than 70,000 Btu/hr-ft^2.
[PSD-FL-169 and AC50-191876, as amended]

(b) Stack Height: The unit shall be equipped with a single stack, 5 foot in diameter and a minimum height of 75 feet.
[PSD-FL-169 and AC50-191876, as amended]

(c) Stack Sampling Facilities: The stack sampling facilities for this stack must comply with Rule 62-297.345, F.A.C.
[PSD-FL-169 and AC50-191876, as amended]

(d) Monitoring Equipment: This unit shall be equipped with instruments to measure steam production, steam pressure, and steam temperature.
[PSD-FL-169 and AC50-191876, as amended]

(e) Air Quality Control Systems: This unit shall be equipped with the following:

(1) Low NOx Distillate Oil Burners.
(2) Flue Gas Recirculation System.

[PSD-FL-169 and AC50-191876, as amended]

(f) Continuous Monitoring Systems: The permittee shall install and operate continuous monitoring devices for opacity and nitrogen oxides (NOx). The monitoring devices shall meet the applicable requirements of 40 CFR 60.48b(a) and (b).
[PSD-FL-169 and AC50-191876, as amended]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

D.2. Permitted Capacity: The permittee shall not allow, cause, suffer or permit the operation of the unit in excess of the following capacities without prior authorization from the Permitting Authority:

(a) Steam Production: 150,000 pounds per hour (1-hour average).
[PSD-FL-169 and AC50-191876, as amended]

(b) Maximum Heat Input: 1,463 gallons per hour (~205 mmBtu/hr based on No.2 Fuel Oil) on a 1-hour average.
[PSD-FL-169 and AC50-191876, as amended]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

{Permitting note(s): Prior authorization includes the issuance of construction, reconstruction, or modification permits or a determination by the Permitting Authority that the action is not subject to 62-210.300(1), F.A.C.}

D.3. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the methods of operation without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Steam Generator Operation: The permittee is authorized to operate the emissions unit as a Fossil-Fuel Fired Steam Generator.
[PSD-FL-169 and AC50-191876, as amended]

(b) Fossil Fuels: The permittee is authorized to fire only very low sulfur distillate fuel oil, Grade No. 2.
[PSD-FL-169 and AC50-191876, as amended]

(c) Seasonal Operations: The permittee is authorized to operate Mill Boiler No. 16 during the crop season (November through February), provided the heat input is limited to the equivalent reduction in heat input from No. 6 fuel oil for the existing bagasse/No. 6 fuel oil fired boilers at the sugar mill. Mill Boiler No. 16 shall not be operated as a replacement to a functional bagasse fired boiler when bagasse fuel is available.
[PSD-FL-169 and AC50-191876, as amended]

(d) Simultaneous Operations: Following the permanent shutdown of Emissions Units 003, 004, 005, 006, 010, 011, 012, 013, and 016, the permittee is authorized to operate Mill Boiler No. 16 as a standby boiler for the cogeneration facility (EU ID Nos. 030, 031, & 032) and may operate the Emissions Unit during startup, debugging, and testing of the cogeneration facility. After April 1, 1998, Mill Boiler No. 16 may be operated only when one or more of the cogeneration facility boilers are shutdown. [PSD-FL-169 and AC50-191876, as amended]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

D.4. Hours of Operation: The permittee shall not allow the operation of the unit for more than 175 days (4,200 hours) during the off-season months of March through October.
[PSD-FL-169, as amended and AC50-191876, as amended]

Emission Limitations And Standards

D.5. Visible Emissions: The permittee shall not allow visible emissions that exceed 20 percent opacity (6-minute average), except that an opacity of up to 27 percent is allowed for 6 minutes in any 1-hour period.
[40 CFR 60.43b(f), PSD-FL-169 ,and AC50-191876, as amended]

D.6. Stack Emissions: The permittee shall not allow stack emissions to exceed any limit shown in the following Table:

Allowable Emissions					
Pollutant	**lb/mmBtu**	**lb/hr**	**TPY(1)**	**TPY(2)**	**Total TPY(3)**
Particulate Matter	0.054	11.0	23.1	12.9	36.0
PM10	0.027	5.5	11.6	6.4	18.0
Volatile Organic Compounds	0.09	18.5	38.7	21.7	60.4
Nitrogen Oxides	0.18(4)	36.9	77.5	43.2	120.7
Carbon Monoxide	0.20	41.0	86.1	48.0	134.1
Sulfur Dioxide	0.51	105.5	132.9	123.6	256.5

Notes:
(1) Allowable emissions during the period March 1 through October 31.
(2) Potential Emissions during the period November 1 through February 28.
(3) Potential Emissions during the entire year for purposes of annual testing. For pollutants with potential emissions greater than 100 tons per year an annual stack test is required unless exempt by rule, permit or order.
(4) Based on a 30-day rolling average as determined by the NOx CEMS. All other pollutants based on the 3-hour stack test average.

[PSD-FL-169, as amended and AC50-191876, as amended]

D.7. Sulfur Dioxide: The permittee shall allow the firing of only No. 2 fuel oil containing 0.5 percent sulfur by weight during the crop season and 0.3 percent sulfur by weight during the off-season within Mill Boiler No. 16.
[PSD-FL-169 and AC50-191876, as amended]

Test Methods And Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.8. Visible Emissions: All visible emissions tests performed pursuant to the requirements of this permit shall be conducted using EPA Method 9, described in 40 CFR 60, Appendix A, Rule 62-297.401(9), F.A.C. The EPA Method 9 is specified as the applicable opacity test method and the required minimum period of observation for a compliance test shall be sixty (60) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310(4)(a)2., F.A.C., PSD-FL-169, and AC50-191876, as amended]

D.9. Particulate Matter: All particulate matter tests performed pursuant to the requirements of this permit shall be conducted using EPA Methods 1, 2, 3, 4, and 5, described in 40 CFR 60, Appendix A, incorporated in Rules 62-297.401(1) through (5), F.A.C.
[PSD-FL-169, as amended and AC50-191876, as amended]

D.10. PM10: All PM10 tests performed pursuant to the requirements of this permit shall be conducted using EPA Method 201 or 201A, incorporated in Rules 62-297.401(41) and 62-297.401(41)(a), F.A.C. and described in 40 CFR 51, Appendix M.
[PSD-FL-169 and AC50-191876, as amended]

D.11. Volatile Organic Compounds: All volatile organic compound tests performed pursuant to the requirements of this permit shall be conducted using EPA Method 25, incorporated in Rule 62-297.401(25), F.A.C. described in 40 CFR 60, Appendix A.
[PSD-FL-169, as amended and AC50-191876, as amended]

D.12. Nitrogen Oxides: All nitrogen oxides tests performed pursuant to the requirements of this permit shall be conducted using EPA Methods 7, 7A or 7E, incorporated in Rules 62-297.401(7), (7)(a), or 7(e)F.A.C. and described in 40 CFR 60, Appendix A.
[PSD-FL-169 and AC50-191876, as amended]

D.13. Carbon Monoxide: All carbon monoxide tests performed pursuant to the requirements of this permit shall be conducted using EPA Method 10, incorporated in Rule 62-297.401(10), F.A.C. and described in 40 CFR 60, Appendix A.
[PSD-FL-169 and AC50-191876, as amended]

D.14. Sulfur Dioxide: All sulfur dioxide tests performed pursuant to the requirements of this permit shall be conducted using EPA Methods 6, 6A, or 6B, incorporated in Rules 62-297.401(6), (6)(a), and (6)(b), F.A.C. and described in 40 CFR 60, Appendix A.

[Rule 62-297.401, F.A.C.]

D.15. Fuel Oil Sulfur Content: All fuel oil sulfur content tests performed pursuant to the requirements of this permit shall be conducted using ASTM D129-91, ASTM D2662-94, or ASTM D4294-90 , Rule 62-297.440(1)(h), (1)(i), or (1)(j), F.A.C. Copies of the documents are available from ASTM.[Rule 62-297.401, F.A.C.]

Compliance Demonstrations And Periodic Monitoring

D.16. Continuous Compliance Demonstrations: The permittee shall determine compliance with the emission limitations for nitrogen oxides and opacity by use of continuous monitoring systems and comply with the performance specifications under 40 CFR Part 60, Appendix B and the Quality Assurance Procedures of 40 CFR Part 60, Appendix F. The specific performance specifications include the following:

(a) Performance Specification 1—Specifications and test procedures for opacity continuous emission monitoring systems in stationary sources.

(b) Performance Specification 2—Specifications and test procedures for SO_2 and NOx continuous emission monitoring systems in stationary sources.

(c) Performance Specification 3—Specifications and test procedures for O_2 and CO_2 continuous emission monitoring systems in stationary sources.

(d) Performance Specification 6—Specifications and test procedures for continuous emission rate monitoring systems in stationary sources.

[40 CFR 60.48b(a), 40 CFR 60.48b(b), 40 CFR 60.13(a), and Rule 62-204.800(7), F.A.C.]

D.17. Annual Compliance Demonstrations: The permittee shall have formal compliance tests conducted for visible emissions, particulate matter, nitrogen oxides, sulfur dioxide and carbon monoxide from the emissions unit annually during each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit.
[Rule 62-297.310(7), F.A.C., PSD-FL-169, as amended and AC50-191876, as amended]

D.18. Renewal Compliance Demonstrations: The permittee shall have formal compliance tests conducted for particulate matter, PM10, volatile organic compounds, carbon monoxide and sulfur dioxide from the emissions unit prior to renewal of the operating permit (Every five years), unless otherwise specified by rule, order, or permit. The most recent annual compliance tests may be submitted to satisfy the requirements of this provision.
[Rule 62-297.310(7), F.A.C., PSD-FL-169, as amended and AC50-191876, as amended]

D.19. Waiver of Compliance Test Requirements: The Compliance Authority shall waive the compliance test requirements, unless a Special Compliance test is required under Rule 62-297.310(7)(b), F.A.C., for the following pollutants:

(a) Annual and renewal sulfur dioxide testing provided the permittee maintains fuel oil records and/or vendor certifications in accordance with Condition III.D.19 (c) of this permit and 40 CFR 60.49b(r).

(b) Annual carbon monoxide testing provided the permittee burns less than 22,470 gallons of No. 2 fuel oil between November 1 and February 28 of each federal fiscal year. [Rule 62-297.310(7)(a)4.b.,F.A.C, PSD-FL-169, as amended, and AC50-191876, as amended]

(c) Renewal testing provided that during the year prior to renewal, the unit did not operate or operated less than 400 hours.

[Rule 62-297.310(7)(a)4.a., F.A.C.]

D.20. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with the Specific Conditions **D.2.**, **D.3.**, **D.4.** and **D.7.** of this permit: [Rule 62-213.440(1)(b), F.A.C]

(a) Steam Production: The permittee shall monitor steam production (lb/hr), pressure, and temperature recording the hourly values during each day of operation. All instrumentation shall be properly maintained and functional at all times.
[PSD-FL-169, as amended and AC50-191876, as amended]

(b) Maximum Heat Input: The permittee shall monitor fuel oil consumption (gal/hr) recording the value hourly.
[PSD-FL-169, as amended and AC50-191876, as amended]

(c) Oil Sulfur Content: The permittee shall perform fuel oil sampling each day an emissions unit fires fuel oil analyzing the sample for sulfur content and recording the results of the analysis. In lieu of daily sampling, the permittee may determine compliance with the sulfur content limitation based on a certification from the fuel supplier. The certification must include the following:

(1) Fuel Oil Supplier: Name, address and phone number;

(2) Fuel Oil Lot Number: Lot number for delivery;

(3) Fuel Oil Sulfur Content: Sulfur content and method of analysis;

(4) Fuel Oil Density: Density and method used of analysis; and

(5) Fuel Oil Heat Content: Heat and method of analysis

[40 CFR 60.49b(r)].

(d) Hours of Operation: The permittee shall log the hours of operation for each day of operation.
[PSD-FL-169, as amended and AC50-191876, as amended]

D.21. Emissions Unit Performance: The permittee shall use the continuous monitoring systems to ensure compliance with Specific Condition **D.6** of this permit :
[Rule 62-213.440(1)(b), F.A.C]

New Source Performance Standards (NSPS) – 40 CFR 60

{Permitting note: The boiler is subject to the requirements of 40 CFR 60 Subpart A-General Provisions and Subpart Db- Standards of Performance for Industrial-Commercial-InstitutionalSteam Generating Units. The NSPS include notifications, emission limitations, monitoring and testing requirements.}

D.22. 40 CFR 60 Subpart A, General Provisions: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart A contained in Appendix NSPS-A of this permit. Specifically:

(a) 40 CFR 60.5, Determination of Construction or Modification,
(b) 40 CFR 60.6, Review of Plans,

(c) 40 CFR 60.7, Notification and Recordkeeping,
(d) 40 CFR 60.8, Performance Tests,
(e) 40 CFR 60.11, Compliance with Standards and Maintenance Requirements,
(f) 40 CFR 60.12, Circumvention,
(g) 40 CFR 60.13, Monitoring Requirements,
(h) 40 CFR 60.14, Modification,
(i) 40 CFR 60.15, Reconstruction,
(j) 40 CFR 60.17, Incorporation by Reference, and
(k) 40 CFR 60.19, General Notification and Reporting Requirements

[40 CFR 60.1, Rule 62-204.800(7)(a), F.A.C.]

D.23. 40 CFR 60 Subpart Db—Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart Db contained in Appendix NSPS-Db. Specifically:

40 CFR 60.42b(e) & (j), Standard for Sulfur Dioxide,
40 CFR 60.43b(f), & (g), Standard for Particulate Matter,
40 CFR 60.44b(a)(1)(ii), (h), and (i), Standard for Nitrogen Oxides,
40 CFR 60.45b(j), Compliance and Performance Test Methods and Procedures for Sulfur Dioxide,
40 CFR 60.46b(a), (b), (c), (d)(7). (e)(1), (e)(4), and (g), Emissions Monitoring for Particulate Matter and Nitrogen Oxides,
40 CFR 60.47b(f), Emission Monitoring for Sulfur Dioxide,
40 CFR 60.48b(a), (b), (c), (d), (e)(3), (f), (g)(1), and (g)(2), Emission Monitoring for Particulate Matter and Nitrogen Oxides, and
40 CFR 60.49b(a), (b), (c)(1)-(3), (d), (e), (f), (g)(1)-(10), (h)(1)-(4), (i), (j), (k)(1)-(11), (l)(1)-(9), (o), (p) and (r), Reporting and Recordkeeping Requirements.

[40 CFR 60.40b(a) and Rule 62-204.800(7)(b), F.A.C.]

D.24. Common Conditions: This emissions unit is also subject to **Specific Conditions J.1. through J.20.** contained in Subsection **J. Common Conditions.**

SUBSECTION E. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-015	Volatile Organic Liquid Storage Tank (Sugar Mill)
-016	Volatile Organic Liquid Storage Tank (Sugar Mill)
-017	Volatile Organic Liquid Storage Tank (Sugar Mill)
-033	Volatile Organic Liquid Storage Tank (Cogeneration Facility)

Emissions Unit(S) Details

Three (3), fixed-cone-roof double-walled storage tanks each having an approximate capacity of 29,500 gallons. The tanks were constructed after July 23, 1984 and are subject to specific recordkeeping requirements of 40 CFR 60 Subpart Kb. The tanks store No. 2 distillate fuel oil used exclusively for Mill Boiler No. 16.

{Permitting note(s): The units are classified as new facilities under the New Source Performance Standards (40 CFR 60 Subpart Kb). Emissions Unit 033 is subject to the recordkeeping requirement of 40 CFR 60 Subpart Kb.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

E.1. Permitted Capacity. The permittee shall not allow, cause, suffer or permit the operation of Emissions Units 015, 016, and 017 in excess of the following total capacity without prior authorization from the Permitting Authority:

(a) Annual Throughput: 9,344,600 gallons (12-month rolling total) of No. 2 distillate oil.

[Rules 62-4.160(2), 62-210.200(228), 62-210.300, F.A.C. and AC50-265485]

E.2. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the method of operation of Emissions Units 015, 016, and 017 without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Fuel Type(s): The permittee is authorized to store No. 2 distillate oil.

(b) Fuel Vapor Pressure: The permittee shall not store or handle any fuels within the units with a maximum true vapor pressure greater than 15.0 kPa (2.176 psi). [AC50-265485 and 40 CFR 60.110b(c)]

[Rules 62-4.160(2), 62-210.200(228), 62-210.300, F.A.C., 40 CFR 60.110b(c), and AC50-265485]

E.3. Hours of Operation: The permittee is authorized to operate the units continuously.

[AC50-265485]

Emission Limitations And Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

E.4. Volatile Organic Compounds (VOC): The permittee shall not allow VOC emissions greater than 217 pounds per year from Emissions Units 015, 016, and 017.
[AC50-265485]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Compliance Demonstrations And Periodic Monitoring

E.5. Compliance Demonstrations: The permittee shall demonstrate compliance with the emissions limitation of Specific Condition **E.4.** based on record keeping and emission estimates calculated using the latest version of AP-42 or the TANKS Software Package.
[Rule 62-297.310(7), F.A.C.]

E.6. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with the Specific Conditions **E.1**, **E.2.** and **E3.** of this permit:

(a) Monthly Throughput: The permittee shall monitor and record the monthly throughput of volatile organic liquids through each tank.

(b) Volatile Organic Liquid Types: The permittee shall monitor and record the type (Name and True Vapor Pressure at 80°F) of volatile organic liquids stored and handled in each tank.

[Rule 62-213.440(1)(b), F.A.C]

New Source Performance Standards (NSPS)

{Permitting note: All the units are subject to the recordkeeping requirements of 40 CFR 60 Subpart Kb provided the permittee complies with the requirements of 40 CFR 60.110b, Applicability.}

E.7. Modification: Upon modification, the emissions unit shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere in accordance with 40 CFR 60. 14.
[40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

E.8. Emission Rate Increases: When a determination of an emission rate increase is required and it is to be based on results from manual emission tests or continuous monitoring systems, the procedures specified in 40 CFR 60 Appendix C shall be used to determine whether an increase in emission rate has occurred in accordance with 40 CFR 60. 14.
[40 CFR 60.14 and Rule 62-204.800(7)(d), F.A.C.]

E.9. Reconstruction: Upon reconstruction, the emissions unit shall become an affected facility, irrespective of any change in emission rate in accordance with 40 CFR 60. 15.
[40 CFR 60.15 and Rule 62-204.800(7)(d), F.A.C.]

E10. 40 CFR 60 Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart Kb contained in Appendix NSPS-Kb. Specifically:

(a) 40 CFR 60.110b, Applicability,

(b) 40 CFR 60.111b, Definitions,

(c) 40 CFR 60.116b, Monitoring of Operations

[40 CFR 60.40b(a), Rule 62-204.800(7)(b), F.A.C.]

E11. Common Conditions: This emissions unit is also subject to **Specific Conditions J.12. , J.18, and J.19.** contained in Subsection **J. Common Conditions.**

Subsection F. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-018	Central Vacuum System for Trans-Shipment Facility
-019	Packaging Lines
-020	Sugar Grinder & Hopper
-025	Fluidized Bed Dryer/Cooler
-026	Sugar Silo S1101
-027	Sugar Silo S1102
-028	Sugar Silo S1103

Emissions Unit(s) Details

Central Vacuum System, designated Emissions Unit 018, used periodically for house keeping purposes. The system includes various pick-up points throughout the Trans-Shipment Facility and is equipped with a cyclonic separator followed by a baghouse manufactured by Ross Cook (Model No. RC30HBFBX-PJ). The baghouse exhausts through an 8' stack.

Packaging Lines, designated Emissions Unit 019, consisting of ten (10) packaging lines, which are used to package sugar in bags ranging in size from 5 pounds to several hundred pounds. The packaging lines are connected to a single baghouse manufactured by MAC Filter (Model 55AVSC64. The baghouse exhausts through a 27' stack.

Sugar Grinder and Hopper, designated Emissions Unit 020 used to reduce the sugar solids to a desired particle size including powered sugar. The grinder has a design capacity of 4 tons per hour. The grinder and interconnected hopper are connected to baghouse manufactured by Reimelt Corporation. The baghouse exhausts through a 45' stack.

Fluidized Bed Dryer, designated emissions unit 025 used as the primary sugar drying system with a permitted capacity of 36.25 TPH. The particulate matter emissions from the fluidized bed dryer are exhausted through a high efficiency baghouse manufactured by BETH GmbH, 23556 L0B-beck (Type BETHPULS 6.60 x 7.5.10). The baghouse exhausts through an 80' stack.

Sugar silo numbers S1101, S1102, and S1103, designated Emissions Units 026, 027, and 028, used to store and handle refined sugar prior to packaging and/or grinding. Each silo has a net capacity of 4,600 cubic feet, a diameter of 12 feet, a height of 68 feet and is equipped with a baghouse manufactured by Reimelt Corporation (Model No. JF795-14P-7.5-5). Each baghouse exhausts through an individual 65' stack.

{Permitting note(s): The units are classified as synthetic minor sources under the PSD Program and considered as "Regulated Emissions Units" because they are subject to unit-specific federally enforceable emission limitations for particulate matter and visible emissions.}

Construction Restrictions

The following specific conditions apply to the emissions unit(s) listed above:

{Permitting note(s): The following construction restrictions are significant, in that the applicant presented the specifications to the Department as part of a synthetic-minor source construction permit application. Minor changes in the design specification may result in violations of the annual particulate matter emission limitations requested by the permittee and incorporated into the federally-enforceable permit conditions. For the Refinery Operations, activities which are completely enclosed and vented within the building are not classified as air pollution sources.}

F.1. Design Specifications: The permittee shall not allow, cause, suffer or permit changes to the following Air Quality Control System (AQCS) specifications without prior authorization from the Permitting Authority.

EU ID No.	Design Flows[1]		AQCS Fabric Filter Specifications[1]			Potential Emissions[1]	
	(ACFM)	(DSCFM)	Filtering Material	Filtering Area	A/C Ratio	gr/dscf	lb/hr
-018	284	280	PF Bags	72	3.9	0.01	0.024
-019	10,000	9,868	PP Bags	3,520	2.84	0.01	0.857
-020	3,000	2,960	GTP Bags	800	3.75	0.0005	0.013
-025	70,620	N/A	PE 550	9,041	7.81	N/A	1.92/0.078[2]
-026	521	500	SPF Bags	81 sq. ft.	6.17	0.02	0.0857
-027	521	500	SPF Bags	81 sq. ft.	6.17	0.02	0.0857
-028	521	500	SPF Bags	81 sq. ft.	6.17	0.02	0.0857

A/C Ratio – Air to Cloth Ratio (dscfm/sq. ft)
N/A – Not Applicable
PF – Polyfelt
PP – Polyester Pleated
GTP – Gore-Tex Polyester
SPF – Standard Polyester Felt
PE 550 – Filter Quality per Manufacturer's Specifications

[1] - Not Federally Enforceable, 0990005-001-AC and 0990005-002-AC.
[2] – Potential Emissions include PM and PM10.

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

F.2. Permitted Capacities: The permittee shall not allow, cause, suffer or permit the operation of a unit in excess of the following capacities without prior authorization from the Permitting Authority.

EU ID No.	Process Rates		
	TPH	**TPY**	**Regulation/Permit**
-018	N/A	N/A	Not Federally Enforceable, 099-0005-001-AC.
-019	81.5(1)	N/A	Not Federally Enforceable, 099-0005-001-AC.
-020	4	N/A	Not Federally Enforceable, 099-0005-001-AC.
-025	36.25	261,000	099-0005-002-AC.
-026	87.5	N/A	Not Federally Enforceable, 099-0005-001-AC.
-027	87.5	N/A	Not Federally Enforceable, 099-0005-001-AC.
-028	87.5	N/A	Not Federally Enforceable, 099-0005-001-AC.
Note(s):(1) Maximum Loading to all packaging lines.			

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

F.3. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the method of operation without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Central Vacuum System: The permittee is authorized to use the system for housekeeping purposes and vent the exhaust to the outside air through the AQCS. The system has no restrictions on the number or types of pick-up points.
[Not Federally Enforceable; 0990005-001-AC]

(b) Packaging Lines: The permittee is authorized to operate a total of ten (10) packaging lines and vent the exhaust to the outside air through the AQCS. The permittee may operate all ten (10) packaging lines simultaneously at a maximum feed rate of 81.5 TPH.
[Not Federally Enforceable; 0990005-001-AC]

(c) Sugar Grinder & Hopper: The permittee is authorized to operate a sugar grinder and associated interconnected hopper and vent the exhaust to the outside air through the AQCS. The permittee may operate the grinder at a maximum feed rate of 4 TPH.
[Not Federally Enforceable; 0990005-001-AC]

(d) Fluidized Bed Dryer/Cooler; The permittee is authorized to operate the Fluidized Bed Dryer/Cooler as the primary sugar drying process and vent the exhaust to the outside air through the AQCS. The permittee may operate the Fluidized Bed Dryer/Cooler at a maximum feed rate of 36.25 TPH.
[0990005-002-AC]

(e) Storage Silos: The permittee is authorized to unload sugar from two refinery trucks at a time into a single silo using mechanical conveyors and vent the exhaust to the outside air through the AQCS. The permittee is authorized to inject a maximum rate of 500 dscfm of dry-compressed air into the bottom of each silo.
[Not Federally Enforceable; 0990005-001-AC]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

F.4. Hours of Operation: The permittee is authorized to operate the Central Vacuum System, Packaging Lines, Sugar Grinder and Hopper, Storage Silos continuously [099-0005-001-AC]. The permittee is authorized to operate the Fluidized Bed Dryer/Cooler a maximum of 7,200 hours per year.
[0990005-002-AC]

Emission Limitations And Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

F.5. Visible Emissions: The permittee shall not allow visible emissions greater than 5 percent opacity (6-minute average) from the Central Vacuum System (EU ID No. 018), the Packaging Lines (EU ID No. 019), the Fluidized Bed Dryer/Cooler (EU ID No. 25), or the Storage Silos (EU ID Nos. 026, 027, & 028) baghouse exhausts.
[Rule 62-297.620(4), F.A.C., 0990005-001-AC, and 0990005-002-AC]

F.6. Particulate Matter (PM & PM_{10}): The permittee shall not allow particulate matter emissions from each unit greater than the following without prior authorization from the Permitting Authority:

EU ID No.	Allowable Emission (TPY)	Regulation/Permit
-018	0.105	0990005-001-AC
-019	3.754	0990005-001-AC
-020	0.060	0990005-001-AC
-025	6.91/0.28(1)	0990005-002-AC
-026	0.375	0990005-001-AC
-027	0.375	0990005-001-AC
-028	0.375	0990005-001-AC
(1) – Particulate Matter/PM10 limitations. TPY – Tons per year.		

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

F.7. Visible Emissions: All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

(a) Test Method: The test method for visible emissions shall be DEP Method 9, incorporated in Rule 62-297.401(9) F.A.C.
[Rule 62-297.401, F.A.C., and 0990005-001-AC]

(b) Test Procedures: Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[0990005-001-AC]

(c) Opacity Compliance Tests: DEP Method 9 is specified as the applicable opacity test method and the required minimum period of observation for a compliance test shall be thirty (30) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310(4)(a)2., F.A.C.]

F.8. Particulate Matter (PM & PM_{10}): All particulate matter tests performed pursuant to the requirements of this permit shall comply with the following:

(a) Test Method: The test methods for particulate matter shall be EPA Methods 1, 2, 3, 4, and 5 described in 40 CFR 60, Appendix A, Rules 62-297.401(1) through (5), F.A.C.
[Rule 62-297.401, F.A.C., 0990005-001-AC, and 0990005-001-AC]

(b) Test Procedures: The test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-297.401, F.A.C.]

Compliance Demonstrations and Periodic Monitoring

F.9. Compliance Demonstrations: The permittee shall have a formal compliance tests conducted for visible emissions, particulate matter and PM10 from each emissions unit annually during each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, for the following pollutants.
[Rule 62-297.310(7), F.A.C]

F.10. Waiver of Compliance Test Requirements: For particulate matter (PM & PM_{10}), the Permitting Authority has waived the particulate matter compliance test requirements and specified the alternative standard of 5% opacity (Specific Condition **F.5.**). If the Compliance Authority has reason to believe that either the design specifications of Specific Condition **F.1.** or the emissions rates are not being met, it shall require that compliance be demonstrated by the test methods specified in Specific Condition **F.8.**
[Rule 62-297.620(4), F.A.C., 0990005-001-AC, and 0990005-002-AC]

F.11. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with the Specific Conditions **F.2.** and **F.3.** of this permit:

(a) Central Vacuum System (EU ID No. 018): None

(b) Packaging Line (EU ID No. 019): The permittee shall monitor and record the date, amount of sugar packaged, number of packaging lines operated, and hours of operation on a daily basis.

(c) Sugar Grinder & Hopper: The permittee shall monitor and record the date and amount of sugar processed on a daily basis.

(d) Fluidized Bed Dryer/Cooler (EU ID No. 025): The permittee shall monitor and record the date and amount of sugar dried on a daily basis.

(e) Storage Silos (EU ID Nos. 026, 027, & 028): The permittee shall monitor and record the date, silo loaded, number of trucks (1 or 2) used, and the amount transferred. The permittee shall also monitor the injection rate of the dry-compressed air at least once per shift and adjust the injection rate as needed to maintain rates below 500 dscfm.

[Rule 62-213.440(1)(b), F.A.C]

F.12. Air Quality Control System: The permittee shall implement the following periodic monitoring requirements to ensure compliance with Specific Conditions **F.1.**, **F.7.** and **F.8.** of this permit:

(a) Central Vacuum System (EU ID No. 018): The permittee shall visually observe the exhaust from the baghouse at least once per week during normal operation.

(b) Packaging Lines (EU ID No. 019): The permittee shall visually observe the exhaust from the baghouse at least once per day during normal operations.

(c) Sugar Grinder and Hopper (EU ID No. 020): The permittee shall visually observe the exhaust from the baghouse at least once per day during normal operations.

(d) Fluidized Bed Dryer/Cooler (EU ID No. 025): The permittee shall visually observe the exhaust from the baghouse at least once per day during normal operations.

(e) Storage Silos (EU ID Nos. 026, 027, & 028): The permittee shall visually observe the exhaust from each baghouse at least once per day during normal operation.

[Rule 62-213.440(1)(b), F.A.C]

{Permitting note(s): If any visible emissions are observed from a unit during any periodic monitoring, the permittee is expected to comply with the excess emissions rule (62-210.700(a), F.A.C.) including inspecting and repairing the AQCS prior to any further activities.}

F.13. Common Conditions: This emissions unit is also subject to **Specific Conditions J.1. through J.20.** contained in **Subsection J. Common Conditions.**

Subsection G. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-021	Central Dust Collection System No. 1 (Rotoclone No. 1)
-022	Central Dust Collection System No. 2 (Rotoclone No. 2)
-023	Cooler No. 1 (Wet Cyclone No. 1)
-024	Cooler No. 2 (Wet Cyclone No. 2)

Emissions Unit(s) Details

Central Dust Collection System No. 1 (Rotoclone No. 1), designated Emissions Unit 021, used to control emissions from the Rotary Dryer, Bucket Elevator No. 10 (BE-10), and Belt Conveyor 11 (BC-11). The system is controlled by use of a skimmer followed by a wet rotoclone manufactured by AFF (Type W). The rotoclone exhausts through a 93' stack.

Central Dust Collection System No. 2 (Rotoclone No. 2), designated Emissions Unit 022, used to control emissions from three (3) Rotex Screens, the Silo Scale, belt conveyors BC-16 and BC-19, the Packing Rotex Screen, the Packing Room Bins, the Bulk Curing Bins 1 through 6, Bucket Elevator 16 (BE-16) and the Sweco Shaker Screen. The system is controlled by use of wet rotoclone manufactured by AFF (Type W). The rotoclone exhausts through a 93' stack.

Cooler No. 1, designated Emissions Unit 023 used to cool drier sugar leaving the Rotary Dryer. The Cooler has a design capacity of 35.4 TPH. The Cooler exhausts to a wet cyclone vented at a height of 47' stack.

Cooler No. 2, designated Emissions Unit 024 used to cool drier sugar leaving the Rotary Dryer. The Cooler has a design capacity of 35.4 TPH. The Cooler exhausts to a wet cyclone vented at a height of 35' stack.

{Permitting note(s): The units are classified as synthetic minor sources under the PSD Program and considered as "Regulated Emissions Units" because they are subject to unit-specific federally enforceable emission limitations for particulate matter and visible emissions.}

Construction Restrictions

The following specific conditions apply to the emissions unit(s) listed above:

{Permitting note(s): The following construction restrictions are significant, in that the applicant presented the specifications to the Department as part of a synthetic-minor source construction permit application. Minor changes in the design specification may result in violations of the annual particulate matter emission limitations requested by the permittee and incorporated into the federally-enforceable permit conditions. For the Refinery Operations, activities which are completely enclosed and vented within the building are not classified as air pollution sources.}

G.1. Design Specifications: The permittee shall not allow, cause, suffer or permit changes to the following Air Quality Control System (AQCS) specifications without prior authorization from the Permitting Authority:
[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

EU ID No.	Design Flows[1]	AQCS Design Specifications[1]		Potential Emissions[1]
	(ACFM)	Water Injection Rate	Pressure Drop	RD & FBD (lb/hr)
-021	19,000	7.5 gpm	9.0 in H_2O	RD – (1.86/0.74) & FBD – (0.391/0.16)
-022	19,000	7.5 gpm	9.0 in H_2O	RD – (0.37/0.15) & FBD – (0.59/0.23)
-023	14,100	7.5 gpm	8.0 in H_2O	RD – (5.50/3.04)
-024	14,100	7.5 gpm	8.0 in H_2O	RD- (5.50/3.04)

ACFM – Actual Cubic Feet per Minute
gpm – gallons per minute, minimum value
in. H_2O – inches of water, minimum value
RD – Rotary Dryer FBD – Fluidized Bed Dryer

[1] - Not Federally Enforceable, 0990005-002-AC.
[2] – Potential Emissions Particulate Matter/PM10.

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

G.2. Permitted Capacities: The permittee shall not allow, cause, suffer or permit the operation of a unit in excess of the following capacities without prior authorization from the Permitting Authority.

EU ID No.	Process Rates			
	RD - TPH	FBD - TPH	Total – TPY*	Regulation/Permit
-021	35.42	0.00	255,024	0990005-002-AC.
-022	35.42	0.00	255,024	0990005-002-AC.
-023	35.42	36.25	261,000	0990005-002-AC.
-024	35.42	36.25	261,000	099-0005-002-AC.

RD – Rotary Dryer FBD – Fluidized Bed Dryer
TPH – tons per hour TPY – tons per year
* - Not federally enforceable

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

G.3. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the method of operation without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Rotary Dryer/Coolers: The permittee is authorized to use the Rotary Dryer and Cooler Nos. 1 and 2 for specialty sugars and in the event the fluidized bed dry/cooler is off line for repairs and vent the emissions units to the outside air through the AQCS. [0990005-002-AC]

(b) Central Dust Collection System No. 1: The permittee is authorized to operate the Rotary Dryer, Bucket Elevator No. 10 (BE-10), and Belt Conveyor 11 (BC-11) and vent the exhaust from each emissions unit to the outside air through the AQCS.
[Not Federally Enforceable; 0990005-002-AC]

(c) Central Dust Collection System No. 2: The permittee is authorized to operate the three (3) Rotex Screens, the Silo Scale, belt conveyors BC-16 and BC-19, the Packing Rotex Screen, the Packing Room Bins, the Bulk Curing Bins 1 through 6, Bucket Elevator 16 (BE-16) and the Sweco Shaker Screen and vent the exhaust from each emissions unit to the outside air through the AQCS.
[Not Federally Enforceable; 0990005-002-AC]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

G.4. Hours of Operation: The permittee is authorized to operate the Rotary Dryer, and Cooler Nos. 1 and 2, Bucket Elevator No. 10 (BE-10), belt conveyors BC-11, BC-16 and BC-19, bucket elevators BE-10 and BE-16, the three (3) Rotex Screens, the Silo Scale, the Packing Rotex Screen, the Packing Room Bins, the Bulk Curing Bins 1 through 6, and the Sweco Shaker Screen a maximum of 7,200 hours per year.
[0990005-002-AC]

Emission Limitations And Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

G.5. Visible Emissions: The permittee shall not allow visible emissions greater than 5 percent opacity (6-minute average) from the Central Dust Collection System Nos. 1 and 2 (EU ID Nos. 021 and 022) or Cooler Nos. 1 and 2 (EU ID Nos. 023 and 24).
[0990005-002-AC]

G.6. Particulate Matter (PM & PM_{10}): The permittee shall not allow particulate matter emissions from each unit greater than the following without prior authorization from the Permitting Authority:

EU ID No.	Allowable Emission (TPY)		
	PM	**PM10**	**Regulation/Permit**
-021	5.788	2.32	0990005-002-AC.
-022	0.046	1.158	0990005-002-AC.
-023	17.13	9.48	0990005-002-AC.
-024	17.13	9.48	0990005-002-AC

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

G.7. Visible Emissions: All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

(a) Test Method: The test method for visible emissions shall be DEP Method 9, incorporated in Rules 62-297.401(9), F.A.C.
[Rule 62-297.401, F.A.C., and 0990005-001-AC]

(b) Test Procedures: Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[0990005-001-AC]

(c) Opacity Compliance Tests: DEP Method 9 is specified as the applicable opacity test method and the required minimum period of observation for a compliance test shall be thirty (30) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310(4)(a)2., F.A.C.]

G.8. Particulate Matter (PM & PM_{10}): All particulate matter tests performed pursuant to the requirements of this permit shall comply with the following:

(a) Test Method: The test methods for particulate matter shall be EPA Methods 1, 2, 3, 4, 5, 201 or 201A described in 40 CFR 60, Appendix A, Rules 62-297.401(1) through (5), (41) and (41)(a), F.A.C.
[Rule 62-297.401, F.A.C., and 0990005-002-AC]

(b) Test Procedures: The test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-297.401, F.A.C.]

Compliance Demonstrations and Periodic Monitoring

G.9. Annual Compliance Demonstrations: The permittee shall have formal compliance tests conducted for visible emissions from each emissions point (EU ID Nos. 021, 022, 023 & 024) annually during each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, for the following pollutants.
[Rule 62-297.310(7), F.A.C]

G.10. Initial and Renewal Compliance Test Requirements: The permittee shall have formal compliance tests conducted for particulate matter and PM10 emissions from each emissions point (EU ID Nos. 021, 022, 023 & 024) within ninety (90) days of the effective date of this permit and at least sixty (60) days prior to renewal.
[Rule 62-297.310(7)(a)1 and 4, F.A.C.]

G.11. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with Specific Conditions **G.2.** and **G.3.** of this permit:

(a) Central Dust Collection System No. 1 (EU ID No. 021): The permittee shall monitor and record the date, amount of sugar processed through the Rotary Dryer, Bucket Elevator No. 10, and Belt Conveyor 11, and hours of operation on a daily basis.

(b) Central Dust Collection System No. 2 (EU ID No. 022): The permittee shall monitor and record the date, amount of sugar processed through the three (3) Rotex Screens, the Silo Scale, belt conveyors BC-16 and BC-19, the Packing Rotex Screen, the Packing Room Bins, the Bulk Curing Bins 1 through 6, Bucket Elevator 16, the Sweco Shaker Screen and hours of operation on a daily basis.

(c) Cooler Nos. 1 and 2 (EU ID Nos. 023 & 024): The permittee shall monitor and record the date, amount of sugar processed through each cooler, and the hours of operation on a daily basis.

[Rule 62-213.440(1)(b), F.A.C]

G.12. Air Quality Control System: The permittee shall implement the following periodic monitoring requirements to ensure compliance with Specific Conditions **G.1.**, **G.7.** and **G.8.** of this permit:

(a) Central Dust Collection System Nos. 1 & 2 (EU ID Nos. 021 and 022): The permittee shall visually observe the exhaust from each wet rotoclone at least once per day, check water injection system and flow rate at least once per shift and during normal operations.

(b) Wet Cyclones (EU ID Nos. 023 and 024): The permittee shall visually observe the exhaust from each wet rotoclone at least once per day, check water injection system and flow rate at least once per shift and during normal operations.

[Rule 62-213.440(1)(b), F.A.C]

{Permitting note(s): If any visible emissions are observed from a unit during any periodic monitoring, the permittee is expected to comply with the excess emissions rule (62-210.700(a), F.A.C.) including inspecting and repairing the AQCS prior to any further activities.}

G.13. Common Conditions: This emissions unit is also subject to **Specific Conditions J.1. through J.20.** contained in **Subsection J. Common Conditions.**

Subsection H. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-029	Material Handling and Storage Operations (Cogeneration Facility)

Emissions Unit(S) Details

The materials handling and storage operations include the truck and railcar unloading operations, storage piles, transfer operations, conveyors, screens, crushers, hoppers and silos. The materials handled and stored include coal, biomass (bagasse and wood), ash (fly and bottom) and a mercury removal agent (Carbon). Unconfined particulate matter emissions from the operations are controlled through the use of Best Available Control Technology (BACT) and reasonable precautions as specified in the specific conditions.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

H.1. Permitted Capacity. The permittee shall not allow, cause, suffer or permit the operation of the unit in excess of the following capacities without prior authorization from the Permitting Authority.
[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

Coal Handling: 112,750 tons per year (12-month rolling total) of bituminous coal. [Not Federally Enforceable]

(a) Biomass Handling: 1,352,941 tons per year (12-month rolling total) of biomass fuels (bagasse and wood).
[Not Federally Enforceable]

(b) Fly Ash Handling: 43,294 tons per year (12-month rolling total) of removal agent (dry basis).
[Not Federally Enforceable]

{Permitting note(s): Prior authorization includes the issuance of construction, reconstruction, or modification permits or a determination by the Permitting Authority that the action is not subject to 62-210.300(1), F.A.C.}

H.2. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the methods of operation without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Coal Handling and Storage Operations[1]: The permittee is authorized to handle and store bituminous coal. The following activities are associated with these operations:

- Railcar & Truck Unloading
- Conveyor (Railcar to Coal Pile)

- Coal Storage Piles (Active & In-active)
- Reclaim Hopper
- Conveyor (Reclaim Hopper to Coal Crusher)
- Coal Crusher
- Conveyor (Coal Crusher to Conveyor)
- Conveyor (Conveyor to Boiler Silos)

(b) Biomass Handling and Storage Operations: The permittee is authorized to handle and store biomass fuels. The following activities are associated with these operations:

- Truck Unloading (Dumps #1 and #2, Unloading Bay)
- Chain Conveyors (#1 & #2)
- Unloading Conveyor
- Disk Screen
- Hogger
- Storage Conveyor
- Radial Stacker
- Biomass Storage Pile (Active & In-active)
- Underpile Chain Reclaimers (#1 and #2)
- Boiler Feed Conveyor
- Boiler Feed Conveyor Hopper
- Sugar Mill Bagasse Feed Conveyor
- Sugar Mill Bagasse Conveyor Hopper
- Chain Distribution Conveyors (#1 & #2)
- Boiler Meter Bins
- Recycle Conveyor
- Fixed Recycle Stacker

(c) Fly Ash Handling and Storage Operations: The permittee is authorized to handle and store fly ash. The following activities are associated with these operations:

- Boiler Bank Hoppers
- Air Preheater Hoppers
- Electrostatic Precipitator Hoppers
- Enclosed Drag Chain Conveyors
- Fly Ash Storage Silo (1,500 tons)
- Fly Ash Pug-Mill Conditioners
- Fly Ash Truck Loadout

(d) Mercury Removal Agent Handling and Storage Operations: The permittee is authorized to handle and store a mercury removal agent (carbon). The following activities are associated with these operations:

- Pneumatic Truck Unloading System
- Three Storage Silos
- Injection System

(e) Bottom Ash Handling and Storage Operations: The permittee is authorized to handle and store bottom ash. The following activities are associated with these operations:

- Submerged & Enclosed Drag Chain Conveyors
- Transfer Conveyor
- Collection Conveyor
- Three-Walled Storage Bunker
- Bottom Ash Truck Loadout

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

H.3. Hours of Operation: The permittee is authorized to operate the materials handling and storage operations continuously.

{Permitting note(s): The following notes address the Operating Restrictions: (1) Specific portions of the coal handling and storage operations, when constructed, will be subject to 40 CFR 60 Subpart Y and the applicant is required to comply with the General Provisions of 40 CFR Part 60, Subpart A.}

Emission Limitations, Standards And Work Practices

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

H.4. Visible Emissions: The permittee shall not allow visible emissions from the materials handling and storage operations that exceed the following without prior authorization from the Permitting Authority:

(a) Coal & Biomass Handling and Storage Operations: An opacity greater than or equal to 5 percent, except when adding, moving or removing coal from the coal pile, which would be allowed at no more than 20 percent opacity.
[PSD-FL-196 and AC50-219413, as amended]

(b) Fly Ash Handling and Storage Operations: An opacity greater than or equal to 5 percent (6-minute average).
[PSD-FL-196 and AC50-219413, as amended]

(c) Mercury Control Agent Handling and Storage Operations: An opacity greater than or equal to 5 percent (6-minute average).
[PSD-FL-196 and AC50-219413, as amended]

H.5. Particulate Matter (PM & PM_{10}): The permittee shall not allow particulate matter emissions to exceed the following without prior authorization from the Permitting Authority.

(a) Fly Ash Storage Silo: The permittee shall not allow emissions greater than 0.01 grains per actual cubic foot (gr/acf) outlet dust loading from the silo baghouse.
[PSD-FL-196 and AC50-219413, as amended]

(b) Mercury Control Agent Silos: The permittee shall not allow emissions greater than 0.01 grains per actual cubic foot (gr/acf) outlet dust loading from the silo baghouses. [PSD-FL-196 and AC50-219413, as amended]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

H.6. Fugitive Dust Controls: The permittee shall implement the following controls to preclude particulate matter emissions:

(a) All conveyors and conveyor transfer points shall be enclosed to preclude PM emissions (except those directly associated with the stacker/reclaimers, for which enclosure is operationally infeasible).

(b) Inactive coal storage piles shall be shaped, compacted, and oriented to minimize wind erosion. Sod, wetting agents, synthetic or other appropriate materials shall be used to cover those parts of the inactive coal pile that are prone to wind or water erosion.

(c) Water sprays or chemical wetting agents and stabilizers shall be applied to storage piles, handling equipment, unenclosed transfer points, etc. during dry periods and as necessary to all facilities to maintain an opacity in compliance with condition **H.4.** of this permit.

(d) The fly ash handling system (including transfer points and storage bin) shall be enclosed. The ash shall be wetted in the ash conditioner to minimize fugitive dust prior to it being discharged into the disposal bin.

(e) The mercury control system reactant storage silos shall be maintained at a negative pressure while operating with the exhaust vented to a filter control system.

[PSD-FL-196 and AC50-219413, as amended]

H.7. Unconfined Emissions of Particulate Matter: The permittee shall implement the following reasonable precautions to control the emissions of unconfined particulate matter:

(a) Use of an evacuation systems and baghouse on the boiler building fuel handling system. The permittee shall submit an after-the-fact construction permit application for the system within 60 days of the effective date of this permit.

(b) The use of enclosed materials transfer points where feasible.

(c) The use of windbreaks around the material handling equipment.

(d) Maintenance of paved areas as needed.

[Not Federally Enforceable; Rule 62-296.320(c), F.A.C.]

H.8. Fuel Management Plan: The permittee shall comply with the conditions of the April 1, 1994 Fuel Management Plan contained in Appendix FMP-94.
[PSD-FL-196 and AC50-219413, as amended]

H.9. Ash Management Plan: The permittee shall comply with the conditions of the April 1, 1994 Ash Management Plan contained in Appendix AMP-94.
[PSD-FL-196 and AC50-219413, as amended]

H.10. Operation and Maintenance Plans: Within ninety (90) days of the effective date of this permit, the permittee shall submit to the Permitting Authority operation and maintenance plans that will allow the permittee to monitor emission control equipment efficiency and enable the permittee to return malfunctioning equipment to proper operation as expeditiously as possible. The O/M Plans shall be incorporated into this permit as the following appendices:

(a) Appendix OMP-001, Fly Ash Silo Baghouse;

(b) Appendix OMP-002, Mercury Control Agent Storage Silo Baghouses; and

(c) Appendix OMP-003, Cogeneration Boilers.

[PSD-FL-196 and AC50-219413, as amended]

{Permitting note(s): The controls identified in condition **H.6.** are specified within the construction permits and federally enforceable. Those identified in condition **H.7.** are in addition to controls specified in the construction permits and were identified within the initial Title V application.}

Test Methods And Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

H.11. Visible Emissions: All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

(a) Test Method: The test method for visible emissions shall be DEP Method 9, incorporated in Rule 62-297.401(9), F.A.C.

[Rule 62-296.410(3)(a), F.A.C.]

(b) Test Procedures: Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[PSD-FL-196 and AC50-219413, as amended]

(c) Opacity Compliance Tests: DEP Method 9 is specified as the applicable opacity test method and the required minimum period of observation for an annual compliance test shall be thirty (30) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310(4)(a)2., F.A.C.]

H.12. Particulate Matter (PM & PM_{10}): All particulate matter tests performed pursuant to the requirements of this permit shall comply with the following:

(a) Test Method: The test methods for particulate matter shall be EPA Methods 1, 2, 3, 4, 5, 201 and 201A described in 40 CFR 60, Appendix A, Rules 62-297.401(1) through (5), (41) and (41)(a), F.A.C.
[Rule 62-297.401, F.A.C.]

(b) Test Procedures: The test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-297.401, F.A.C.]

Compliance Demonstrations And Periodic Monitoring

H.13. Compliance Demonstrations: The permittee shall conduct formal compliance tests for visible emissions annually each federal fiscal year (October 1 – September 30) and prior to renewal for particulate matter, unless otherwise specified by rule, order, or permit.
[Rule 62-297.310(7)(a)3 and 4, F.A.C, PSD-FL-196, and AC50-219413, as amended]

H.14. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with the conditions **H.1.** and **H.2.** of this permit:

(a) Coal Handling: The permittee shall maintain records on each coal shipment including date and amount.

(b) Biomass Handling: The permittee shall maintain records on each biomass shipment including date and amount.

(c) Fly Ash Handling: The permittee shall maintain records on each fly ash shipment including date and amount.

[Rule 62-213.440(1)(b), F.A.C]

H.15. Air Quality Control Systems: The permittee shall implement the following periodic monitoring requirements to ensure compliance with conditions **H.4.** and **H.5.** of this permit:

(a) Visible Emissions: The permittee shall visually inspect the Coal and Biomass Handling and Storage Operations, the Fly Ash Handling and Storage Operations, and the Mercury Control Agent Handling and Storage Operations at least once per day for visible emissions. The permittee shall record the date, time of each inspection, and any corrective actions required.

(b) Particulate Matter (PM/PM_{10}): The permittee shall visually inspect each baghouse at least once per day for visible emissions. The permittee shall record the date and time of the inspections and record any corrective actions required.

[Rule 62-213.440(1)(b), F.A.C]

New Source Performance Standards (NSPS) – 40 CFR 60

{Permitting note: The proposed coal handling and storage operations are subject to the requirements of 40 CFR 60 Subpart A-General Provisions and Subpart Y-Standards of Performance for Coal Preparation Plants. The NSPS include notifications, emission limitations, and testing requirements.}

H.16. 40 CFR 60 Subpart A, General Provisions: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart A contained in Appendix NSPS-A. Specifically:

(a) 40 CFR 60.7, Notification and Recordkeeping,

(b) 40 CFR 60.8, Performance Tests,

(c) 40 CFR 60.11, Compliance with Standards and Maintenance Requirements,

(d) 40 CFR 60.12 Circumvention,

(e) 40 CFR 60.14, Modification, and

(f) 40 CFR 60.19 General Notification and Reporting Requirements

[40 CFR 60.1 and Rule 62-204.800(7)(a), F.A.C.]

H.17. 40 CFR 60 Subpart Y, Standards of Performance for Coal Preparation Plants: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart Y contained in Appendix NSPS-Y. Specifically:

(a) 40 CFR 60.252(c), Standards for Particulate Matter, and
(b) 40 CFR 60.254(a)(2), Test Methods and Procedures.

[40 CFR 60.250(a) and (b), and Rule 62-204.800(7)(b), F.A.C.]

COMMON CONDITIONS

H.18. Common Conditions: This emissions unit is also subject to **Specific Conditions J.1.** through **J.20.** contained in **Subsection J. Common Conditions.**

Subsection I. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-030	Cogeneration Boiler No. 1
-031	Cogeneration Boiler No. 2
-032	Cogeneration Boiler No. 3

Emissions Unit Description

Cogeneration Boiler Nos. 1, 2 and 3, designated Emissions Units 030, 031, and 032 (Formerly 001, 002, and 003 under Facility ID No. 0990332), respectively, are spreader stoker type units fired by biomass (bagasse, wood, etc.), No. 2 fuel oil, and coal. The air quality control system or strategy includes use of mechanical separators, an Electrostatic Precipitator (ESP), a selective non-catalytic reduction (SNCR) system, an activated carbon injection, and good combustion practices. Each boiler is vented through a separate 199' stack.

{Permitting note(s): The boilers are classified as new major facilities under the PSD Program for sulfur dioxide (SO_2), sulfuric acid mist (H_2SO_4), nitrogen oxides (NOx), beryllium, and total fluorides. The units are synthetically limited (federally enforceable) for particulate matter (TSP & PM10), volatile organic compounds (VOC), carbon monoxide (CO), lead, and mercury. The synthetic emission limits for VOC and NOx, are more stringent than the Reasonably Available Control Technology (RACT) requirements of Rule 62-296.570, F.A.C. The units are classified as new facilities under the New Source Performance Standards (40 CFR 60 Subpart Da), Rule 62-296.405(2), F.A.C., Fossil Fuel Fire Steam Generators with more than 250 million Btu per Hour of Heat Input, and Rule 62-296.410, F.A.C., Carbonaceous Fuel Burners. The units are Classified as "Qualifying Cogeneration Facilities" under 40 CFR Part 72, and exempt from the requirement to obtain an Acid Rain Permit.}

Construction Requirements

The following specific conditions apply to the emissions unit(s) listed above:

I.1. Design Specifications:. The permittee shall not allow any changes to the design of these units without prior authorization from the Permitting Authority. The design requirements include the following:

(a) Power Generation: Construction of the proposed units shall reasonably conform to the plans described in the construction permit applications. The units shall be designed, constructed, and operated so that its gross generating capacity shall not exceed 74.9 megawatt (MW), 1 hour average, except during scheduled emission compliance. [AC50-219413, as amended and PSD-FL-196, as amended]

(b) Boiler Design: Each boiler shall be of the spreader stoker type with a maximum heat input of 715 mmBtu/hr with biomass fuel, 490 mmBtu/hr with fossil fuels.
[AC50-219413, as amended and PSD-FL-196, as amended]

(c) Stack Height: Each boiler shall have an individual stack, and each stack must have a minimum height of 199 feet.
[AC50-219413, as amended and PSD-FL-196, as amended]

(d) Stack Sampling Facilities: The stack sampling facilities for each stack must comply with Rule 62-297.345, F.A.C.
[AC50-219413, as amended and PSD-FL-196, as amended]

(e) Monitoring Equipment: Each boiler shall be equipped with instruments to measure the fuel feed rate, steam production, steam pressure, and steam temperature.
[AC50-219413, as amended and PSD-FL-196, as amended]

(f) Air Quality Control Systems: Each unit shall be equipped with the following:

(1) Mechanical Dust Collector designed for at least 80 percent removal of large particulate matter.

(2) Electrostatic precipitator (ESP) designed for at least 99 percent removal of particulate matter.

(3) Selective non-catalytic reduction (SNCR) system designed for at least 40 percent removal of NOx.

(4) Carbon injection system (or equivalent) for mercury emissions control.

[AC50-219413, as amended and PSD-FL-196, as amended]

(g) Continuous Monitoring Systems: The permittee shall install and operate continuous monitoring devices for each main boiler exhaust for opacity, nitrogen oxides (NOx), sulfur dioxide (SO_2), oxygen (O_2), and carbon monoxide (CO). The monitoring devices shall meet the applicable requirements of Rule 62-296.405, F.A.C., and 40 CFR 60.47a. The opacity monitor shall be placed in the ductwork between the electrostatic precipitator and the stack or in the stack.
[AC50-219413, as amended and PSD-FL-196, as amended]

(h) Oxygen Monitor: An oxygen meter shall be installed for each unit to continuously monitor a representative sample of the flue gas. The oxygen monitor shall be used with automatic feedback or manual controls to continuously maintain air/fuel ratio parameters at an optimum. Operating procedures shall be established based on the initial emission compliance tests and the document "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls" shall be used as a guide. The operating plan shall be provided within ninety (90) days of the effective date of this permit and will be incorporated into the permit as Appendix OP-001, Operating Plan for Use of the Oxygen Meter as BACT for Combustion Controls.
[AC50-219413, as amended and PSD-FL-196, as amended]

(i) AQCS Design Features: For the mechanical dust collectors, electrostatic precipitator, the selective non-catalytic reduction process (SNCR), and the activated carbon injection mercury control system (equivalent controls allowed), the permittee shall submit to the Permitting and Compliance Authorities copies of technical data pertaining to the selected PM, NOx, and mercury emission controls within ninety (90) days of the effective date of this permit. The data should include, but not be limited to, guaranteed efficiency and emission rates and major design parameters.
[AC50-219413, as amended and PSD-FL-196, as amended]

(j) Operation and Maintenance Plan: Within ninety (90) days of the effective date of this permit, the permittee shall submit to the Permitting and Compliance Authorities an operation and maintenance plan that will allow the permittee to monitor emission control equipment efficiency and enable the permittee to return malfunctioning equipment to proper operation as expeditiously as possible. The O/M Plan shall be incorporated into this permit as Appendix OMP-003, Air Quality Control System Operation and Maintenance Plan.
[AC50-219413, as amended and PSD-FL-196, as amended]

[Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C.]

Essential Potential to Emit (PTE) Parameters

{Permitting note(s): Those operating restrictions which are identified as "Not Federally Enforceable" have been included for purposes of compliance testing, establishing appropriate emission limitations and to aid in determining future rule applicability.}

I.2. Permitted Capacity: The permittee shall not allow the operation of the units in excess of the following without prior authorization from the Permitting Authority:

(a) Power Generation: The facility shall not exceed 74.9 (gross) megawatts (1-hour average) generating capacity, except during emissions compliance tests.
[AC50-219413, as amended and PSD-FL-196, as amended]

(b) Steam Production: The steam production shall not exceed an average of 455,418 lbs/hr (1-hour average) at 1,500 psig, 975°F for each boiler.
[AC50-219413, as amended and PSD-FL-196, as amended]

(c) Maximum Heat Input: The maximum heat input rate for each steam generator shall not exceed 715 mmBtu/hr when burning 100 percent biomass, 490 mmBtu/hr when burning 100 percent fossil fuels. The maximum heat input to the three boilers shall not exceed 11.5×10^{12} Btu per year (12-month rolling average).
[AC50-219413, as amended and PSD-FL-196, as amended]

[Rule 62-210.300, F.A.C.]

{Permitting note(s): Prior authorization includes the issuance of construction, reconstruction, or modification permits or a determination by the Permitting Authority that the action is not subject to 62-210.300(1), F.A.C.}

I.3. Methods of Operation – The permittee shall not allow, cause, suffer or permit any change in the method of operation without prior authorization from the Permitting Authority. The authorized methods of operation include the following:

(a) Steam Generator Operation: The permittee is authorized to operate the emissions unit as either an electric utility steam generator, a fossil-fuel fired steam generator, or a carbonaceous fuel burner.
[PSD-FL-196 and AC50-219413, as amended]

(b) Carbonaceous Fuels: The permittee is authorized to fire biomass including bagasse and wood waste material as the primary fuel. Authorized wood waste material is clean construction and demolition wood debris, yard trash, land clearing debris, and other clean

cellulose and vegetative matter. The fuel used in the boilers shall not contain special wastes, except wood, lumber, trees, tree remains, bagasse, cane tops and leaves, and other clean vegetative and cellulose matter. The biomass fuel used in the boilers shall not contain hazardous substances, hazardous wastes, biomedical wastes, or garbage. The wood waste shall not contain more than 70.7 parts per million (ppm) arsenic or 83.3 ppm chromium or 62.8 ppm copper based on analysis of a composite sample of the fuel.
[AC50-219413, as amended and PSD-FL-196, as amended]

(c) Fuel Oil: The permittee is authorized to burn only "new" No. 2 fuel oil with a maximum sulfur content of 0.05 percent sulfur as determined by the appropriate test method listed in 40 CFR 60.17. "New" oil means an oil which has been refined from crude oil and has not been used in any manner that may contaminate it.
[AC50-219413, as amended and PSD-FL-196, as amended]

(d) Coal: The permittee is authorized to burn low sulfur coal with a maximum sulfur content of 0.70 percent and a maximum potential emission equivalent to 1.2 lbs SO_2/mmBtu.
[AC50-219413, as amended and PSD-FL-196, as amended]

(e) Fossil Fuels: The combined use of coal and oil shall be less than 25 percent of the total heat input to boilers on a calendar quarter basis. The consumption of oil shall be less than 25 percent of the total heat input to boilers on a calendar quarter basis. The consumption of low sulfur coal shall not exceed 69,720 tons during any 12-month period (12-month rolling average).
[PSD-FL-196 and AC50-219413, as amended]

(f) Yard Waste: Each boiler (co-fired combustor) is limited to combusting a fuel stream, 30 percent or less of the weight which is comprised, in aggregate, of yard waste (yard trash) defined as a municipal solid waste (MSW) in 40 CFR 60.51a, as measured on a calendar quarter basis.
[40 CFR 60.50(a), 40 CFR 60.50a(d), AC50-219413, as amended and PSD-FL-196, as amended]

[Rule 62-210.300, F.A.C., AC50-219413, as amended and PSD-FL-196, as amended]

I.4. Hours of Operation: The permittee is authorized to operate the boilers continuously 8,760 hours per year.
[AC50-219413, as amended and PSD-FL-196, as amended]

Emission Limitations And Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

I.5. Visible Emissions: The permittee shall not allow visible emissions that exceed 20 percent opacity (6-minute average) except up to 27 percent opacity is allowed for 6 minutes in any 1-hour period.
[AC50-219413, as amended and PSD-FL-196, as amended]

I.6 Stack Emissions: The permittee shall not allow stack emissions, based on the maximum allowable heat input rate for each fuel, to exceed any limit shown in the following table.

EMISSION LIMIT (PER BOILER)[d]							
	Biomass		**No. 2 Oil**		**Bit. Coal**		**Total[e] Three Boilers**
Pollutant	(lb/mmBtu)	(lb/hr)	(lb/mmBtu)	(lb/hr)	(lb/mmBtu)	(lb/hr)	(TPY)
Particulate Matter (TSP)	0.03	21.5	0.03	14.7	0.03	14.7	172.5
Particulate Matter (PM_{10})	0.03	21.5	0.03	14.7	0.03	14.7	172.5
Sulfur Dioxide 3-hour average 24-hour average Annual average (Bagasse) (Wood Waste)	 --- 0.10 0.02[a] 0.05[a][c]	 --- 71.5 --- 	 --- 0.05 --- 	 --- 24.5 --- 	 1.2 1.2 1.2[a] 	 588.0 588.0 --- 	 --- --- 1,154.3[f]
Nitrogen Oxides Annual average	0.159[a]	107.3[a]	0.15[a]	73.5[a]	0.17[a]	83.3[a]	862.5
Carbon Monoxide 30-day Rolling Average	0.35[a]	250.3[a] ?	0.35[a]	171.5[a]	0.35[a]	171.5[a]	2,012.5
Volatile Organic Compounds	0.06	42.9 (c)	0.03	14.7	0.03	14.7	345.0
Lead (Bagasse) (Wood Waste)	 2.5×10^{-5} [b] 1.6×10^{-4} [c]	 0.018 ↙ 0.114 [c]	8.9×10^{-7}	0.0004	6.4×10^{-5}	0.031	0.454[f]
Mercury (Bagasse) (Wood Waste)	 5.43×10^{-6} [b] 4.0×10^{-6} [c]	 0.0039 [b] 0.0029 [c]	2.4×10^{-6}	0.00118	8.4×10^{-6}	0.0041	0.0300
Beryllium	---	---	3.5×10^{-7}	0.00017	5.9×10^{-6}	0.0029	0.0052
Fluorides	---	---	6.3×10^{-6}	0.003	0.024	11.8	21.2
Sulfuric Acid Mist	0.003	2.15	0.0015	0.74	0.036	17.6	34.6

[AC50-219413, as amended and PSD-FL-196, as amended]

Table Notes:

a. Compliance based on 30-day rolling average, per 40 CFR 60, Subpart Da.
[CO Limit: Although carbon monoxide (CO) emissions are not regulated by NSPS Subpart Da, compliance shall be demonstrated in a similar manner. The CO emissions from each boiler shall not exceed 0.35 pounds per mmBtu based on a 30-day (boiler operating days) rolling average. Compliance with this standard shall be demonstrated by continuous emissions monitoring data. The 30-day rolling average shall be determined by calculating the arithmetic average of all hourly emission rates for 30 successive boiler operating days. The 1-hour averages shall be

expressed in lb/mmBtu of heat input and are calculated using at least two valid data points. Calculation of the 30-day roiling average shall consist of at least 18 hours in at least 22 out of 30 successive boiler operating days. If this minimum data requirement cannot be met with a continuous monitoring system, the permittee shall supplement emission data with other monitoring systems approved by the EPA Administrator or the reference methods and procedures as described in 40 CFR 60.47a.]

b. Emission limit for bagasse.
c. Emission limit for wood waste.
d. The emission limit shall be prorated when more than one type of fuel is burned in a boiler.
e. Limit heat input from No. 2 fuel to less than 24.9 percent of total heat input on a calendar quarter basis, coal to 69,720 tons during any 12-month period, and the combination of oil and coal to less than 24.9 percent of the total heat input on a calendar quarter basis.
f. Compliance based on a 12-month rolling average for any fuel combination.

I.7. Excess Emissions: The permittee shall comply with the excess emissions rule contained in Rule 62-210.700, F.A.C. In addition, the permittee is allowed excess emissions during startup, shutdown, and malfunction. Periods of startup, shutdown and malfunction shall be defined as:

(a) Startup is the commencement of operation of a boiler which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which may result in excess emissions. Periods of startup for each boiler shall end once steam generation reaches 150,000 pounds per hour.

(b) Shutdown is the cessation of the operation of a boiler for any purpose after steam generation drops 150,000 pounds per hour.

(c) Malfunction is any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

(d) Excess emissions resulting from startup, shutdown or malfunction of a boiler shall be permitted for standards based on short-term averaging periods (shorter than 24-hour averages) as specified in this permit, providing:

(1) The operators implement best operational practices to minimize emissions, and

(2) Excess emissions do not exceed four (4) hours for startup, four (4) hours for shutdown, nor two (2) hours for malfunction in any 24-hour period (day).

(e) Within one (1) working day of excess emissions due to a malfunction. the permittee shall notify the regulating agencies of the date, time, description, steps to taken to minimize emissions, and actions taken to correct the problem.

(f) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. Excess emissions of standards based on long-term averaging periods (24-hour averages or longer) are not permitted because compliance is demonstrated by continuous monitor and provisions of

this permit allow exclusion of monitoring data for periods of startup. shutdown, and malfunction.

(g) Continuous emission monitoring data required by this permit shall be collected and recorded during all periods of operation including startup, shutdown, and malfunction, except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments. Although recorded, emissions during periods of startup, shutdown and malfunction may be excluded from the averaging calculations required to determine compliance with the emissions standards, not to exceed four (4) hours during startup, four (4) hours during shutdown, nor two (2) hours during malfunction in a 24-hour period. Excess Emissions beyond these periods shall be recorded and included in the averaging calculations required to determine compliance with the emissions standards. The permittee shall submit to the regulating agencies a Quarterly Excess Emissions Report within 30 days of the end of each calendar quarter. The report shall identify the date, time, and description of each startup, shutdown, and malfunction resulting in excess emissions. It shall also identify any steps taken to mitigate emissions during any malfunction as well as any corrective actions taken.

[AC50-219413, as amended and PSD-FL-196, as amended]

Test Methods And Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

I.8. Test Methods*: Compliance with the visible emissions limitation of Condition **I.5.** and the emission limitations for each fuel stated in Condition **I.6** of this permit shall be demonstrated using EPA Methods, as contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources), or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants), or any other method as approved by the Department, in accordance with Rule 62-297.620 F.A.C.:

(a) Sample and Velocity Traverses: EPA Method 1, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(1), F.A.C.
[Rule 62-297.401(1), F.A.C.]

(b) Stack Gas Velocity and Volumetric Flow Rate: EPA Method 2, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(2), F.A.C..
[Rule 62-297.401(2), F.A.C.]

(c) Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight: EPA Method 3 or 3a, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(3), F.A.C.
[Rule 62-297.401(3) and (3)(a), F.A.C.]

(d) Determination of Moisture Content in Stack Gases: EPA Method 4, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(4), F.A.C.
[Rule 62-297.401(4), F.A.C.]

(e) Determination of Particulate Emissions: EPA Method 5, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(5), F.A.C.
[Rule 62-297.401(5), F.A.C.]

(f) Determination of PM10 Emissions (Exhaust Gas Recycle Procedure): EPA Method 201 or 201A, described in 40 CFR 51, Appendix M and incorporated in Rule 62-297.401(41), F.A.C.
[Rule 62-297.401(41) and (41)(a), F.A.C.]

(g) Determination of Sulfur Dioxide Emissions: EPA Method 6, 6C or 19, described in 40 CFR 60, Appendix A A and incorporated in Rule 62-297.401(6), F.A.C.
[Rule 62-297.401(6), (6)(c), and (19), F.A.C.]

(h) Determination of Nitrogen Oxide Emissions: EPA Method 7 or 7E , described in 40 CFR 60, Appendix A A and incorporated in Rule 62-297.401(7), F.A.C.
[Rule 62-297.401(7), and (7)(e), F.A.C.]

(i) Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions**: EPA Method 8, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(8), F.A.C.
[Rule 62-297.401(8), F.A.C.]

(j) Visual Determination of the Opacity of Emissions: EPA Method 9, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(9), F.A.C.
[Rule 62-297.401(9), F.A.C.]

(k) Determination of Carbon Monoxide Emissions: EPA Method 10, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(10), F.A.C.
[Rule 62-297.401(10), F.A.C.]

(l) Determination of Inorganic Lead Emissions: EPA Method 12, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(12), F.A.C.
[Rule 62-297.401(12), F.A.C.]

(m) Determination of Total Fluoride Emissions: EPA Method 13A or 13B, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(13), F.A.C.
[Rule 62-297.401(13)(a) and (13)(b), F.A.C.]

(n) Determination of Total Gaseous Non-methane Organic Emissions: EPA Method 18 or 25, described in 40 CFR 60, Appendix A and incorporated in Rule 62-297.401(18) and (25), F.A.C.
[Rule 62-297.401(18) and (25), F.A.C.]

(o) Determination of Particulate and Gaseous Mercury Emissions: EPA Method 101A, described in 40 CFR 61, Appendix B and incorporated in Rule 62-297.401(32), F.A.C.
[Rule 62-297.401(32)(a), F.A.C.]

(p) Determination of Beryllium Emissions: EPA Method 104, described in 40 CFR 61, Appendix B and incorporated in Rule 62-297.401(35), F.A.C.
[Rule 62-297.401(35), F.A.C.]

(q) Determination of Particulate and Gaseous Arsenic Emissions: EPA Method 108, described in 40 CFR 61, Appendix B and incorporated in Rule 62-297.401(39), F.A.C.
[Rules 62-297.401(39), F.A.C.]

(r) Determination of Chromium and Copper Emissions: EMTIC Test Method. [PSD-FL-196 and AC50-219413, as amended]

[AC50-219413, as amended and PSD-FL-196, as amended]

[Permitting note(s): * Other approved EPA test methods may be substituted for the listed method unless the Department has adopted a specific test method for the air pollutant. ** Test for sulfuric acid mist only required when coal is burned at the facility.]

I.9. Test Procedures: Emission compliance tests shall be conducted under such conditions as the Compliance Authority shall specify based on representative performance of the facility. The permittee shall make available to the Permitting and Compliance Authorities such records as may be necessary to determine the conditions of the performance tests.
[AC50-219413, as amended and PSD-Fl-196, as amended]

Compliance Demonstrations And Periodic Monitoring

I.10. Compliance Demonstrations: The permittee shall have formal compliance tests for PM and PM10, NO_x, SO_2, sulfuric acid mist, CO, VOC, lead, mercury, beryllium, fluorides, arsenic, chromium, copper, and visible emissions performed according to the following schedule:

(a) Annually for PM and PM10, SO_2[(1)(2)], sulfuric acid mist[(1)], NOx[(2)], CO[(2)], VOC, mercury, arsenic, chromium, copper and visible emissions[(2)].

(b) Once every five years (prior to renewal of this permit) for SO_2, sulfuric acid mist, lead, beryllium, and fluorides.

{Permitting note(s): [(1)]Annual test required only during years coal is burned in the boilers. [Rule 62-297.310(7) F.A.C., AC50-219413, as amended and PSD-FL-196, as amended]
[(2)]Pollutants subject to continuous monitoring requirements and relief of the annual testing requirements must be provided through a permit modification.}

I.11 Continuous Monitoring Systems: The permittee shall comply with the performance specifications for continuous monitoring systems under 40 CFR Part 60, Appendix B and the Quality Assurance Procedures of 40 CFR Part 60, Appendix F. The specific performance specifications include the following:

(a) Performance Specification 1—Specifications and test procedures for opacity continuous emission monitoring systems in stationary sources

(b) Performance Specification 2—Specifications and test procedures for SO_2 and NOx continuous emission monitoring systems in stationary sources

(c) Performance Specification 3—Specifications and test procedures for O_2 and CO_2 continuous emission monitoring systems in stationary sources

(d) Performance Specification 4—Specifications and test procedures for CO continuous emission monitoring systems in stationary sources

(e) Performance Specification 4A—Specifications and test procedures for CO continuous emission monitoring systems in stationary sources

(f) Performance Specification 6—Specifications and test procedures for continuous emission rate monitoring systems in stationary sources

[40 CFR 60.13(a) and Rule 62-204.800(7), F.A.C.]

I.12. Operating Parameters: The permittee shall implement the following periodic monitoring requirements to ensure compliance with the conditions **I.2.** and **I.3.** of this permit.

(a) Steam Production: The permittee shall continuously monitor steam production (lb/hr), temperature (°F), and pressure (psig) recording the values (1-hour average) and daily values (24-hour block average) during each day of operation. All instrumentation shall be properly maintained so as to be functional at all times.

(b) Maximum Heat Input: The permittee shall continuously monitor the heat input rate based on the fuel flow monitors recording the maximum heat input rate (1-hour average) for each fuel during each day of operation. All instrumentation shall be properly maintained and functional at all times.

(c) Fuel Types:. The permittee shall monitor and maintain a daily log of the amounts and types of fuels used. The amount, heating value, beryllium content (coal only), sulfur content, and equivalent SO_2 emission rate (in lbs/mmBtu) of each fuel oil and coal delivery shall be kept in a log. For each calendar month, the calculated SO_2, mercury and lead emissions and 12-month rolling average shall be determined (in tons) and kept in a log.

(d) Hours of Operation: The permittee shall log the hours of operation for each day of operation.

[Rule 62-213.440(1)(b), F.A.C., AC50-219413, as amended and PSD-FL-196, as amended]

I.13. Combustion Control Performance: The permittee shall monitor combustion efficiency in accordance with Appendix OP-001, Operating Plan for the Use of the Oxygen Meter as BACT for Combustion Controls to ensure compliance with Specific Condition **I.6.** of this permit.
[Rule 62-213.440(1)(b), F.A.C., AC50-219413, as amended and PSD-FL-196, as amended]

I.14. Air Quality Control Systems: The permittee shall monitor and inspect the AQCS in accordance with Appendix OMP-003, Air Quality Control System Operation and Maintenance Plan to ensure compliance with Specific Condition **I.6.** of this permit.
[Rule 62-213.440(1)(b), F.A.C., AC50-219413, as amended and PSD-FL-196, as amended]

I.15. Wood-Waste And Ash Inspection And Testing Plan: The permittee shall monitor and inspect the biomass fuels in accordance with Appendix FMTP-001, Wood-Waste And Ash Inspection And Testing Plan to ensure compliance with Specific Condition **I.6.** of this permit.
[Rule 62-213.440(1)(b), F.A.C., AC50-219413, as amended and PSD-FL-196, as amended]

New Source Performance Standards (NSPS) - 40 CFR 60

{Permitting note: The cogeneration facility boilers are subject to the requirements of 40 CFR 60 Subpart A-General Provisions, 40 CFR 60 Subpart E - Standards of Performance for Incinerators, 40 CFR 60 Subpart Ea Standards of Performance for Municipal Waste Combustors for Which Construction is Commenced After December 20, 1989 and on or Before September 20, 1994, and 40 CFR 60 Subpart Da- Standards of Performance for Electric Utility Steam Generating Units for Which Construction Is Commenced After September 18, 1978. The NSPS include notifications, exemptions, emission limitations, monitoring and testing requirements.}

I.16. 40 CFR 60 Subpart A, General Provisions: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart A contained in Appendix NSPS-A of this permit. Specifically:

(l) 40 CFR 60.5, Determination of Construction or Modification,
(m) 40 CFR 60.6, Review of Plans,
(n) 40 CFR 60.7, Notification and Recordkeeping,
(o) 40 CFR 60.8, Performance Tests,
(p) 40 CFR 60.11, Compliance with Standards and Maintenance Requirements,
(q) 40 CFR 60.12 Circumvention,
(r) 40 CFR 60.13, Monitoring Requirements,
(s) 40 CFR 60.14, Modification,
(t) 40 CFR 60.15, Reconstruction,
(u) 40 CFR 60.17, Incorporation by Reference, and
(v) 40 CFR 60.19, General Notification and Reporting Requirements

[40 CFR 60.1, and Rule 62-204.800(7)(a), F.A.C.]

I.17. 40 CFR 60 Subpart Da- Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart Da contained in Appendix NSPS-Da. Specifically:

(a) 40 CFR 60.41a, Definitions,
(b) 40 CFR 60.42a(a), (a)(1), (a)(2), (a)(3) and (b), Standard for Particulate Matter,
(c) 40 CFR 60.43a(a), (b)(2), (d)(2), (g), (h)(1) and (h)(2), Standard for Sulfur Dioxide,
(d) 40 CFR 60.44a(a), (a)(1), (a)(2), and (c), Standard for Nitrogen Oxides,
(e) 40 CFR 60.46a(a), (b), (c), (e), (f), (g) and (h), Compliance Provisions,
(f) 40 CFR 60.47a(a), (b), (b)(2), (c), (d), (e), (f), (g), (h), (h)(1), (h)(2), (h)(3), (h)(4), (i), (i)(1), (i)(2), (i)(5), (j), (j)(1), (j)(2), (j)(3), and (j)(4), Emission Monitoring,
(g) 40 CFR 60.48a(a), (b), (b)(1), (b)(2), (b)(3), (c)(3), (c)(4), (c)(5), (d), (d)(1), (d)(2), (e), (e)(1), and (e)(2), Compliance Determination Procedures and Methods, and
(h) 40 CFR 60.49a(a), (b), (b)(1), (b)(2), (b)(4), (b)(5), (b)(6), (b)(7), (b)(8), (b)(9), (c), (c)(1), (c)(2), (c)(3), (c)(4), (c)(5), (f), (g), (g)(1), (g)(2), (g)(3), (g)(4), (h), and (i), Reporting Requirements.

[40 CFR 60.40a(a)(1) and (a)(2), and Rule 62-204.800(7)(b), F.A.C.]

I.18. 40 CFR 60 Subpart E - Standards of Performance for Incinerators: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart E contained in Appendix NSPS-E. Specifically the following sections related to applicability:

(a) 40 CFR 60.50(a) and (b), Applicability and Designation of Affected Facility, and
(b) 40 CFR 60.51 (a) and (b), Definitions.

I.19. 40 CFR 60 Subpart Ea - Standards of Performance for Municipal Waste Combustors for Which Construction is Commenced After December 20, 1989 and on or Before September 20, 1994: The permittee shall comply with the applicable requirements of 40 CFR 60 Subpart Ea contained in Appendix NSPS-Ea. Specifically the following sections related to applicability:

(a) 40 CFR 60.50a(a), (d), (e), (g), and (h), Applicability and Delegation of Authority, and
(b) 40 CFR 60.51a, Definitions

Common Conditions

I.20. Common Conditions: This emissions unit is also subject to **Specific Conditions J.1. through J.20.** contained in **Subsection J. Common Conditions.**

Subsection J. Common Conditions.

This section addresses the common conditions for the following emissions unit(s) as noted within each emissions units section.

EU ID No.	Status	Brief Description
003	Regulated	Mill Boiler No. 4
004	Regulated	Mill Boiler No. 5
005	Regulated	Mill Boiler No. 6
009	Regulated	Mill Boiler No. 10
010	Regulated	Mill Boiler No. 11
011	Regulated	Mill Boiler No. 12
012	Regulated	Mill Boiler No. 14
013	Regulated	Mill Boiler No. 15
014	Regulated	Mill Boiler No. 16
015	Regulated	Sugar Mill NSPS Storage Tank
016	Regulated	Sugar Mill NSPS Storage Tank
017	Regulated	Sugar Mill NSPS Storage Tank
018	Regulated	Central Vacuum System for the Trans-Shipment Facility
019	Regulated	Packaging Lines
020	Regulated	Sugar Grinder and Hopper
021	Regulated	Central Dust Collection System No. 1 (Wet Rotoclone #1)
022	Regulated	Central Dust Collection System No. 2 (Wet Rotoclone #2)
023	Regulated	Cooler No. 1 (Cyclone No. 1)
024	Regulated	Cooler No. 2 (Cyclone No. 2)
025	Regulated	Fluidized Bed Dryer/Cooler
026	Regulated	Sugar Silo (S1101)
027	Regulated	Sugar Silo (S1102)
028	Regulated	Sugar Silo (S1103)
029	Regulated	Materials Handling and Storage Operations (Cogeneration Facility)
030	Regulated	Cogeneration Boiler No. 1
031	Regulated	Cogeneration Boiler No. 2
032	Regulated	Cogeneration Boiler No. 3
033	Unregulated	Cogeneration Facility NSPS Storage Tank

J.1. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed

for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard.
[Rule 62-297.310(1), F.A.C.]

J.2. Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity as defined below. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.301(2), F.A.C.]

J.3. Permitted Capacity: Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
[Rule 62-297.310(2)(b), F.A.C.]

J.4. Calculation of Emission Rate: The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule.
[Rule 62-297.310(3), F.A.C.]

J.5. Required Sampling Time: Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
[Rule 62-297.310(4)(a)1, F.A.C.]

J.6. Opacity Compliance Tests: When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

(a) For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

(b) The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

[Rule 62-297.310(4)(a)2, F.A.C.]

J.7. Minimum Sample Volume: Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
[Rule 62-297.310(4)(b), F.A.C.]

J.8. Required Flow Rate Range: For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

[Rule 62-297.310(4)(c), F.A.C.]

J.9. Allowed Modification to EPA Method 5: When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.
[Rule 62-297.310(4)(e), F.A.C.]

J.10. Required Equipment: The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
[Rule 62-297.310(5)(a), F.A.C.]

J.11. Calibration of Sampling Equipment: Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
[Rule 62-297.310(4)(d), F.A.C.]

Table 297.310-1 Calibration Schedule			
Item	**Minimum Calibration Frequency**	**Reference Instrument**	**Tolerance**
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. Thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 &2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded Max. deviation between readings	Micrometer	+/-0.001" mean of at least three readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter Comparison check	2% 5%

J.12. Accuracy of Equipment: Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5)(b), F.A.C.]

J.13. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct a special compliance test. The special compliance test shall be conducted within 15 days of operation of the EU outside the design criteria of the AQCS (air quality control system). The special compliance test shall be conducted to document compliance with the emission limitations and to establish a normal range of operation.
[Rule 62-297.310(7)(b), F.A.C.]

J.14. Waiver of Compliance Test Requirements: If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7)(c), F.A.C.]

J.15. Compliance Test Notification: The permittee shall notify the Compliance Authority fifteen (15) days prior to Emission Unit (EU) testing.
[Rule 62-297.310(7)(a)(9), F.A.C.]

J.16. Compliance Test Submittal: Copies of the test report(s) shall be submitted to the Permitting Authority and the Compliance Authority within forty-five (45) days of completion of testing.
[Rule 62-297.310(8)(b), F.A.C.]

J.17. Test Reports: The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
[Rule 62-297.310(8)(c), F.A.C.]

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.

5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

J.18. Recordkeeping: The permittee shall ensure that all records of monitoring information shall specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses.

[Rule 62-213.440(1)(b)2.a., F.A.C.]

J.19. Record Retention: The permittee shall retain records of all monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
[Rule 62-213.440(1)(b)2.b., F.A.C.]

J.20. Alternate Sampling Procedure: The owner or operator of any emissions unit subject to the provisions of this chapter may request in writing a determination by the Secretary or his/her designee that any requirement of this chapter (except for any continuous monitoring requirements) relating to emissions test procedures, methodology, equipment, or test facilities shall not apply to such emissions unit and shall request approval of an alternate procedures or requirements.

The request shall set forth the following information, at a minimum:

(a) Specific emissions unit and permit number, if any, for which exception is requested.

(b) The specific provision(s) of this chapter from which an exception is sought.

(c) The basis for the exception, including but not limited to any hardship which would result from compliance with the provisions of this chapter.

(d) The alternate procedure(s) or requirement(s) for which approval is sought and a demonstration that such alternate procedure(s) or requirement(s) shall be adequate to demonstrate compliance with applicable emission limiting standards contained in the rules of the Department or any permit issued pursuant to those rules.

The Secretary or his/her designee shall specify by order each alternate procedure or requirement approved for an individual emissions unit source in accordance with this section or shall issue an order denying the request for such approval. The Department's order shall be final agency action, reviewable in accordance with Section 120.57, Florida Statutes.
[Rule 62-297.620, F.A.C.]

P. E. Certification Statement

Okeelanta Corporation
Facility ID Nos.: 0990005 & 0990332

Draft Permit No.: 0990005-002-AV
Sugarcane Processing Facility: 0990005
Cogeneration Facility: 0990332

Project type: Sugarcane Processing, Sugar Refining, and Power Generation Facilities

I HEREBY CERTIFY *that the engineering features described in the above referenced application provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Title 62. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, and geological features).*

_____ _____

David M . Knowles, P.E. Date
Registration Number: 4361

Permitting Authority:
Department of Environmental Protection
2295 Victoria Avenue, Suite 364W
Fort Myers, Florida 33901-3881
Telephone: (941)332-6975
Fax: (941)332-6969

APPENDIX AC-001
ANNUAL CERTIFICATION CHECKLIST
OKEELANTA CORPORATION

Permit Condition	Compliance Status[1]	Compliance Method[2]
SECTION II. FACILITY-WIDE CONDITIONS		
FEDERALLY ENFORCEABLE FACILITY WIDE CONDITIONS		
1. APPENDIX TV-3, TITLE V CONDITIONS		
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited		
3. General Particulate Emission Limiting Standards: General Visible Emissions Standard.		
4. Prevention of Accidental Releases (Section 112(r) of CAA)		
5. Unregulated Emissions Units and/or Activities		
6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions		
7. Title V Effective Date		
8. Notifications and Reports		
9. U.S. Environmental Protection Agency, Report & Notifications		
10. Excess Emissions Requirements		
11. Air Emissions Bubble		
12. Alternate Sampling Procedures		
13. Annual Statement of Compliance		
14. Facility Wide Recordkeeping and Monitoring Requirements		
15. Facility Wide Operating Restrictions		
SECTION EMISSIONS UNIT(S) AND CONDITIONS		
Emissions Units 003, 004, and 005, Mill Boiler Nos. 4, 5, and 6		
Operating Restrictions		
A.1. Permitted Capacity		
A.2. Methods of Operation		
A.3. Hours of Operation		
Emission Limitations and Standards		
A.4. Visible Emissions		
A.5. Particulate Matter		
A.6. Volatile Organic Compounds		
A.7. Nitrogen Oxides		
A.8. VOC & NOx RACT Limits		
A.9. Fuel Oil Sulfur Content		
Test Methods and Procedures		
A.10. Visible Emissions		
A.11. Particulate Matter		
A.12. Volatile Organic Compounds		
A.13. Nitrogen Oxides		
A.14. Fuel Oil Sulfur Content		
Compliance Demonstrations and Periodic Monitoring		
A.15. Compliance Demonstrations		
A.16. Waiver of Compliance Test Requirements		
A.17. Operating Parameters		
A.18. Air Quality Control System		
A.19. Emissions Unit Performance		
New Source Performance Standards		
A.20 Modification		
A.21 Emission Rate Increases		
A.22 Reconstruction		
Common Conditions		
A.23. Common Conditions		

APPENDIX AC-001
ANNUAL CERTIFICATION CHECKLIST
OKEELANTA CORPORATION

Permit Condition		Compliance Status[1]	Compliance Method[2]
Emissions Units 009 and 010, Mill Boiler Nos. 10 and 11			
Operating Restrictions			
B.1.	Permitted Capacity		
B.2.	Methods of Operation		
B.3.	Hours of Operation		
Emission Limitations and Standards			
B.4.	Visible Emissions		
B.5.	Particulate Matter		
B.6.	Volatile Organic Compounds (VOC)		
B.7.	Nitrogen Oxides (NO_x)		
B.8.	VOC & NOx RACT Limits		
B.9.	Fuel Oil Sulfur Content		
Test Methods and Procedures			
B.10.	Visible Emissions		
B.11.	Particulate Matter		
B.12.	Volatile Organic Compounds		
B.13.	Nitrogen Oxides		
B.14.	Fuel Oil Sulfur Content		
Compliance Demonstrations and Periodic Monitoring			
B.15.	Compliance Demonstrations		
B.16.	Waiver of Compliance Test Requirements		
B.17.	Operating Parameters		
B.18.	Air Quality Control System		
B.19.	Emissions Unit Performance		
New Source Performance Standards (NSPS)			
B.20	Modification		
B.21	Emission Rate Increases		
B.22	Reconstruction		
Common Conditions			
B.23.	Common Conditions		
Emissions Units 011, 012, and 013, Mill Boiler Nos. 12, 14, and 15			
Permitting Requirements			
C.1.	After-the-Fact PSD Applications		
Operating Restrictions			
C.2.	Permitted Capacity		
C.3.	Methods of Operation		
C.4.	Hours of Operation		
Emission Limitations and Standards			
C.5.	Visible Emissions		
C.6.	Particulate Matter		
C.7.	Volatile Organic Compounds (VOC)		
C.8.	Nitrogen Oxides (NO_x)		
C.9.	VOC & NOx RACT Limits		
C.10.	Fuel Oil Sulfur Content		
Test Methods and Procedures			
C.11.	Visible Emissions		
C.12.	Particulate Matter		
C.13.	Volatile Organic Compounds		
C.14.	Nitrogen Oxides		
C.15.	Fuel Oil Sulfur Content		
Compliance Demonstrations and Periodic Monitoring			
C.16.	Waiver of Compliance Test Requirements		
C.17.	Compliance Demonstrations		
C.18.	Operating Parameters		
C.19.	Air Quality Control System		

APPENDIX AC-001
ANNUAL CERTIFICATION CHECKLIST
OKEELANTA CORPORATION

Permit Condition		Compliance Status[1]	Compliance Method[2]
C.20.	Emissions Unit Performance		
New Source Performance Standards			
C.21.	Modification		
C.22.	Emission Rate Increases		
C.23.	Reconstruction:		
Common Conditions			
C.24.	Common Conditions		
Emissions Unit 014, Mill Boiler No. 16			
Construction Requirements			
D.1.	Design Specifications		
Operating Restrictions			
D.2.	Permitted Capacity		
D.3.	Methods of Operation		
D.4.	Hours of Operation		
Emission Limitations and Standards			
D.5.	Visible Emissions		
D.6.	Stack Emissions		
D.7. Fuel Oil Sulfur Content			
Test Methods and Procedures			
D.8.	Visible Emissions		
D.9. Particulate Matter			
D.10.	PM10		
D.11.	Volatile Organic Compounds		
D.12.	Nitrogen Oxides		
D.13.	Carbon Monoxide		
D.14.	Sulfur Dioxide		
D.15.	Fuel Oil Sulfur Content		
Compliance Demonstrations and Periodic Monitoring			
D.16.	Continuous Compliance Demonstrations		
D.17.	Annual Compliance Demonstrations		
D.18.	Renewal Compliance Demonstrations		
D.19.	Waiver of Compliance Test Requirements		
D.20.	Operating Parameters		
D.21.	Emissions Unit Performance		
New Source Performance Standards			
D.22.	40 CFR 60 Subpart A, General Provisions		
D.23	40 CFR 60 Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units		
Common Conditions			
D.24.	Common Conditions		
Emissions Units 015, 016, 017, and 033, NSPS Storage Tanks			
Operating Restrictions			
E.1.	Permitted Capacity		
E.2.	Methods of Operation		
E.3.	Hours of Operation		
Emission Limitations and Standards			
E.4.	Volatile Organic Compounds (VOC)		
Compliance Demonstrations and Periodic Monitoring			
E.5.	Compliance Demonstrations		
E.6. Operating Parameters			
New Source Performance Standards			
E.7. Modification			
E.8. Emission Rate Increases			
E.9. Reconstruction			

APPENDIX AC-001
ANNUAL CERTIFICATION CHECKLIST
OKEELANTA CORPORATION

Permit Condition		Compliance Status[1]	Compliance Method[2]
E.10.	40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984.		
Common Conditions			
E.11.	Common Conditions		
Emissions Units 018, 019, 020, 025, 026, 027, 028, Central Vacuum System for the Trans-Shipment Facility, Packaging Lines, Sugar Grinder & Hopper, Fluidized Bed Dryer/Cooler, and Sugar Silos S1101, S1102, and S1103			
Construction Restrictions			
F.1.	Design Specifications		
Operating Restrictions			
F.2.	Permitted Capacity		
F.3.	Methods of Operation		
F.4.	Hours of Operation		
Emission Limitations and Standards			
F.5.	Visible Emissions		
F.6.	Particulate Matter (PM & PM_{10})		
Test Methods and Procedures			
F.7.	Visible Emissions		
F.8. Particulate Matter (PM & PM_{10})			
Compliance Demonstrations and Periodic Monitoring			
F.9.	Compliance Demonstrations		
F.10.	Waiver of Compliance Test Requirements		
F.11.	Operating Parameters		
F.12.	Air Quality Control System		
Common Conditions			
F.13.	Common Conditions		
Emissions Units 021, 022, 023, and 024, Central Dust Collection Systems (Nos. 1 & 2) and the Wet Cyclones (Nos. 1 & 2)			
Construction Restrictions			
G.1.	Design Specifications		
Operating Restrictions			
G.2.	Permitted Capacity		
G.3.	Methods of Operation		
G.4.	Hours of Operation		
Emission Limitations and Standards			
G.5.	Visible Emissions		
G.6.	Particulate Matter (PM & PM_{10})		
Test Methods and Procedures			
G.7.	Visible Emissions		
G.8. Particulate Matter (PM & PM_{10})			
Compliance Demonstrations and Periodic Monitoring			
G.9.	Compliance Demonstrations		
G.10.	Waiver of Compliance Test Requirements		
G.11.	Operating Parameters		
G.12.	Air Quality Control System		
Common Conditions			
G.13.	Common Conditions		

Emissions Unit 029, Material Handling and Storage Operations (Cogeneration Facility)		
Operating Restrictions		
H.1. Permitted Capacity		
H.2. Methods of Operation		
H.3. Hours of Operation		
Emission Limitations, Standards and Work Practices		
H.4. Visible Emissions		
H.5. Particulate Matter (PM & PM_{10})		
H.6. Fugitive Dust Controls		
H.7. Unconfined Emissions of Particulate Matter		
H.8. Fuel Management Plan		
H.9. Fuel Management Plan		
H.10. Operation and Maintenance Plans		
Test Methods and Procedures		
H.11. Visible Emissions		
H.12. Particulate Matter (PM & PM_{10})		
Compliance Demonstrations and Periodic Monitoring		
H.13. Compliance Demonstrations		
H.14. Operating Parameters		
H.15. Air Quality Control Systems		
New Source Performance Standards (NSPS)		
H.16. 40 CFR 60 Subpart A, General Provisions		
H.17. 40 CFR 60 Subpart Y, Standards of Performance for Coal Preparation Plants		
Common Conditions		
H.18. Common Conditions		
Emissions Units 030, 031, and 032, Cogeneration Facility Boilers		
Construction Requirements		
I.1. Design Specifications		
Operating Restrictions		
I.2. Permitted Capacity		
I.3. Methods of Operation		
J.4. Hours of Operation		
Emission Limitations and Standards		
I.5. Visible Emissions		
I.6 Stack Emissions		
I.7 Excess Emissions		
Test Methods and Procedures		
I.8. Test Methods		
I.9. Test Procedures		
Compliance Demonstrations and Periodic Monitoring		
I.10. Compliance Demonstrations		
I.11 Continuous Monitoring Systems		
I.12. Operating Parameters		
I.13. Combustion Control Performance		
I.14. Air Quality Control Systems		
I.15. Wood-Waste and Ash Inspection and Testing Plan		
New Source Performance Standards (NSPS)		
I.16. 40 CFR 60 Subpart A, General Provisions		
I.17 40 CFR 60 Subpart Da- Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978		
I.18 40 CFR 60 Subpart E - Standards of Performance for		

Incinerators.		
I.19 40 CFR 60 Subpart Ea- Standards of Performance for Municipal Waste Combustors for Which Construction is Commenced After December 20, 1989 and Before September 20, 1994 .		
Common Conditions		
I.20. Common Conditions		
Common Conditions		
J.1. Required Number of Test Runs		
J.2. Operating Rate During Testing		
J.3. Permitted Capacity		
J.4. Calculation of Emission Rate		
J.5. Required Sampling Time		
J.6. Opacity Compliance Tests		
J.7. Minimum Sample Volume		
J.8. Required Flow Rate Range		
J.9. Calibration of Sampling Equipment		
J.10. Allowed Modification to EPA Method 5		
J.11. Required Equipment		
J.12. Accuracy of Equipment		
J.13. Special Compliance Tests		
J.14. Waiver of Compliance Test Requirements		
J.15. Compliance Test Notification		
J.16. Compliance Test Submittal		
J.17. Test Reports		
J.18. Recordkeeping		
J.19. Record Retention		
J.20. Alternate Sampling Procedure		

Notes: The compliance status of each condition of the permit must be reported each year as well as the method use to determine compliance. The method used should identify the type of method used as well as the procedure.

(1) Compliance Status Codes:

CC – Continuous compliance meaning the source/emissions unit complied with the permit condition continuously during the reporting period.

IC – Intermittent compliance meaning the source/emissions unit was not in continuous compliance with the permit condition during the reporting period. Attach an explanation for any IC conditions.

UC – Unknown compliance meaning the source/emissions unit may or may not have been in compliance during the reporting period. Attach description of any reason(s) for the unknown status.

OC – Out of compliance meaning that the source/emissions unit was operated out of compliance for the entire reporting period. Attach a listing of consent orders, notice of violation, notice to correct, etc..

(2) Compliance Method Codes:

IA – Internal Self-Assessment or EA – External Audit or third-party assessment

RR – Record Review; ST – Stack Test; CEMS – Continuous Emissions Monitoring System; PM – Periodic Monitoring.

A. PERMIT CONDITIONS

Palm Beach County Restrictions on Ash Management

A detailed ash management plan must be submitted by the petitioner and approved by the Palm Beach County Health Department. The plan must detail contingency plans, testing, and monitoring of the ash, ash handling and disposal methods, planned spreading locations and identification of environmental impacts and measures for mitigating those impacts (Petition 92-14, Condition F5).

All fly ash and bottom ash from the facility which are produced during any period in which fossil fuels are used, and thereafter for a reasonable time, shall be segregated and managed as set forth in the ash management plan (92-14, F4).

FDEP Industrial Wastewater Permit Restrictions on Ash Management

None evident.

A Management of Surface Waters permit draft is not yet available for review. We believe that the agency is satisfied that county requirements on fuel usage and ash management are sufficient.

B. BAGASSE AND WOOD

Ash Quantities

The maximum quantities of bottom and fly ash that could be generated during normal operation are provided below:

Fuel	Bottom Ash T/yr	Fly Ash T/vr
Bagasse	1,800	5,500
Wood	3,600	10,800
TOTALS	5,400	16,300

The amount of ash generated by firing bagasse has been based upon operating on bagasse for 150 days per year. The amount of ash generated by firing wood has been based upon operating on wood for 215 days per year. Due to the occurrence of planned and unplanned shutdown during the year, the quantities noted above are conservatively high.

System Description

Bottom Ash

Bottom ash will be discharged continuously from each boiler into three water—submerged drag chain conveyors. Each conveyor will consist of a wet upper compartment and a dry lower compartment. The upper compartment will be a water-tight steel trough, designed to contain the water required for quenching and cooling the bottom ash to 140°F, and sized to accommodate and store up to 2 hours of bottom ash generated from the wood or bagasse.

The submerged chain conveyor will be designed for a removal rate of 8 tph. An integrated water supply and recirculation system will be used. Over flow water from the submerged dry chain conveyor trough, hopper seal trough, and dewatered ash storage pile will be piped back to a recirculation sump equipped with an overflow weir and a return sump pump. Make-up water will be added to the recirculation sump to replace water lost in the dewatered ash and through evaporation.

The dewatered ash from the dewatering inclined ramp of the chain conveyor will be discharged into a 8 tph transfer conveyor which will transfer the dewatered ash into a 25 tph collecting conveyor, which in turn will unload the ash into a three-sided bunker, sized to accommodate about a 7-day ash capacity. A front-end loader will be used to reclaim and load the stored ash into trucks.

Fly Ash

Fly ash will consist of ash collected in air heater hoppers, dust collector hoppers, and from ESP hoppers. The system will encompass the removal and conveying of the fly ash from the hoppers to a storage silo,

using a dry ash vacuum pneumatic conveying system.

Two main transport pipeline will be used, each serving all hoppers. Each pipeline will be designed for conveying ash to separator/filter units mounted on the top of the storage silo. Vacuum blowers of 100-percent capacity, each serving one pipeline, and a system of cross-ties between the pipelines will be provided. An additional 100-percent vacuum blower will serve as a common back-up. The system conveying capacity will be sufficient to remove 24 hours of ash generation in 6 to 8 hours. System piping will be abrasion/corrosion resistant-type, hardened, cast alloy metal pipes and elbows. Elbows will be constructed with replacement wear-back sections.

The ash storage silo will be sized to accommodate 1,500 tons (about 7 days) of fly ash. The silo will be a conical bottom cylinder type carbon steel structure. Two twin shaft pug-mill conditioner unloaders rated at 200 tph each will be provided for discharging the ash into trucks for disposal.

Ash Removal

Fly ash will be loaded from the fly ash silo directly into trucks. Bottom ash falls from the boiler's grate into a water filled collection tank. From there the ash is conveyed by submerged drag chain onto a collection conveyor for transport to the three-walled bunker with a roof. At this point the ash is extremely wet. Under normal operating procedures, the ash will be removed from the bunker in a wetted condition. If it is determined that the bottom ash in storage has become dry, it will be sprayed with water.

Bottom ash will be removed from the storage bunkers by a front-end loader and also loaded into trucks. Loading of the trucks will be accomplished during daylight hours, with the fly ash silo and bottom ash bunkers providing the necessary overnight storage. The trucks will be covered and trucked to the designated staging area.

Ash Spreading

At the staging area the ash will be commingled and transferred to the spreaders. The spreaders will be drawn around the designated fields and the ash will be evenly distributed across the field. It is anticipated that the ash will be spread at a rate of approximately 2 tons per acre. The spreading of ash will take place over selected portions of Okeelanta's 90,000 acres of farmland. The ash will be spread on fallow fields, therefore, the specific location and schedule of the spreading will depend on the crop rotation plan developed each year by the Okeelanta farming operation and thus is not available at this time. If a fugitive dust problem exists after the ash has been spread, the ash will be wetted or incorporated.

We consider that the ash is a soil-conditioning agent without negative environmental impacts. The FDEP has advised Okeelanta that no Ash Management Plan needs to be submitted to the state to cover the spreading of ash on farmlands.

Quality Control

The standardized test to characterize the ash will be Method for Chemical Analysis of water and wastes, EPA-600/4-82. The tests will be conducted no less than once a month on a mixed product of fly ash and bottom ash for mercury, lead, arsenic, chromium, barium, selenium, silver, cadmium and copper.

There are no criteria established for the acceptance or rejection of ash materials. The control of ash quality will be at the source of the fuel, in particular the wood supplies which are required to meet strict standards, as noted in the Fuel Management Plan. The testing of ash will be performed to confirm further the quality of the fuel source and assist Osceola in its plans for spreading.

Additionally, stack tests will be performed in accordance with the FDEP air permit. These tests will be conducted with and without the mercury control system in operation thus providing an indication of the amount of mercury being removed.

C. COAL

The design of the Okeelanta Cogeneration Project includes the provision for the future installation of equipment and systems to allow the use of coal as a supplemental fuel. The following describes the FDEP air permit restrictions related to coal ash: coal ash (if collected as a result of coal firing) will be transported off site for disposal.

Ash Quantities

The maximum quantities of ash to be generated while burning a blend of coal and biomass are provided below:

Bottom Ash-4,000T/yr

Fly Ash-12,000 T/yr

The amount of ash generated has been calculated based upon the maximum amount of coal allowed to be burned per year under the conditions of the FDEP air permit.

System Description

The fly ash will be collected and stored through the same system as described for handling fly ash when firing wood or bagasse. However, the disposal of the coal fly ash will be handled in a different manner. Any fly ash collected when burning coal will not be disposed of by spreading on the sugar cane fields. The ash will be collected and removed from the silo and disposed of in a permitted landfill. The ash would be transported from the site in covered or pressure differential trucks depending upon the final design requirements.

The bottom ash would also be handled in the same manner as when firing wood or bagasse and ultimately stored in the bunkers prior to removal. Again, this ash would be removed to a certified landfill site.

Quality Control

Since coal ash has been classified as non-hazardous by the EPA and suitable for landfill disposal, we will not be performing any tests on the ash produced by the combination of coal or coal with biomass.

Upon the introduction of any amount of coal into the fuel feed system of the boilers, all ash generated will be treated as though it is 100% coal ash.

ASP No.	Effective Date(s)		Affected Emission Unit(s)	Description
	Issued	Expiration		
98-E-01	3/26/99	4/01/01	003, 004, 005, 009, 010, 011,012, & 013	Waiver of the annual stack test requirements for the units when operating less than 400 hours per year.

A. PERMIT CONDITIONS

Palm Beach County

The restrictions on fuel usage are covered by certain special conditions incorporated as part of the County's approval of Petition 92-14. These conditions reflect, in part, the air permit requirements issued by the Florida Department of Environmental Protection (FDEP) and under Use Limitations establish criteria for height of fuel storage areas, the definition of "biomass waste", restrictions on sulfur content of coal and fuel oil and the containment requirements for stored liquids such at fuels and oils.

Florida Dept. of Environmental Protection (FDEP) Air Permit

Acting under authority of the U.S. Environmental Protection Agency, FDEP has issued a final construction permit for the Okeelanta Power Limited Partnership (OPLP) cogeneration facility (Permit Number AC50-219413 *(PSD-FL-196)*). This permit allows construction of air pollution sources. The permit limits operating capacity of the facility to 74.9 MW and an average of 455,418 lb/hr steam. Allowed fuels are biomass, No. 2 fuel oil and coal. Use of coal is further limited to a 16 percent annual capacity factor (72,714 tons per year of coal).

Electrostatic precipitators for particulate matter control, selective non-catalytic reduction systems for nitrogen oxides control, and a mercury control system are required. Coal must contain no more than 0.7% sulfur, and No. 2 fuel oil must contain no more than 0.05% sulfur.

The permit limits emissions of all regulated pollutants, including SO_2, NOx, PM, CO, VOC, mercury, and other regulated pollutants. Extensive source testing is required to demonstrate compliance, and continuous emissions monitoring is required, as well as fuel and ash sampling and analysis. This permit constitutes best available control technology (BACT) for SO_2 emissions, and reasonable available control technology (RACT) for NOx and VOC emissions.

FDEP Industrial Wastewater Permit Restrictions on Fuel Usage

The FDEP industrial wastewater permit (No. IC50-228716) indicates that the facility will be biomass/oil/coal fired. Specific Condition No. 4 of the permit notes that the permit is valid only for the specific processes and operations (including the types and quantities of raw materials and chemicals) indicated in the application. Any changes in these which may result in altered characteristics of the discharge are not permitted without the prior approval of FDEP and modification of the permit.

B. BAGASSE

Use

Bagasse is a fibrous waste product resulting from the milling of sugar cane. It is being collected and transported by conveyor to the cogeneration plant for use as a fuel in a process which generates both steam and electricity. The mill will supply bagasse to the cogeneration project during the Grinding Season, normally from mid October to mid March the next year.

System Description

During the grinding season, the sugar mill will provide the cogeneration facility with bagasse at an average daily rate that will be 6,500 tons per day (tpd) and a maximum hourly rate of 270 tons per hour (tph).

The bagasse will be transferred from the mill to the cogeneration facility via the Bagasse Transfer Conveyor, at the design rate of 270 tph. The Bagasse Transfer Conveyor is equipped with a belt scale designed to monitor and record the rate and quantity of bagasse flowing to the facility.

A system of Chain Distribution Conveyors receive the bagasse at the boiler area and transfer the material to the boiler feeders or to the bagasse bypass and recycle subsystem which conveys the bagasse to a storage area on the site.

The fuel from the Chain Distribution Conveyors will be bottom discharged into the boiler feed system via discharge chutes. Each chute is provided with shut off gates which are manually operated.

The entire fuel conveying system is provided with the necessary controls and fire protection systems.

The maximum height of the bagasse pile will be 50 feet and its maximum size will be about 500 feet by 600 feet and will be in the location noted on the site plan as fuel storage area. The bagasse will have a moisture content in excess of 50%, minimizing the incidence of fugitive emissions. During periods when the pile surface dries out, the pile will be sprayed with water.

The design of the fire protection system for the plant includes a fire water distribution system, designed in accordance with appropriate NFPA standards, including piping, valves and yard hydrants. Hydrants will be located in strategic areas around the fuel storage area at a spacing of approximately 250 feet along the buried yard loop or branch line piping. Hydrants will be suitable for attaching hoses for manually fire fighting. Deluge water spray systems will be used for protection of the fuel handling equipment and the conveyors.

The pile will be spread, compacted and rotated to minimize the number of air pockets in the pile and the risk of fire. Also, as explained above, the pile will be dampened when viewed to be dry.

During operation of the plant, fuel pile management personnel will be on site 24 hours a day. Telephone communication will be used to contact the local fire department upon the occurrence of a fire incident. The plant operation maintenance manual will incorporate instructions on fire protection and fighting procedure and personnel will be given classroom instructions.

C. WOOD WASTE

Use

During the Non-grinding Season, normally from mid March to mid October, the bagasse is no longer available as a fuel and clean wood waste is used instead.

System Description

Wood waste will be delivered to the facility by trucks at an approximate design rate of 3,600 tons per day. The anticipated deliveries are 6 days per week, 12 hours per day. Each truck is anticipated to have a capacity of 25 tons of wood waste.

The trucks will be unloaded utilizing two hydraulically operated truck dumpers. A third unloading bay is provided to accommodate self-unloading trucks.

The wood waste will be discharged into three receiving hoppers equipped with chain conveyors which will transfer the wood to the Unloading Conveyor

The Unloading Conveyor which is equipped with a belt scale and a magnetic separator will convey the wood waste to the Screen and Hog Tower at a design rate of 300 tph.

The Screen and Hog Tower is an open facility at which the wood waste is discharged onto a disc screen which will separate the material sized less than 3" from the oversized material. The oversized material will be discharged to the Hog, which is a motor driven, size reducing piece of equipment which reduces the oversized wood to less than 3", suitable to feed into the boiler.

The sized wood waste is then transferred from the Screen and Hog Tower by a radial stacker to a wood storage area (wood yard) on the site or directed to the boilers via Plant Feed Conveyor which is equipped with a belt scale for monitoring and recording the quantity of fuel delivered directly to the boilers.

The wood is reclaimed continuously at design rates of 175 tph of wood chips or 87.5 tph of wood chips combined with 135 tph of bagasse by two under pile chain reclaimers.

The reclaimed fuel is transferred to the cogeneration facility via the Plant Feed Conveyor and to the boiler feeders by the Chain Distribution Conveyors.

A Radial Stacker will form a circular pile approximately 50 feet in height which forms the base configuration of the entire storage pile. The pile shape and ultimate configuration is developed by the use of plant mobile equipment which spreads, compacts, and shapes the pile. The maximum height of the wood pile will be 50 feet and its maximum size will be 600 feet by 900 feet.

The wood will have a relatively high moisture content and, as noted below, only 15% will be less than 1/4" in size. Fugitive emissions will be controlled by water spraying as necessary.

Quality Control

The wood waste will be supplied to the Project under long-term contracts which include quality requirements reflecting the conditions of the FDEP air permit. In addition to quality tests at the supplier's facility, additional quality tests will be conducted at the Project on a regular basis.

The wood waste suppliers will collect and test a representative sample from each load of wood. One third of the sample will be available to Okeelanta for confirmation test. Tests will be conducted in accordance with ASTM E870-82 or successor standard. If the supplier's and Okeelanta's test results differ by more than 5% then a third sample will be submitted to an independent laboratory.

In accordance with the FDEP air permit the tests will be conducted on a weekly basis for the first year of operation and thereafter on a monthly basis. Upon delivery to the site, the wood waste will be stored in separate weekly piles, such that in the event the wood waste is determined not to be in accordance with the supplier's specification it can be readily identified and removed by the supplier.

The wood waste specification imposed on the supplier will be:

1. less than 1% by volume or weight shall be plastics, rubber, glass and painted wood.
2. free from chemically treated wood (e.g. chromium, copper and arsenic; creosote; or pentachlorophenol) except for incidental amounts, not to exceed 1% by volume or weight.
3. less than 5% shall be sand, soil or other organic material
4. moisture content shall be between 20% and 50% with a quarterly average of less than 40%.
5. 95% shall be less than 4" in size, 15% (on an individual load) will be less than 1/4" in size.

Osceola has the right to reject any load which does not meet any one of the above requirements, and the supplier will be required to remove the delivered amount from the site.

However, if the wood waste exceeds the specification limits for sand, soil, inorganic material or moisture content, Osceola may accept the material provided that the supplier reduces its handling and processing costs by a predetermined rate.

D. FUEL OIL

Use

Fuel oil will be used for two primary purposes - i) for start-up of the boilers , and ii) as a fuel for the on-site vehicles and heavy mobile equipment.

System Description

No. 2 fuel oil will be used as a startup fuel for the boilers. The fuel oil system will consist of a truck unloading facility, a 50,000 gallon fuel oil storage tank, two fuel oil transfer pumps, a fuel oil dispensing station, and associated piping, valves, and instrumentation. Detailed plans of the fuel storage system will be submitted to the Department of Environmental Resources Management prior to construction.

Spill Protection and Clean Up

The fuel oil will be stored in an enclosed tank surrounded by a berm which will be sized to contain the full capacity of the tank in the event of a spill. The tank will be located at a distance from the plant in accordance with the NFPA separation requirements. The area around the fuel tank will be serviced by hydrants connected to the fire system yard loop. Any spilled oil will be collected and taken off-site for proper disposal.

Quality Control

Due to the limited use of fuel oil (as a start—up fuel only), there will be no testing procedures employed. The fuel oil will be purchased as low sulfur fuel (0.05% in accordance with the FDEP air permit) on the spot market.

The only acceptance criteria to be used for fuel oil will be that the sulfur content is not greater than 0.05%.

E. COAL

The design of the Okeelanta project includes provisions for the installation of equipment and systems to use coal as a supplemental fuel, its use being restricted by the FDEP air permit. The plant will be designed with space allocated for equipment to receive, unload, store, retrieve and fire coal. The use of coal requires construction of additional systems and facilities of the plant. Implementation of coal firing will be predicated upon the experienced reliability of the wood supplies and the prediction of the future economics of wood supplies. The project will have a number of long term wood supply contracts in place which will satisfy the needs of the project for at least 15 years. Independent studies of the wood supplies in Florida indicate that a continually increasing quantity will be available. However, due to the long term obligation of the project to supply Florida Power and Light Company with electrical energy for 30 years, the plant has been permitted to allow limited coal firing.

The following describes the permit restrictions issued by the FDEP regarding the use of coal as a fuel and the plan we expect to implement, in the event the decision is made to fire coal.

Delivery and Unloading

The most efficient method to deliver coal to the site is by rail. The project would construct a spur line from the existing rail line, located to the south of the Okeelanta Mill, into the site area. Under the terms of the air permit, the maximum number of cars required would be 600 per year.

A truck unloading capability would also be provided.

Storage and Retrieval

Coal unloaded at the unloading facility will be conveyed on a covered conveyor to a stacking tower. The coal will be stored in two distinct piles - i) an active pile, from which coal is withdrawn on a regular basis, and ii) an inactive pile which provides a back—up source of fuel and is used only in emergency situations. The active pile will be constantly used with coal being withdrawn from it by means of mobile equipment loading into a hopper. The hopper will deliver the coal onto a covered conveyor for delivery to the day hoppers. The coal will then be fed to the boilers as required from the day hoppers.

The inactive pile will be established by moving excess coal from the active pile by mobile equipment. The inactive coal pile will be compacted and treated to minimize fugitive emissions.

The maximum height of the coal pile will be 50 feet and its maximum size is not expected to exceed two acres. At any time that a coal pile has remained unused for a three month period, the pile will be treated with an encrusting agent to minimize fugitive emissions.

The design of the fire protection system for the plant includes a fire water distribution system, designed in accordance with appropriate NFPA standards, including piping, valves and yard hydrants. Hydrants will be located in strategic areas around the fuel storage area at a spacing of approximately 250 feet along the buried yard loop or branch line piping. Hydrants will be suitable for attaching hoses for manually fire fighting. Deluge water spray systems will be used for protection of the fuel handling equipment and the conveyors.

The pile will be spread and compacted to minimize the number of air pockets in the pile and the risk of fire. Also, the pile will be dampened when viewed to be dry.

During operation of the plant, fuel pile management personnel will be on site 24 hours a day. Telephone communication will be used to contact the local fire department upon the occurrence of a fire incident. The plant operation maintenance manual will incorporate instructions on fire protection and fighting procedure and personnel will be given classroom instructions.

The fire protection system is not yet designed. However, during the design process, the Palm Beach County Fire and Rescue office will be contacted to assure that its requirements are incorporated in the final design.

Quality Control

ASTM D-2234 will be used as guidance for the collection of a coal sample and ASTM D-2013 will be used for the analysis of the sample. The analysis will determine:

Heating value, BTU/lb
Moisture content, %
Ash content, %
Sulfur content, %

The sampling and testing by an independent laboratory will be conducted for each delivery. Samples will be collected and tested at the source and test results forwarded to Osceola for receipt prior to delivery of the coal. The limit for sulfur content as contained in the FDEP air permit is 0.7%.

Operational testing, including emissions ash testing, will provide additional information about the properties of the coal fired.

Under the terms of the coal supply contract the supplier will be requested to meet certain criteria relating to heating value, moisture ash and sulfur content. Any load which does not meet any one of these criteria, is subject to rejection by Okeelants and the supplier will be responsible for its removal from site. The project will also have the right to conduct spot check analyses on deliveries to confirm the information submitted by the supplier.

Regular operational testing, such as the Continuous Emissions Monitoring and ash testing, will provide additional information relating to the quality of the coal.

Wood-Waste and Ash Inspection and Testing Plan

Okeelanta Generating Plant

June 1995

Prepared by

Okeelanta Power Limited Partnership

Okeelanta Generating Plant
6 miles Sosuth of Suoth Bay on U.S. Highway 27
South Bay, Florida 33493

Submitted to
Florida Department of Environmental Protection
Bureau of Air Regulation

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References:

Bechtel Drawing 22433-M-03 1-0140-02; "Fuel Handling System Flow Diagram"

Bechtel Drawings 22433-M73-JN-O01 and 22433-M73-JM-0O1; "Fly Ash and Bottom Ash Handling System Flow Diagrams

1.0 INTRODUCTION

The Okeelanta Power, L.P. (OPLP) is constructing a bagasse/wood-waste fired cogeneration plant, known as the Okeelanta Generating Plant (OGP), adjacent to the site of the Okeelanta Sugar Mill. The OGP is located approximately six miles south of the town of South Bay in Palm Beach County, Florida.

As a provision of the OGP s Florida Department of Environmental Protection (FDEP) Air Permit (AC50-219413, PSD-FL-196), the plant is required to implement inspection and testing procedures for the wood-waste and other materials delivered to the plant for fuel. The primary function of these procedures is to keep painted and chemically-treated wood, household garbage, toxic or hazardous non-biomass, and non-combustible waste material from being burned at the plant. In addition, the FDEP Air Permit also requires the sampling and analysis of ash from the biomass burned in order to determine the concentration of copper, chromium, and arsenic present. This Wood-Waste and Ash Inspection and Testing Plan describes the implementation of these procedures during operation of the OGP to ensure compliance with the sampling and analysis provisions outlined in the air permit

The Plan includes a brief description of the OGP and its operations related to wood-waste and ash handling in Sections 2.0 and 3.0. Procedures for inspection, sampling, and analysis of the wood-waste at both the wood-waste supply sites and at the OGP, as well as procedures for ash sampling and analysis are described in Section 4.0. The OGP procedures for recordkeeping of inspections, sampling, and analysis results are provided in Section 5.0. Drawings for the fuel and ash handling systems, showing inspection (wood-waste only) and sampling locations are provided in the appendix.

2.0 FACILITY INFORMATION

The Okeelanta Generating Plant (OGP) is a new 74.9 MW (gross) bagasse and wood-waste fired cogeneration plant located in South Bay, Florida, adjacent to the existing Okeelanta Sugar Mill. The plant is designed to supply high and low pressure steam to the Okeelanta Sugar Mill during the grinding season (mid-October to April) while burning bagasse as the primary fuel. During the non-grinding season the OGP is designed to provide low pressure steam while using processed wood-waste as the primary fuel. Steam generation will be accomplished by means of bagasse and wood-waste fired non-reheat boilers.

Electrical power generation will be provided by means of an extraction-condensing turbine generator and will be used to meet in-house loads and for sale to Florida Power & Light.

The major components of the plant include:

- three balanced draft bagasse/wood-fired boilers with membrane wall construction, superheater, and economizer (boilers are also permitted for future coal firing to a maximum of 25 % of rated heat input)
- three electrostatic precipitators (one/boiler) with integral stacks
- an extraction-condensing turbine generator
- material storage and handling systems (e.g., wood-waste, bagasse, ash)
- ancillary plant equipment.

3.0 PROCESS DESCRIPTIONS

The following sub-sections describe the OGP wood-waste and ash handling systems from a "process flow" standpoint. Although the OGP also includes a bagasse handling system which operates during the sugar cane grinding season, only the wood-waste and ash are subject to the sampling and analysis requirements of the OGP air permit. Therefore, only these systems are described in this plan.

3.1 Wood-Waste Handling System

The following description of the Wood-Waste Handling System is depicted schematically on the wood-waste/bagasse flow diagram (Bechtel Drawing #22433-M-031-0140-02) contained in the appendix .

Wood-waste will be delivered to the OGP by 25-ton trucks (typical) at an approximate design rate of 1,200 tons per day, with deliveries anticipated 12 hours per day, 6 days per week. The trucks will be unloaded at the OGP utilizing two hydraulically operated truck dumpers. A third unloading area will also be provided to accommodate any self-unloading trucks that may be available for fuel transportation.

While unloading from the trucks, the wood-waste will be discharged into receiving hoppers equipped with live bottom chain conveyors which will transfer the wood material to the 48" Unloading Conveyor. The Unloading Conveyor, which is equipped with a belt scale and magnetic separator, will convey the wood-waste to the Screen and Hog Tower at a design rate of up to 300 tons per hour (tph) .

The Screen and Hog Tower is an open facility consisting of a disc screen and a motor-driven, size-reducing hog. The wood-waste will be discharged onto the disc screen which acts to separate material sized less than 3" from any oversized material. The oversized material (i.e., > 3") is discharged to the Hog which reduces the wood pieces to the less than 3" size, suitable for feeding into the boilers.

The sized wood-waste is transferred from the Screen and Hog Tower via the Storage Conveyor to the Radial Stacker Conveyor which deposits the sized wood-waste at the wood storage area.

Sized wood-waste is reclaimed from the wood pile at a design rate of up to 175 tph through the use of two under-pile chain reclaimers. The reclaimers transfer the sized wood-waste to the Boiler Feed Conveyor which deposits the fuel on to one of two chain distribution conveyors for apportionment into the boilers.

3.2 Ash Handling Systems

The ash handling systems at the OGP comprises equipment from two distinct systems, (1) the handling of bottom ash from the boilers, and (2) the handling of fly ash collected in the electrostatic precipitators (ESP), the dust collector hoppers and the air heater hoppers. Therefore, the following two sub-sections provide separate discussions of both the equipment related to bottom ash handling and the equipment for fly ash handling. A process flow diagram of these ash handling systems is also provided in the appendix

to this plan (Bechtel Drawings #22433 M73-JN-0O1 and #22433 M73-JM-0O1) .

3.2.1 Bottom Ash Handling

Bottom ash will be continuously discharged from the boilers into three water-submerged drag chain conveyors. Each conveyor will consist of a wet compartment and a dry lower compartment. The upper compartment will be a water-tight steel trough designed to contain the water required for quenching and cooling the bottom ash to 1400 F. The trough will be sized to accommodate up to two hours of bottom ash generated from the combustion of wood-waste (or bagasse).

The dewatered ash from the dewatering inclined ramp of the chain conveyor will be discharged into an 8 tph transfer conveyor from each individual boiler which will then transfer the dewatered ash into a 25-tph collecting conveyor. The collecting conveyor will unload the ash into a three-sided bunker, sized to a capacity of approximately 1-day of normal ash generation. Mobile equipment will be used to reclaim and load the stored ash into trucks for disposal off site.

3.2.2 Fly Ash Handling

Fly ash at the OGP will include ash collected in the air heater hoppers, dust collector hoppers and from the ESP hoppers. The fly ash handling system will encompass the removal and transport of the fly ash from the hoppers to a storage silo using a dry chain conveyor and bucket elevator conveyor system.

The fly ash collected from the air heaters and ESPs will discharge via enclosed chutes to the collecting fly ash chain conveyor. The collecting conveyor transfers the ash to the bucket elevator conveyor, which in turn carries the ash up to the flight chain conveyor. The flight conveyor discharges the fly ash into the top of the ash storage silo. The conveying capacity of this system will be sufficient to remove 24-hours of ash generation in 6 to 8 hours of operation.

The ash storage silo will be sized to accommodate 1,500 tons (approximately 7 days of ash generation) of fly ash. The silo will be a conical-bottom cylinder-type carbon steel structure. Two twin shaft pug-mill conditioner unloaders, rated at 200 tph each, will discharge the ash into trucks for disposal.

4.0 INSPECTION, SAMPLING, AND ANALYSIS PROCEDURES

As stated in Section 1.0, the FDEP Air Permit for the OGP requires that inspection, sampling, and analysis of the wood-waste burned, and sampling and analysis of the ash generated at the plant, be performed to demonstrate that contaminants, principally copper, chromium, arsenic, in the biomass burned in the boilers are minimized.

The specific inspection and sampling procedures to be utilized at each stage of the wood-waste and ash handling systems are provided in the following sub-sections.

4.1 Wood-Waste Supply Sites.

As stipulated in the OGP fuel supply contracts with the wood-waste suppliers, the delivered wood-waste must be substantially free of plastics, rubber, glass, and painted wood and contain only incidental amounts of chemically treated wood (e.g., chromium, copper, arsenic, creosote, pentachlorophenol).

To help ensure that wood-waste delivered to the OGP meets the provisions of the air permit, as well as other fuel quality specifications, the wood waste suppliers will perform inspection and material segregation operations on each load of feedstock received at their facilities. Although the OGP will obtain wood-waste fuel from several different suppliers with a variety of sources for their unprocessed feedstock, the following description of the inspection and material segregation operations are typical of those operations performed at wood yards supplying the OGP.

The bulk material feedstock at the originating wood yards will first undergo a "gross" material separation by removing the bulk wood-waste from other mixed wastes (e.g., plastics, non-wood debris, scrap metal, concrete/soils) through the use of heavy equipment, magnetic separation, and mechanical screening.

Trained personnel will be involved in oversight at this level of material segregation such that the majority of prohibited wastes are removed from the bulk wood-waste. After this operation, the wood-waste will be further visually inspected and manually sorted (when applicable) to remove chemically-treated and painted wood, smaller mixed wastes, and other non-combustible materials. The "sorted" wood-waste is then mechanically sized and screened (to actual contract specifications) .prior to delivery to the OGP site.

As a quality assurance measure, each fuel supplier's operations will be reviewed at least once monthly through an unannounced site inspection by OGP personnel. These visits will allow OGP to ensure that the supplier's inspection and segregation efforts remain at acceptable levels.

4.2 OGP Wood Yard Storage

In accordance with the FDEP Air Permit, analysis of wood-waste to be burned at the plant will conducted on a weekly basis for the first year of operation at the OGP. Thereafter, upon approval of FDEP, sampling and analysis may be reduced to a monthly basis.

Upon delivery of the wood-waste to the OGP, each load will be visually inspected by the Fuel/Ash Handler stationed at the truck receiving dumping area. Loads which contain unacceptable, visible amounts (i.e., greater than fuel contract specified limits) of chemically treated and/or painted wood and other prohibited mixed wastes will be rejected by the inspector and prevented from discharging at the OGP fuel storage area. If the delivered load is acceptable based on the visual inspection, the truck will be staged for unloading.

Sampling of the wood-waste will occur at the OGP fuel storage yard. Representative samples will be taken from specified sections of the wood-waste pile which represent and include the fuel to be reclaimed and burned during the following week of plant operation. These "weekly" sections, and their schedule for reclamation and burning, will be identified and approved by the Plant Manager (or designee) prior to samples being taken.

A total of three grab samples will be taken from different areas and depths at the specified "weekly" section of the fuel pile. Each grab sample will be approximately one pound and will be stored in sealable plastic (ziplock-type) bags.

Prior to releasing the samples for outside lab analysis, a "composite sample" will be produced by combining the three individual grab samples into a homogeneous mixture and cutting out a single sample from the mixture as specified by the lab performing the analyses. This "composite sample" will represent the composition of the wood-waste to be burned during the following week of plant operations. The remaining portion of the homogenous mixture will be retained onsite for use as a control sample to the verify lab test results, if necessary.

Laboratory results on the samples will typically be available to the OGP Fuels Manager within 2-3 days of receipt of the sample at the lab. Any results which indicate contamination of the wood-waste in the "weekly" section of the pile by copper, chromium, and/or arsenic in concentrations above the air permit-specified limits (i.e., 62.8 ppm copper, 83.3 ppm chromium, and 70.7 ppm arsenic) will be immediately investigated by the onsite Environmental, Health and Safety Representative (EH&S). The "weekly" section of the pile tested will not be burned until additional testing of the control sample is undertaken to verify the original test results. If necessary, additional sampling/testing will be performed to determine the extent of contaminated wood-waste in the "weekly" section of the fuel pile.

4.3 Bottom Ash/Fly Ash

In accordance with the FDEP Air Permit, analysis of the ash generated at the OGP will conducted on a monthly basis for the first year of operation. Results from the analyses will be used to confirm that the air permit-specified limits on the concentration of copper, chromium, and arsenic in the biomass combusted at the OGP are being met. Three ash products will be analyzed:

1. Fly ash collected from the air heater, dust collectors, and ESP hoppers,
2. Bottom ash from the three boilers,
3. A mixed product of fly ash and bottom ash.

Grab samples of the bottom ash will be obtained weekly by the Chemical Technician as material is loaded from the storage bunker to trucks for offsite disposal. Fly ash grab samples will be obtained (also by the Chemical Technician) weekly from the transfer point between the collecting fly ash chain conveyor and the bucket elevator conveyor, as ash is loaded into the silo. The individual sample size for the bottom ash and fly ash grab samples will be approximately one pound each.

Prior to releasing the ash samples for outside lab analysis, a "combined ash sample" for the facility will also be produced by blending a portion of the individual weekly bottom and fly ash samples (approximately 8, 1 lb samples per month) into a homogeneous composite (fly and bottom ash) ash sample. A portion of the remaining individual fly ash, bottom ash, and combined ash samples will be retained on site as control samples for verification of lab test results, if necessary.

As stated in the air permit, the monthly ash samples will be analyzed for copper, chromium, and arsenic in accordance with appropriate analytical procedures per 40 CFR 261, Appendix III, described in SW-846, *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*. Laboratory results on the sample will typically be available to the OGP Fuels Manager within 2-3 days after receipt of the sample at the lab.

Any results on the representative monthly composite ash sample which indicate the burning of wood-waste with concentrations of copper, chromium and/or arsenic above of the air permit limits will be investigated by the EH&S Representative. Re-testing of the control ash sample will be performed to verify the original lab test results. Comparison of the ash sample results with the corresponding fuel test results will also be performed to ensure that existing material segregation and sampling procedures for the wood-waste provide for an accurate representation of the composition of the wood-waste burned at the facility.

4.4 Analysis Result Correlation

Results from the wood-waste, bottom ash, fly ash, and combined fly/bottom ash product sampling and analysis will be correlated so that a comparison of the analyzed metals content in the feedstock (wood-waste) with that of the ash products can be made. This information will be used to assess the adequacy of the wood-waste sampling procedures and for determining the distribution of the initial wood-waste metals content in the fly and bottom ash products. In addition, this information may be used to support a future request by OGP for FDEP to relax the sampling and analysis requirements of this plan.

5.0 RECORDKEEPING

As required by the OGP air permit, results from the weekly wood-waste and monthly ash analyses will be included in the Stack Monitoring Reports submitted quarterly to FDEP's South and Southeast district Offices and the Palm Beach County Health Unit. Specifically, FDEP will be notified of:

- Any analysis results which indicate exceedances of the allowable concentrations of copper, chromium, and arsenic.
- Any re-sampling/re-analysis and handling ("blending") of the wood-waste performed in the event an exceedance is indicated by the original analysis.
- The ultimate disposal of the off-specification material.

In addition, records on the various wood-waste inspections and wood-waste and ash sampling and analysis procedures outlined in this Plan will be maintained at the OGP for review on an as-requested

basis by FDEP. The records will typically include:

- Fuel delivery information (e.g., supplier, time/date of delivery, type of material, delivery size)
- Written inspection reports (stating findings) of unannounced site visits to wood-waste suppliers to determine adequacy of their material segregation operations
- Wood-waste and ash sampling and analysis information (e.g., time/date of sampling, locations selected from the "weekly" sections, any atypical conditions, labs utilized, sample results) .

These records may also be used by OGP personnel in investigating potential non-compliance events and verifying fuel and ash test results.

Appendix H-1, Permit History/Id Number Changes

Okeelanta Corporation
a.k.a. Okeelanta Farms Company
Facility ID Nos.: 0990005 & 0990332

Draft Permit No.: 0990005-002-AV
Sugarcane Processing Facility: 0990005
Cogeneration Facility: 0990332

Permit History (for tracking purposes):

EU ID No.	Description	Permit No(s).	Issue Date	Exp. Date.	Revised Date
003	**Mill Boiler No. 4**				
	AO – Initial	AO50-2053	5/23/73	7/1/75	-
	AC – AQCS	AC50-2054A	12/20/74	N/A	-
	AO – Renewal	AO50-2054A	2/2/76	2/2/79	-
	AC – AQCS	AC50-6585	?	N/A	-
	AC – Amendment	AC50-6585	-	-	5/21/98
	AO – Renewal	AO50-17918	5/2/79	5/2/84	-
	AO – Renewal	AO50-92636	9/18/84	9/18/89	-
	AO – Renewal	AO50-169210	9/12/89	9/12/94	-
	AO – Extension	AO50-169210	-	Note 1	-
	AO – Amendment	AO50-169210	-	-	5/21/98
004	**Mill Boiler No. 5**				
	AO - Initial	AO50-2055	5/23/73	7/1/75	-
	AC – AQCS	AC50-2055A	12/23/74	N/A	-
	AO – Renewal	AO50-2055A	2/2/76	2/2/79	
	AO – Renewal	AO50-5886	2/11/79	2/11/84	-
	AC – AQCS	AC50-6595	5/12/80	N/A	-
	AC – Amendment	AC50-6595	-	-	5/21/98
	AO – New/Renewal	AO50-7399	3/25/81	3/25/86	-
	AO –Renewal	AO50-115245	2/11/86	2/11/91	-
	AO – Renewal	AO50-190690	1/2/91	1/2/96	-

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Cogeneration Facility: 0990332

Permit History (for tracking purposes):

EU ID No.	Description	Permit No(s).	Issue Date	Exp. Date.	Revised Date
004	**Mill Boiler No. 5 (cont.)**				
	AO – Extension	AO50-190690	-	Note 1	-
	AO – Amendment	AO50-190690	-	-	5/21/98
005	**Mill Boiler No. 6**				
	AO – Initial	AO50-2056	5/23/73	7/1/75	-
	AC – AQCS	AC50-2056A	6/28/74	N/A	-
	AO – Renewal	AO50-2056A	6/17/75	6/17/78	-
	AO – Renewal	AO50-5329	9/29/78	9/29/83	-
	AC – AQCS	AC50-6013	8/17/79	N/A	-
	AC – Amendment	AC50-6013	-	-	5/21/98
	AO – Renewal	AO50-94277	10/16/84	1/23/90	-
	AO – Renewal	AO50-175414	3/12/90	3/12/95	-
	AO – Extension	AO50-175414	-	Note 1	-
	AO – Amendment	AO50-175414	-	-	5/21/98
009	**Mill Boiler No. 10**				
	AO – Initial	AO50-?	?(73)	7/1/75	-
	AC – AQCS	AC50-?	? (74/75)	N/A	-
	AO – Renewal	AO50-?	6/17/75	6/17/78	-
	AO – Renewal	AO50-?	9/29/78	9/29/83	-
	AC – AQCS	AC50-6014	8/17/79	N/A	-
	AC – AQCS	AC50-6963	10/6/80	N/A	-

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Cogeneration Facility: 0990332

Permit History (for tracking purposes):

EU ID No.	Description	Permit No(s).	Issue Date	Exp. Date.	Revised Date
009	**Mill Boiler No. 10 (cont.)**				
	AC – Amendment	AC50-6963	-	-	5/21/98
	AO – Renewal	AO50-115246	3/24/86	3/24/91	-
	AO – Renewal	AO50-190693	5/31/91	5/31/96	-
	AO – Extension	AO50-190693	-	Note 1	-
	AO – Amendment	AO50-190693	-	-	5/21/98
010	**Mill Boiler No. 11**				
	AC – Initial	AO50-2332	10/9/74	N/A	-
	AO – Initial	AO50-2332	3/29/76	3/29/81	-
	AC – AQCS	AC50-5225	5/13/78	N/A	-
	AC – AQCS	AC50-6015	8/17/79	N/A	-
	AC – Amendment	AC50-6015	-	-	5/21/98
	AO – New	AO50-6617	3/31/80	3/31/85	-
	AO – Renewal	AO50-99355	2/25/85	2/25/90	-
	AO – Renewal	AO50-175411	3/12/90	3/12/95	-
	AO – Extension	AO50-175411	-	Note 1	-
	AO – Amendment	AO50-175411	-	-	5/21/98
011	**Mill Boiler No. 12**				
	AC – Initial	AC50-2238	7/12/76	N/A	-
	AC – AQCS	AC50-2238A	2/24/77	N/A	-
	AC – Amendment	AC50-2238A	-	-	5/21/98

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Permit History (for tracking purposes):

EU ID No.	Description	Permit No(s).	Issue Date	Exp. Date.	Revised Date
011	**Mill Boiler No. 12 (cont.)**				
	AO – New	AO50-4970	8/27/78	8/27/79	-
	AO – Renewal	AO50-6127	?(1979)	?(1984)	-
	AO – Renewal	AO50-92633	9/19/84	9/26/89	-
	AO – Renewal	AO50-169215	9/18/89	9/12/94	-
	AO – Extension	AO50-169215	-	Note 1	-
	AO – Modification	AO50-207415	3/25/92	9/12/94	-
	AO – Amendment	AO50-169215	-	-	5/21/98
012	**Mill Boiler No. 14**				
	AC – Initial	AC50-2650	8/9/77	N/A	-
	AC – Amendment	AC50-2650	-	-	5/21/98
	AO – New	AO50-4969	5/8/78	5/8/79	-
	AO – Renewal	AO50-6060	10/11/79	10/11/80	-
	AO – Renewal	AO50-7138	10/16/80	10/16/85	-
	AO – Renewal	AO50-111231	10/29/85	10/29/90	-
	AO – Renewal	AO50-189904	12/10/90	12/10/95	-
	AO – Extension	AO50-189904	-	Note 1	-
	AO – Modification	AO50-207415	3/25/92	12/10/95	-
	AO – Amendment	AO50-189904	-	-	5/21/98
013	**Mill Boiler No. 15**				
	AC – Initial	AC50-5225	?(1978)	N/A	-

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Permit History (for tracking purposes):

	AC – Initial	AC50-6016	9/11/79	N/A	-
	AO – New	AO50-6616	3/31/80	3/31/85	-
	AC – AQCS	AC50-7575	1/15/82	N/A	-
	AC – Amendment	AC50-7575	-	-	5/21/98
	AO – Renewal	AO50-129387	2/26/87	2/26/92	-
	AO – Renewal	AO50-209094	4/21/92	4/21/97	-
	AO – Extension	AO50-209094	-	Note 1	-
	AO – Modification	AO50-259709	-	-	1/4/95
	AO – Amendment	AO50-209094	-	-	5/21/98
EU ID No.	**Description**	**Permit No(s).**	**Issue Date**	**Exp. Date.**	**Revised Date**
014	**Mill Boiler No. 16**				
	AC – Initial	AC50-191876 (PSD-FL-169)	3/1/93	N/A	-
	AC – Modification	AC50-191876 (PSD-FL-169)	-	-	2/18/93
	AC – Amendment	AC50-191876 (PSD-FL-169)	-	-	3/19/93
	AC – Amendment	AC50-191876 (PSD-FL-169)	-	-	3/7/94
	AO – Operating/COCOC	AO50-257065	11/29/94	11/29/99	-
	AO – Extension	AO50-257065	-	Note 1	-
015	**Volatile Organic Liquid Storage Vessels (NSPS Kb)**				
	AC – Initial (After-the-Fact)	AC50-265485	5/22/95	Note 2	-
016	**Volatile Organic Liquid Storage Vessels (NSPS Kb)**				
	AC – Initial (After-the-Fact)	AC50-265485	5/22/95	Note 2	-

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Sugarcane Processing Facility: 0990005
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Permit History (for tracking purposes):

017	**Volatile Organic Liquid Storage Vessels (NSPS Kb)**				
	AC – Initial (After-the-Fact)	AC50-265485	5/22/95	Note 2	-
018	**Central Vacuum System for the Trans-Shipment Facility**				
	AC – Initial (After-the-Fact)	0990005-001-AC	1/24/96	Note 2	-
019	**Packaging Lines**				
	AC – Initial (After-the-Fact)	0990005-001-AC	1/24/96	Note 2	-
020	**Sugar Grinder and Hopper**				
	AC – Initial (After-the-Fact)	0990005-001-AC	1/24/96	Note 2	-
021	**Central Dust Collection System No. 1 (Wet Rotoclone #1)**				
	AC – Initial (After-the-Fact)	0990005-002-AC	7/17/96	Note 2	-
022	**Central Dust Collection System No. 2 (Wet Rotoclone #2)**				
	AC – Initial (After-the-Fact)	0990005-002-AC	7/17/96	Note 2	-
EU ID No.	**Description**	**Permit No(s).**	**Issue Date**	**Exp. Date.**	**Revised Date**
023	**Cooler No. 1 (Cyclone #1)**				
	AC – Initial (After-the-Fact)	0990005-002-AC	7/17/96	Note 2	-
024	**Cooler No. 2 (Cyclone #2)**				
	AC – Initial (After-the-Fact)	0990005-002-AC	7/17/96	Note 2	-
025	**Fluidized Bed Dryer/Cooler**				
	AC – Initial	0990005-002-AC	7/17/96	Note 2	-
026	**Sugar Silo (S1101)**				
	AC – Initial (After-the-Fact)	0990005-001-AC	1/24/96	Note 2	-

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Permit History (for tracking purposes):

027	**Sugar Silo (S1102)**				
	AC – Initial (After-the-Fact)	0990005-001-AC	1/24/96	Note 2	-
028	**Sugar Silo (S1103)**				
	AC – Initial (After-the-Fact)	0990005-001-AC	1/24/96	Note 2	-
029	**Materials Handling and Storage Operations (Cogeneration Facility)**				
	AC – Initial	AC50- & PSD-FL-	9/27/93	-	-
	AC – Modification	AC50- & PSD-FL-	10/16/95	-	-
	AC – Extension	AC50- & PSD-FL-	-	Note 2	-
030	**Cogeneration Boiler No. 1 (Cogeneration Facility)**				
	AC – Initial	AC50-219413 & PSD-FL-196	9/27/93	-	-
	AC – Extension	AC50-219413 & PSD-FL-196	-	Note 2	-
	AC – Amendment	AC50-219413 & PSD-FL-196(A)	-	-	2/20/96
	AC – Amendment	AC50-219413 & PSD-FL-196(B)	-	-	6/14/96
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-003-AC	-	-	1/22/97
	AC – Amendment	AC50-219413 & PSD-FL-196(D) FDEP File 0990332-004-AC	-	-	4/18/97
EU ID No.	**Description**	**Permit No(s).**	**Issue Date**	**Exp. Date.**	**Revised Date**
030	**Cogeneration Boiler No. 1 (Cogeneration Facility)**				
	AC – Amendment	AC50-219413 & PSD-FL-196(C) FDEP File 0990332-005-AC	-	-	5/5/97
	AC – Amendment	AC50-219413 & PSD-FL-196(D) FDEP File 0990332-007-AC	-	-	5/8/97

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Sugarcane Processing Facility: 0990005
Cogeneration Facility: 0990332

Permit History (for tracking purposes):

	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-003-AC	-	-	5/13/97
	AC – Amendment	AC50-219413 & PSD-FL-196(A) FDEP File 0990332-003-AC	-	-	9/2/97
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-0096AC	-	-	10/24/97
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-009-AC	-	-	6/15/98
	AC – Amendment	AC50-219413 & PSD-FL-196F FDEP File 0990332-010-AC	-	-	6/14/99
031	**Cogeneration Boiler No. 2 (Cogeneration Facility)**				
	AC – Initial	AC50-219413 & PSD-FL-196	9/27/93	-	-
	AC – Extension	AC50-219413 & PSD-FL-196	-	Note 2	-
	AC – Amendment	AC50-219413 & PSD-FL-196(A)	-	-	2/20/96
	AC – Amendment	AC50-219413 & PSD-FL-196(B)	-	-	6/14/96
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-003-AC	-	-	1/22/97
	AC – Amendment	AC50-219413 & PSD-FL-196(D) FDEP File 0990332-004-AC	-	-	4/18/97
	AC – Amendment	AC50-219413 & PSD-FL-196(C) FDEP File 0990332-005-AC	-	-	5/5/97
	AC – Amendment	AC50-219413 & PSD-FL-196(D) FDEP File 0990332-007-AC	-	-	5/8/97

EU ID No.	Description	Permit No(s).	Issue Date	Exp. Date.	Revised Date
031	**Cogeneration Boiler No. 2 (Cogeneration Facility)**				

Permit History (for tracking purposes):

	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-003-AC	-	-	5/13/97
	AC – Amendment	AC50-219413 & PSD-FL-196(A) FDEP File 0990332-003-AC	-	-	9/2/97
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-0096AC	-	-	10/24/97
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-009-AC	-	-	6/15/98
	AC – Amendment	AC50-219413 & PSD-FL-196F FDEP File 0990332-010-AC	-	-	6/14/99
032	**Cogeneration Boiler No. 3 (Cogeneration Facility)**				
	AC – Initial	AC50-219413 & PSD-FL-196	9/27/93	-	-
	AC – Extension	AC50-219413 & PSD-FL-196	-	Note 2	-
	AC – Amendment	AC50-219413 & PSD-FL-196(A)	-	-	2/20/96
	AC – Amendment	AC50-219413 & PSD-FL-196(B)	-	-	6/14/96
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-003-AC	-	-	1/22/97
	AC – Amendment	AC50-219413 & PSD-FL-196(D) FDEP File 0990332-004-AC	-	-	4/18/97
	AC – Amendment	AC50-219413 & PSD-FL-196(C) FDEP File 0990332-005-AC	-	-	5/5/97
	AC – Amendment	AC50-219413 & PSD-FL-196(D) FDEP File 0990332-007-AC	-	-	5/8/97
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-003-AC	-	-	5/13/97

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	AC – Amendment	AC50-219413 & PSD-FL-196(A) FDEP File 0990332-003-AC	-	-	9/2/97
EU ID No.	**Description**	**Permit No(s).**	**Issue Date**	**Exp. Date.**	**Revised Date**
032	**Cogeneration Boiler No. 3 (Cogeneration Facility)**				
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-0096AC	-	-	10/24/97
	AC – Amendment	AC50-219413 & PSD-FL-196 FDEP File 0990332-009-AC	-	-	6/15/98
	AC – Amendment	AC50-219413 & PSD-FL-196F FDEP File 0990332-010-AC	-	-	6/14/99
033	**Cogeneration Facility NSPS Storage Tank**				
	AC/AO	Rule 62-210.300(b)(3), F.A.C. (Temporary Exemption)			

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Reserved – To be provided within ninety (90) days of the effective date of the Title V Permit.

Example Requirements:

The plan shall include a schedule for the maintenance and inspection of each control device and collection system and a schedule for recording performance parameters of the control devices, collection systems and auxiliary equipment. Records of inspections, maintenance and performance data of control devices and auxiliary equipment shall be retained by the emissions unit and shall be made available to the Department upon request. The performance parameters shall include such physical, chemical or electrical characteristics as are applicable to the particular emissions unit and which are indicators of the condition, operating rates and efficiencies. Such parameters may include, but shall not be limited to, the following indicators for:

Baghouses

Bag pressure drop
Gas flowrate: direct method preferred; indirect method acceptable
Air to cloth ratio
Bag Weave
Bag material
Gas temperature, inlet and outlet
Bag cleaning conditions:
Pulse: Air pressure
Shake: shaker motor current
Reverse: reverse air fan current
Bag cleaning cycle:
Shake: duration, frequency, and delay periods
Reverse: duration, frequency, and delay periods

The Operation and Maintenance plan shall include identification of control device(s) for each emissions unit subject to provisions of this rule including but not limited to the following appropriate design specifications and other descriptive data:

1. Manufacturer
2. Model name and number
3. Type: scrubber, baghouse, electrostatic precipitator, dry scrubber, etc.
4. Design flow rate (liquid and/or gas)
5. For EPS's: primary and secondary voltage and current
6. Efficiency rating at design capacity
7. Pressure drop
8. Liquid to gas ratio
9. Scrubbing liquor composition

Appropriate parameters of processing or materials handling systems provide a measure of the rate of operations. The operation and maintenance plan shall include performance parameters which indicate the rate of operation, process weight through-put, the fuel or other energy source, the materials being processed or other physical or chemical characteristics, as applicable. Such parameters may include, but shall not be limited to the following:

a. Weight per unit time of raw materials input;
b. Process temperature or pressure;
c. Fuel or fuel mixture;

d. Chemical or physical data on product or raw materials;
e. Air to fuel ratio or percent excess oxygen;
f. Electrical power use rate by auxiliary equipment.

The plan shall contain inspection and maintenance schedules including periodic assessments of the condition of manholes, ducting, breaching, hoods, conveyor and elevator housing, loading sheds and other equipment, and a schedule for recording of performance parameter data.

Records of inspection, maintenance and performance parameter data shall be retained and shall be made available to the Department upon request.

Reserved – To be provided within ninety (90) days of the effective date of the Title V Operating Permit.

Example Requirements:

The plan shall include a schedule for the maintenance and inspection of each control device and collection system and a schedule for recording performance parameters of the control devices, collection systems and auxiliary equipment. Records of inspections, maintenance and performance data of control devices and auxiliary equipment shall be retained by the emissions unit and shall be made available to the Department upon request. The performance parameters shall include such physical, chemical or electrical characteristics as are applicable to the particular emissions unit and which are indicators of the condition, operating rates and efficiencies. Such parameters may include, but shall not be limited to, the following indicators for:

Baghouses

Bag pressure drop
Gas flowrate: direct method preferred; indirect method acceptable
Air to cloth ratio
Bag Weave
Bag material
Gas temperature, inlet and outlet
Bag cleaning conditions:
Pulse: Air pressure
Shake: shaker motor current
Reverse: reverse air fan current
Bag cleaning cycle:
Shake: duration, frequency, and delay periods
Reverse: duration, frequency, and delay periods

The Operation and Maintenance plan shall include identification of control device(s) for each emissions unit subject to provisions of this rule including but not limited to the following appropriate design specifications and other descriptive data:

1. Manufacturer
2. Model name and number
3. Type: scrubber, baghouse, electrostatic precipitator, dry scrubber, etc.
4. Design flow rate (liquid and/or gas)
5. For EPS's: primary and secondary voltage and current
6. Efficiency rating at design capacity
7. Pressure drop
8. Liquid to gas ratio
9. Scrubbing liquor composition

Appropriate parameters of processing or materials handling systems provide a measure of the rate of operations. The operation and maintenance plan shall include performance parameters which indicate the rate of operation, process weight through-put, the fuel or other energy source, the materials being processed or other physical or chemical characteristics, as applicable. Such parameters may include, but shall not be limited to the following:

a. Weight per unit time of raw materials input;
b. Process temperature or pressure;
c. Fuel or fuel mixture;

d. Chemical or physical data on product or raw materials;
e. Air to fuel ratio or percent excess oxygen;
f. Electrical power use rate by auxiliary equipment.

The plan shall contain inspection and maintenance schedules including periodic assessments of the condition of manholes, ducting, breaching, hoods, conveyor and elevator housing, loading sheds and other equipment, and a schedule for recording of performance parameter data.

Records of inspection, maintenance and performance parameter data shall be retained and shall be made available to the Department upon request.

Reserved – To be provided within ninety (90) days of the effective date of the Title V Permit.

Example Requirements:

The plan shall include a schedule for the maintenance and inspection of each control device and collection system and a schedule for recording performance parameters of the control devices, collection systems and auxiliary equipment. Records of inspections, maintenance and performance data of control devices and auxiliary equipment shall be retained by the emissions unit and shall be made available to the Department upon request. The performance parameters shall include such physical, chemical or electrical characteristics as are applicable to the particular emissions unit and which are indicators of the condition, operating rates and efficiencies. Such parameters may include, but shall not be limited to, the following indicators for:

Electrostatic Precipitators.

The following information shall be recorded unless otherwise agreed to by the Department:

Primary voltage
Primary current
Secondary current
Spark rate
Secondary voltage
Rapper frequency, plate
Rapper Vibrator frequency, wire
Rapper duration, plate
Rapper Vibrator duration, wire
Gas temperature, inlet and outlet
Estimated gas flowrate
Static pressure

The Operation and Maintenance plan shall include identification of control device(s) for each emissions unit subject to provisions of this rule including but not limited to the following appropriate design specifications and other descriptive data:

1. Manufacturer
2. Model name and number
3. Type: scrubber, baghouse, electrostatic precipitator, dry scrubber, etc.
4. Design flow rate (liquid and/or gas)
5. For EPS's: primary and secondary voltage and current
6. Efficiency rating at design capacity
7. Pressure drop
8. Liquid to gas ratio
9. Scrubbing liquor composition

Appropriate parameters of processing or materials handling systems provide a measure of the rate of operations. The operation and maintenance plan shall include performance parameters which indicate the rate of operation, process weight through-put, the fuel or other energy source, the materials being processed or other physical or chemical characteristics, as applicable. Such parameters may include, but shall not be limited to the following:

a. Weight per unit time of raw materials input;
b. Process temperature or pressure;

c. Fuel or fuel mixture;
d. Chemical or physical data on product or raw materials;
e. Air to fuel ratio or percent excess oxygen;
f. Electrical power use rate by auxiliary equipment.

The plan shall contain inspection and maintenance schedules including periodic assessments of the condition of manholes, ducting, breaching, hoods, conveyor and elevator housing, loading sheds and other equipment, and a schedule for recording of performance parameter data.

The operation and maintenance plan may include, but shall not be limited to, the following:

Steam flow
Fuel type (e.g., gas, oil, coal, or mixtures thereof)
Consumption rate for type(s) of fuel(s) burned
Fuel oil temperature (if applicable)

Records of inspection, maintenance and performance parameter data shall be retained and shall be made available to the Department upon request.

The following RACT, BACT and LAER determination(s) are part of the Title V Operating Permit:

Date	Emissions Unit ID No.	Type	Pollutant(s)
07/29/91	14 Mill Boiler No. 16	BACT BACT BACT BACT	Particulate Sulfur Dioxide (fuel oil) Nitrogen Oxides Visible Emissions
9/27/93	30, 31, & 32 Cogen Boilers	BACT BACT BACT	Sulfur Dioxide Fluorides Beryllium
9/27/93	30, 31, & 32 Cogen Boilers	RACT RACT	Nitrogen Oxides Volatile Organic Compounds
10/24/95	30, 31, & 32 Cogen Boilers	Re-BACT Re-BACT Re-BACT	Sulfur Dioxide Fluorides Beryllium
10/24/95	30, 31, & 32 Cogen Boilers	BACT	Nitrogen Oxides
05/21/98	04, 05, 06, 09, 10, 11, 12, & 13 Sugar Mill Boilers	RACT RACT	Nitrogen Oxides Volatile Organic Compounds

Appendix U-1
List of Unregulated Emission Units and/or Activities

Okeelanta Corporation **Draft Permit No.:** 0990005-003-AV
Sugarcane Processing & Power Generation Facilities **Facility ID No.:** 0990005

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities have been identified by the permittee as 'unregulated emissions units'.

EU ID No.	EU Description	Activities/Equipment
034	Shop Activities	• Surface Coating Operations (Non-RACT Vehicle Painting) • Diesel Engine – Portable Air Compressor • Vehicle Repair (Body Shop) • Crawlers Repair Shop • Hydraulic Oil, Mineral Spirits, and Waste/Used Oil Storage Tanks • Mechanics' Trucks With Portable Air Compressors (Gasoline Engines) • Portable Pressure Cleaners (Gasoline Engines) • Steam Clean Station • Truck, Trailer, Service Vehicles, Wheel Tractor Repair Shops
035	Sugar Mill Boiler House	• Boiler Ash Disposal, Handling and Storage • Boiler Blowdown Pipes & Vents • Boiler Water Chemical Prep Tanks • Boiler Water Dearator and Tank
036	Sugar Mill Cane Dumping Area	• Cane Dumping, Handling, and Storage Cane Knives, Shredding, And Conveying
037	Sugarcane Processing Facility	• Bagacillo Handling Systems • Batch Mixers (<30 Cu. Ft.) • Carbonaceous Fuel Handling, Storage Piles and Hogger • Cold Cleaning Devices (Non-Halogenated Solvent) • Containers For Oils/Wax/Grease • Cooling Water Towers, Spray Ponds and Canals • Diesel, Gasoline, Fuel Oil, Kerosene, Lube Oil, Waste and Used Oil Storage Tanks (Non-Nsps) • Electric Ovens For Drying • Emergency Generators • Gear Boxes, Reducers Vents • Ground Water Remediation Stripping Tower • Handling Of Raw Sugar • Industrial Waste Water Tanks (Non-Mact) • Molasses Storage Tanks

Appendix U-1
List of Unregulated Emission Units and/or Activities

EU ID No.	EU Description	Activities/Equipment
037	Sugarcane Processing Facility	• Mud Ponds • Oil/Water Seperator/Skimmer Equipment • Painting Operations • Portable Diesel Air Compressors • Portable Electric Generators • Portable Welders • Pressurized Lpg Tanks • Process Water Filtration Intake Screens • Process Wide Flanges and Valves • Pump Operations • Scrubber Water Ponds and Troughs • Stationary Internal Combustion Engines (General) • Vacuum Cleaning Systems • Vehicle Generated Dust • Vents From Hydraulic/Lube Oil Reservoirs • Woodworking and Metal Working Operations • Centrifugals With Mixers • Crystallizers • Evaporator Cleaning Operations • Evaporators (W/ Non-Condensable Gas Vent) • Juice Heaters • Mud Filter Condensers Vacuum Pumps • Non-Nsps Process Tanks (Batch, Clarified Juice, Coagulant Mix, Flash, Liming, Mingler, Mixer, Mud Mixing, Pan Feed, Magma, Mud Waste, Muriatic, Sugar Receiver, Syrup Storage, And Alcohol (Isopropanol)) • Rotary Vacuum Filters • Sugar Receiver Tanks • Vacuum Pans, Condensers, And Pumps
038	Sugar Mill Fuel Farm	• Diesel & Gasoline Pumps And Loading Arms
039	Sugar Mill Potable Water System	• Hydrogen Sulfide Degasifiers • Process Water Discharge Canal
040	Sugar Mill Sewer Plant	• Sewage Treatment Plant
041	Sugar Refinery	• Bagging Machines • Bulk Curing, Wet Sugar, and Portable Sugar Overflow Bins • Centrifugals • Desweeteners • Evaporators With Condensers • Large And Small Heaters • Primary And Secondary Filters • Refined Sugar Handling, Storage Silo, and Sugar/Syrup Mixer • Rotex Screens • Silo Scale • Sugar Refinery Process Tanks Including: Blackwater, Clarifier, Liquor, Melted Sugar Storage, Melter, Mixer, Reactor, Scums,

Appendix U-1
List of Unregulated Emission Units and/or Activities

EU ID No.	EU Description	Activities/Equipment
041	Sugar Refinery	Secondary Treatment, Sweetwater, and Syrup Storage Tanks. • Vacuum Pans With Condenser and Non-Condensable Gas Vent.
042	Cogeneration Facility	• Boiler Drum Blowdown Tank • Cooling Tower • Diesel Fire Pump Diesel Engine and Diesel Fuel Storage Tank • Hydrogen Sulfide Degasifier • No. 2 Distillate Fuel Oil Storage Tank • Oil Water Separators • Package Sewage Treatment Plant (Non-MACT) • Waste Water Neutralization Tank

FIGURE 1--SUMMARY REPORT--GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

[Note: This form is referenced in 40 CFR 60.7, Subpart A-General Provisions]

Pollutant *(Circle One)*: SO_2 NO_X TRS H_2S CO Opacity

Reporting period dates: From _____ to _____

Company: _____

Emission Limitation: _____

Address: _____

Monitor Manufacturer: _____

Model No.: _____

Date of Latest CMS Certification or Audit: _____

Process Unit(s) Description: _____

Total source operating time in reporting period [1]: _____

Emission data summary [1]	**CMS performance summary** [1]
1. Duration of excess emissions in reporting period due to:	1. CMS downtime in reporting period due to:
a. Startup/shutdown ..... ____	a. Monitor equipment malfunctions ..... ____
b. Control equipment problems ..... ____	b. Non-Monitor equipment malfunctions ..... ____
c. Process problems ..... ____	c. Quality assurance calibration ..... ____
d. Other known causes ..... ____	d. Other known causes ..... ____
e. Unknown causes ..... ____	e. Unknown causes ..... ____
2. Total duration of excess emissions ..... ____	2. Total CMS Downtime ..... ____
3. Total duration of excess emissions x (100) / [Total source operating time] ..... ____ % [2]	3. [Total CMS Downtime] x (100) / [Total source operating time] ..... ____ % [2]

[1] For opacity, record all times in minutes. For gases, record all times in hours.

[2] For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.

Note: On a separate page, describe any changes since last quarter in CMS, process or controls.

I certify that the information contained in this report is true, accurate, and complete.

Name: _____

Signature: _____ *Date*: _____

Title: _____

Table 1-1, Summary of Air Pollutant Standards and Terms

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING, & POWER GENERATION

DRAFT PERMIT NO.: 0990005-003-AV
FACILITY ID NO.: 0990005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.
Note: The "Equivalent Emissions" listed are for informational purposes only.

				Allowable Emissions			Equivalent Emissions*		
Eu ID No.	Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hr	TPY	lbs./hour	TPY	Regulatory Citation(s)
003	VE[1]		8,760	Thirty (30) % Opacity	-	-	-	-	62-296.410(1)(b)1, F.A.C.
	PM	CF	8,760	0.3 lbs./mmBtu	-	-	54.6	239.1	62-296.410(1)(b)2, F.A.C.
	PM	FO	8,760	0.1 lbs./mmBtu	-	-	3.57	15.6	62-296.410(1)(b)2, F.A.C.
	VOC[2]	CF/FO	8,760	5.0 lbs./mmBtu	-	-	910.0	3,985.8	62-296.570(4)(b)6, F.A.C.
	VOC[3]	CF/FO	8,760	1.5 lbs./mmBtu	-	-	273.0	1,195.7	62-296.570(2), F.A.C.
	NOx[2]	CF/FO	8,760	0.9 lbs./mmBtu	-	-	163.8	717.4	62-296.570(4)(b)6, F.A.C.
	NOx[3]	CF/FO	8,760	0.45 lbs.mmBtu	-	-	81.9	358.7	62-296.570(2), F.A.C.
	Fuel Oil Sulfur	FO	8,760	2.5% Sulfur by weight	-	-	99.1	434.2	Not Federally Enforceable
004	VE[1]		8,760	Thirty (30) % Opacity	-	-	-	-	62-296.410(1)(b)1, F.A.C.
	PM	CF	8,760	0.3 lbs./mmBtu	-	-	54.6	239.1	62-296.410(1)(b)2, F.A.C.
	PM	FO	8,760	0.1 lbs./mmBtu	-	-	3.57	15.6	62-296.410(1)(b)2, F.A.C.
	VOC[2]	CF/FO	8,760	5.0 lbs./mmBtu	-	-	910.0	3,985.8	62-296.570(4)(b)6, F.A.C.
	VOC[3]	CF/FO	8,760	1.5 lbs./mmBtu	-	-	273.0	1,195.7	62-296.570(2), F.A.C.
	NOx[2]	CF/FO	8,760	0.9 lbs./mmBtu	-	-	163.8	717.4	62-296.570(4)(b)6, F.A.C.
	NOx[3]	CF/FO	8,760	0.45 lbs.mmBtu	-	-	81.9	358.7	62-296.570(2), F.A.C.
	Fuel Oil Sulfur	FO	8,760	2.5% Sulfur by weight	-	-	99.1	434.2	Not Federally Enforceable
005	VE[1]		8,760	Thirty (30) % Opacity	-	-	-	-	62-296.410(1)(b)1, F.A.C.
	PM	CF	8,760	0.3 lbs./mmBtu	-	-	78.0	341.6	62-296.410(1)(b)2, F.A.C.
	PM	FO	8,760	0.1 lbs./mmBtu	-	-	8.63	37.8	62-296.410(1)(b)2, F.A.C.
	VOC[2]	CF/FO	8,760	5.0 lbs./mmBtu	-	-	1,300.0	5,694.0	62-296.570(4)(b)6, F.A.C.
	VOC[3]	CF/FO	8,760	1.5 lbs./mmBtu	-	-	390.0	1,708.2	62-296.570(2), F.A.C.

Table 1-1, Summary of Air Pollutant Standards and Terms

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING, & POWER GENERATION

DRAFT PERMIT NO.: 0990005-003-AV
FACILITY ID NO.: 0990005

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Note: The "Equivalent Emissions" listed are for informational purposes only.

				Allowable Emissions			Equivalent Emissions*		
Eu ID No.	Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hr	TPY	lbs./hour	TPY	Regulatory Citation(s)
	NOx[2]	CF/FO	8,760	0.9 lbs./mmBtu	-	-	234.0	1,024.9	62-296.570(4)(b)6, F.A.C.
	NOx[3]	CF/FO	8,760	0.45 lbs.mmBtu	-	-	117.0	512.5	62-296.570(2), F.A.C.
	Fuel Oil Sulfur	FO	8,760	2.5% Sulfur by weight	-	-	239.6	1,049.6	Not Federally Enforceable
009	VE[1]		8,760	Thirty (30) % Opacity	-	-	-	-	AC50-6963
	PM	CF	8,760	0.20 lbs./mmBtu	-	-	57.0	249.7	AC50-6963
	PM	FO	8,760	0.10 lbs./mmBtu	-	-	12.29	53.8	AC50-6963
	VOC[2]	CF/FO	8,760	5.0 lbs./mmBtu	-	-	1,425.0	6,241.5	62-296.570(4)(b)6, F.A.C.
	VOC[3]	CF/FO	8,760	1.5 lbs./mmBtu	-	-	427.5	1,872.5	62-296.570(2), F.A.C.
	NOx[2]	CF/FO	8,760	0.9 lbs./mmBtu	-	-	256.5	1,123.5	62-296.570(4)(b)6, F.A.C.
	NOx[3]	CF/FO	8,760	0.45 lbs.mmBtu	-	-	128.25	561.7	62-296.570(2), F.A.C.
	Fuel Oil Sulfur	FO	8,760	2.5% Sulfur by weight	-	-	341.3	1,494.7	Not Federally Enforceable
010	VE[1]		8,760	Thirty (30) % Opacity	-	-	-	-	62-296.410(1)(b)1, F.A.C.
	PM	CF	8,760	0.2 lbs./mmBtu	-	-	55.8	244.4	62-296.410(1)(b)2, F.A.C.
	PM	FO	8,760	0.1 lbs./mmBtu	-	-	8.33	36.5	62-296.410(1)(b)2, F.A.C.
	VOC[2]	CF/FO	8,760	5.0 lbs./mmBtu	-	-	1,395.0	6,110.1	62-296.570(4)(b)6, F.A.C.
	VOC[3]	CF/FO	8,760	1.5 lbs./mmBtu	-	-	418.5	1,833.0	62-296.570(2), F.A.C.
	NOx[2]	CF/FO	8,760	0.9 lbs./mmBtu	-	-	251.1	1,099.8	62-296.570(4)(b)6, F.A.C.
	NOx[3]	CF/FO	8,760	0.45 lbs.mmBtu	-	-	125.55	549.9	62-296.570(2), F.A.C.
	Fuel Oil Sulfur	FO	8,760	2.5% Sulfur by weight	-	-	231.3	1,013.1	Not Federally Enforceable
011	VE[1]		8,760	Thirty (30) % Opacity	-	-	-	-	62-296.410(1)(b)1, F.A.C.
	PM	CF	8,760	0.2 lbs./mmBtu	-	-	68.4	299.6	62-296.410(1)(b)2, F.A.C.

Table 1-1, Summary of Air Pollutant Standards and Terms

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING, & POWER GENERATION

DRAFT PERMIT NO.: 0990005-003-AV
FACILITY ID NO.: 0990005

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Note: The "Equivalent Emissions" listed are for informational purposes only.

				Allowable Emissions			Equivalent Emissions*		
Eu ID No.	Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hr	TPY	lbs./hour	TPY	Regulatory Citation(s)
	PM	FO	8,760	0.1 lbs./mmBtu	-	-	15.06	66.0	62-296.410(1)(b)2, F.A.C.
	VOC[2]	CF/FO	8,760	5.0 lbs./mmBtu	-	-	1,710.0	7,489.8	62-296.570(4)(b)6, F.A.C.
	VOC[3]	CF/FO	8,760	1.5 lbs./mmBtu	-	-	513.0	2,246.9	62-296.570(2), F.A.C.
	NOx[2]	CF/FO	8,760	0.9 lbs./mmBtu	-	-	307.8	1,348.2	62-296.570(4)(b)6, F.A.C.
	NOx[3]	CF/FO	8,760	0.45 lbs.mmBtu	-	-	153.9	674.1	62-296.570(2), F.A.C.
	Fuel Oil Sulfur	FO	8,760	2.5% Sulfur by weight	-	-	418.2	1,831.6	Not Federally Enforceable
012	VE[1]		8,760	Thirty (30) % Opacity	-	-	-	-	62-296.410(1)(b)1, F.A.C.
	PM	CF	8,760	0.20 lbs./mmBtu	-	-	66.6	291.7	62-296.410(1)(b)2, F.A.C.
	PM	FO	8,760	0.10 lbs./mmBtu	-	-	15.06	66.0	62-296.410(1)(b)2, F.A.C.
	VOC[2]	CF/FO	8,760	5.0 lbs./mmBtu	-	-	1,665.0	7,292.7	62-296.570(4)(b)6, F.A.C.
	VOC[3]	CF/FO	8,760	1.5 lbs./mmBtu	-	-	499.5	2,187.8	62-296.570(2), F.A.C.
	NOx[2]	CF/FO	8,760	0.9 lbs./mmBtu	-	-	299.7	1,312.7	62-296.570(4)(b)6, F.A.C.
	NOx[3]	CF/FO	8,760	0.45 lbs.mmBtu	-	-	149.85	656.3	62-296.570(2), F.A.C.
	Fuel Oil Sulfur	FO	8,760	2.5% Sulfur by weight	-	-	418.2	1,831.6	Not Federally Enforceable
013	VE[1]		8,760	Thirty (30) % Opacity	-	-	-	-	62-296.410(1)(b)1, F.A.C.
	PM	CF	8,760	0.20 lbs./mmBtu	-	-	55.8	244.4	62-296.410(1)(b)2, F.A.C.
	PM	FO	8,760	0.10 lbs./mmBtu	-	-	8.63	37.8	62-296.410(1)(b)2, F.A.C.
	VOC[2]	CF/FO	8,760	5.0 lbs./mmBtu	-	-	1,395.0	6,110.1	62-296.570(4)(b)6, F.A.C.
	VOC[3]	CF/FO	8,760	1.5 lbs./mmBtu	-	-	418.5	1,833.0	62-296.570(2), F.A.C.
	NOx[2]	CF/FO	8,760	0.9 lbs./mmBtu	-	-	251.1	1,099.8	62-296.570(4)(b)6, F.A.C.
	NOx[3]	CF/FO	8,760	0.45 lbs.mmBtu	-	-	125.55	549.9	62-296.570(2), F.A.C.

Table 1-1, Summary of Air Pollutant Standards and Terms

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING, & POWER GENERATION

DRAFT PERMIT NO.: 0990005-003-AV
FACILITY ID NO.: 0990005

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Note: The "Equivalent Emissions" listed are for informational purposes only.

				Allowable Emissions			Equivalent Emissions*		
Eu ID No.	Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hr	TPY	lbs./hour	TPY	Regulatory Citation(s)
	Fuel Oil Sulfur	FO	8,760	2.5% Sulfur by weight	-	-	239.6	1,049.6	Not Federally Enforceable
014	VE[1]	FO	7,824	< Twenty (20) % Opacity	-				AC50-191876
	PM	FO	7,824	0.054 lbs./mmBtu	11.0	36.0	11.0	36.0	AC50-191876
	PM10	FO	7,824	0.027 lbs./mmBtu	5.5	18.0	5.5	18.0	AC50-191876
	VOC	FO	7,824	0.09 lbs./mmBtu	18.5	60.4	18.5	60.4	AC50-191876
	NOx	FO	7,824	0.18 lbs./mmBtu	36.9	120.7	36.9	120.7	AC50-191876
	CO	FO	7,824	0.20 lbs./mmBtu	41.0	134.1	41.0	134.1	AC50-191876
	SO_2	FO	7,824	0.51 lbs./mmBtu	105.5	256.5	105.5	256.5	AC50-191876
	Fuel Oil Sulfur	FO	8,760	.5% Sulfur by weight	-	-	-	-	Not Federally Enforceable
015, 016, & 017	VOC	FO	8,760	TANKS 2.0	-	0.01	-	-	AC50-265485
018	VE	N/A	8,760	< five (5) % Opacity[4]	-				0990005-001-AC
	PM	N/A	8,760	-	-	0.105	0.024	0.105	0990005-001-AC
019	VE	N/A	8,760	< five (5) % Opacity[4]	-				0990005-001-AC
	PM	N/A	8,760	-	-	3.754	0.857	3.754	0990005-001-AC
020	VE	N/A	8,760	< five (5) % Opacity[4]	-				0990005-001-AC
	PM	N/A	8,760	-	-	0.060	0.013	0.060	0990005-001-AC
021	VE	N/A	7,200	< five (5) % Opacity[4]	-				0990005-002-AC
021	PM	N/A	7,200	-	-	5.788	1.860	5.788	0990005-002-AC
	PM10	N/A	7,200	-	-	2.320	0.740	2.320	0990005-002-AC
022	VE	N/A	7,200	< five (5) % Opacity[4]	-				0990005-002-AC

Table 1-1, Summary of Air Pollutant Standards and Terms

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING, & POWER GENERATION

DRAFT PERMIT NO.: 0990005-003-AV
FACILITY ID NO.: 0990005

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Note: The "Equivalent Emissions" listed are for informational purposes only.

				Allowable Emissions			Equivalent Emissions*		
Eu ID No.	Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hr	TPY	lbs./hour	TPY	Regulatory Citation(s)
	PM	N/A	7,200	-	-	0.046	0.590	0.046	0990005-002-AC
	PM10	N/A	7,200	-	-	1.158	0.230	1.158	0990005-002-AC
023	VE	N/A	7,200	<five (5) % Opacity[4]	-				0990005-002-AC
	PM	N/A	7,200	-	-	17.130	5.500	17.130	0990005-002-AC
	PM10	N/A	7,200	-	-	9.480	3.040	9.480	0990005-002-AC
024	VE	N/A	7,200	<five (5) % Opacity[4]	-				0990005-002-AC
	PM	N/A	7,200	-	-	17.130	5.500	17.130	0990005-002-AC
	PM10	N/A	7,200	-	-	9.480	3.040	9.480	0990005-002-AC
025	VE	N/A	7,200	<five (5) % Opacity[4]	-				0990005-002-AC
	PM	N/A	7,200	-	-	6.910	1.920	6.910	0990005-002-AC
	PM10	N/A	7,200	-	-	0.280	0.078	0.280	0990005-002-AC
026	VE	N/A	8,760	<five (5) % Opacity[4]	-				0990005-001-AC
	PM	N/A	8,760	-	-	0.375	0.857	0.375	0990005-001-AC
027	VE	N/A	8,760	<five (5) % Opacity[4]	-				0990005-001-AC
	PM	N/A	8,760	-	-	0.375	0.857	0.375	0990005-001-AC
028	VE	N/A	8,760	<five (5) % Opacity[4]	-				0990005-001-AC
	PM	N/A	8,760	-	-	0.375	0.857	0.375	0990005-001-AC
029	VE	N/A	8,760	<five (5) % Opacity[4]	-				AC50-219413
	PM	N/A	8,760	0.01 gr/dscf [5]	-	-	0.857	-	AC50-219413
030, 031	VE[6]	All	8,760	<Twenty (20) % Opacity	-	-	-	-	AC50-219413
& 032	PM (TSP)	CF	8,760	0.03 lbs./mmBtu	21.50	(7)	21.5	(7)	AC50-219413

Table 1-1, Summary of Air Pollutant Standards and Terms

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING, & POWER GENERATION

DRAFT PERMIT NO.: 0990005-003-AV
FACILITY ID NO.: 0990005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.
Note: The "Equivalent Emissions" listed are for informational purposes only.

				Allowable Emissions			Equivalent Emissions*		
Eu ID No.	Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hr	TPY	lbs./hour	TPY	Regulatory Citation(s)
	PM (TSP)	FO	8,760	0.03 lbs./mmBtu	14.70	(7)	14.7	(7)	AC50-219413
	PM (TSP)	BC	8,760	0.03 lbs./mmBtu	14.70	(7)	14.7	(7)	AC50-219413
	PM_{10}	CF	8,760	0.03 lbs./mmBtu	21.50	(7)	21.5	(7)	AC50-219413
	PM_{10}	FO	8,760	0.03 lbs./mmBtu	14.70	(7)	14.7	(7)	AC50-219413
	PM_{10}	BC	8,760	0.03 lbs./mmBtu	14.70	(7)	14.7	(7)	AC50-219413
	SO_2	CF	8,760	0.10 lbs./mmBtu	71.50	(8)	76.0	(8)	AC50-219413
	SO_2 (Annual ave)	BG	8,760	0.02 lbs./mmBtu	-	(8)	-	(8)	AC50-219413
	SO_2 (Annual ave)	WW	8,760	0.05 lbs./mmBtu	-	(8)	-	(8)	AC50-219413
	SO_2	FO	8,760	0.05 lbs./mmBtu	24.50	(8)	24.5	(8)	AC50-219413
	SO_2	BC	8,760	1.2 lbs./mmBtu	588.00	(8)	588.0	(8)	AC50-219413
030, 031	NOx	CF	8,760	0.15 lbs./mmBtu	107.30	(9)	107.3	(9)	AC50-219413
& 032	NOx	FO	8,760	0.15 lbs./mmBtu	73.50	(9)	73.5	(9)	AC50-219413
	NOx	BC	8,760	0.17 lbs.mmBtu	83.30	(9)	83.3	(9)	AC50-219413
	CO	CF	8,760	0.35 lbs./mmBtu	250.30	(10)	250.3	(10)	AC50-219413
	CO	FO	8,760	0.35 lbs./mmBtu	171.50	(10)	171.5	(10)	AC50-219413
	CO	BC	8,760	0.35 lbs/mmBtu	171.50	(10)	171.5	(10)	AC50-219413
	VOC	BG	8,760	0.06 lbs./mmBtu	42.90	(11)	42.9	(11)	AC50-219413
	VOC	FO	8,760	0.03 lbs./mmBtu	14.70	(11)	14.7	(11)	AC50-219413
	VOC	BC	8,760	0.03 lbs/mmBtu	14.70	(11)	14.7	(11)	AC50-219413
	Pb	BG	8,760	$2.5X10^{-5}$ lbs./mmBtu	0.0180	(12)	0.0180	(12)	AC50-219413
	Pb	WW	8,760	$1.6X10^{-4}$ lbs./mmBtu	0.1140	(12)	0.1140	(12)	AC50-219413

Table 1-1, Summary of Air Pollutant Standards and Terms

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING, & POWER GENERATION

DRAFT PERMIT NO.: 0990005-003-AV
FACILITY ID NO.: 0990005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.
Note: The "Equivalent Emissions" listed are for informational purposes only.

				Allowable Emissions			Equivalent Emissions *		
Eu ID No.	Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hr	TPY	lbs./hour	TPY	Regulatory Citation(s)
	Pb	FO	8,760	$8.9X10^{-7}$ lbs./mmBtu	0.0004	(12)	0.0004	(12)	AC50-219413
	Pb	BC	8,760	6.4X10-5 lbs./mmBtu	0.0310	(12)	0.0310	(12)	AC50-219413
	Hg	BG	8,760	$5.43X10^{-6}$ lbs./mmBtu	0.0039	(13)	0.0039	(13)	AC50-219413
	Hg	WW	8,760	$4.0X10^{-6}$ lbs./mmBtu	0.0029	(13)	0.0029	(13)	AC50-219413
	Hg	FO	8,760	$2.4X10^{-6}$ lbs./mmBtu	0.00118	(13)	0.0012	(13)	AC50-219413
	Hg	BC	8,760	$8.4X10^{-6}$ lbs./mmBtu	0.0041	(13)	0.0041	(13)	AC50-219413

Table 1-1, Summary of Air Pollutant Standards and Terms

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING, & POWER GENERATION

DRAFT PERMIT NO.: 0990005-003-AV
FACILITY ID NO.: 0990005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.
Note: The "Equivalent Emissions" listed are for informational purposes only.

				Allowable Emissions			Equivalent Emissions*		
Eu ID No.	Pollutant Name	Fuel(s)	Hours/Year	Standard(s)	lbs./hr	TPY	lbs./hour	TPY	Regulatory Citation(s)
030, 031	Be	CF	8,760	-	-	-	-	-	AC50-219413
& 032	Be	FO	8,760	$3.5X10^{-7}$ lbs./mmBtu	0.00017	(14)	0.0002	(14)	AC50-219413
	Be	BC	8,760	$5.9X10^{-6}$ lbs./mmBtu	0.0029	(14)	0.0029	(14)	AC50-219413
	FI	CF	8,760	-	-	-	-	-	AC50-219413
	FI	FO	8,760	$6.3X10^{-6}$ lbs./mmBtu	0.003	(15)	0.0030	(15)	AC50-219413
	FI	BC	8,760	0.024 lbs./mmBtu	11.8	(15)	11.8000	(15)	AC50-219413
	H_2SO_4	CF	8,760	0.003 lbs./mmBtu	2.15	(16)	2.15	(16)	AC50-219413
	H_2SO_4	FO	8,760	0.0015 lbs./mmBtu	0.7	(16)	0.7	(16)	AC50-219413
	H_2SO_4	BC	8,760	0.036 lbs.mmBtu	17.6	(16)	17.6	(16)	AC50-219413

Notes:

(1) Except that 40% opacity is allowed for two minutes in any hour.
(2) Federally enforceable limit.
(3) Permittee's RACT Analysis and requested limits, not yet federally enforceable.
(4) VE of 5% opacity in-leu of annual stack testing.
(5) PM emission limitation applies to the baghouses.
(6) Except that 27% opacity is allowed for 6 minutes minutes in any hour.
(7) Total from both boilers not to exceed 172.5 tons per year.
(8) Total from both boilers not to exceed 1,154.3 tons per year.
(9) Total from both boilers not to exceed 862.5 tons per year.
(10) Total from both boilers not to exceed 2,012.5 tons per year.
(11) Total from both boilers not to exceed 345.0 tons per year.
(12) Total from both boilers not to exceed 0.454 tons per year.
(13) Total from both boilers not to exceed 0.030 tons per year.
(14) Total from both boilers not to exceed 0.0052 tons per year.
(15) Total from both boilers not to exceed 21.2 tons per year.
(16) Total from both boilers not to exceed 34.6 tons per year.

BG - Bagasse
WW - Wood Waste
FO - Fuel Oil
BC - Bituminous Coal
CF - Carbonaceous Fuels

See permit condition(s)
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Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
003, 004, & 005	VE	BG/FO	Method 9	Annually[1]		60 Minutes		A.10 & A.15
	PM	BG/FO	Methods 1-5	Annually[1]		Three Runs		A.11 & A.15
	VOC	BG/FO	Method 25 or 25A	Annually[1]		Three Runs		A.12 & A.15
	NOx	BG/FO	Method 7 or 7E	Annually[1]		Three Runs		A.13 & A.15
	Fuel Oil Sulfur	FO	Recordkeeping	Daily	-	-		A.14, A.15, A.16, & A.17
	Steam Production	BG/FO	Recordkeeping	CMS	-	-	X	A.17
	Maximum Heat Input	BG/FO	Recordkeeping	Daily	-	-		A.17
	Fuel Types	BG/FO	Recordkeeping	Daily	-	-		A.17
	Fuel Oil Usage	FO	Recordkeeping	CMS	-	-	X	A.17
	Hours of Operation	BG/FO	Recordkeeping	Daily	-	-		A.17
	Scrubber Pressure Drop	BG/FO	Recordkeeping	every 8 hours	-	-		A.18
	Scrubber Water Pressure	BG/FO	Recordkeeping	every 8 hours	-	-		A.18
	Scrubber Water Flow	BG/FO	Recordkeeping	every 8 hours	-	-		A.18
	Scrubber Feed Water Quality	BG/FO	Recordkeeping	Monthly	-	-		A18
	Emissions Unit Performance	BG/FO	Recordkeeping	every 8 hours	-	-	X	A.19
009 & 010	VE	BG/FO	Method 9	Annually[1]		60 Minutes		B.10 & B.15
	PM	BG/FO	Methods 1-5	Annually[1]		Three Runs		B.11 & B.15

Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

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Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
009 & 010	VOC	BG/FO	Method 25 or 25A	Annually(1)		Three Runs		B.12 & B.15
	NOx	BG/FO	Method 7 or 7E	Annually(1)		Three Runs		B.13 & B.15
	Fuel Oil Sulfur Content	FO	Method 6, 6A or 6B	Annually(1)	-	Three Runs		B.14, B.15, B.16, & B.17
	Steam Production	BG/FO	Recordkeeping	CMS	-	-	X	B.17
	Maximum Heat Input	BG/FO	Recordkeeping	Daily	-	-		B.17
	Fuel Types	FO	Recordkeeping	Daily	-	-		B.17
	Fuel Oil Usage	FO	Recordkeeping	CMS	-	-	X	B.17
	Hours of Operation	BG/FO	Recordkeeping	Daily	-	-		B.17
	Scrubber Pressure Drop	BG/FO	Recordkeeping	every 8 hours	-	-		B.19
	Scrubber Water Pressure	BG/FO	Recordkeeping	every 8 hours	-	-		B.19
	Scrubber Water Flow	BG/FO	Recordkeeping	every 8 hours	-	-	X	B.19
	Scrubber Feed Water Quality	BG/FO	Recordkeeping	Monthly	-	-		B.19
	Emissions Unit Performance	BG/FO	Recordkeeping	every 8 hours	-	-	X	B.19
011, 012,	VE	BG/WW/FO	Method 9	Annually(1)		60 Minutes		C.11 & C.16
& 013	PM	BG/WW/FO	Methods 1-5	Annually(1)		Three Runs		C.12 & C.16
	VOC	BG/WW/FO	Method 25 or 25A	Annually(1)		Three Runs		C.13 & C.16
	NOx	BG/WW/FO	Method 7 or 7E	Annually(1)		Three Runs		C.14 & C.16
	Fuel Oil Sulfur	FO	Recordkeeping	Daily	-	-		C.15, C.16, & C.17

Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

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Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
	Steam Production	BG/WW/FO	Recordkeeping	CMS	-	-	X	C.18

Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

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Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
	Maximum Heat Input	BG/WW/FO	Recordkeeping	Daily	-	-		C.18
	Fuel Types	BG/WW/FO	Recordkeeping	Daily	-	-		C.18
	Fuel Oil Usage	FO	Recordkeeping	CMS	-	-	X	C.18
	Hours of Operation	BG/WW/FO	Recordkeeping	Daily	-	-		C.18
	Scrubber Pressure Drop	BG/WW/FO	Recordkeeping	every 8 hours	-	-		C.19
	Scrubber Water Pressure	BG/WW/FO	Recordkeeping	every 8 hours	-	-		C.19
	Scrubber Water Flow	BG/WW/FO	Recordkeeping	every 8 hours	-	-	X	C.19
	Scrubber Feed Water Quality	BG/WW/FO	Recordkeeping	Monthly	-	-		C.19
	Emissions Unit Performance	BG/WW/FO	Recordkeeping	every 8 hours	-	-	X	C.20
014	VE	FO	Method 9	Annually(1)		60 Minutes	X	D.8 & D.16
	PM	FO	Methods 1-5	Annually(1)		Three Runs		D.9 & D.17
	PM10	FO	Methods 201 or 201A	Renewal		Three Runs		D.10 & D.17
	VOC	FO	Method 25 or 25A	Renewal		Three Runs		D.11 & D.18
	NOx	FO	Method 7 or 7E	Annually(1)		Three Runs	X	D.12, D.16, & D.17
	CO	FO	Method 10	Annually(1)		Three Runs		D.13 & D.17
	SO2	FO	Methods 6, 6A, or 6B	Annually(1)		Three Runs		D.14, D.17 & D.19
	Fuel Oil Sulfur	FO	Recordkeeping	Daily	-	-		D.15 & D.19
	Steam Production	FO	Recordkeeping	CMS	-	-	X	D.20

Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

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Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
	Maximum Heat Input	FO	Recordkeeping	Daily	-	-		D.20
	Oil Sulfur Content	FO	Recordkeeping	Daily	-	-		D.20
	Hours of Operation	FO	Recordkeeping	Daily	-	-		D.20
015, 016,	Monthly Throughput	-	Recordkeeping	Daily	-	-		F.6
& 017	Volatile organic Liquid Types	-	Recordkeeping	Daily	-	-		F.6
018	VE	-	Method 9	Annually(1) & Daily	-	30 Minutes		G.7, G.9, & G.12
	PM	-	Methods 1-5	Special Test	-	Three Runs		G.8, G.9, & G.10
	PM10	-	Methods 201 & 201A	Special Test	-	Three Runs		G.8, G.9, & G.10
019	VE	-	Method 9	Annually(1) & Daily	-	30 Minutes		G.7, G.9, & G.12
	PM	-	Methods 1-5	Special Test	-	Three Runs		G.8, G.9, & G.10
	PM10	-	Methods 201 & 201A	Special Test	-	Three Runs		G.8, G.9, & G.10
	Sugar Packaged (tons)	-	Recordkeeping	-	Daily	-		G.11
	Packaging Lines Operated	-	Recordkeeping	-	Daily	-		G.11
	Hours of Operation	-	Recordkeeping	-	Daily	-		G.11
020	VE	-	Method 9	Annually(1) & Daily	-	30 Minutes		G.7, G.9, & G.12
	PM	-	Methods 1-5	Special Test	-	Three Runs		G.8, G.9, & G.10

Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

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Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
	PM10	-	Methods 201 & 201A	Special Test	-	Three Runs		G.8, G.9, & G.10
	Sugar Processed (tons)	-	Recordkeeping	-	Daily	-		G.11
021	VE	-	Method 9	Annually(1) & Daily	-	30 Minutes		H.7, H.9, & H.12
	PM	-	Methods 1-5	Special Test	-	Three Runs		H.8 & H.10
	PM10	-	Methods 201 & 201A	Special Test	-	Three Runs		H.8 & H.10
	Sugar Processed (tons)	-	Recordkeeping	-	Daily	-		H.11
	Hours of Operation	-	Recordkeeping	-	Daily	-		H.11
022	VE	-	Method 9	Annually(1) & Daily	-	30 Minutes		H.7, H.9, & H.12
	PM	-	Methods 1-5	Special Test	-	Three Runs		H.8 & H.10
	PM10	-	Methods 201 & 201A	Special Test	-	Three Runs		H.8 & H.10
	Sugar Processed (tons)	-	Recordkeeping	-	Daily	-		H.11
	Hours of Operation	-	Recordkeeping	-	Daily	-		H.11
023 & 024	VE	-	Method 9	Annually(1) & Daily	-	30 Minutes		H.7, H.9, & H.12
	PM	-	Methods 1-5	Special Test	-	Three Runs		H.8 & H.10
	PM10	-	Methods 201 & 201A	Special Test	-	Three Runs		H.8 & H.10

Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

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Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
	Sugar Processed (tons)	-	Recordkeeping	-	Daily	-		H.11
	Hours of Operation	-	Recordkeeping	-	Daily	-		H.11
025	VE	-	Method 9	Annually[(1)] & Daily	-	30 Minutes		G.7, G.9 & G.12
	PM	-	Methods 1-5	Special Test	-	Three Runs		G.8, G.9, & G.10
	PM10	-	Methods 201 & 201A	Special Test	-	Three Runs		G.8, G.9, & G.10
	Sugar Dried (tons)	-	Recordkeeping	-	Daily	-		G.11
026, 027,	VE	-	Method 9	Annually[(1)] & Daily	-	30 Minutes		G.7, G.9 & G.12
& 028	PM	-	Methods 1-5	Special Test	-	Three Runs		G.8, G.9, & G.10
	PM10	-	Methods 201 & 201A	Special Test	-	Three Runs		G.8, G.9, & G.10
	Silo Loaded	-	Recordkeeping	-	Daily	-		G.11
	Number of Trucks Used	-	Recordkeeping	-	Daily	-		G.11
	Sugar Transferred (Tons)	-	Recordkeeping	-	Daily	-		G.11
	Compressed Air Injection Rate	-	Recordkeeping	-	every 8-hours	-		G.11
	Hours of Operation	-	Recordkeeping	-	Daily	-		G.11
029	Fuel Management Plan	-	Recordkeeping	as required	-	-		I.8
	Ash Management Plan	-	Recordkeeping	as required	-	-		I.9
	O/M Plans	-	Recordkeeping	as required	-	-		I.10

Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
	VE	-	Method 9	Annually[(2)]		30 Minutes		I.11 & I.13
	PM	-	Methods 1-5	Annually[(2)]		Three Runs		I.12 & I.13
	Coal Handling	-	Recordkeeping	per shipment	-	-		I.14
	Biomass Handling	-	Recordkeeping	per shipment	-	-		I.14
	Fly Ash Handling	-	Recordkeeping	per shipment	-	-		I.14
	AQCSs	-	Recordkeeping	Daily	-	-		I.15
030, 031, & 032	Sample & Velocity Traverses	BG/WW/FO/BC	Method 1	Annually	-	Three Runs		J.8
	Stack Gas Velocity & Volumetric Flow Rate	BG/WW/FO/BC	Method 2	Annually	-	Three Runs		J.8
	CO_2, O_2, Excess Air, and Dry Molecular Weight	BG/WW/FO/BC	Method 3	Annually	-	Three Runs	O_2	J.8
	Moisture Content	BG/WW/FO/BC	Method 4	Annually	-	Three Runs		J.8
	PM (TSP)	BG/WW/FO/BC	Method 5	Annually	-	Three Runs		J.8
	PM_{10}	BG/WW/FO/BC	Method 201 or 201A	Annually	-	Three Runs		J.8
	SO_2	BG/WW/FO/BC	Method 6, 6C, or 19	Annually	-	Three Runs	X	J.8
	NOx	BG/WW/FO/BC	Method 7 or 7E	Annually	-	Three Runs	X	J.8
	H2SO4/SO2	BG/WW/FO/BC	Method 8	Annually	-	Three Runs		J.8
	VE	BG/WW/FO/BC	Method 9	Annually	-	Three Runs	X	J.8
	CO	BG/WW/FO/BC	Method 10	Annually	-	Three Runs	X	J.8

Table 2-1, Summary of Compliance Requirements

OKEELANTA CORPORATION
SUGARCANE PROCESSING, REFINING & POWER GENERATION FACILITIES

DRAFT Permit No.: 0990005-003-AV
Facility ID No.: 0990005

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Notes: * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

Emissions Unit ID No.	Pollutant Name or Parameter	Fuel (s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
	Pb	BG/WW/FO/BC	Method 12	Annually	-	Three Runs		J.8
	Fl	BG/WW/FO/BC	Method 13A or 13B	Annually	-	Three Runs		J.8
	VOC	BG/WW/FO/BC	Method 18 or 25	Annually	-	Three Runs		J.8
	Hg	BG/WW/FO/BC	Method 101A	Annually	-	Three Runs		J.8
	Be	BG/WW/FO/BC	Method 104	Annually	-	Three Runs		J.8
	Ar	BG/WW/FO/BC	Method 108	Annually	-	Three Runs		J.8
030, 031,	Cr/Cu	BG/WW/FO/BC	EMTIC Method	Annually	-	Three Runs		J.8
& 032	Steam Production	BG/WW/FO/BC	Recordkeeping	CMS	-		X	J.12
	Maximum Heat Input	BG/WW/FO/BC	Recordkeeping	Daily	-			J.12
	Fuel Types	BG/WW/FO/BC	Recordkeeping	Daily	-			J.12
	Hours of Operation	BG/WW/FO/BC	Recordkeeping	Daily	-			J.12
	Combustion Control Performance	BG/WW/FO/BC	Recordkeeping	Daily	-			J.13
	AQCSs	BG/WW/FO/BC	Recordkeeping	Daily	-			J.14
	Fuels & Ash	BG/WW/FO/BC	Recordkeeping	Daily	-			J.15

Notes:
(1). A compliance test to be conducted during each federal fiscal year.

BG - Bagasse
WW - Wood Waste
FO - Fuel Oil
BC - Bituminous Coal