

Golder Associates Inc.

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



RECEIVED

JAN 11 2007

0637539

January 10, 2007

BUREAU OF AIR REGULATION

Florida Department of Environmental Protection
2600 Blair Stone Road, MS # 5505
Tallahassee, Florida 32399-2400

Attention: Trina Vielhauer, Chief, Bureau of Air Regulation

**RE: OKEELANTA CORPORATION
TITLE V REVISION APPLICATION FOR TRANS-SHIPMENT FACILITY
AIR PERMIT NO. 0990005-019-AC**

Dear Ms. Vielhauer:

On behalf of Okeelanta Corporation, please find enclosed four (4) copies of a Title V permit revision application. The purpose of the application is to incorporate into the Title V permit the provisions of air permit No. 0990005-019-AC, issued on April 11, 2006. If the Department has any questions concerning the this request, please call me at (352)336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

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

DB/kjp

Enclosures

Cc: A. Satyal, Palm Beach County
R. Blackburn, FDEP
M. Capone, Okeelanta Corp.

Y:\Projects\2006\0637539 Okeelanta TV\4.1\1011007.doc

RECEIVED

JAN 11 2007

BUREAU OF AIR REGULATION

**APPLICATION FOR
TITLE V AIR OPERATION PERMIT REVISION
FOR
*TRANS-SHIPMENT FACILITY EXPANSION***

**OKEELANTA CORPORATION
*SOUTH BAY, FLORIDA***

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

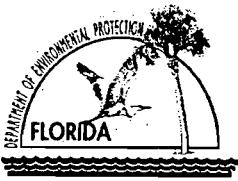
**Prepared By:
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500**

January 2007

0637539

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

APPLICATION FOR AIR PERMIT – LONG FORM



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

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

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

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Okeelanta Corporation	
2. Site Name: Okeelanta Sugar Mill	
3. Facility Identification Number: 0990005	
4. Facility Location...: Street Address or Other Locator: 21250 U.S. Highway 27 South City: South Bay County: Palm Beach Zip Code: 33493	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

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

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s): 0990005 - 017 - AJ	4. Siting Number (if applicable):

(Added to Title V Renewal)

APPLICATION INFORMATION

Purpose of Application

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

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

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

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

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

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

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

Application Comment

Application to revise Title V Operating Permit to incorporate the provisions of the Air Construction Permit No. 0990005-019-AC. This permit was to construct two baghouse/receivers to pneumatically unload sugar from railcars and increase sugar packaging capacity of the trans-shipment facility from 865 tons per day to 1,300 tons per day.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
018-020, 030-032, 045-047	Sugar Trans-shipment Facility	AFMM	

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

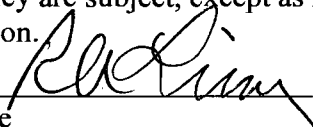
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () - ext. Fax: () -
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i> _____ Signature _____ Date

APPLICATION INFORMATION

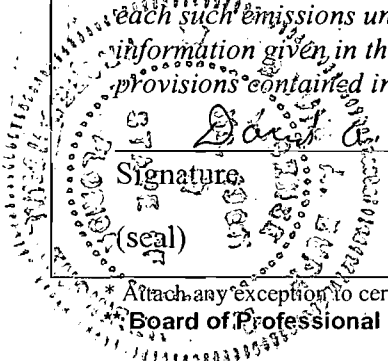
Application Responsible Official Certification

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

1. Application Responsible Official Name: Ricardo A. Lima, Vice President and General Manager
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Okeelanta Corporation Street Address: 21250 U.S. Highway 27 South City: South Bay State: FL Zip Code: 33493
4. Application Responsible Official Telephone Numbers... Telephone: (561) 993-1600 ext. Fax: (561) 992-7326
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application. Signature <u></u> Date <u>1/9/07</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 545 Fax: (352) 336-6603
4. Professional Engineer Email Address: dbuff@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature: <u>David A. Buff</u> Date: <u>1/9/07</u>

* Attach any exception to certification statement.

Board of Professional Engineers Certificate of Authorization #00001670

FACILITY INFORMATION

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

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

Facility Contact

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

Facility Primary Responsible Official

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

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

FACILITY INFORMATION

Facility Regulatory Classifications

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

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

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

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

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

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

Additional Requirements for Title V Air Operation Permit Applications

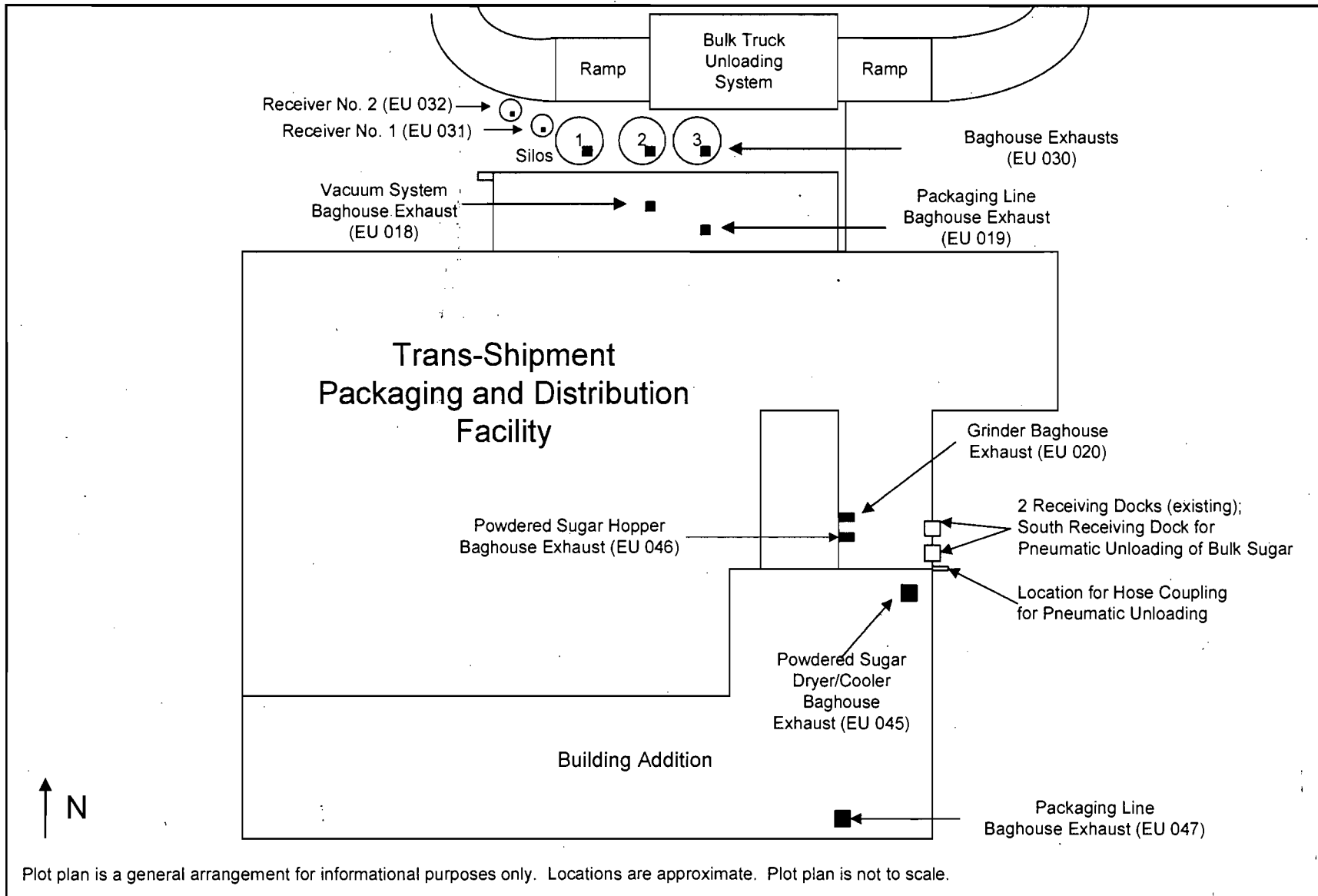
1. List of Insignificant Activities (Required for initial/renewal applications only):
 Attached, Document ID: _____ Not Applicable (revision application)
2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
 Attached, Document ID: **OC-FI-CV2**
 Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
 Attached, Document ID: **OC-FI-CV3**
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
 Attached, Document ID: _____
 Equipment/Activities On site but Not Required to be Individually Listed
 Not Applicable
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only):
 Attached, Document ID: _____ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: **OC-FI-CV6** Not Applicable

Additional Requirements Comment

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ATTACHMENT OC-FI-C1

FACILITY PLOT PLAN



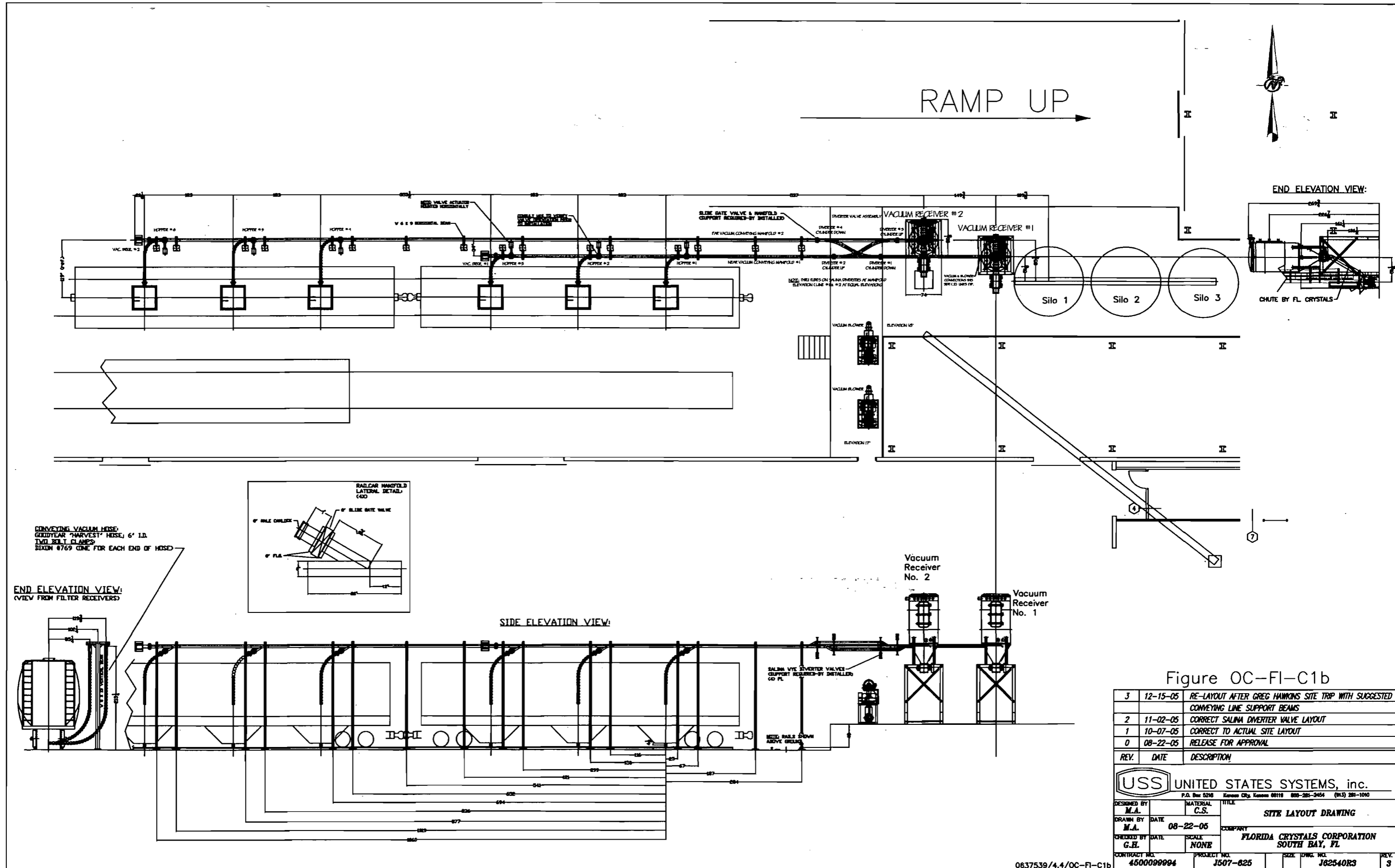


Figure OC-FI-C1b

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

USS UNITED STATES SYSTEMS, inc.
 P.O. Box 5216 Kansas City, Kansas 66110 800-281-2454 (913) 281-1000

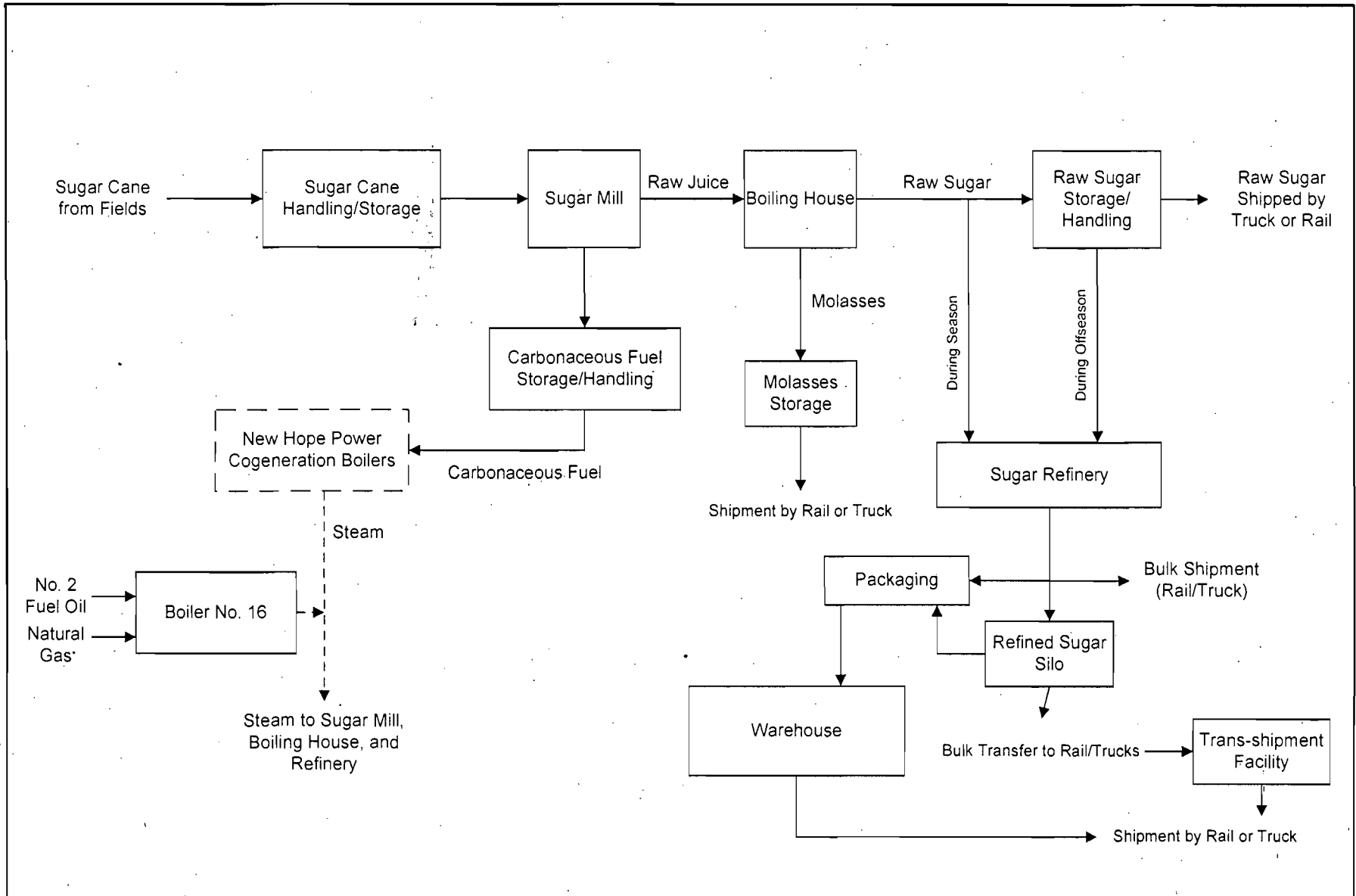
DESIGNED BY M.A.	MATERIAL C.S.	TITLE SITE LAYOUT DRAWING
DRAWN BY M.A.	DATE 08-22-06	COMPANY FLORIDA CRYSTALS CORPORATION SOUTH BAY, FL
CHECKED BY G.E.	SCALE NONE	
CONTRACT NO. 4500099994	PROJECT NO. J507-825	SIZE DWG. NO. J62540R3

0837539/4.4/OC-FI-C1b

REV. 3

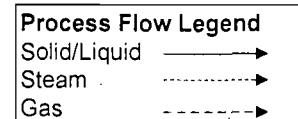
ATTACHMENT OC-FI-C2

PROCESS FLOW DIAGRAM



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

Overall Sugar Mill - Facility Flow Diagram



ATTACHMENT OC-FI-CV2

TITLE V CORE LIST

ATTACHMENT OC-FI-CV2

TITLE V CORE LIST

Effective: 03/01/02

[Note: The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

Federal: (description)

40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: (description)**CHAPTER 62-4, F.A.C.: PERMITS, effective 06-01-01**

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

**CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS,
effective 06-21-01**

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.

ATTACHMENT OC-FI-CV2**TITLE V CORE LIST**

Effective: 03/01/02

62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.
62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.
62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-210.400, F.A.C.: Emission Estimates.
62-210.650, F.A.C.: Circumvention.
62-210.700, F.A.C.: Excess Emissions

62-210.900, F.A.C.: Forms and Instructions.
62-210.900(1), F.A.C.: Application for Air Permit - Title V Source, Form and Instructions.
62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.
62-210.900(7), F.A.C.: Application for Transfer of Air Permit - Title V and Non-Title V Source.

CHAPTER 62-212, F.A.C.: STATIONARY SOURCES- PRECONSTRUCTION REVIEW,
effective 08-17-00

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION,
effective 04-16-01

62-213.205, F.A.C.: Annual Emissions Fee.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.415, F.A.C.: Trading of Emissions Within a Source.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.450, F.A.C.: Permit Review by EPA and Affected States
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.
62-213.900(7), F.A.C.: Statement of Compliance Form

ATTACHMENT OC-FI-CV2

TITLE V CORE LIST Effective: 03/01/02

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-02-99

- 62-296.320(2), F.A.C.: Objectionable Odor Prohibited.
- 62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter

CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING,
effective 03-02-99

- 62-297.310, F.A.C.: General Test Requirements.
- 62-297.330, F.A.C.: Applicable Test Procedures.
- 62-297.340, F.A.C.: Frequency of Compliance Tests.
- 62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions Unit.
- 62-297.350, F.A.C.: Determination of Process Variables.
- 62-297.570, F.A.C.: Test Report.
- 62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

Miscellaneous:

- CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests**
- CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective 07-01-98**
- CHAPTER 62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94**
- CHAPTER 62-257, F.A.C.: Asbestos Notification and Fee, effective 02-09-99**
- CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling, effective 09-10-96**

ATTACHMENT OC-FI-CV3

COMPLIANCE STATEMENT

**ATTACHMENT OC-FI-CV3
COMPLIANCE STATEMENT**

Okeelanta Corporation certifies, based on information and belief formed after reasonable inquiry, that it is in compliance with each federal, state, and local applicable requirement addressed in this Title V air operation permit revision application as of the date of this application.

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this Title V revision application is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this Title V revision application are true, accurate, and complete.

A compliance statement will be submitted with the annual operating report by March 1 of each year.

Ricardo A. Lima, Vice President and General Manager
Okeelanta Corporation

DATE

ATTACHMENT OC-FI-CV6

REQUESTED CHANGES TO CURRENT TITLE V

AIR OPERATION PERMIT

ATTACHMENT OC-FI-CV6
REQUESTED CHANGES TO CURRENT TITLE V AIR OPERATION PERMIT

Okeelanta Corporation has modified the existing Packaging and Distribution Facility (also known as the Trans-shipment Facility) at the Okeelanta sugar complex located near South Bay, Florida in order to incorporate the conditions of the Air Construction Permit No. 0990005-019-AC.

EMISSIONS UNIT INFORMATION

Section [1] of [1]
Sugar Trans-Shipment Facility

III. EMISSIONS UNIT INFORMATION

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

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

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

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

EMISSIONS UNIT INFORMATION

Section [1] of [1]
Sugar Trans-Shipments Facility

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)
- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
 - The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)
- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
 - This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
 - This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

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

3. Emissions Unit Identification Number: **018, 019, 020, 030, 031, 032, 045, 046, 047**

4. Emissions Unit Status Code: A	5. Commence Construction Date: 	6. Initial Startup Date: 	7. Emissions Unit Major Group SIC Code: 20	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	---	---------------------------------------	--	--

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:
This emission unit consists of Multiple Emission Points: The Vacuum System Baghouse (EU 018), the Packaging Lines Baghouse (EU 019), the Grinder Baghouse (EU 020), the three Sugar Silo Baghouses (EU 030), the Railcar Sugar Unloading Receivers Nos. 1 & 2 Baghouses (EU 031 & 032), the Powdered Sugar Dryer/Cooler Baghouse (EU 045), the Powdered Sugar Hopper Baghouse (EU 046), the new Packaging Lines Baghouse (EU 047).

EMISSIONS UNIT INFORMATION

Section [1] of [1]
Sugar Trans-shipment Facility

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

- 1 baghouse (Vacuum System)
- 2 baghouses (Packaging Lines)
- 1 baghouse (Grinder & Hopper)
- 3 baghouses (One for each of 3 Storage Silos)
- 1 baghouse (Powdered Sugar dryer/cooler)
- 1 Cyclonic Separator (Inlet side of vacuum pump of Vacuum System)
- 1 baghouse (Powdered Sugar Hopper)
- 1 baghouse (Railcar Unloading Receiver No. 1)
- 1 baghouse (Railcar Unloading Receiver No. 2)

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

EMISSIONS UNIT INFORMATION

Section [1] of [1]
 Sugar Trans-Shipment Facility

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: Trans-Shipment Facility		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Eleven baghouses: Packaging Lines; Vacuum System; Grinder & Hopper; Sugar Silos (3); Powdered Sugar Dryer/Cooler; New Packaging Lines; Powdered Sugar Hopper; Railcar Unloading Receiver No. 1; and Railcar Unloading Receiver No. 2.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 27 feet	7. Exit Diameter: 1.50 feet	
8. Exit Temperature: 75 °F	9. Actual Volumetric Flow Rate: 10,000 acfm	10. Water Vapor: 0.025 %	
11. Maximum Dry Standard Flow Rate: 9,868 dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: Parameters shown are for the existing Packaging Lines Baghouse (EU 019). See Attachment OC-EU1-C15 for stack/vent information on each separate emission point contained in this EU.			

EMISSIONS UNIT INFORMATION

Section [1] of [1]
 Sugar Trans-shipment Facility

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

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

Segment Description and Rate: Segment ____ of ____

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

EMISSIONS UNIT INFORMATION

Section [1] of [1]
 Sugar Trans-Shipments Facility

POLLUTANT DETAIL INFORMATION

Page [1] of [1]
 Particulate Matter Total - PM

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

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

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

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2.8 lb/hour 12.29 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Attachment OC-EU1-F1.8.		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: See Attachment OC-EU1-F1.10 for calculations, and Permit No. 0990005-019-AC.			
11. Pollutant Potential/Estimated Fugitive Emissions Comment:			

EMISSIONS UNIT INFORMATION

Section [1] of [1]
 Sugar Trans-Shipment Facility

POLLUTANT DETAIL INFORMATION

Page [1] of [1]
 Particulate Matter Total - PM

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: * See Comment	4. Equivalent Allowable Emissions: 2.8 lb/hour 12.29 tons/year
5. Method of Compliance: EPA Method 9	
6. Allowable Emissions Comment (Description of Operating Method): Based on requested allowable emissions. Permit No. 0990005-019-AC. Permit requires baghouse design specifications (see Attachment OC-EU1-F1.8).	

Allowable Emissions Allowable Emissions ____ of ____

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

Allowable Emissions Allowable Emissions ____ of ____

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

EMISSIONS UNIT INFORMATION

Section [1] of [1]
Sugar Trans-Shipment Facility

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: EPA Method 9	
5. Visible Emissions Comment: Existing permit condition in Permit No. 0990005-019-AC. Rule 62-297.620(4), F.A.C.	

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [1]
Sugar Trans-Shipments Facility

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [1]
Sugar Trans-Shipments Facility

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <u>OC-EU1-11</u> <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <u>OC-EU1-13</u> <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input checked="" type="checkbox"/> Attached, Document ID: <u>OC-EU1-16</u> Test Date(s)/Pollutant(s) Tested: <u>VE</u> <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]
Sugar Trans-Shipment Facility

Additional Requirements for Air Construction Permit Applications

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

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: OC-EU1-IV1 <input type="checkbox"/> Not Applicable
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application. <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [1]
Sugar Trans-Shipment Facility

Additional Requirements Comment

[Empty box for Additional Requirements Comment]

ATTACHMENT OC-EU1-C15

STACK PARAMETER SUMMARY

**ATTACHMENT OC-EU1-C15
STACK PARAMETER SUMMARY TABLE FOR THE TRANS-SHIPMENT FACILITY**

Emission Source	Control Device	Point ID	Discharge Type	Stack Height (ft)	Exit Diameter (ft)	Exit Temperature (° F)	Actual Volumetric Flow Rate (acfm)	Percent Water Vapor (%) ^a	Maximum Standard Flow Rate (scfm)
Vacuum System	Baghouse	018	Horizontal	8	0.33	75	284	0.025	280
Packaging Lines 0-9	Baghouse	019	Vertical	27	1.50	75	10,000	0.025	9,869
Grinder	Baghouse	020	Horizontal	39	1.00	75	3,000	0.025	2,961
Silo No. 1	Baghouse	030	Horizontal	65	0.50	90	521	0.025	500
Silo No. 2	Baghouse	030	Horizontal	65	0.50	90	521	0.025	500
Silo No. 3	Baghouse	030	Horizontal	65	0.50	90	521	0.025	500
Railcar Unloading Receiver #1	Baghouse	031	Horizontal	5.0	0.50	90	641	0.025	615
Railcar Unloading Receiver #2	Baghouse	032	Horizontal	5.0	0.50	90	641	0.025	615
Powdered Sugar Dryer/Cooler	Baghouse	045	Vertical	48	2.00	90	9,000	0.025	8,640
Powdered Sugar Hopper	Baghouse	046	Horizontal	48	0.75	90	1,800	0.025	1,728
Packaging Lines 11-14	Baghouse	047	Vertical	48	1.75	90	6,000	0.025	5,760

Footnotes:

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

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

Equivalent diameter = 0.9862 ft.

ATTACHMENT OC-EU1-F1.10

SUMMARY OF PARTICULATE EMISSIONS

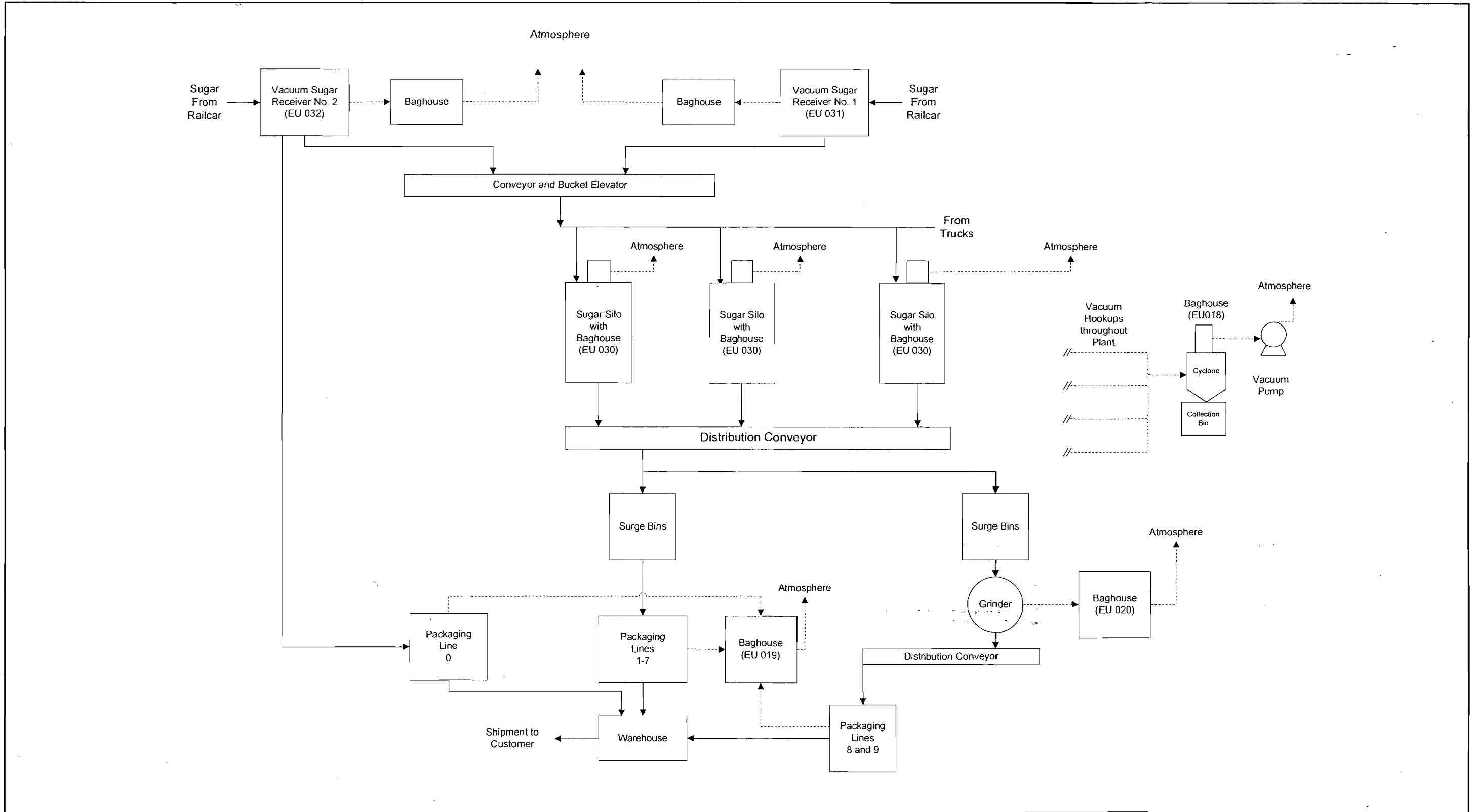
**ATTACHMENT OC-EU1-F1.10
SUMMARY OF PARTICULATE EMISSIONS FOR THE TRANS-SHIPMENT FACILITY**

Emission Segment Source	Point ID	Baghouse Guaranteed Manufacturer's Emission Rate	Baghouse Gas Flow Rate	Hourly Emissions (lb/hr)	Annual Emissions^a (TPY)
Vacuum System 1	018	0.01 gr/scf	280 scfm	0.024	0.11
Packaging Lines 0-9	019	0.01 gr/scf	9,869 scfm	0.86	3.75
Grinder	020	0.0005 gr/scf	2,961 scfm	0.013	0.06
Silo No. 1	030	0.02 gr/scf	500 scfm	0.086	0.38
Silo No. 2	030	0.02 gr/scf	500 scfm	0.086	0.38
Silo No. 3	030	0.02 gr/scf	500 scfm	0.086	0.38
Railcar Unloading Receiver #1	031	0.02 gr/scf	615 scfm	0.11	0.46
Railcar Unloading Receiver #2	032	0.02 gr/scf	615 scfm	0.11	0.46
Powdered Sugar Dryer/Cooler	045	0.01 gr/scf	8,640 scfm	0.77	3.38
Powdered Sugar Hopper	046	0.01 gr/scf	1,728 scfm	0.15	0.68
Packaging Lines 11-14	047	0.01 gr/scf	5,760 scfm	0.51	2.25
Total Particulate Emissions All Sources				2.81 lb/hr	12.29 TPY

^a Based on 8,760 hr/yr operation.

ATTACHMENT OC-EU1-I1

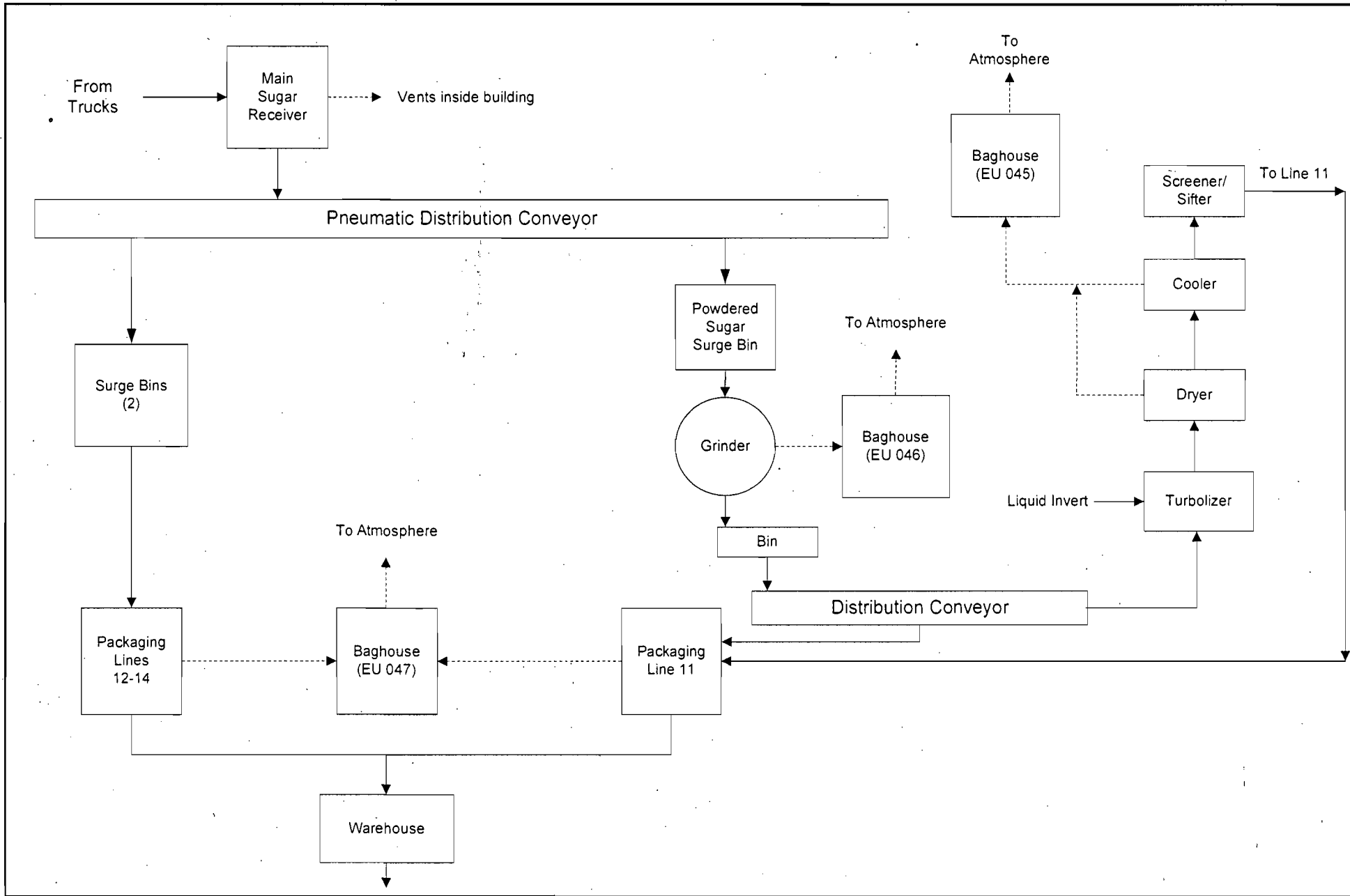
PROCESS FLOW DIAGRAMS



Attachment OC-EU1-11a. Process Flow Diagram
 Trans-shipment Facility - Phase 1 and Increased Capacity
 Okeelanta Corporation Refinery
 South Bay, Florida

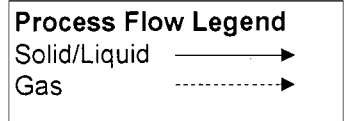
Process Flow Legend
 Solid/Liquid ———→
 Gas - - - - ->





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

0637539/4.4/OC-EU1-I1b



ATTACHMENT OC-EU1-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT OC-EU1-I3a
CONTROL EQUIPMENT PARAMETERS FOR THE
VACUUM SYSTEM BAGHOUSE (EU 018) AT THE TRANS-SHIPMENT FACILITY

Vacuum System	
Manufacturer and Model No.	Ross Cook Model RC30HBFBX-PJ
Outlet Gas Temp (°F)	75
Outlet Gas Flow Rate (acfm)	284
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	280
Cleaning Method	Pulse Jet cleaning (Timer Actuated)
Bag Material	Polyfelt
Total Area of Filter Media (sq. ft)	72
Air to Cloth Ratio	3.9
Manufacturer's Guaranteed Outlet Loading (grains/scf)	0.01
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.024

Note: Parameters based on manufacturers design specifications.

Exit temperature from construction permit application.

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

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X

outlet loading rate (grains/dscf) ÷ 7000 grains/lb X 60 min/hr

**ATTACHMENT OC-EU1-I3b
CONTROL EQUIPMENT PARAMETERS FOR THE
PACKAGING LINES 0-9 BAGHOUSE (EU 019) AT THE TRANS-SHIPMENT FACILITY**

Packaging Lines 0-9	
Manufacturer and Model No.	MAC Environmental Model 55AVSC64 Style III
Outlet Gas Temp (°F)	75
Outlet Gas Flow Rate (acfm)	10,000
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	9,869
Cleaning Method	Pulse Jet cleaning (Timer Actuated)
Bag Material	Polyester Pleated
Total Area of Filter Media (sq. ft)	3,520
Air to Cloth Ratio	2.84
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.01
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.86

Note: Parameters based on manufacturers design specifications.

Exit temperature from construction permit application.

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

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X

outlet loading rate (grains/acfm) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3c
CONTROL EQUIPMENT PARAMETERS FOR THE
GRINDER BAGHOUSE (EU 020) AT THE TRANS-SHIPMENT FACILITY

Grinder System	
Manufacturer and Model No.	Reimelt Corp. Model
Outlet Gas Temp (°F)	75
Outlet Gas Flow Rate (acfm)	3,000
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	2,961
Cleaning Method	Pulse Jet cleaning (Timer Actuated)
Bag Material	Gor-Tex Polyester
Total Area of Filter Media (sq. ft)	800
Air to Cloth Ratio	3.75
Manufacturer's Guaranteed Outlet Loading (grains/scf)	0.0005
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.013

Note: Parameters based on manufacturers design specifications.

Exit temperature from construction permit application.

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

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (dscfm) X

outlet loading rate (grains/dscf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3d

CONTROL EQUIPMENT PARAMETERS FOR THE
SUGAR STORAGE SILOS BAGHOUSES (EU 030) AT THE TRANS-SHIPMENT FACILITY

Each Storage Silo	
Manufacturer and Model No.	Reimelt Corp. Model JF795-14P-7.5-5
Outlet Gas Temp (°F)	90
Outlet Gas Flow Rate (acfm)	521
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	500
Cleaning Method	Pulse Jet cleaning (Timer Actuated)
Bag Material	Polyester
Total Area of Filter Media (sq. ft)	81
Air to Cloth Ratio	6.17
Manufacturer's Guaranteed Outlet Loading (grains/scf)	0.02
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.086

Note: Parameters based on manufacturers design specifications.

Exit temperature from construction permit application.

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

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (dscfm) X

outlet loading rate (grains/dscf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-I3e
CONTROL EQUIPMENT PARAMETERS FOR THE
VACUUM RECEIVER NOS. 1 AND 2 (EUs 031 & 032) BAGHOUSES AT THE TRANS-SHIPMENT
FACILITY

Each of Vacuum Receiver Nos. 1 and 2	
Manufacturer and Model No.	United States Systems 84AVR36:60S
Outlet Gas Temp (°F)	90
Outlet Gas Flow Rate (acfm)	641
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	615
Cleaning Method	--
Bag Material	Polyester (Scrim supported felt type)
Total Area of Filter Media (sq. ft)	408
Air to Cloth Ratio	1.57
Manufacturer's Guaranteed Outlet Loading (grains/scf)	0.02
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.105

Note: Parameters based on manufacturers design specifications.

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3f
CONTROL EQUIPMENT PARAMETERS FOR THE
POWDERED SUGAR DRYER/COOLER (EU 045) AT THE TRANS-SHIPMENT FACILITY

Powdered Sugar Dryer/Cooler	
Manufacturer and Model No.	Reimelt Corp. Model SL3-18
Outlet Gas Temp (°F)	90
Outlet Gas Flow Rate (acfm)	9,000
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	8,640
Cleaning Method	Pulse Jet cleaning (Timer Actuated)
Bag Material	Duratex II (pleated cartridges)
Total Area of Filter Media (sq. ft)	4,824
Air to Cloth Ratio	1.87
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.01
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.77

Note: Parameters based on manufacturers design specifications.

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

Sample calculations:

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

**ATTACHMENT OC-EU1-I3g
CONTROL EQUIPMENT PARAMETERS FOR THE
POWDERED SUGAR HOPPER BAGHOUSE (EU 046) AT THE TRANS-SHIPMENT FACILITY**

Powdered Sugar Hopper Baghouse	
Manufacturer and Model No.	Reimelt Corp. Model 24TB-FRIP-32:S6
Outlet Gas Temp (°F)	90
Outlet Gas Flow Rate (acfm)	1,800
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	1,728
Cleaning Method	Pulse Jet cleaning (Timer Actuated)
Bag Material	Spun Bond Polyester (pleated elements)
Total Area of Filter Media (sq. ft)	325
Air to Cloth Ratio	5.54
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.01
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.15

Note: Parameters based on manufacturers design specifications.

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

Sample calculations:

Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X

outlet loading rate (grains/acf) ÷ 7000 grains/lb X 60 min/hr

ATTACHMENT OC-EU1-13h
CONTROL EQUIPMENT PARAMETERS FOR THE
PACKAGING LINES 11-14 BAGHOUSE (EU 047) AT THE TRANS-SHIPMENT FACILITY

Packaging Lines 11-14	
Manufacturer and Model No.	MAC Equipment Inc. 55RTC52
Outlet Gas Temp (°F)	90
Outlet Gas Flow Rate (acfm)	6,000
Exhaust Gas Moisture Content (%)	0.025
Outlet Gas Flow Rate (scfm)	5,760
Cleaning Method	Pulse Jet cleaning (Timer Actuated)
Bag Material	Polyester (pleated tubular cartridge)
Total Area of Filter Media (sq. ft)	2,662
Air to Cloth Ratio	2.25
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.01
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.51

Note: Parameters based on manufacturers design specifications.

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

Sample calculations:

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



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1969 - 2006

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

MESSAGE TRANSMITTAL

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

Dear Matthew,

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

- media: polyester
- weight: 16 oz./sq yd
- construction: scrim supported felt
- mullen burst strength: 375 psi
- thermal stability: 2% maximum at 275 degrees F for 2 hours
- operating temp.: 240 degrees F
- finish: heat set and calendered
- permeability: 17-40cfm/sq ft @ 0.5" w.c.

Sincerely,

Greg Hawkins
Sales Manager

cc: Mark Aron -- United States Systems

THIS MESSAGE CONTAINS INFORMATION THAT IS PROPRIETARY TO US SYSTEMS. IT IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. AUTHORIZATION FOR OTHER USERS MUST BE OBTAINED IN WRITING FROM UNITED STATES SYSTEMS.

ATTACHMENT OC-EU1-I6

VE COMPLIANCE TEST

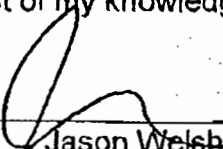
VISIBLE EMISSIONS TEST REPORT

PREPARED FOR:
Okeelanta Corporation
21250 US Highway 27
South Bay, Florida


CONCERNING:
Visible Emissions Test Program
One Emission Unit
Okeelanta Corporation
South Bay, Florida
July 19, 2006

PREPARED BY:
South Florida Environmental Services, LLC
2257 Vista Parkway Unit 25
West Palm Beach, Florida 33411

I hereby certify that the information contained in this report is true and accurate to the best of my knowledge.



Jason Welsh
Environmental Technician



Date



Okeelanta Corporation
Visible Emissions Test Report

COMPENDIUM:

At the request of Okeelanta Corporation and in compliance with the Florida Statutes [62-297.310(4)(a)2, F.A.C.], as stipulated in their permit (No. 0990005-003-AV), South Florida Environmental Services performed compliance testing for visible emissions at Okeelanta Corporation on July 19, 2006. Testing was conducted on one railcar unloading unit (ID #31).

During the compliance test, the unit tested was observed to be in normal operating condition. The test was conducted for a thirty-minute period. All testing and data reduction were conducted in accordance with EPA Method 9 as found in 40 CFR 60 Appendix A, as amended.

Jason Welsh of South Florida Environmental Services was the certified visible emissions evaluator at the time of testing. Mr. Mathew Capone, Director of Environmental Programs, was responsible for coordinating plant operations. Mr. Paul Kalamaras of the Palm Beach County Division of Environmental Health & Engineering was on-site to observe the test.

The results (summarized in Table 1) show that the emissions units test was operating in compliance with Florida statutes, and as required by regulatory conditions stipulated in the facility's permit.

Table 1: Summary of Results

Location	Highest Six Minute Average Opacity (%)	Overall Opacity (%)	Allowable Opacity (%)
ID #31	0.0	0.0	5

Okeelanta Corporation
Visible Emissions Test Report

VISIBLE EMISSIONS TEST REPORT
Field Data Sheets

South Florida Environmental Services No. 06-548
July 19, 2006

Received Time Dec. 27. 2006 3:10PM No. 0331



BEST AVAILABLE COPY



South Florida Environmental Services

SOURCE NAME		OBSERVATION DATE				START TIME				STOP TIME			
Okeelanta Corporation		19 July 06				1109				1140			
ADDRESS		SEC				MIN				SEC			
21250 Hwy 27		0	15	30	45	0	15	30	45	0	15	30	45
CITY	STATE	MIN				SEC				MIN			
South Bay	FL	0	0	0	0	0	0	0	0	0	0	0	0
ZIP		MIN				SEC				MIN			
33493		0	0	0	0	0	0	0	0	0	0	0	0
SOURCE ID NUMBER		MIN				SEC				MIN			
		0	0	0	0	0	0	0	0	0	0	0	0
PROCESS EQUIPMENT		MIN				SEC				MIN			
Rail Car unloading		0	0	0	0	0	0	0	0	0	0	0	0
OPERATING MODE		MIN				SEC				MIN			
Normal		0	0	0	0	0	0	0	0	0	0	0	0
CONTROL EQUIPMENT		MIN				SEC				MIN			
Dust Collector		0	0	0	0	0	0	0	0	0	0	0	0
OPERATING MODE		MIN				SEC				MIN			
		0	0	0	0	0	0	0	0	0	0	0	0
DESCRIBE EMISSION POINT		MIN				SEC				MIN			
Vent at ground level		0	0	0	0	0	0	0	0	0	0	0	0
HEIGHT ABOVE GROUND (FEET)		MIN				SEC				MIN			
2		0	0	0	0	0	0	0	0	0	0	0	0
HEIGHT RELATIVE TO OBSERVER		MIN				SEC				MIN			
-4		0	0	0	0	0	0	0	0	0	0	0	0
DISTANCE FROM OBSERVER		MIN				SEC				MIN			
10		0	0	0	0	0	0	0	0	0	0	0	0
DIRECTION FROM OBSERVER		MIN				SEC				MIN			
188		0	0	0	0	0	0	0	0	0	0	0	0
DESCRIBE EMISSIONS		MIN				SEC				MIN			
None		0	0	0	0	0	0	0	0	0	0	0	0
EMISSION COLOR		MIN				SEC				MIN			
N/A		0	0	0	0	0	0	0	0	0	0	0	0
WATER DROPLETS PRESENT		MIN				SEC				MIN			
NO		0	0	0	0	0	0	0	0	0	0	0	0
WATER DROPLET PLUME ATTACHED OR DETACHED		MIN				SEC				MIN			
NO		0	0	0	0	0	0	0	0	0	0	0	0
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED		MIN				SEC				MIN			
N/A		0	0	0	0	0	0	0	0	0	0	0	0
DESCRIBE BACKGROUND		MIN				SEC				MIN			
Structure		0	0	0	0	0	0	0	0	0	0	0	0
BACKGROUND COLOR		MIN				SEC				MIN			
Gray/white		0	0	0	0	0	0	0	0	0	0	0	0
WIND SPEED		MIN				SEC				MIN			
0.5 mph		0	0	0	0	0	0	0	0	0	0	0	0
WIND DIRECTION		MIN				SEC				MIN			
NE		0	0	0	0	0	0	0	0	0	0	0	0
AIRBORN TEMPERATURE		MIN				SEC				MIN			
79°		0	0	0	0	0	0	0	0	0	0	0	0
WET BULB TEMPERATURE		MIN				SEC				MIN			
		0	0	0	0	0	0	0	0	0	0	0	0
RH RELATIVE HUMIDITY		MIN				SEC				MIN			
		0	0	0	0	0	0	0	0	0	0	0	0
SOURCE LAYOUT SKETCH		MIN				SEC				MIN			
Draw North Arrow		0	0	0	0	0	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	0	0	0	0
AVERAGE OPACITY FOR HIGHEST PERIOD: 0% RANGE OF OPACITY READINGS: MINIMUM 0% / MAXIMUM 0% NUMBER OF READINGS ABOVE 0%: 0 OBSERVER'S NAME (PRINT): James Jason Welsh OBSERVER'S SIGNATURE: [Signature] DATE: 19 July 06 ORGANIZATION: SFES CERTIFIED BY: ATA VERIFIED BY: [Blank] DATE: [Blank]		0	0	0	0	0	0	0	0	0	0	0	0
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE: [Blank] DATE: [Blank]		0	0	0	0	0	0	0	0	0	0	0	0

6801 West Parkview North West Palm Beach, FL 33411
 Tel: 561-833-3000 Fax: 561-833-3000

Okeelanta Corporation
Visible Emissions Test Report

VISIBLE EMISSIONS EVALUATOR CERTIFICATE

South Florida Environmental Services No. 08-548
July 19, 2006

Received Time Dec. 27, 2006 3:10PM No. 0331



VISIBLE EMISSIONS EVALUATOR

This is to certify that

Jason Welsh

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

344882

West Palm Beach, Florida

July 13, 2006

Certificate Number

Location

Date of Issue

Thomas Ford

President

Michael W. Junjford

Director of Training

**South Florida
Environmental Services**

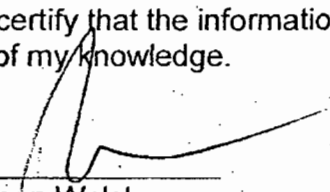
VISIBLE EMISSIONS TEST REPORT

PREPARED FOR:
Okeelanta Corporation
21250 US Highway 27
South Bay, Florida

CONCERNING:
Visible Emissions Test Program
Seven Emission Units
Okeelanta Corporation
South Bay, Florida
September 8th, 2006

PREPARED BY:
South Florida Environmental Services, LLC
2257 Vista Parkway, Suite 25
West Palm Beach, Florida 33411

I hereby certify that the information contained in this report is true and accurate to the best of my knowledge.



Jason Welsh
Environmental Technician

08 Sep 06
Date

COMPENDIUM:

At the request of Okeelanta Corporation and in compliance with the Florida Statutes [62-297.310(4)(a)2, F.A.C.], as stipulated in their permit (No. 0990005-003-AV), South Florida Environmental Services performed compliance testing for visible emissions at Okeelanta Corporation on September 8th, 2006. Testing was conducted on seven emission units that are not subject to a multiple-valued opacity standard (potential PM Emissions < 100 tons per year). Emission unit #46 was not tested as it is not anticipated to be used during the year.

During the compliance testing all units were observed to be operating at normal condition. The test on each unit was conducted for a thirty-minute period. All testing and data reduction were conducted in accordance with EPA Method 9 as found in 40 CFR 60 Appendix A, as amended.

Jason Welsh of South Florida Environmental Services was the certified visible emissions evaluators at the time of testing. Mr. Mathew Capone, Director of Environmental Programs, was responsible for coordinating plant operations. Mr. Paul Kalamaras of the Palm Beach County Health Department was additionally present.

The results are summarized in Table 1, and show that all emissions units are operating in compliance with Florida Statutes and as required by regulatory conditions stipulated in their permit.

Table 1: Summary of Results

Location	Highest Six Minute Average Opacity (%)	Overall Opacity (%)	Allowable Opacity (%)
EU 019	0	0	5
EU 020	1.66	.75	5
EU 030-Western	0	0	5
EU 030-Middle	0	0	5
EU 030-Eastern	0	0	5
EU 032	0	0	5
EU 046*	N/A	N/A	N/A
EU 047	0	0	5
* This unit not tested as it is not in use for the year.			



VISIBLE EMISSIONS TEST REPORT
Field Data Sheets





South Florida Environmental Services

SOURCE NAME		OBSERVATION DATE					START TIME					STOP DATE				
OK 21942A		08 Sep 06					1052					1122				
ADDRESS		SEC					SEC					MIN				
2250 US Hwy 27		0	15	30	45	0	0	15	30	45	0	0	15	30	45	
CITY: South Bay		STATE: FL		ZIP: 33156		1		0		0		0		0		
PHONE:		SCHOOL ID NUMBER:		EA 32		2		0		0		0		0		
PROCESS/EQUIPMENT:		OPERATING MODE:		2 1/2 inch diam		3		0		0		0		0		
CONTROL/EQUIPMENT:		OPERATING MODE:				4		0		0		0		0		
Dust Collector						5		0		0		0		0		
DESCRIBE EMISSION POINT:				Duct on ground		6		0		0		0		0		
HEIGHT ABOVE GROUND LEVEL:		HEIGHT RELATIVE TO OBSERVER:		5		7		0		0		0		0		
DISTANCE FROM OBSERVER:		DIRECTION FROM OBSERVER:		220		8		0		0		0		0		
6						9		0		0		0		0		
DESCRIBE EMISSIONS:				None		10		0		0		0		0		
EMISSION COLOR:		PLUME TYPE (CONTINUOUS/FLUENT):		N/A		11		0		0		0		0		
N/A		FLUENT/INTERMITTENT:				12		0		0		0		0		
WATER DROPLETS PRESENT:		IF WATER DROPLET PLUME:		NO		13		0		0		0		0		
NO		ATTACHED/DETACHED:				14		0		0		0		0		
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED:				N/A		15		0		0		0		0		
DESCRIBE BACKGROUND:		SKY CONDITIONS:		Ground / RR road		16		0		0		0		0		
BACKGROUND COLOR:		SKY CONDITIONS:		Gray		17		0		0		0		0		
Gray		SCATTERED				18		0		0		0		0		
WIND SPEED:		WIND DIRECTION:		5 mph		19		0		0		0		0		
5 mph		SW				20		0		0		0		0		
AIR TEMP:		WET BULB TEMP:		90		21		0		0		0		0		
		RH (%)				22		0		0		0		0		
						23		0		0		0		0		
Source Layout Sketch		Draw North Arrow				24		0		0		0		0		
Emission Point		Observer's Position				25		0		0		0		0		
Sketch		Sketch				26		0		0		0		0		
						27		0		0		0		0		
						28		0		0		0		0		
						29		0		0		0		0		
						30		0		0		0		0		

AVERAGE OPACITY PER HIGHEST PERIOD:	0%	NUMBER OF READINGS ABOVE 5%:	0
RANGE OF OPACITY READINGS:	0 - 0	MINIMUM:	0
MAXIMUM:	0		
OBSERVER'S NAME (PRINT):	James Jason Welsh		
OBSERVER'S SIGNATURE:			
ORGANIZATION:	ETA		
CERTIFIED BY:	ETA		
DATE:	08 Sep 06		

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS	DATE:
SIGNATURE:	DATE:
DATE:	DATE:

VISIBLE EMISSIONS EVALUATOR CERTIFICATE



VISIBLE EMISSIONS EVALUATOR

This is to certify that

Jason Welsh

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

341882

West Palm Beach, Florida

July 13, 2006

Certificate Number

Location

Date of Issue

Thomas Hore

President

Michael W. Junford

Director of Training

ATTACHMENT OC-EU1-IV1

**APPLICABLE REQUIREMENTS FOR SUGAR
TRANS-SHIPMENT FACILITY**

ATTACHMENT OC-EU1-IV1

APPLICABLE REQUIREMENTS FOR SUGAR TRANS-SHIPMENT FACILITY

APPLIC STAT	RULE DESCRIP	RULE NUMBER	RULE TITLE
APPLICABLE	62-4	62-4.070(3)	Existing Equipment
APPLICABLE	62-4	62-4.070(3)	Fugitive Dust Emissions
APPLICABLE	62-4	62-4.070(3)	Hours of Operation
APPLICABLE	62-4	62-4.070(3)	Opacity Standards
APPLICABLE	62-4	62-4.070(3)	Operational Data
APPLICABLE	62-4	62-4.130	Plant Operations - Problems
APPLICABLE	62-4	62-4.160(14)	Records Retention
APPLICABLE	62-204	62-204.800	Test Method
APPLICABLE	62-210	62-210.200(187)	Objectionable Odor Prohibited
APPLICABLE	62-210	62-210.200(PTE)	Permitted Capacity
APPLICABLE	62-210	62-210.200(PTE)	Hours of Operation
APPLICABLE	62-210	62-210.370(2)	Annual Operating Report
APPLICABLE	62-210	62-210.650	Circumvention of control equipment
APPLICABLE	62-210	62-210.700(1)	Excess Emissions - Allowed
APPLICABLE	62-210	62-210.700(4)	Excess Emissions - Prohibited
APPLICABLE	62-210	62-210.700(6)	Excess Emissions - Notification
APPLICABLE	62-213	62-213.440(1)(b)2	Records Retention
APPLICABLE	62-296	62-296.320(4)(c)	Fugitive Dust Emissions
APPLICABLE	62-296	62-296.320(2)	Objectionable Odor Prohibited
APPLICABLE	62-297	62.297.100	Test Method
APPLICABLE	62-297	26-297.310(4) & (5)	Test Procedures
APPLICABLE	62-297	62-297.310(7)(a)1	Initial Compliance Tests
APPLICABLE	62-297	62-297.310(7)(a)3	Tests Prior to Renewal
APPLICABLE	62-297	62-297.310(7)(a)4	Annual Compliance Tests
APPLICABLE	62-297	62-297.310(7)(a)9	Test Notification
APPLICABLE	62-297	62-297.310(7)(b)	Special Compliance Tests
APPLICABLE	62-297	62.297.310(8)	Test Reports
APPLICABLE	40 CFR 60	40 CFR 60	Test Method

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

GOLDER ASSOCIATES INC.

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

APR 14 2006

Air Permit No. 0990005-019-AC
Okeelanta Corporation
Sugar Transshipment Facility

Authorized Representative:

Mr. Ricardo Lima, V.P. and General Manager

GAINESVILLE

Enclosed is Final Air Permit No. 0990005-019-AC, which authorizes the construction of two new sugar receivers (with baghouses) to pneumatically unload sugar from railcars; and a new sugar packaging line (Line "0"), which will share an existing baghouse system. The sugar packaging capacity of the transshipment facility will increase from 865 tons per day to 1300 tons per day. The new equipment will be installed at the existing sugar transshipment facility (SIC No. 2062), which is located approximately one-half mile south of the Okeelanta sugar refinery. The existing facility is located in Palm Beach County at 21250 U.S. Highway 27 South in South Bay, Florida. As noted in the attached Final Determination, only minor changes and clarifications were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/11/06 to the persons listed:

- Ricardo Lima, Okeelanta Corporation*
- Matthew Capone, Okeelanta Corporation
- David Buff, Golder Associates Inc.
- Ron Blackburn, SD Office
- James Stormer, PBCHD

Clerk Stamp

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

(Clerk)

4/11/06
(Date)

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation, Air Permitting South Program
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400

PROJECT

Air Permit No. 0990005-019-AC
Okeelanta Corporation
Sugar Transshipment Facility

This permit authorizes the construction of: two new sugar receivers with separate baghouses to pneumatically unload sugar from railcars; and a new sugar packaging line (Line "0"), which will share an existing baghouse system. The sugar packaging capacity of the transshipment facility will increase from 865 tons per day to 1300 tons per day. The new equipment will be installed at the existing sugar transshipment facility (SIC No. 2062), which is located approximately one-half mile south of the Okeelanta sugar refinery. The existing facility is located in Palm Beach County at 21250 U.S. Highway 27 South in South Bay, Florida.

NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on February 27, 2006. The applicant published the "Public Notice of Intent to Issue" in the Palm Beach Post on March 17, 2006. The Department received the proof of publication on March 29, 2006. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

COMMENTS

Only minor comments were received from the applicant. The comments and the Department's response are summarized below.

1. New Railcar Sugar Unloading Receivers: In the descriptions throughout the permit for this equipment, replace "separate baghouses" with "integral baghouses" or "built-in baghouses". Also, identify each railcar sugar unloading receiver as a separate Emissions Unit. *Response*: The intent was merely to recognize that there will be two baghouses. The permit was clarified to read, "Each railcar sugar unloading receiver (EU-031, EU-032) shall be controlled by a baghouse."
2. Sugar Silo EU Numbers: To clarify the record keeping and reporting requirements, revise the three Emissions Unit numbers for these silos (EU-026, EU-027, and EU-028) to a common Emissions Unit number. *Response*: The permit was revised to identify the three silos as a single Emissions Unit (030) with three separate Emissions Points (S1101, S1102, and S1103).

CONCLUSION

The final action of the Department is to issue the permit with the changes described above.



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

PERMITTEE:

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

Authorized Representative:

Mr. Ricardo Lima, V.P. and General Manager

Air Permit No. 0990005-019-AC
Okeelanta Corporation
Sugar Transshipment Facility
Expansion Project
Permit Expires: April 4, 2008

PROJECT AND LOCATION

This permit authorizes the construction of: two new sugar receivers (with baghouses) to pneumatically unload sugar from railcars; and a new sugar packaging line (Line "0"), which will share an existing baghouse system. The sugar packaging capacity of the transshipment facility will increase from 865 tons per day to 1300 tons per day. The new equipment will be installed at the existing sugar transshipment facility (SIC No. 2062), which is located approximately one-half mile south of the Okeelanta sugar refinery. The existing facility is located in Palm Beach County at 21250 U.S. Highway 27 South in South Bay, Florida. The UTM coordinates are Zone 17, 524.90 km East, and 2940.10 km North. The map coordinates are latitude 26° 35' 00" N and longitude 80° 45' 00" W.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

Michael G. Cooke

Michael G. Cooke, Director
Division of Air Resource Management

4/11/06

(Effective Date)

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SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The facility consists of two adjacent plants. New Hope Power Partnership (ARMS ID No. 0990332) operates a nominal 140 MW cogeneration plant that provides process steam for the sugar mill/refinery and generates electricity for sale to the power grid (SIC No. 4911). Okeelanta Corporation (ARMS ID No. 0990005) operates a sugar mill (SIC No. 2061), sugar refinery (SIC No. 2062) and transshipment facility. The cogeneration plant, sugar mill, and sugar refinery are all considered a single facility for purposes of the PSD and Title V regulatory programs. The transshipment facility is located approximately one-half mile south of the sugar refinery and consists of the following emissions units.

ID	Emission Unit Description	ID	Emission Unit Description
018	Central vacuum system No. 1	032	Railcar sugar unloading receiver No. 2 (New)
019	Sugar packaging line Nos. 0-9 (New Line "0")	045	Powdered sugar dryer/cooler
020	Sugar grinder	046	Powdered sugar hopper
030	Sugar silos Nos. 1, 2, and 3 (Points #1101-1103)	047	Sugar packaging lines (11-14)
031	Railcar sugar unloading receiver No. 1 (New)	---	---

Extra-fine granulated sugar (EFG) from the refinery is delivered to the transshipment facility at one of three locations. At the east truck receiving dock, trucks are pneumatically unloaded into a main sugar receiver, which pneumatically transfers sugar into surge bins above packaging lines (11-14). At the north side of the facility, trucks are unloaded at a bulk receiving station by locking a boot mechanism against the truck's hopper and sugar is transferred from trucks by screw conveyors to a bucket elevator feeding one of three storage silos. At the north railcar receiving station just west of the sugar silos, railcars will be pneumatically unloaded into two new sugar receivers for transfer by screw conveyor to a bucket elevator feeding one of three storage silos. The west receiver will also transfer sugar directly to a surge bin for new packaging line "0", which will be used to fill totes north of packaging line "1" in the existing packaging room. At the three storage silos, sugar is transferred by screw conveyor into surge bins located above packaging lines (1-9).

Sugar is metered from the surge bins into the packaging lines for processing into a variety of packages and containers for wholesale and retail distribution. A small portion of sugar can be conveyed to the grinder and mixed with starch to produce powdered sugar. In addition, brown sugar may be produced by mixing light or dark molasses with the extra fine granulated sugar.

The transshipment facility emits particulate matter due to the handling and storage of sugar. The transshipment facility was constructed in 1996 with nine sugar packaging lines (1-9) and consisted of four primary areas: truck unloading; packaging; warehouse; and office/administration areas. An expansion project in 2000 added: four new packaging lines (11-14); a pneumatic main sugar receiver storage bin; and additional packaging/storage areas. This project will add packaging line "0" and two railcar unloading receivers. The transshipment facility has been permitted such that total potential emissions of all included emissions units are below the PSD significant emission rate of 15 tons per year of PM₁₀. After this expansion project, the total potential emissions from the transshipment facility will remain below the PSD significant emission rate of 15 tons per year of PM₁₀.

REGULATORY CLASSIFICATION

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility has no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major facility as defined in Rule 62-212.400, F.A.C.

RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. **Permitting Authority:** All documents related to applications for permits to construct or operate shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall be submitted to the Air Resource Section of the Department's South District Office (Post Office Box 2549, Fort Myers, Florida, 33902-2549) and the Air Pollution Control Section of the Palm Beach County Health Department (Post Office Box 29, West Palm Beach, Florida, 33402-0029).
2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's South District Office (Post Office Box 2549, Fort Myers, Florida, 33902-2549) and the Air Pollution Control Section of the Palm Beach County Health Department (Post Office Box 29, West Palm Beach, Florida, 33402-0029).
3. **Appendices:** The following Appendices are attached as part of this permit: Appendix A (Citation Format); and Appendix B (General Conditions).
4. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. **New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. **Modifications:** The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. **Title V Permit:** This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Transshipment Facility

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description	ID	Emission Unit Description
018	Central vacuum system No. 1	032	Railcar sugar unloading receiver No. 2 (New)
019	Sugar packaging line Nos. 0-9 (New Line "0")	045	Powdered sugar dryer/cooler
020	Sugar grinder	046	Powdered sugar hopper
030	Sugar silos Nos. 1, 2, and 3 (Points #1101-1103)	047	Sugar packaging lines (11-14)
031	Railcar sugar unloading receiver No. 1 (New)	---	---

EQUIPMENT

- Existing Equipment: The transshipment facility consists of the following existing equipment: central vacuum system No. 1 (EU-018); sugar packaging line Nos. 1-9 (EU-019); sugar grinder (EU-020); sugar silos Nos. 1 - 3 (EU-030); powdered sugar dryer/cooler (EU-045); powdered sugar hopper (EU-046); and sugar packaging lines 11-14 (EU-047). Each existing units shall be controlled by a baghouse system. This air construction permit supersedes all previous air construction permits for the transshipment facility. [Rule 62-4.070(3), F.A.C.]
- New Sugar Packaging Line: The permittee is authorized to the install a new packaging line "0". The new packaging line will be added to the group of existing packaging lines 1-9 (EU-019) and shall be controlled by the existing common baghouse. [Design; Application No. 0990005-019-AC]
- New Railcar Sugar Unloading Receivers: The permittee is authorized to the install two new railcar sugar unloading receivers (Nos. 1 and 2). Each railcar sugar unloading receiver (EU-031, EU-032) shall be controlled by a baghouse. [Design; Application No. 0990005-019-AC]
- Baghouse Design Specifications: Each of the following emissions units shall be controlled by a baghouse that is designed, operated, and maintained to achieve the particulate matter baghouse design specification (grains/scf) identified in the following table.

ID	Emission Unit Description	Baghouse Specification ^a (grains/scf)	Exhaust Rate scfm	Maximum Emissions ^b	
				lb/hour	tons/year
018	Central vacuum system No. 1	0.01	280	0.024	0.11
019	Sugar packaging lines (0-9)	0.01	9869	0.86	3.75
020	Sugar grinder	0.0005	2961	0.013	0.06
030	Sugar silo No. 1 (Point #S1101)	0.02	500	0.086	0.38
	Sugar silo No. 2 (Point #S1102)	0.02	500	0.086	0.38
	Sugar silo No. 3 (Point #S1103)	0.02	500	0.086	0.38
031	Railcar unloading receiver No. 1	0.02	615	0.11	0.46
032	Railcar unloading receiver No. 2	0.02	615	0.11	0.46
045	Powdered sugar dryer/cooler	0.01	8640	0.77	3.38
046	Powdered sugar hopper	0.01	1728	0.15	0.68
047	Sugar packaging lines (11-14)	0.01	5760	0.51	2.25
				Total	12.29

- New and replacement bags shall meet these specifications based on vendor information. No particulate matter emissions tests are required.
- These rates represent the maximum expected emissions based on the baghouse design specification, the maximum

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Transshipment Facility

exhaust flow rates, and 8760 hours of operation per year. These rates are not enforceable emissions standards.

[Design; Application No. 0990005-019-AC]

5. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]

PERFORMANCE RESTRICTIONS

6. Permitted Capacity: The maximum sugar packaging rate is 1300 tons per day. [Rule 62-210.200(PTE), F.A.C.; [Design; Application No. 0990005-019-AC]
7. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rule 62-4.070(3), F.A.C; 62-210.200(PTE), F.A.C.]
8. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
9. Fugitive Dust Emissions: This permit requires the use of fans, filters, pneumatic unloading/loading, ductwork, storage silos and other similar equipment to contain, capture, and/or control particulate matter related to the storage and handling of sugar at the transshipment facility. The permittee shall also take the following reasonable precautions to prevent fugitive particulate matter emissions from any activity, including: vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling.
- Enclose or cover conveyor systems.
 - Confine abrasive blasting where possible.
 - As necessary, landscape and/or plant vegetation.
 - As necessary, pave and maintain high-traffic roads, parking areas and yards.
 - As necessary, remove particulate matter from roads, work areas, buildings, and other paved areas under the control of the permittee to prevent fugitive dust emissions.
 - As necessary, apply water or other dust suppressants to control emissions from unpaved roads, yards, and other activities as road grading, land clearing, and the demolition of buildings.

[Rule 62-296.320(4)(c), F.A.C.; Rule 62-4.070(3), F.A.C.]

10. Objectionable Odor Prohibited: The transshipment facility shall not discharge air pollutants which cause or contribute to an objectionable odor. An "objectionable odor" means 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. [Rules 62-296.320(2) and 62-210.200(187), F.A.C.]

EMISSIONS STANDARDS

11. Opacity Standard: As determined by EPA Method 9 observations, visible emissions from each baghouse exhaust point shall not exceed 5% opacity. [Rule 62-4.070(3), F.A.C.; Application No. 0990005-019-AC]
12. Excess Emissions - Allowed: Excess emissions resulting from malfunction of any emissions 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.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Transshipment Facility

13. Excess Emissions - Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
14. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Compliance Authority. [Rule 62-210.700(6), F.A.C.]

PERFORMANCE TESTING

15. Initial Compliance Tests: For this expansion project, each baghouse exhaust points for EU-019, EU-031, and EU-032 shall be tested to demonstrate initial compliance with the specified opacity standard. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rule 62-297.310(7)(a)1, F.A.C.]
16. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), each baghouse exhaust point shall be tested to demonstrate compliance with the specified opacity standard. [Rule 62-297.310(7)(a)4, F.A.C.]
17. Tests Prior to Renewal: Within the 12-month period prior to renewing the operation permit, each baghouse exhaust point shall be tested to demonstrate compliance with the specified opacity standard. [Rule 62-297.310(7)(a)3, F.A.C.]
18. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required test. [Rule 62-297.310(7)(a)9, F.A.C.]
19. Test Method: All tests shall be conducted in accordance with EPA Method 9, which is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. Tests shall also comply with the applicable requirements of Rule 62-297.310, F.A.C. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]
20. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur. The permittee shall record the actual sugar processing rate for the emissions unit being controlled and tested. [Rule 62-297.310(4) and (5), F.A.C.]
21. Test Notification: At least 15 days prior to the date on which each formal compliance test is to begin, the permittee shall notify the Compliance Authority of: the date, time, and place of the test; and the contact person who will be responsible for coordinating and having the test conducted. [Rule 62-297.310(7)(a)9, F.A.C.]
22. Special Compliance Tests: When the Compliance Authority, 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 compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Compliance Authority. [Rule 62-297.310(7)(b), F.A.C.]

RECORDS AND REPORTS

23. Test Reports: The permittee shall submit a report to the Compliance Authority on the results of each opacity test. The required test report shall be filed as soon as practical but no later than 45 days after completing the test. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Compliance Authority to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information:
 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 materials processed, and the types and amounts of material processed during each test.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Transshipment Facility

5. The means, raw data and computations used to determine the amount of 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. The date, starting time and duration of the test.
8. The test procedure used.
9. The names of individuals who furnished the process variable data, conducted the test, and prepared the report.
10. The applicable standard for the emissions unit and the test result in the same form and unit of measure.
11. A certification that, to the knowledge of the owner or his authorized agent, all data submitted is true and correct. 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.

[Rule 62-297.310(8), F.A.C.]

24. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Compliance Authority upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
25. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]
26. Operational Data: The permittee shall maintain adequate records of the sugar packaging rate to demonstrate compliance with the conditions of this permit. [Rule 62-4.070(3), F.A.C.]

SECTION 4. APPENDICES
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Appendix A. Citation Formats

Appendix B. General Conditions

SECTION 4. APPENDIX A

CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit

"AO" identifies the permit as an Air Operation Permit

"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located

"2222" represents the specific facility ID number

"001" identifies the specific permit project

"AC" identifies the permit as an air construction permit

"AF" identifies the permit as a minor federally enforceable state operation permit

"AO" identifies the permit as a minor source air operation permit

"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality

"FL" means that the permit was issued by the State of Florida

"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

**SECTION 4. APPENDIX C
GENERAL CONDITIONS**

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

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

SECTION 4. APPENDIX C
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
 - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.