Golder Associates Inc.

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

July 11, 2008 0838-7593

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

Attention: Mr. Ajay Satyal, Air Program Administrator

RE: OKEELANTA CORPORATION
PERMIT NO. 0990005-020-AC
SUGAR REFINERY EXPANSION
TITLE V REVISION APPLICATION

Dear Mr. Satyal:

On behalf of Okeelanta Corporation, please find attached four (4) copies of a Title V revision application for the Sugar Refinery at Okeelanta. If you have any questions concerning this matter, please call me at (352) 336-5600 or Matt Capone at (561) 993-1658.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

DB/sl

cc: Matt Capone, Okeelanta
J. Stormer, PBCHU
J. Koerner, DEP Tallahassee

TV Refinery expansion submit ltr.doc

RECEIVED - D.E.P.
JUL 14 2008
SOUTH DISTRICT

APPLICATION FOR
TITLE V AIR OPERATING PERMIT REVISION
FOR
SUGAR REFINERY 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

July 2008

0838-7593

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:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- 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, revised, or renewal Title V air operation permit.

RECEIVED - D.E.P.
JUL 14 2008
SOUTH DISTRICT

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? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Matt Capone, Director of Environmental Programs**
2. Application Contact Mailing Address... Organization/Firm: **Okeelanta Corporation** Street Address: **21250 U.S. Highway 27** City: **South Bay** State: **Florida** Zip Code: **33493**
3. Application Contact Telephone Numbers... Telephone: **(561) 993-1658** ext. Fax: **(561) 992-7520**
4. Application Contact E-mail 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 - AV	4. Siting Number (if applicable):

(Add to Title V Renewal)

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being 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. 0990005-021-AC. This permit was to increase refined sugar production at the sugar refinery affecting potential emissions of the existing fluidized bed dryer/cooler and rotary dryer operations, and bulk load-out stations at the sugar refinery (EUs 021-025, 034, 035, and 043).

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
021-025, 034, 035, 043	Okeelanta Sugar Refinery	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 E-mail Address:
5. Owner/Authorized Representative Statement: *I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.* _____ _____ Signature Date

APPLICATION INFORMATION

Application Responsible Official Certification

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

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

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   ☒ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   ☐ The designated representative at an Acid Rain source, CAIR source, or Hg Budget 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 E-mail Address: **Matthew_Capone@floridacrystals.com**

6. Application Responsible Official Certification:

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

M. Capone for R.A. Lima — Signature

JULY 11, 2008 — Date

APPLICATION INFORMATION

Professional Engineer Certification

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

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

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

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

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

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

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

David A. Buff
Signature

7/11/2008
Date

(seal)

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

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone **17** East (km) **524.90** North (km) **2940.10**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) **26/35/00** Longitude (DD/MM/SS) **80/45/00**	
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **20**	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) 992-7520**
4. Facility Contact E-mail 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 E-mail Address:

Facility Regulatory Classifications

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

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

List of Pollutants Emitted by Facility

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

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

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

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

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: **August 2007**
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: **August 2007**
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: **August 2007**

Additional Requirements for Air Construction Permit Applications

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

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:
   ☐ 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 Onsite 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

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

   Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not an Acid Rain source)

   Phase II NO_X Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

   New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a Hg Budget unit)

Additional Requirements Comment

ATTACHMENT OC-FI-CV2

IDENTIFICATION OF APPLICABLE REQUIREMENTS
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.
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

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 REPORT AND PLAN

ATTACHMENT OC-FI-CV3

COMPLIANCE REPORT AND PLAN FOR OKEELANTA CORPORATION

A. SUGAR REFINERY – ANNUAL VE TESTING

– Rotary Dryer with Rotoclone No. 1 (EU 021)

Deviations from Applicable Requirements

Specific Condition 10 of permit no. 0990005-021-AC requires that a formal compliance test be conducted annually for visible emissions (VE). Specific Condition 22 of permit no. 0990005-021-AC requires that a VE compliance test be conducted prior to obtaining an operation permit for the Rotoclone No. 1 exhaust (EU 021). The initial testing of the other refinery emissions units was performed on March 27, 2008, after completing modifications under this construction permit. However, EU 021 was not in operation at the time, and therefore was not tested.

Compliance Plan

There currently is no schedule for starting production with EU 021. Okeelanta proposes to conduct a VE compliance test within 30 days of restarting operation of the emissions unit. Specific Condition 21 of permit no. 0990005-021-AC requires Okeelanta to submit an application for an operating permit prior to the expiration date of the construction permit (July 14, 2008). Okeelanta does not anticipate operating Rotoclone No. 1 (EU 021) by the construction permit expiration date, and possibly not before the end of the current federal fiscal year. Rotoclone No. 1 and the associated rotary dryer is needed as a backup refined sugar production unit for the main production equipment (fluidized bed dryer/cooler and baghouse – EU 025). Okeelanta proposes to submit an application for an operating permit prior to the construction permit expiration date without having conducted a compliance test for EU 021 due to lack of operation. Once EU 021 has been shutdown more than one year, FDEP will be notified prior to the intended restart date in accordance with Permit Condition 19 of Appendix TV-3.

B. SUGAR REFINERY – CONSTRUCTION OF SPECIALTY SUGAR CONVEYORS – **Rotoclone No. 1 (EU 021)**

Deviations from Applicable Requirements

The air permit application for permit no. 0990005-021-AC includes the construction of specialty sugar conveyors, with dust pickup points vented to Rotoclone No. 1. The specialty sugar conveyors have not yet been constructed. As a result, a compliance test with both the Rotary Dryer and the specialty sugar conveyors operating cannot be conducted at this time. Specific Condition 22 of permit no. 0990005-0210-AC requires that a VE compliance test be conducted prior to obtaining an operation permit for the Rotoclone No. 1 exhaust (EU 021).

Compliance Plan

There currently is no schedule for installing the specialty sugar conveyors with dust pickup points vented to EU 021. Okeelanta proposes to conduct a VE compliance test within 30 days of completing construction on the specialty sugar conveyors. Okeelanta proposes to then submit an application for an operating permit for the specialty sugar conveyors.

ATTACHMENT OC-FI-CV6

REQUEST CHANGES TO CURRENT TITLE V AIR OPERATING PERMIT

ATTACHMENT OC-FI-CV6

REQUESTED CHANGES TO CURRENT TITLE V AIR OPERATION PERMIT

Okeelanta Corporation has modified the existing Sugar Refinery at the Okeelanta sugar complex located near South Bay, Florida. Okeelanta is requesting that the conditions of the Air Construction Permit No. 0990005-021-AC now be incorporated into the Title V Air Operating Permit.

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 an initial, revised or renewal 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. 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 an 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 or 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. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes 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]
Sugar Refinery

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 Refinery

3. Emissions Unit Identification Number: **021-025, 034, 035, 043**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:
A			**20**

8. Federal Program Applicability: (Check all that apply)

   ☐ Acid Rain Unit

   ☐ CAIR Unit

   ☐ Hg Budget Unit

9. Package Unit:
   Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
    The sugar refinery produces standard white sugar or specialty sugars from the raw sugar sent from the mill. Some of the refined sugar is sold in bulk and shipped by truck or rail car. The majority of the refined sugar produced is transferred by truck to an onsite packaging and distribution warehouse (Transshipment facility).

EMISSIONS UNIT INFORMATION

Section [1]
Sugar Refinery

Emissions Unit Control Equipment/Method: Control 1 of 3

1. Control Equipment/Method Description: **Baghouse**
2. Control Device or Method Code: **018**

Emissions Unit Control Equipment/Method: Control 2 of 3

1. Control Equipment/Method Description: **Wet Cyclonic Separators (4)**
2. Control Device or Method Code: **057**

Emissions Unit Control Equipment/Method: Control 3 of 3

1. Control Equipment/Method Description: **Process Enclosed**
2. Control Device or Method Code: **054**

Emissions Unit Control Equipment/Method: Control _____ of _____

1. Control Equipment/Method Description:
2. Control Device or Method Code:

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate: **490,000 TPY Refined Sugar**	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8,760** hours/year
6. Operating Capacity/Schedule Comment: **The maximum production rate of 490,000 is for combined EU 021, EU023, EU 024, and EU 025.**	

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: **See comment.**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: **See Attachment OC-EU1-C15.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **93** feet	7. Exit Diameter: **7** Feet
8. Exit Temperature: **115**°F	9. Actual Volumetric Flow Rate: **70,620** acfm	10. Water Vapor: **0.7** %
11. Maximum Dry Standard Flow Rate: **64,390** 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 are shown for the stack with the greatest volumetric flow rate (Fluidized Bed Dryer Baghouse – EU 025). See Attachment CO-EU1-C15 for all stack parameters.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type): **Food and Agriculture – Sugar Cane Processing, General**		
2. Source Classification Code (SCC): **3-02-015-01**	3. SCC Units: **Tons sugar produced**	
4. Maximum Hourly Rate: **75 (24-hr average)**	5. Maximum Annual Rate: **490,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Maximum hourly and annual rates refer to the amount of refined sugar production by the refinery from the fluidized bed and rotary drying systems (1,350 TPD from the fluidized bed and the rotary drying systems; 1,800 TPD for simultaneous operation).**		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type): **Food and Agricultural – Sugar Cane Processing, Other Not Classified**		
2. Source Classification Code (SCC): **3-02-015-99**	3. SCC Units: **Tons processed**	
4. Maximum Hourly Rate: **44**	5. Maximum Annual Rate: **139,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Maximum hourly and maximum annual rates refer to the maximum amount of refined sugar loaded at the Bulk Load-Out Station.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type): **Food and Agriculture – Sugar Cane Processing, Other Not Classified**		
2. Source Classification Code (SCC): **3-02-015-99**	3. SCC Units: **Tons processed**	
4. Maximum Hourly Rate: **72**	5. Maximum Annual Rate: **351,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **Maximum hourly and maximum annual rates refer to the maximum amount of refined sugar loaded at the Transfer Bulk Load-Out Station.**		

Segment Description and Rate: Segment _____ of _____

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

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	057, 018	054	EL
PM_{10}	057, 018	054	EL
VOC			NS

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 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 operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control: **99.4**
3. Potential Emissions: **7.93** lb/hour **21.70** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference: **Refer to Attachment OC-EU1-F1.10**	7. Emissions Method Code: **2**
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: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:
Total potential hourly and annual emissions represent sugar drying and handling (fluidized bed and rotary systems combined) and load-out operations. Refer to Attachment OC EU1 F1.10.

11. Potential, Fugitive, and Actual Emissions Comment:
Refer to Attachments for complete calculations and description of control equipment.

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 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: **21.70 TPY**	4. Equivalent Allowable Emissions: lb/hour **21.70** tons/year
5. Method of Compliance: **EPA Method 9.**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. 0990005-021-AC.**	

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):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 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 operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.75** lb/hour **2.70** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference: **Refer to Attachment A, Table 5.**	7. Emissions Method Code: **2**
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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Total potential hourly emissions represent sugar drying and handling using the rotary drying system only, and load-out operations. Total potential annual emissions represent sugar drying and handling using the fluidized bed and rotary systems combined, and load-out operations. Refer to Attachment OC-EU1-F1.10.**	
11. Potential, Fugitive, and Actual Emissions Comment: **Refer to Attachment OC-EU1-F1.10 for complete calculations and description of control equipment.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 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: **2.70 TPY**	4. Equivalent Allowable Emissions: lb/hour **2.70** tons/year
5. Method of Compliance: **EPA Method 9.**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. 0990005-021-AC.**	

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):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 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 operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **10.10** lb/hour **39.0** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference: **Refer to Attachment OC-EU1-F1.10, Table 6**	7. Emissions Method Code: **2**
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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **VOC emissions based on an estimated 78,040 lb/yr alcohol usage rate. Refer to Attachment OC-EU1-F1.10.**	
11. Potential, Fugitive, and Actual Emissions Comment: **Refer to Attachment OC-EU1-F1.10 for complete calculations.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

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):	

Allowable Emissions Allowable Emissions _____ of _____

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

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: **VE05**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Rule 62-297.620(4), F.A.C. and Permit No. 0990005-021-AC. This limit applies to each point source exhaust stack.**	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **20 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Rule 62-296.310(2), F.A.C. and Permit No. 0990005-021-AC. This limit applies to all fugitive emissions points.**	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor _ of _

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

Continuous Monitoring System: Continuous Monitor ____ of ____

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

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

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

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

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

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

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

6. Compliance Demonstration Reports/Records:
   ☒ Attached, Document ID: OC-EU1-I6
   Test Date(s)/Pollutant(s) Tested: VE (May 8, 2008)
   ☐ Previously Submitted, Date: _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

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

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☐ Attached, Document ID: _____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☒ Attached, Document ID: **OC-EU1-IV1** ☐ Not Applicable
2. Compliance Assurance Monitoring: ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Alternative Methods of Operation: ☒ Attached, Document ID: **OC-EU1-IV3** ☐ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

ATTACHMENT OC-EU1-C15

EMISSION POINT INFORMATION

ATTACHMENT OC-EU1-C15

EMISSION POINT INFORMATION

Descriptions of Emissions Points Comprising this Emissions Unit:

ID 021 Rotary Dryer/Wet Rotoclone No. 1
022 Conveying/Wet Rotoclone No. 2
023 Cooler No. 1/ Rotoclone No. 3
024 Cooler No. 2/ Rotoclone No. 4
025 Fluidized Bed Dryer/Cooler
034 Bulk Load-out Operation
035 Transfer Bulk Load-out Operation
043 Alcohol Usage in Refinery

Emission Point Comment:

1. Identification of Point on Plot Plan or Flow Diagram:

- Bulk Load-Out Area
- Transfer Bulk Load-Out Area
- R3 – Cooler No. 1/Wet Rotoclone No. 3
- R4 – Cooler No. 2/Wet Rotoclone No. 4
- FB – Fluidized Bed Dryer/Cooler Baghouse
- R1 – Rotary Dryer/Wet Rotoclone No. 1
- R2 – Conveying/Wet Rotoclone No. 2

See the following table for stack/vent information for each emission point.

Stack Parameters for the Okeelanta Sugar Refinery

EU ID	Stack Description	Stack Height (ft)	Exit Diameter (ft)	Stack Temp (°F)	Actual Volumetric Flow Rate (acfm)	Percent Water Vapor (%)	Maximum Dry Standard Flow Rate (dscfm)
021	Wet Rotoclone No. 1	89	2.5	100	15,000	NA	NA
022	Wet Rotoclone No. 2	86	2.5	90	15,000	NA	NA
023	Wet Rotoclone No. 3	80	2.5	100	15,000	NA	NA
024	Wet Rotoclone No. 4	80	2.5	100	15,000	NA	NA
025	Fluidized Bed Dryer/Cooler Baghouse	93	7	115	70,620	0.7	64,390

Footnote:
(a) Stack height verified in 2006.

ATTACHMENT OC-EU1-F1.10

SUMMARY OF PARTICULATE EMISSIONS

ATTACHMENT OC-EU1-F1.10a
POTENTIAL PARTICULATE MATTER EMISSIONS USING THE FLUIDIZED BED DRYING SYSTEM
OKEELANTA CORPORATION

Source Emission Point Description	Emission Unit ID	Maximum Refined Sugar Throughput (TPD)	(lb/hr)	(TPY)	PM Uncontrolled Emission Factor	Loading to Control Equipment (lb/hr)	Control Efficiency (%)	Maximum Emission Rate (lb/hr)	Maximum Annual Emissions (TPY)
Particulate Matter (PM)									
Fluidized Bed Dryer/Cooler Baghouse	025	1,350	112,500	490,000	1.5 % [a]	1,687.5	99.80 [b]	3.38	14.70
AAF/ Wet Rotoclone No. 2	022	1,350	112,500	490,000	2.2994 lb/ton [c]	129.34	99.90 [d]	0.1293	0.563
							Total	**3.38**	**14.70**
Particulate Matter (PM_{10})									
Fluidized Bed Dryer/Cooler Baghouse	025	1,350	112,500	490,000	0.060 % [e]	67.5	99.80 [b]	0.135	0.5880
AAF/ Wet Rotoclone No. 2	022	1,350	112,500	490,000	0.09198 lb/ton [e]	5.174	99.00 [d]	0.05174	0.2253
							Total	**0.135**	**0.59**

Note: TPD = tons per day, lb/hr = pounds per hour, TPY = tons per year.

Footnotes:

[a] Based on manufacturer's maximum estimated PM inlet loading rate of 1.5 % of throughput rate for fluidized bed dryer/cooler. Factor assumes that all of the fluidized bed dryer/cooler sugar dust is vented to this control device.

[b] Baghouse manufacturers efficiency.

[c] Based on continuous drop emission factors computed from AP-42 (USEPA, 1995) Section 13.2.4.
Formula used with multiple for drop points, Rotoclone No. 2 with 22 drop points.
E (lb/ton) = k x 0.0032 x (U/5)^1.3 / (M/2)^1.4 ; where U is assumed to be a max of 1 mph due to the building enclosure.
M = Moisture Content = 0.03% for refined sugar.
k = 0.74 for PM.
E = 0.104 lb/ton per transfer point/operation, or 2.294 lb/ton for 22 points.

[d] Manufacturers control equipment efficiency rating for total PM = 99.9% and PM_{10} = 99.0%.

[e] Based on sugar dust analysis, uncontrolled PM_{10} is less than 4% of total sugar dust loading to the control equipment.

ATTACHMENT OC-EU1-F1.10b
POTENTIAL PARTICULATE MATTER EMISSIONS USING THE ROTARY DRYING SYSTEM
OKEELANTA CORPORATION

Source Emission Point Description	Emission Unit ID	Maximum Refined Sugar Throughput (TPD)	(lb/hr)	(TPY)	PM Uncontrolled Emission Factor	Loading to Control Equipment (lb/hr)	Control Efficiency[d] (%)	Maximum Emission Rate (lb/hr)	Maximum Annual Emissions (TPY)
SCENARIO 1 - ROTARY DRYER AND COOLER NOS. 1 AND 2									
Particulate Matter (PM)									
Cooler No. 1 /Wet Rotoclone No. 3	023	1,350	112,500	130,000	0.175 %[a]	197	99.9	0.20	0.23
Cooler No. 2 /Wet Rotoclone No. 4	024	1,350	112,500	130,000	0.175 %[a]	197	99.9	0.20	0.23
AAF Skimmer/Wet Rotoclone No.1 (from dryer)	021	1,350	112,500	130,000	3.150 %[a]	3,544	99.9	3.54	4.09
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	1,350	112,500	130,000	0.2090 lb/ton[c]	11.76	99.9	0.0118	0.014
AAF/Wet Rotoclone No.2	022	1,350	112,500	130,000	2.2994 lb/ton[c]	129.34	99.9	0.1293	0.149
							Total	**4.08**	**4.71**
Particulate Matter (PM_{10})									
Cooler No. 1 /Wet Rotoclone No. 3	023	1,350	112,500	130,000	0.007 %[e]	7.9	99.0	0.08	0.09
Cooler No. 2 /Wet Rotoclone No. 4	024	1,350	112,500	130,000	0.007 %[e]	7.9	99.0	0.08	0.09
AAF Skimmer/Wet Rotoclone No.1 (from dryer)	021	1,350	112,500	130,000	0.126 %[c]	141.8	99.0	1.42	1.64
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	1,350	112,500	130,000	0.00836 lb/ton[e]	0.470	99.0	0.0047	0.005
AAF/Wet Rotoclone No.2	022	1,350	112,500	130,000	0.09198 lb/ton[e]	5.174	99.0	0.0517	0.060
							Total	**1.63**	**1.89**
SCENARIO 2 - COOLER NOS. 1 AND 2									
Particulate Matter (PM)									
Cooler No. 1 /Wet Rotoclone No. 3	023	600	50,000	130,000	3.150 %[b]	1575	99.9	1.57	4.09
Cooler No. 2 /Wet Rotoclone No. 4	024	600	50,000	130,000	0.350 %[b]	175	99.9	0.17	0.45
AAF Skimmer/Wet Rotoclone No.1 (from dryer)	021	0	0	0	0.000 %[b]	0.00	99.9	0.00	0.00
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	0	0	0	0.2090 lb/ton[c]	0.00	99.9	0.0000	0.000
AAF/Wet Rotoclone No.2	022	600	50,000	130,000	2.2994 lb/ton[c]	57.49	99.9	0.0575	0.149
							Total	**1.81**	**4.70**
Particulate Matter (PM_{10})									
Cooler No. 1 /Wet Rotoclone No. 3	023	600	50,000	130,000	0.126 %[c]	63.0	99.0	0.63	1.64
Cooler No. 2 /Wet Rotoclone No. 4	024	600	50,000	130,000	0.014 %[c]	7.0	99.0	0.07	0.18
AAF Skimmer/Wet Rotoclone No.1 (from dryer)	021	0	0	0	0.000 %[e]	0.00	99.0	0.00	0.00
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	0	0	0	0.00836 lb/ton[e]	0.00	99.0	0.0000	0.000
AAF/Wet Rotoclone No.2	022	600	50,000	130,000	0.09198 lb/ton[e]	2.299	99.0	0.0230	0.060
							Total	**0.72**	**1.88**

Note: TPD = tons per day, lb/hr = pounds per hour, TPY = tons per year.

Footnotes:

[a] Based on sugar industry data, uncontrolled sugar dust loading (PM and PM_{10}) is a max of 3.5% of the total refined sugar throughput when rotary dryers/coolers are used. Factor assumes that 5% of the uncontrolled sugar dust is vented to each Cooler No. 1 and No. 2 Wet Cyclone and 90% is vented to Wet Rotoclone No. 1.

[b] Based on sugar industry data, uncontrolled sugar dust loading (PM and PM_{10}) is a max of 3.5% of the total refined sugar throughput when rotary dryers/coolers are used. Factor assumes that 90% of the uncontrolled sugar dust is vented to Wet Rotoclone No. 3 and 10% is vented to Wet Rotoclone No. 4.

[c] Based on continuous drop emission factors computed from AP-42 (USEPA, 1995) Section 13.2.4.
Formula used with multiple for drop points, Rotoclone No. 1 having 2 drop points and Rotoclone No. 2 with 22 drop points.
E (lb/ton) = k x 0.0032 x (U/5)^1.3 / (M/2)^1.4 ; where U is assumed to be a max of 1 mph due to the building enclosure.
M = Moisture Content = 0.03% for refined sugar.
k = 0.74 for PM.
E = 0.104 lb/ton per transfer point/operation, or 2.294 lb/ton for 22 points.

[d] Manufacturers control equipment efficiency rating for total PM = 99.9% and PM_{10} = 99.0%.

[e] Based on sugar dust analysis, uncontrolled PM_{10} is less than 4% of total sugar dust loading to the control equipment.

ATTACHMENT OC-EU1-F1.10c
POTENTIAL PARTICULATE MATTER EMISSIONS USING THE FLUIDIZED BED AND ROTARY DRYING/COOLING SYSTEMS SIMULTANEOUSLY
OKEELANTA CORPORATION

Source Emission Point Description	Emission Unit ID	Refined Sugar Throughput [a] (TPD)	(lb/hr)	(TPY)	PM Uncontrolled Emission Factor	Loading to Control Equipment (lb/hr)	Control Efficiency (%)	Maximum Emission Rate (lb/hr)	(TPY)
Particulate Matter (PM)									
Fluidized Bed Drying System									
Fluidized Bed Dryer/Cooler Baghouse	025	1,350	112,500	360,000	1.5 %	1687.5	99.8	3.38	10.80
Rotary Drying System									
Cooler No. 1 /Wet Rotoclone No. 3	023	450	37,500	130,000	0.175 %	65.63	99.9	0.07	0.23
Cooler No. 2 /Wet Rotoclone No. 4	024	450	37,500	130,000	0.175 %	65.63	99.9	0.07	0.23
AAF Skimmer/Wet Rotoclone No.1 (from dryer)	021	450	37,500	130,000	3.150 %	1,181.3	99.9	1.18	4.09
Material Handling									
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	1,800	150,000	130,000	0.2090 lb/ton	15.68	99.9	0.0157	0.0136
AAF/Wet Rotoclone No.2	022	1,800	150,000	490,000	2.2994 lb/ton	172.46	99.9	0.1725	0.5634
							Total	**4.88**	**15.93**
Particulate Matter (PM_{10})									
Fluidized Bed Drying System									
Fluidized Bed Dryer/Cooler Baghouse	025	1,350	112,500	360,000	0.060 %	67.50	99.8	0.135	0.43
Rotary Drying System									
Cooler No. 1 /Wet Rotoclone No. 3	023	450	37,500	130,000	0.007 %	2.63	99.0	0.03	0.09
Cooler No. 2 /Wet Rotoclone No. 4	024	450	37,500	130,000	0.007 %	2.63	99.0	0.03	0.09
AAF Skimmer/Wet Rotoclone No.1 (from dryer)	021	450	37,500	130,000	0.126 %	47.25	99.0	0.47	1.64
Material Handling									
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	1,800	150,000	130,000	0.00836 lb/ton	0.627	99.0	0.0063	0.0054
AAF/Wet Rotoclone No.2	022	1,800	150,000	490,000	0.09198 lb/ton	6.898	99.0	0.0690	0.2253
							Total	**0.71**	**2.48**

Note: TPD = tons per day, lb/hr = pounds per hour, TPY = tons per year.

Footnote:

[a] Based on 1,800 TPD throughput as a combined operation potential maximum for the refinery.

ATTACHMENT OC-EU1-F1.10d
POTENTIAL PARTICULATE MATTER EMISSIONS FROM THE BULK AND TRANSFER LOAD-OUT OPERATIONS
OKEKELANTA COPORATION

Source Emission Point Description	Emission Unit ID	Maximum Refined Sugar Throughput [a] (TPD)	(lb/hr)	(TPY)	PM Uncontrolled Emission Factor	Uncontrolled PM Emissions (lb/hr)	Control Efficiency (%)	Maximum Emission Rate (lb/hr)	Annual Emissions (TPY)
Particulate Matter (PM)									
Bulk load-out Operations	034	600	88,000	139,000	0.105 lb/ton[b]	4.60	50 [d]	2.30	3.63
Transfer Bulk Load-out Operations	035	1,200	144,000	351,000	0.105 lb/ton[b]	7.53	90 [d]	0.75	1.83
							Total	**3.05**	**5.47**
Particulate Matter (PM_{10})									
Bulk load-out Operations	034	600	88,000	139,000	0.00418 lb/ton[c]	0.184	50 [d]	0.092	0.15
Transfer Bulk Load-out Operations	035	1,200	144,000	351,000	0.00418 lb/ton[c]	0.301	90 [d]	0.030	0.07
							Total	**0.122**	**0.22**

Note: TPD = tons per day, lb/hr = pounds per hour, TPY = tons per year.

Footnotes:

[a] Throughput based on 1,800 tons/day (TPD) and 490,000 tons/yr (TPY), with 30/70% split between the Bulk and Transfer Bulk load-out operations.

[b] Bulk load-out operations continuous drop emission factors are computed from AP-42 (USEPA, 1995) Section 13.2.4.
E (lb/ton) = k x 0.0032 x (U/5)^1.3 / (M/2)^1.4 ; where U is assumed to be a max of 1 mph due to the building enclosure.
M = Moisture Content = 0.03% for refined sugar.
k = 0.74 for PM.

[c] PM_{10}, based on sugar dust analysis, is less than 4% of total sugar dust loading.

[d] Represents assumed control efficiency achieved from the building load-out enclosure. Transfer bulk load-out control efficiency is higher than bulk load-out building due to improved design and operating procedures.

ATTACHMENT OC-EU1-F1.10e
SUMMARY OF POTENTIAL PARTICULATE MATTER EMISSIONS FROM THE SUGAR REFINERY
OKEELANTA CORPORATION

Source Emission Point Description	Emission Unit ID	Maximum Hourly Emissions (lb/hr)	Annual Emissions (TPY)
Particulate Matter (PM)[a]			
Fluidized Bed Drying System			
Fluidized Bed Dryer/Cooler Baghouse	025	3.38	10.80
Rotary Drying System			
Cooler No. 1 / Rotoclone No. 3	023	0.07	0.23
Cooler No. 2 / Rotoclone No. 4	024	0.07	0.23
AAF Skimmer/Wet Rotoclone No.1 (from dryer)	021	1.18	4.09
Material Handling			
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	0.02	0.01
AAF/Wet Rotoclone No.2	022	0.17	0.56
Bulk and Transfer Load-Out Operations			
Bulk load-out Operations	034	2.30	3.63
Transfer Bulk Load-out Operations	035	0.75	1.83
	Total	**7.93**	**21.39**
Particulate Matter (PM_{10})[b]			
Fluidized Bed Drying System			
Fluidized Bed Dryer/Cooler Baghouse	025	---	0.43
Rotary Drying System			
Cooler No. 1 / Rotoclone No. 3	023	0.08	0.09
Cooler No. 2 / Rotoclone No. 4	024	0.08	0.09
AAF Skimmer/Wet Rotoclone No.1 (from dryer)	021	1.42	1.64
Material Handling			
AAF Skimmer/Wet Rotoclone No.1 (from transfer points)	021	0.005	0.005
AAF/Wet Rotoclone No.2	022	0.052	0.225
Bulk and Transfer Load-Out Operations			
Bulk load-out Operations	034	0.09	0.15
Transfer Bulk Load-out Operations	035	0.03	0.07
	Total	**1.75**	**2.70**

Note: lb/hr = pounds per hour; TPY = tons per year.

Footnotes:

[a] Maximum emissions occur when using the Fluidized Bed and Rotary drying/cooling systems simultaneously.

[b] Maximum hourly emissions occur when using the Rotary drying/cooling system. Maximum annual emissions occur when using the Fluidized Bed and Rotary drying/cooling systems simultaneously.

ATTACHMENT OC-EU1-I1

PROCESS FLOW DIAGRAMS

ATTACHMENT OC-EU1-F1.10f
POTENTIAL EMISSIONS OF VOCS FROM SUGAR REFINERY CHEMICAL USAGE
OKEELANTA CORPORATION

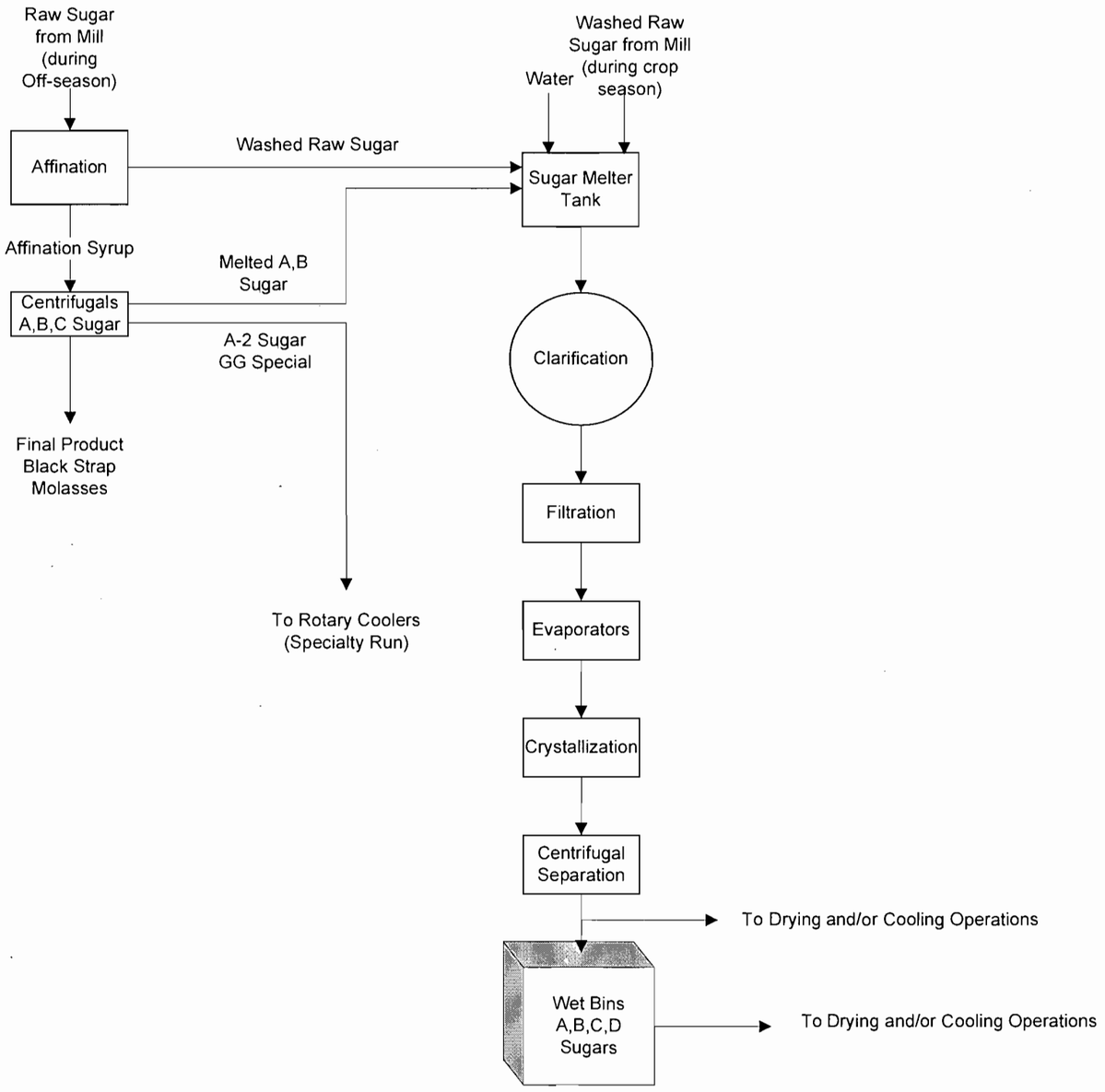
Material	Chemical	VOC Content	Potential Chemical Usage[a] (lb/yr)	Potential VOC Emissions (TPY)
Alcohol	Isopropyl Alcohol or Ethanol	100 %	78,040	39.02
		Total VOCs	**10.10 lb/hr[b]**	**39.0 TPY**

Note: lb/hr = pounds per hour; TPY = tons per year.

Footnotes:

[a] Based on estimates for maximum usage rates.

[b] Based on 7,728 hours per year for the dryers reported in the facility's 2005 Annual Operating Report, assuming that 100% of compound is emitted to the atmosphere.

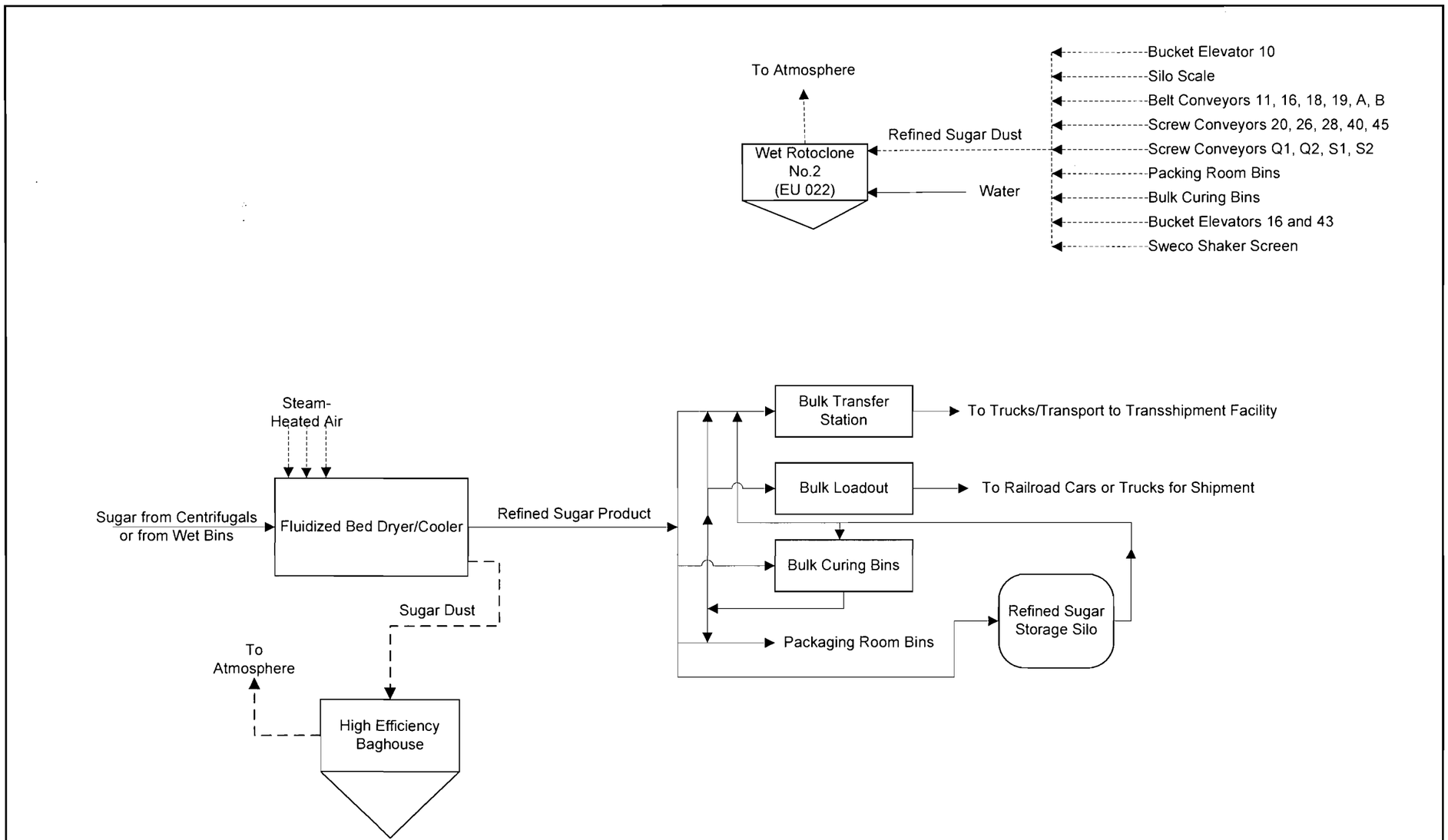


Attachment OC-EU1-I1a. Process Flow Diagram
Sugar Refinery Mini-Boiling House Expansion
Okeelanta Refinery
South Bay, Florida

OC-EU1-I1.vsd

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

Golder Associates

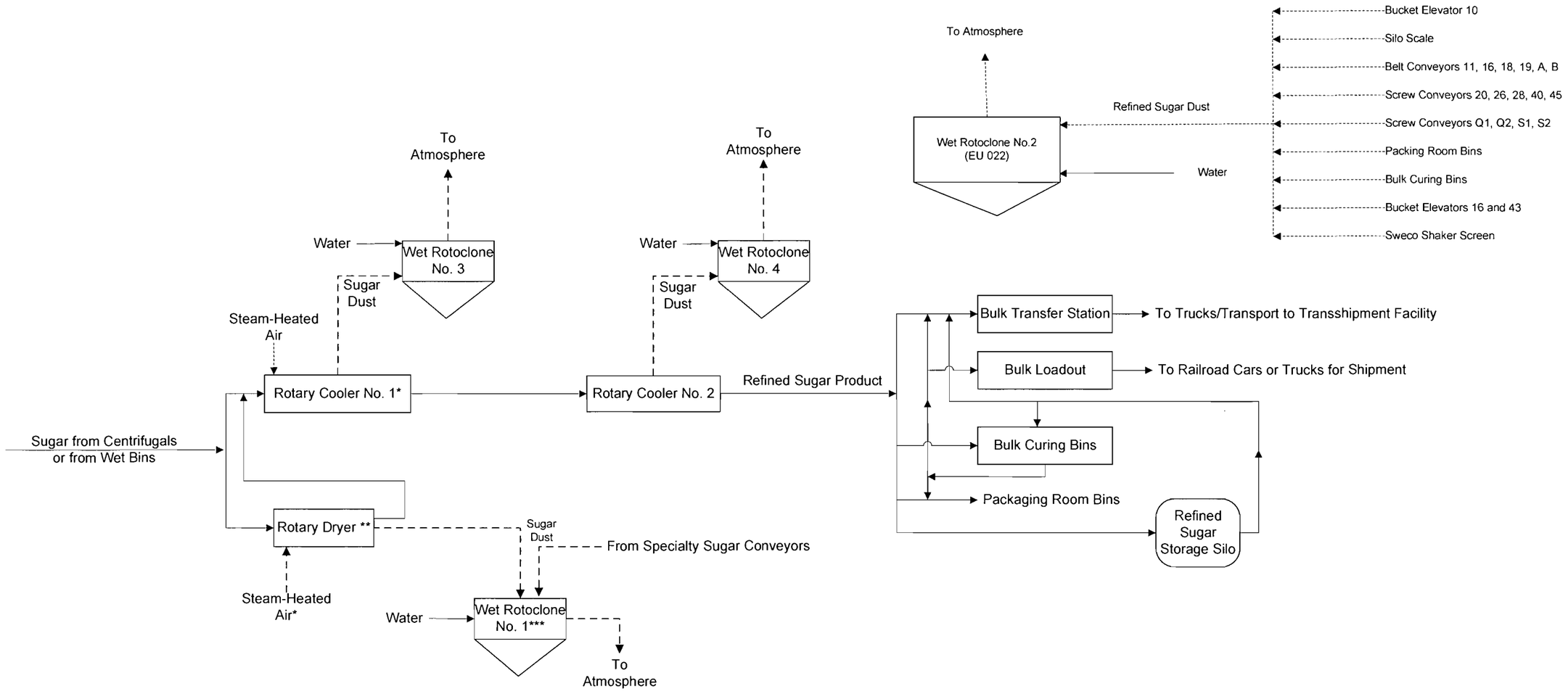


Attachment OC-EU1-I1b. Process Flow Diagram
Proposed Operations with Fluidized Bed Dryer/Cooler After Refinery Expansion
Florida Crystals Refinery
South Bay, Florida

OC-EU1-I1.vsd

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

Golder Associates



* For specialty sugar with low-production loads (<450 TPD), Rotary Cooler No. 1 functions as Dryer (Rotary Dryer not Operated).
** Rotary dryer typically run only for high-production loads.
*** Operated only when Rotary Dryer or proposed specialty conveyors are needed.

Attachment OC-EU1-I1c. Process Flow Diagram
Proposed Operations with Rotary Dryer/Coolers After Refinery Expansion
Florida Crystals Refinery
South Bay, Florida

OC-EU1-I1.vsd

Process Flow Legend
Solid/Liquid
Gas

Golder Associates

ATTACHMENT OC-EU1-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT OC-EU1-I3a
CONTROL EQUIPMENT PARAMETERS AND PARTICULATE REMOVAL EFFICIENCIES FOR SUGAR DUST WET COLLECTION SYSTEMS AT THE SUGAR REFINERY OKEELANTA CORPORATION

Name	Rotary Dryer Wet Rotoclone No. 1	Conveying Wet Rotoclone No. 2	Rotary Cooler No. 1 Wet Rotoclone No. 3	Rotary Cooler No. 2 Wet Rotoclone No. 4
Emission Unit ID No.	021	022	023	024
Manufacturer	American Air Filter (AAF)	American Air Filter (AAF)	American Air Filter (AAF)	American Air Filter (AAF)
Type/Design	Wet Rotoclone Type W, Size 27	Wet Rotoclone Type W, Size 27	Wet Rotoclone Type W, Size 27	Wet Rotoclone Type W, Size 27
Outlet Gas Temp (^{o}F)	100	100	100	100
Outlet Gas Flow Rate (acfm)	15,000	15,000	15,000	15,000
Water Injection Rate (gal/min) (minimum)[a]	2	2	2	2
Total PM Control Efficiency (%)[b]	99.9	99.9	99.9	99.9
Total PM_{10} Control Efficiency (%)[b]	99.0	99.0	99.0	99.0

Sample calculations:
Control efficiency (%) = [(inlet loading rate - outlet loading rate) / inlet loading rate] × 100.

Footnotes:
[a] Based on 2002 stack testing for Rotoclones Nos. 1 and 2, and manufacturer's data for Rotoclones Nos. 3 and 4.
[b] Control efficiency is manufacturer's efficiency rating.

ATTACHMENT OC-EU1-I3b
CONTROL EQUIPMENT PARAMETERS AND PARTICULATE REMOVAL EFFICIENCY DERIVATION FOR FLUIDIZED BED DRYER/COOLER PULSE JET BAGHOUSE (EU 025) AT SUGAR REFINERY OKEELANTA CORPORATION

Manufacturer	BETH GmbH, 23556 Lobeck
Type	BETHPULS 6.60 x 7.5.10
Outlet Gas Temp (°F)	115
Outlet Gas Flow Rate (acfm)	70,620
Exhaust Gas Moisture Content (%)	0.7
Cleaning Method	Pulse Jet Compressed Air
Compressed Air Consumption (cfm)	51.8
Number of Bags	420
Total Filter Media Surface Area (sq. ft)	9,041
Air to Cloth Ratio (cfm per sq ft.)	7.81
Outlet Loading (grains/dscf)	0.00348 [a]

Pollutants	Inlet[b] Loading lb/hr	Control[c] Efficiency (%)	Outlet Loading lb/hr
Particulate Matter	960	99.80	1.92

Note: All parameters are based on manufacturers design information.

Footnotes:
[a] Calculated based on expected outlet loading rate (lb/hr) and outlet gas flow rate (scfm) at operational conditions.
[b] Inlet loading to the filter specified by the fluidized bed dryer manufacturer while operating at Okeelanta's estimated maximum refined sugar production (includes a 20% design safety factor).
[c] Control efficiency based on baghouse manufacturers design information for dust content in raw gas (10g/m³ at standard conditions) and for dust content in clean gas (20 mg/m³ at standard conditions).

Sample calculations:
Outlet loading rate = inlet loading rate x [1-(control efficiency/100)].

ATTACHMENT OC-EU1-I6

COMPLIANCE DEMONSTRATION REPORTS/RECORDS

May 7, 2008

Mr. Michael Helmke
Air Pollution Control Section
Palm Beach County Health Department
Post Office Box 29
901 Evernia Street
West Palm Beach, Florida 33402-0029

Subject: **VE Compliance Test Report**
Title V Permit No. 0990005-012-AV
Okeelanta Corporation

Dear Mr. Helmke:

Please find enclosed the Visible Emissions (VE) compliance test report for the sugar refinery at Okeelanta Corporation. The VE compliance tests were completed on March 27, 2008 with South Florida Environmental Services, LLC (SFES). VE compliance tests were performed on designated emissions unit numbers 022, 023, 024 & 025.

The results included in this report may have been provided to the Air Pollution Control Section of the Palm Beach County Health Department previously by SFES. If you have any questions about the VE tests, please call Matthew Capone at (561) 996-9072.

Based on information and belief formed after reasonable inquiry, the statements and information in the enclosed visible emissions report are true, accurate, and complete.

Sincerely,

Ricardo A. Lima
Vice President/General Manager

enclosure

C: Florida DEP, South District
M. Capone, Okeelanta Corporation
FILE

Okeelanta Corporation
21250 U.S. Highway 27 S • P.O. Box 86 • South Bay, FL 33493 • Phone (561) 993-1600 • Fax (561) 992-7326

South Florida
Environmental Services

VISIBLE EMISSIONS TEST REPORT

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

CONCERNING:
Visible Emissions Test Program
E. U. Nos. (022, 023, 024, & 025)
Okeelanta Corporation
South Bay, Florida

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.

Francis K Morlu
Project Manager

May 8, 2008
Date

COMPENDIUM:

South Florida Environmental Services performed compliance testing for visible emissions at Okeelanta Corporation on March 27, 2008. The test was conduct in accordance with the Florida Statues [62-297.310(4)(a)2, F.A.C.], as stipulated in their permit (No. 0990005-020-AC), The emission units tested were 022, 023, 024, & 025.

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

Francis Morlu of South Florida Environmental Services was the certified visible emissions evaluator at the time of testing. Mr. Matthew Capone, Director of Environmental Programs, was responsible for coordinating Plant Operations.

The results (summarized in Table 1), show that the emission units tested were operating in compliance with Florida statues, 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 (%)
EU 022	0.0%	0.0%	5%
EU 023	0.0%	0.0%	5%
EU 024	0.0%	0.0%	5%
EU 025	0.0%	0.0%	5%

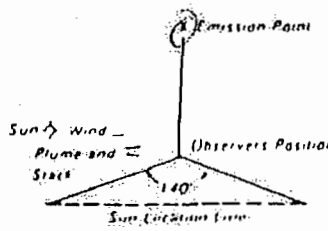
VISIBLE EMISSIONS TEST REPORT

Field Data Sheets

South Florida Environmental Services

SOURCE NAME: OLEAN TK CORPORATION	OBSERVATION DATE: 3/27/08
ADDRESS: 2250 U.S. HIGHWAY 27	START TIME: 1316
CITY: SOUTH BAY	STATE: FL
ZIP: 33493	STOP TIME: 1046
PHONE:	SOURCE ID NUMBER: ECTOL
PROCESS EQUIPMENT: SUGAR REFINERY	OPERATING MODE: NORMAL
CONTROL EQUIPMENT: DUST COLLECTOR	OPERATING MODE: NORMAL
DESCRIBE EMISSION POINT: EXIST OF DUST COLLECTOR	
HEIGHT ABOVE GROUND LEVEL: ≈125	HEIGHT RELATIVE TO OBSERVER: 0
DISTANCE FROM OBSERVER: ≈ 60	DIRECTION FROM OBSERVER: S 25
DESCRIBE EMISSIONS: NONE	
EMISSION COLOR: N/A	PLUME TYPE: CONTINUOUS ☐ FUGITIVE ☐ INTERMITTENT ☐
WATER DROPLETS PRESENT: NO ☒ YES ☐	IF WATER DROPLET PLUME: ATTACHED ☐ DETACHED ☐
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED: EXIT OF STACK	
DESCRIBE BACKGROUND: SKY	
BACKGROUND COLOR: BLUE	SKY CONDITIONS: SCATTERED
WIND SPEED: ≈20	WIND DIRECTION: E
AMBIENT TEMP: 75	WET BULB TEMP:
RH (percent):	

Source Layout Sketch — Draw North Arrow



SEC / MIN	0	15	30	45	MIN	0	15	30	45
1	0	0	0	0	31				
2	0	0	0	0	32				
3	0	0	0	0	33				
4	0	0	0	0	34				
5	0	0	0	0	35				
6	0	0	0	0	36				
7	0	0	0	0	37				
8	0	0	0	0	38				
9	0	0	0	0	39				
10	0	0	0	0	40				
11	0	0	0	0	41				
12	0	0	0	0	42				
13	0	0	0	0	43				
14	0	0	0	0	44				
15	0	0	0	0	45				
16	0	0	0	0	46				
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23	0	0	0	0	53				
24	0	0	0	0	54				
25	0	0	0	0	55				
26	0	0	0	0	56				
27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

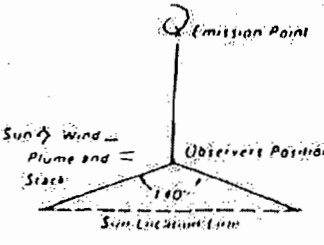
AVERAGE OPACITY FOR HIGHEST PERIOD: 0	NUMBER OF READINGS ABOVE: 0 % WERE 0
RANGE OF OPACITY READINGS: MINIMUM 0	MAXIMUM 0
OBSERVER'S NAME (PRINT): FRANCIS MORLA	
OBSERVER'S SIGNATURE: [signature]	DATE: 3/27/08
ORGANIZATION: SFES	
CERTIFIED BY: ETA	DATE: 2/13/08
VERIFIED BY: ETA	DATE: 2/13/08
COMMENTS	
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE	
TITLE	DATE

6891 Vista Parkway North West Palm Beach FL 33411
Tel [illegible]

South Florida Environmental Services

SOURCE NAME: OLDCASTLE CORPORATION	OBSERVATION DATE: 3/27/08
ADDRESS: 21250 U.S. HIGHWAY 27	START TIME: 0940
CITY: SOUTH BAY	STATE: FL
ZIP: 33493	STOP TIME: 1010
PHONE	SOURCE ID NUMBER: EU022
PROCESS EQUIPMENT: COOLER #1	OPERATING MODE: NORMAL
CONTROL EQUIPMENT: DUST COLLECTOR	OPERATING MODE: NORMAL
DESCRIBE EMISSION POINT: EXIT OF COOLER	
HEIGHT ABOVE GROUND LEVEL: ≈ 120	HEIGHT RELATIVE TO OBSERVER: ≈ 4
DISTANCE FROM OBSERVER: ≈ 60	DIRECTION FROM OBSERVER: 210
DESCRIBE EMISSIONS: NONE	
EMISSION COLOR: N/A	PLUME TYPE: CONTINUOUS ☐ FUGITIVE ☐ INTERMITTENT ☐
WATER DROPLETS PRESENT: NO X YES ☐	IF WATER DROPLET PLUME: ATTACHED ☐ DETACHED ☐
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED: EXIT OF DUST COLLECTOR	
DESCRIBE BACKGROUND: SKY	
BACKGROUND COLOR: BLUE	SKY CONDITIONS: CLEAR
WIND SPEED: 0-15	WIND DIRECTION: E
AMBIENT TEMP: 75	WET BULB TEMP:
RH (percent):	

Source Layout Sketch — Draw North Arrow



SEC / MIN	0	15	30	45	MIN	0	15	30	45
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28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

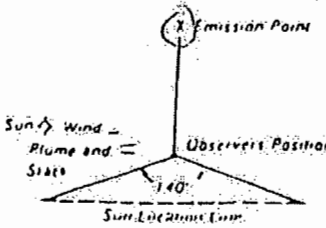
AVERAGE OPACITY FOR HIGHEST PERIOD	NUMBER OF READINGS ABOVE 0 % WERE 0
RANGE OF OPACITY READINGS: MINIMUM 0	MAXIMUM 0
OBSERVER'S NAME (PRINT): FRANCIS MORLU	
OBSERVER'S SIGNATURE	DATE: 3/27/08
ORGANIZATION: SFES	
CERTIFIED BY: ETA	DATE: 2/13/08
VERIFIED BY: ETA	DATE: 2/13/08
COMMENTS	
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS	
SIGNATURE	
TITLE	DATE

6821 Vista Parkway North, West Palm Beach, FL 33411
Tel: (561) 697-8500 Fax: (561) 697-8626

South Florida Environmental Services

SOURCE NAME	OLDCASTLE CORPORATION
ADDRESS	21250 U.S. HIGHWAY 27
CITY	SOUTH BAY
STATE	FL
ZIP	33493
PHONE	
SOURCE ID NUMBER	EU024
PROCESS EQUIPMENT	COOLER #2
OPERATING MODE	NORMAL
CONTROL EQUIPMENT	DUST COLLECTOR
OPERATING MODE	NORMAL
DESCRIBE EMISSION POINT	EXIT OF COOLER
HEIGHT ABOVE GROUND LEVEL	≈ 120
HEIGHT RELATIVE TO OBSERVER	≈ 5
DISTANCE FROM OBSERVER	≈ 60
DIRECTION FROM OBSERVER	200
DESCRIBE EMISSIONS	NONE
EMISSION COLOR	N/A
PLUME TYPE	CONTINUOUS ☐ FUGITIVE ☐ INTERMITTENT ☐
WATER DROPLETS PRESENT	NO ☒ YES ☐
IF WATER DROPLET PLUME	ATTACHED ☐ DETACHED ☐
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED	EXIT OF DUST COLLECTOR
DESCRIBE BACKGROUND	SKY
BACKGROUND COLOR	BLUE
SKY CONDITIONS	CLEAR
WIND SPEED	
WIND DIRECTION	E
AMBIENT TEMP	76
WET BULB TEMP	
RH percent	

Source Layout Sketch — Draw North Arrow



OBSERVATION DATE	START TIME	STOP TIME
3/27/08	0940	1010

SEC / MIN	0	15	30	45	MIN	0	15	30	45
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28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

AVERAGE OPACITY FOR HIGHEST PERIOD	NUMBER OF READINGS ABOVE % WERE
RANGE OF OPACITY READINGS MINIMUM	MAXIMUM
OBSERVER'S NAME (PRINT)	EVANGELOS MORLU
OBSERVER'S SIGNATURE	DATE 3/27/08
ORGANIZATION	SFES
CERTIFIED BY	ETA — DATE 2/13/08
VERIFIED BY	ETA — DATE 2/13/08

COMMENTS

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS

SIGNATURE

TITLE — DATE

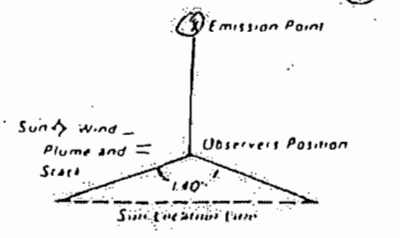
1801 Vista Parkway North West Palm Beach, FL 33411
[illegible]

BEST AVAILABLE COPY

South Florida Environmental Services

SOURCE NAME	OKEELANTA CORPORATION
ADDRESS	21250 U.S. HIGHWAY 27
CITY	SOUTH BAY
STATE	FL
ZIP	33493
PHONE	
SOURCE ID NUMBER	EU025
PROCESS EQUIPMENT	DRYER/COOLER
OPERATING MODE	NORMAL
CONTROL EQUIPMENT	BAGHOUSE
OPERATING MODE	NORMAL
DESCRIBE EMISSION POINT	EXIT OF BAGHOUSE
HEIGHT ABOVE GROUND LEVEL	≈ 150
HEIGHT RELATIVE TO OBSERVER	≈ 70
DISTANCE FROM OBSERVER	≈ 120
DIRECTION FROM OBSERVER	210
DESCRIBE EMISSIONS	NONE
EMISSION COLOR	N/A
PLUME TYPE	CONTINUOUS ☐ FUGITIVE ☐ INTERMITTENT ☐
WATER DROPLETS PRESENT	NO ☒ YES ☐
IF WATER DROPLET PLUME	ATTACHED ☐ DETACHED ☐
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED	EXIT OF STACK
DESCRIBE BACKGROUND	SKY
BACKGROUND COLOR	BLUE
SKY CONDITIONS	CLEAR
WIND SPEED	0-15
WIND DIRECTION	E
AMBIENT TEMP	75
WET BULB TEMP	
RH percent	

Source Layout Sketch — Draw North Arrow



OBSERVATION DATE: 3/27/08 — START TIME: 0942 — STOP TIME: 1010

SEC / MIN	0	15	30	45	MIN	0	15	30	45
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6	0	0	0	0	36				
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28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

AVERAGE OPACITY FOR HIGHEST PERIOD	0
NUMBER OF READINGS ABOVE	0 % WERE 0
RANGE OF OPACITY READINGS MINIMUM	0 MAXIMUM 0
OBSERVER'S NAME (PRINT)	FRANCIS K. MORLU
OBSERVER'S SIGNATURE	[signature] DATE 3/27/08
ORGANIZATION	SPES
CERTIFIED BY	ETM DATE 2/13/08
VERIFIED BY	ETM DATE 2/13/08

COMMENTS

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

Vista Parkway North, West Palm Beach, FL 33411
[illegible]

VISIBLE EMISSIONS TEST REPORT

Process Rates

FLORIDA CRYUSTALS REFINERY PROCESS RATES DURING COMPLIANCE TESTS

OKEELANTA TITLE V FACILITY 0990005-012-AV

Summary of Tests Performed on March 27, 2008

EU ID No. 023 – Cooler No. 1 Wet Rotoclone No. 3

VE Test period 0940 to 1010
Refined Sugar Production Rate = 20 tons per hour

EU ID No. 024 – Cooler No. 2 Wet Rotoclone No. 4

VE Test period 0940 to 1010
Refined Sugar Production Rate = 20 tons per hour

EU ID No. 025 – Fluidized Bed Dryer/Cooler

VE Test period 0940 to 1010
Refined Sugar Production Rate = 50.044 tons per hour

EU ID No. 022 – Central Dust Collection System No. 2/Rotoclone No. 2

VE Test period 1016 to 1046
Refined Sugar Production Rate = 50 tons per hour

VISIBLE EMISSIONS EVALUATOR CERTIFICATE

VISIBLE EMISSIONS EVALUATOR

This is to certify that

FRANCIS MORLU

met the specifications of Federal Reference Method 9 and qualifies 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, NC. This certificate is valid for six months from date of issue

2/13/2008	359737
DATE OF SCHOOL	CERT NUMBER
TAMPA, FL	MOR522312
SCHOOL LOCATION	STUDENT ID NUMBER

EASTERN TECHNICAL ASSOCIATES

FRANCIS MORLU

MOR522312 STUDENT ID NUMBER

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum devielion 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, NC. This certificate is valid for six months from date of issue and expires on the date below

TAMPA, FL	2/13/2008	359737
SCHOOL LOCATION	DATE OF SCHOOL	CERT NUMBER
WPBF07	8/14/2008	
LAST LECTURE	CERTIFICATION EXP DATE	BEARER

Customer Support
Debbie or Sheila
919-878-3188
www.eta-is-opacity.com

ATTACHMENT OC-EU1-IV1

IDENTIFICATION OF APPLICABLE REQUIREMENTS

Florida Department of
Environmental Protection

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

Charlie Crist
Governor

NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT

February 25, 2008

CERTIFIED MAIL 7007 1490 0003 7130 6693
RETURN RECEIPT REQUESTED

In the Matter of a Request for Administrative Correction:

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

Project No.: 0990005-021-AC
Administrative Correction to Permit No.: 0990005-020-AC
Okeelanta Sugar Mill
Palm Beach County

Enclosed is the ADMINISTRATIVELY CORRECTED permit to the Air Construction Permit, No.: 0990005-020-AC, for the modification of the Okeelanta Sugar Mill located at 21250 U.S. Highway 27 South, South Bay, Palm Beach County, Florida. This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request dated February 18, 2008, to correct typographical errors. This corrective action does not alter the effective dates of the existing permit..

The Department of Environmental Protection (Department) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9314, Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

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

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Any party to this order (permit) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Jon M. Iglehart
Director of
District Management
Post Office Box 2549
Fort Myers, Florida 33902-2549
(239) 332-6975

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF ADMINISTRATIVELY CORRECTED PERMIT (including the corrected page(s)) was sent by certified mail or electronically (with Received Receipt) (*) and copies were sent by U.S. Mail or electronically (with Received Receipt) before the close of business on February 25, 2008 to the person(s) listed or as otherwise noted:

Ricardo A. Lima* - Okeelanta Corporation
Matt Capone - Okeelanta Corporation (matthew_capone@floridacrystals.com)
David Buff, P.E. - Golder and Associates (dbuff@golder.com)
Jeff Koerner - FDEP Tallahassee (jeff.koerner@dep.state.fl.us)
James Stormer - Palm Beach County Health Department (james_stormer@doh.state.fl.us)

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 2/25/08
Date

1. **Specific Condition 17ix. is changed:**

FROM: Weekly rolling consecutive 52 week average for all permitted refined sugar production limits.

TO: Weekly rolling consecutive 52 weeks period total for all permitted refined sugar production limits.

2. **Final Determination, Section I. Public Notice is changed:**

FROM: An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to Okeelanta Corporation for the Okeelanta Sugar Mill located at 21250 U.S. Highway 27 South, South Bay, Florida, Palm Beach County was clerked on December 26, 2007. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published in the The Palm Beach Post on December 30, 2007. The DRAFT Permit was available for public inspection at the permitting authority's office in Fort Myers. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on January 4, 2008.

TO: An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to Okeelanta Corporation for the Okeelanta Sugar Mill located at 21250 U.S. Highway 27 South, South Bay, Florida, Palm Beach County was clerked on December 26, 2007. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the The Palm Beach Post on December 30, 2007. The DRAFT Permit was available for public inspection at the permitting authority's office in Fort Myers. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was received on January 4, 2008.

Final Determination

Air Construction Permit
Permit Project No.: 0990005-021-AC
Administrative Correction to Permit No. 0990005-020-AC

I. Public Notice.

An "INTENT TO ISSUE AIR CONSTRUCTION PERMIT" to Okeelanta Corporation for the Okeelanta Sugar Mill located at 21250 U.S. Highway 27 South, South Bay, Florida, Palm Beach County was clerked on December 26, 2007. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was published in the The Palm Beach Post on December 30, 2007. The DRAFT Permit was available for public inspection at the permitting authority's office in Fort Myers. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" was received on January 4, 2008.

II. Public Comment(s).

Comments were received and the DRAFT Permit was changed. The comments were **not** considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from 1 respondent(s) during the 14 (fourteen) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received.

A. Email from **Mr. David Buff, P.E.** dated January 2, 2008, and received on January 2, 2008.

1. **Comment:** Condition 7a & b: In previously discussing the consecutive 52-week reporting period, we believed that this would apply to only the production rates and alcohol usage. It was not our intention that this would apply to the PM limits. Applying this to the emission limits would require PM and PM10 calculations be performed every week and maintenance of 102 more calculation records per year. Since the TPY emission rates are entirely dependent on the sugar production rates, limiting the production on a rolling consecutive 52-week basis is adequate. We therefore retain our original comment and request that the emission limits be changed to " tons per year".

   Response: Request granted.
   The PM and PM 10 emissions limits are listed for informational purposes only, as stated in the permit. As previously discussed and agreed, PM and PM10 emissions only need to be reported on the Annual Operating Report. Therefore, the time periods identified in the draft permit conditions 7.a. and & b. were typographical errors. It was not the Department's intent to require the facility to monitor PM emissions on a weekly basis, at this time. The time period for the emission limits listed in condition 7.a. will be changed to tons per year. The total PM and PM 10 emissions' time periods for each emission unit, identified in condition 7.b., will be changed to tons per year.

2. **Comment**: Condition 13: Change EU05 to EU025.
   Response: This is a typographical error. Requested changes will be made

3. **Comment**: Condition 17.a: For Condition 3, which are production limits, this condition should state "daily and weekly records".
   Response: This is a typographical error. Requested changes will be made.

4. **Comment:** Condition 17.b: same as above, change "monthly" to "weekly".
   Response: This is a typographical error. Requested changes will be made.

5. **Comment:** Condition 17.b.ix. Again replace "Monthly" with "Weekly" (since this refers to production limits) and replace "average" with "totals" (since the limits are based on a consecutive 52 week total, not average).
   Response: This is a typographical error. Requested changes will be made.

6. **Comment:** Condition 21: Change the reference to Condition 22 to "Condition 10", which specifies the compliance test requirements for this permit.
   Response: Requested denied. Reference to Condition 22 is correct. Conditions 21 and 22 are our standard permit conditions for new construction.

III. Conclusion.

The permitting authority hereby issues the REVISED DRAFT Air Construction Permit, with any changes noted above.

Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:
Okeelanta Corporation
Okeelanta Sugar Refinery
21250 U.S. Highway 27 South
South Bay, FL 33493

Facility I.D. No.: 0990005
Permit Number: 0990005-021-AC
Date of Issue: January 15, 2008
Revised Date: February 25, 2008
Expiration Date: July 14, 2008
County: Palm Beach County
Latitude: 26° 35' 00" N
Longitude: 80°45' 00" W
Project: Sugar Refinery Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, 62-210, 62-296, and 62-297. **This permit administratively corrects Permit No.: 0990005-020-AC. This permit (Permit No.: 0990005-021-AC) replaces and supercedes Permit No.: 0990005-020-AC.** The above named permittee is hereby authorized to construct the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

This permit authorizes an expansion and modification of the sugar refinery operations. The expansion consists of enlarging the mill boiling house associated with the sugary refinery. The mill boiling house expansion includes installation of new process equipment. The new process equipment will be dedicated to the production of specialty sugar products. Existing equipment will be available for the production of standard refined sugars. The sugar refinery's expansion and modification will realize an increase in refined sugar production yield and efficiency and a decrease in the particulate matter (PM) (both PM and PM10) emissions. Specifically, this permit authorizes the following: 1) an increase in the sugar refinery's permitted capacity for total refined sugar production, 2) an increase in the permitted capacity for refined sugar production from the fluidized bed dryer/baghouse system, the bulk load-out station and the transfer bulk load-out station, 3) a modification of the dust collection systems #1 and #2 process operations, 4) a reduction in Total PM and PM10 emissions and 5) alternative methods of operation for the fluidized bed dryer and the rotary dryer/cooler system. *(Permitting Note: In a letter dated November 16, 2004, the Department approved control equipment (Rotoclones No. 3 and No. 4) replacement. The replacement of Rotoclones No. 3 and No. 4 contributes mainly to the decrease in PM emissions. The reduction in PM emissions has not been previously requested through a construction permit application.)*

The facility is located at 21250 U.S. Highway 27 South, South Bay, Palm Beach County.

PERMITTEE:
Okeelanta Corporation
Okeelanta Sugar Mill

Facility I.D. No.: 0990005
Permit Number: 0990005-021-AC
Date of Issue: January 15, 2008
Revised Date: February 25, 2008
Expiration Date: July 14, 2008

SPECIFIC CONDITIONS:

This subsection addresses the following emissions units:

EU No.	Emissions Unit Description
021	Rotary Dryer with Rotoclone No. 1
022	Dust Collection System No. 2 with Rotoclone No. 2
023	Cooler No. 1 with Rotoclone No. 3
024	Cooler No. 2 with Rotoclone No.4
025	Fluidized Bed Dryer/Cooler with Baghouse
034	Bulk Load-Out Operation
035	Transfer Bulk Load-out Station
043	Alcohol Usage

Process Descriptions

The sugar refinery produces refined sugar (standard white sugar and specialty sugars) from the raw sugar sent from the mill. Some of the refined sugar is sold in bulk and shipped by truck or rail car. The majority of the refined sugar produced is transferred by truck to an onsite packaging and distribution warehouse (Transshipment facility).

The primary sugar drying system is a Fluidized Bed Dryer (EU025). The fluidized bed dryer is currently used for standard refined sugar. The exhaust is controlled by a high efficiency pulse jet baghouse manufactured by BETH GmbH, 23556 Lobeck (Type BETHPULS 6.60 x 7.5.10). The baghouse exhausts through a stack 93 feet above grade. Steam is used for the necessary heat and no fuels are fired in the fluidized bed dryer.

The Rotary Drying System consists of one (1) rotary dryer (EU021) and two (2) rotary coolers in series (EU023 and EU024). The rotary dryer system is used for specialty sugars and when the fluidized bed dryer is off line for repairs. Steam is used for the necessary heat and no fuels are fired in the rotary drying system. Emissions from the rotary drying system are controlled with the use of a skimmer followed by a Wet Rotoclone No. 1 (American Air Filter, Type W, Size 27), which exhausts 89 feet above grade. The ductwork associated with the Wet Rotoclone No. 1 will be modified so that it will be able to control sugar dust from the rotary dryer (EU021) and two (2) specialty sugar conveyors. (The two (2) specialty sugar conveyors will convey sugar products during production with rotary dryer and cooling system only). Sugar from the rotary dryer is directed to two (2) coolers (EU023 and EU024). The exhaust from Cooler No. 1 is controlled by Rotoclone No. 3 (American Air Filter, Type W, Size 27) which is vented 80 feet above grade. The exhaust from Cooler No. 2 is controlled by Rotoclone No. 4 (American Air Filter, Type W, Size 27) which is vented 80 feet above grade.

Dust Collection System No. 2 (EU022) controls emissions from miscellaneous refined sugar drop points. As depicted on attachments OC-EU1-11b and OC-EU1-11c which were submitted with the application (DEP File No. 0990005-020-AC), the Dust Collection System No. 2 (EU022) is authorized to be modified to control emissions from bucket elevator 10, the silo scale, belt conveyors 11, 16, 18, 19, A and B, Screw Conveyors 20, 26, 28, 40 and 45, Q1, Q2, S1 and S2, the packing room bins, the bulk curing

SPECIFIC CONDITIONS:

bins #1 through #8, bucket elevator 16 and 43, and the Sweco shaker screen. The system is controlled by Rotoclone No. 2 (American Air Filter, Type W, Size 27), which exhausts 86 feet above grade. Rotoclone No. 2 operates when either the fluidized bed dryer or rotary drying system is operating.
The Bulk Load-Out Operation (EU034) is used to load sugar into either trucks or railcars. The operation includes a silo and a three-sided building. Emissions of fugitive particulate matter are controlled by use of the enclosure.

The Transfer Bulk Load-Out Station (EU035) is used to supply sugar to the Transshipment Facility. The operation includes four (4) enclosed conveyors in series feeding refined sugar from the storage silo or bulk curing bins to an enclosed load-out building. Emissions of fugitive particulate matter are controlled by use of the enclosure and high-pressure air curtains.

The proposed expansion of the existing mill boiling house will consist of extending the building approximately 40 feet on the south end. The following equipment will be housed in the expansion: two (2) melters, two (2) syrup tanks, two (2) grain receiver tanks, two (2) vacuum pans, two (2) magma/cut tanks, two (2) batch centrifuges, two (2) molasses tanks, two (2) screw conveyors, one (1) magma mingler, one (1) run-off tank, a motor control center room, and various pumps and piping systems. The existing sugar refinery expansion building (Permit No. 0990005-005-AC) houses the following associated process equipment: a 1700 cubic feet vacuum pan, a vacuum pan condenser, two (2) centrifugals, syrup and molasses feed tanks, final liquor syrup storage tanks, one (1) 5000 gallon condensate collection tank, one (1) 1000 gallon centrifugal wash water tank, two (2) 1200 cubic feet seeder cutover tanks, a motor control center room, MCC and centrifugal controller room, a refined sugar conveying system, one (1) 2000 cubic feet receiver, various pumps.

For the sugar refinery, activities that are completely enclosed and vented within the building are not classified as air pollution sources.

Two types of alcohol, isopropyl alcohol and organic ethanol, are used in the sugar refinery to aid in the crystallization process in the vacuum pans. Isopropyl alcohol is the primary contributant to the refinery's Volatile Organic Compounds (VOCs) emissions. Isopropyl is used in the production of standard refined sugar. Organic ethanol is used in the production of organic sugar.

Equipment Specifications

1. Baghouse Specifications: To control emissions from the fluidized bed dryer (EU025) the permittee shall operate and maintain a baghouse control system with the following specifications:

Parameter	Specification
Design exhaust flow rate	70,620 acfm
Filtering area	9041 ft^2
Air-to-cloth ratio	7.81 cfm/ft^2
Control efficiency (as described in the application)	99.8% (Total PM and PM10)

[Rule 62-210.242, F.A.C.]

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2. Cyclonic Control Devices: The permittee shall operate and maintain the following emission units and corresponding control equipment in accordance with the specifications identified in the table below:

EU No.	Description	Control Type	Design Flow Rates, acfm	Water Injection Rate gpm, minimum	Control Efficiency (%)	
					PM (Total)	PM10
021	Rotary Dryer	Rotoclone No. 1	15,000	2	99.9	99.0
022	Dust Collection System No. 2	Rotoclone No. 2	15,000	2		
023	Cooler No. 1	Rotoclone No. 3	15,000	2		
024	Cooler No. 2	Rotoclone No. 4	15,000	2		

[Rule 62-210.242, F.A.C.]

Capacity and Performance Restrictions

3. Permitted Capacities:
   a. The sugar refinery [combined EU021, EU023, EU024 and EU025] shall not process more than 490,000 tons of refined sugar during any consecutive 52 week period, and
   b. The sugar refinery's emission units shall not process more than nor exceed the following:

EU No.	Description	Maximum refined sugar processed (tons per consecutive 52 weeks period)	Maximum Usage (lbs per consecutive 52 week period)
021 and 023 and 024	Rotary Dryer System	130,000	
034	Bulk Load-Out Operation	139,000	
035	Transfer Bulk Load-Out Station	351,000	
043	Alcohol	----------	78,040

→ doesn't include EU025?

[Permit No.: 0990005-005-AC; Permit No.: 0990005-020-AC; Rule 62-4-070(3), F.A.C.; Rule 62-4.210(2), F.A.C.]

4. Hours of Operation: Operation of the sugar refinery is limited by the limitations on processing capacities. The hours of operation of are not limited (8760 hours per year). [Permit No. 0990005-005-AC]

SPECIFIC CONDITIONS:

Methods of Operation

5. Method of Operation: The owner or operator is authorized to operate the dryers in any of the following methods:
   a. The Fluidized Bed Dryer only;
   b. Rotary Drying System only: The owner or operator is authorized to operate the rotary dryer system in either of the following two (2) methods:
      i. High Production Rates: The rotary dryer system is operated as a three stage system (rotary dryer followed by two coolers operating in series). High production rates are approximately 1000 TPD for standard white sugar and above 600 TPD for specialty sugar production.
      ii. Low Production Rates: The rotary dryer system is operated as a two stage process. In this configuration, cooler #1 is operated as a rotary dryer and the rotary dryer and wet Rotoclone No. 1 remain shut down. Low production rates are below 500 TPD for specialty sugars.
   c. The Fluidized Bed Dryer and Rotary Dryer System operated simultaneously. The dryers and refinery remain subject to the capacity limitations specified in **Specific Condition No. 3** of this permit. [Permit No. 0990005-020-AC]

Emission Limiting Standards

6. Visible Emissions (VE): The facility and individual emissions units shall not exceed the following visible emissions limits:

Location/ EU	Opacity Limit
Control Device Exhausts: Rotoclone No. 1 (Rotary Dryer - EU021) Rotoclone No. 2 (Dust Collection System No. 2 - EU022) Rotoclone No. 3 (Cooler No. 1 - EU023) Rotoclone No. 4 (Cooler No. 2 - EU024) Baghouse (Fluidized Bed Dryer/Cooler - EU025)	5%
Fugitive Emissions: All fugitive emission points Bulk Load-Out Operation (EU034) Transfer Bulk Load-Out Station (EU035)	20%

[Permit No. 0990005-002-AC; Rules 62-296.320(4), F.A.C.; 62-297.310(7)(c), F.A.C.; and 62-297.620(4), F.A.C.]

7. Particulate Matter (PM/PM10):
   a. The sum of all emission units (EU021, EU022, EU023, EU024, EU025, EU034, and EU035) shall not exceed the following:

Total PM	21.70 tons per year
PM10	2.70 tons per year

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b. As submitted in the application and identified here for information purposes only, the facility's emissions units have the potential to emit the following amounts Total PM and PM10 emissions identified in the table below. The emission amounts shown in the table below reflect the worst case scenario for that emission unit during one of three authorized alternate modes of operation (See **Specific Condition 5.**). The applicant has requested through the application (DEP File No. 0990005-020-AC) to be limited to the PM emissions in ***Specific Condition 7.a.***

EU No.	Description	Total PM (tons per year)	PM10 (tons per year)
021	Rotary Dryer with Rotoclone No. 1	4.104	1.645
022	Dust Collection System No. 2 with Rotoclone No. 2	0.563	0.225
023	Cooler No. 1 with Rotoclone No. 3	4.09	1.64
024	Cooler No. 2 with Rotoclone No.4	0.45	0.18
025	Fluidized Bed Dryer/Cooler with Baghouse	14.70	0.588
034	Bulk Load-Out Operation	3.63	0.15
035	Transfer Bulk Load-out Station	1.83	0.07

[Permit No. 0990005-020-AC]

8. PM/PM10 Emission Factors. As submitted in the application, the following emission factors and control efficiencies shall be used to calculate Total PM/PM10 emissions:

		Total PM		PM10	
EU No.	Description	PM Uncontrolled Emission Factor	Control Efficiency	PM Uncontrolled Emission Factor	Control Efficiency
021	Rotary Dryer with Rotoclone No. 1	3.150% (from dryer) **plus** 0.2090 lb/ton (from transfer points)	99.9 %	0.126 % (from dryer) **plus** 0.00836 lb/ton (from transfer points)	99.0 %
022	Dust Collection System No. 2 with Rotoclone No. 2	2.2994 lb/ton	99.9 %	0.09198 lb/ton	99.0%
023	Cooler No. 1 with Rotoclone No. 3	0.175%	99.9 %	0.007 %	99.0 %
024	Cooler No. 2 with Rotoclone No.4	0.175%	99.9 %	0.007 %	99.0 %
025	Fluidized Bed Dryer/Cooler with Baghouse	1.5%	99.8 %	0.060 %	99.8 %
034	Bulk Load-Out Operation	0.105 lb/ton	50 %	0.00418 lb/ton	50 %
035	Transfer Bulk Load-out Station	0.105 lb/ton	90 %	0.00418 lb/ton	90 %

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9. Volatile Organic Compounds (VOCs): VOCs shall not exceed 39.00 tons during any consecutive 52 weeks period. *(Permitting Note: VOC emissions are contributed mainly from isopropyl alcohol.)* [Permit No. 0990005-020-AC]

Testing

10. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), each baghouse and each Rotoclone exhaust point of emission units EU021, EU022, EU023, EU024, and EU025 shall be tested to demonstrate compliance with the opacity standard specified in **Specific Condition 6.** [Permit No.: 0990005-005-AC; Rule 62-297.310(7)(a)4, F.A.C.]

11. Tests Prior to Renewal: Within the 12-month period prior to renewing the operation permit, each baghouse and each Rotoclone exhaust point shall be tested to demonstrate compliance with the specified opacity standard. [Rule 62-297.310(7)(a)3, F.A.C.]

12. Visible Emissions Test Method: All visible emissions 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. [Permit No.: 0990005-002-AC; Rules 62-204.800 and 62-297.310(4), F.A.C.; 40 CFR 60, Appendix A]

13. Particulate Matter (PM) Testing: As requested by the applicant, the compliance test requirements for particulate emissions for emission units EU021, EU022, EU023, EU024, and EU25 are waived, and substituted with an alternative standard of 5% opacity. If the Department has reason to believe that the particulate weight emission standard applicable to the emission unit is not being met, it shall require that compliance be demonstrated by the test method specified in the applicable rule. [Rule 62-297.620(4), F.A.C. and 62-4.070(3), F.A.C.]

14. Test Procedures:
    a. Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
    b. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes.
    c. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
    d. The permittee shall record the actual sugar processing rate for the emissions unit(s) being controlled and tested.
    e. Tests shall comply with the applicable requirements of Rule 62-297.310, F.A.C.

    [Permit No.: 0990005-005-AC; Rules 62-297.310(4), F.A.C.; 62-297.310, F.A.C.]

15. Test Notification: At least 15 days prior to the date on which each formal compliance test is to begin, the permittee shall notify both the Palm Beach County Health Department and the Department's South District office of the date, time, and place of the test; and the contact person who will be responsible for coordinating and having the test conducted. [Permit No.: 0990005-002-AC; Rule 62-297.310(7)(a)9, F.A.C.]

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Recordkeeping and Reporting

16. Test Reports: For each visible emissions test conducted, the permittee shall file a test report including the information specified in Rule 62-297.310(8), F.A.C. with the Palm Beach County Health Department as soon as practical, but no later than 45 days after the last sampling run of each test is completed. Copies of the reports shall be sent to the Department's South District office. [Permit No.: 0990005-005-AC; Rule 62-297.310(8), F.A.C.]

17. Operational Data:
    a. The permittee shall maintain daily and weekly records to demonstrate compliance with the permit limitations specified in **Specific Condition No. 3** of this permit.
    b. The daily and weekly records shall include, at a minimum, the following records:
        i. Date;
        ii. Hours of operation;
        iii. Total refined sugar produced;
        iv. Refined sugar produced from the fluidized bed sugar drying system;
        v. Refined sugar production from the rotary sugar dryer system (including coolers);
        vi. Quantity of refined sugar handled through the bulk load out area;
        vii. Quantity of refined sugar handle through the transshipment load out area;
        viii. Weekly use of alcohol (isopropyl and organic ethanol); and
        ix. Weekly rolling consecutive 52 weeks period total for all permitted refined sugar production limits.

    [Permit No. 0990005-020-AC; Rule 62-4.070(3), F.A.C.]

18. Annual Operating Reports (AOR). The permittee shall submit an annual operating report [(DEP Form 62-210.900(5)] that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Palm Beach County Health Department (and copies submitted to the Department's South District office) by March 1st of each year. Beginning with 2007, annual emissions shall be computed in accordance with the provisions of subsection. The permittee shall include each emission unit's total PM and PM10 on the AOR. Total PM and PM10 emissions shall be calculated using the emission factors and control efficiencies in **Specific Condition No. 8.** [Permit No. 0990005-020-AC; Rule 62-210.370(3), F.A.C.]

19. 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 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14), F.A.C. and 62-213.440(1)(b)2, F.A.C.]

Facility-Wide Conditions

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

SPECIFIC CONDITIONS:

21. Operating Permit. **To obtain a permit to operate, the permittee must submit a complete application for an operating permit {"Application for Air Permit –Title V Source" [DEP Form 62-210. 900(1)]}, to the Department prior to the expiration date of the construction permit or, no later than 180 days after the unit(s) are placed into operation or modifications completed, whichever occurs first. The application shall include the application fee and required compliance tests results (See Specific Condition No. 22). The applicant shall retain a licensed Professional Engineer registered in the State of Florida for the inspection of the construction of this project. Upon completion, the engineer shall inspect for conformity to the construction permit, applications, and associated documents. [Rules 62-210.300(2), F.A.C., 62-4.210(3), F.A.C. and 62-4.220, F.A.C.]**

22. Required Testing. **The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit. [Rules 62-297.310(7)(a)1., F.A.C. and 62-4.050(3), F.A.C.]**

23. Regulation Compliance. Issuance of the permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Rules 62-210, 92-212, 62-252, 62-272, 62-273, 62-275, 62-296 and 62-297, F.A.C., or any other requirements under federal, state or local law. Other new regulations may impact this source at a future date, and the permittee shall comply with any applicable future regulations when and if they become effective. [Rule 62-210.300, F.A.C.]

24. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor as defined in Rule 62-210.200(217), F.A.C. [Rule 62-296.320(2), F.A.C.]

25. General Pollutant Emission Limiting Standard. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1)(a), F.A.C.]

26. Unconfined Emissions of Particulate Matter. The permittee shall 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 of fuels, raw materials or products.
    a. Enclose or cover conveyor systems where practicable.
    b. Minimize drop distances of dry materials when handling.
    c. As necessary, provide wind breaks around material handling equipment.
    d. Confine abrasive blasting where possible.
    e. As necessary, provide landscape and/or vegetation.

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f. As necessary, remove dust from roads, work areas, parking area, and other paved areas under the control of the permittee to prevent fugitive dust emissions.
g. As necessary, apply water or other dust suppressants to control emissions from unpaved roads, yards, and other activities such as road grading, land clearing, and the demolition of buildings.
h. Enclosure or covering of conveyor systems.

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

27. Liquid Effluent Discharge: Any activity performed by the permittee at the plant site shall not result in the discharge of liquid effluent or contaminated runoff to surface or ground water without prior approval from the Department. [Rule 62-4.070(3), F.A.C.]

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

29. Excess Emissions notification. In case of excess emissions resulting from malfunctions, the permittee or operator shall notify the Department 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 Department. [Rule 62-210.700(6), F.A.C.]

30. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may 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 Department. [Rule 62-297.310(7)(b), F.A.C.]

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

32. Changes/Modifications. The permittee shall submit to the Department for review, any changes in, or modifications to: the method of operations; process or pollution control equipment; increase in hours of operation; equipment capacities; or any change which would result in an increase in potential/actual emissions. Depending on the size and scope of the modification, it may be necessary to submit an application for, and obtain, an air construction permit prior to making the desired change. Routine maintenance of equipment will not constitute a modification of this permit. [Rules 62-4.030, F.A.C.; 62-210.300 an (1)(a), F.A.C.; 62-4.210, F.A.C., and 62-4.070(3), F.A.C.]

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33. The permittee shall submit all compliance related notifications and reports required by this permit to the Palm Beach County Health Department at:

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

Copies of compliance related notifications and reports shall be sent to:

Department of Environmental Protection
South District Office
P.O. Box 2549
Fort Myers, FL 33902
Phone: 239-332-6975
FAX: 239-332-6969

NOTE: In the event of an emergency the permittee shall contact the Department by calling (850) 413-9911. During normal business hours, the permittee shall call (239) 332-6975.

Issued this 25th day of February 2008.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Jon M. Iglehart
Director of
District Management
Post Office Box 2549
Fort Myers, Florida 33902-2549
(239) 332-6975

JMI/SRM/jw

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GENERAL CONDITIONS:

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

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

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

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

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

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed 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 any records that must be kept under the conditions of the permit;

   (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,

GENERAL CONDITIONS:

(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 noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

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

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

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 incorporates the following previously issued determinations:

   (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).

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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 date's 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.

ATTACHMENT OC-EU1-IV3

ALTERNATIVE METHODS OF OPERATION

ATTACHMENT OC-EU1-IV3

ALTERNATIVE METHODS OF OPERATION

Okeelanta Corporation sugar refinery can operate with either the fluidized bed system or the rotary dryer system, or both in combination.

For production with the rotary system, two methods of operation can be utilized. Typically for specialty sugar production, cooler No. 1 is used for drying and cooler No. 2 completes the cooling. This typically low production method of operation is completed in two stages and the rotary dryer and wet rotoclone No. 1 are not in operation. At high production rates or when the specialty sugar conveyors are needed, the rotary dryer and wet rotoclone No. 1 may be operated as a third emission control unit with the rotary system.