Golder Associates Inc.

6026 NW 1st Place
Gainesville, FL 32607
Telephone (352) 336-5600
Fax (352) 336-6603

August 20, 2009

0838-7593

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

Attention: Mr. Ajay Satyal, Air Program Administrator

RE: OKEELANTA CORPORATION
TITLE V AIR OPERATING PERMIT

Dear Mr. Satyal:

On behalf of Okeelanta Corporation, please find attached four copies of a Title V air operating permit application for the Trans-shipment Facility at Okeelanta. If you have any questions concerning this application, 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

Priscilla Grener, E.I.
Engineer

PG/DB/tlc

Enclosure

cc: Matt Capone, Okeelanta
James Stormer, PBCHU

L082009_593 TransShipTV

Supplemental application for Project No. 0990005-017-AV

APPLICATION FOR
TITLE V AIR OPERATING PERMIT REVISION
FOR
TRANS-SHIPMENT FACILITY MODIFICATION

OKEELANTA CORPORATION
SOUTH BAY, FLORIDA

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

Prepared By:
Golder Associates Inc.
6026 NW 1st Place
Gainesville, Florida 32607

August 2009

0838-7593

DISTRIBUTION:
4 Copies – FDEP
1 Copy – PBCHU
2 Copies – Okeelanta Corporation
2 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.

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: **Matthew Capone**
2. Application Contact Mailing Address... Organization/Firm: **Okeelanta Corporation** Street Address: **21250 U.S. Highway 27 South** City: **South Bay** State: **FL** Zip Code: **33493**
3. Application Contact Telephone Numbers... Telephone: **(561) 993-1658** ext. Fax: **(561) 992-7326**
4. Application Contact 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):	4. Siting Number (if applicable):

RECEIVED - D.E.P.

AUG 21 2009

SOUTH DISTRICT

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 the Title V Operating Permit to incorporate the provisions of the Air Construction Permit No. 0990005-023-AC. This permit was to construct a new baghouse for Sugar Packaging Line 14 and to change the process flow for systems controlled by the existing baghouse for emissions unit 045.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
018-020, 030-032, 045-047, 049	Okeelanta Sugar Trans-shipment Facility	ACMM	

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

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:

6. Application Responsible Official Certification:

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

Signature

8-18-09
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: **6026 NW 1st Place**
   City: **Gainesville** State: **FL** Zip Code: **32607**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext. 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

8/14/09 — Date

(seal)

* Attach any exception to certification statement.

**Board of Professional Engineers Certificate of Authorization #00001670.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

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

Facility Contact

1. Facility Contact Name: **Matthew Capone**
2. Facility Contact Mailing Address... Organization/Firm: **Okeelanta Corporation** Street Address: **21250 U.S. Highway 27 South** City: **South Bay** State: **FL** Zip Code: **33493**
3. Facility Contact Telephone Numbers: Telephone: **(561) 993-1658** ext. Fax: **(561) 992-7326**
4. Facility Contact 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 Total – PM	**A**	**N**
Particulate Matter – PM10	**A**	**N**
Particulate Matter – PM2.5	**A**	**N**
Sulfur Dioxide – SO2	**A**	**N**
Nitrogen Oxides – NOx	**A**	**N**
Carbon Monoxide – CO	**A**	**N**
Volatile Organic Compounds – VOC	**A**	**N**
Lead – PB	**B**	**N**
Hydrogen Chloride – H106	**A**	**N**
Mercury Compounds – H114	**B**	**N**
Total Hazardous Air Pollutants – HAPs	**A**	**N**

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID'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: OC-FI-C1 ☐ Previously Submitted, Date:_____

2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: OC-FI-C2 ☐ Previously Submitted, Date:_____

3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: April, 2005

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location:
   ☐ Attached, Document ID:_____ ☐ 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:_____
   ☒ 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

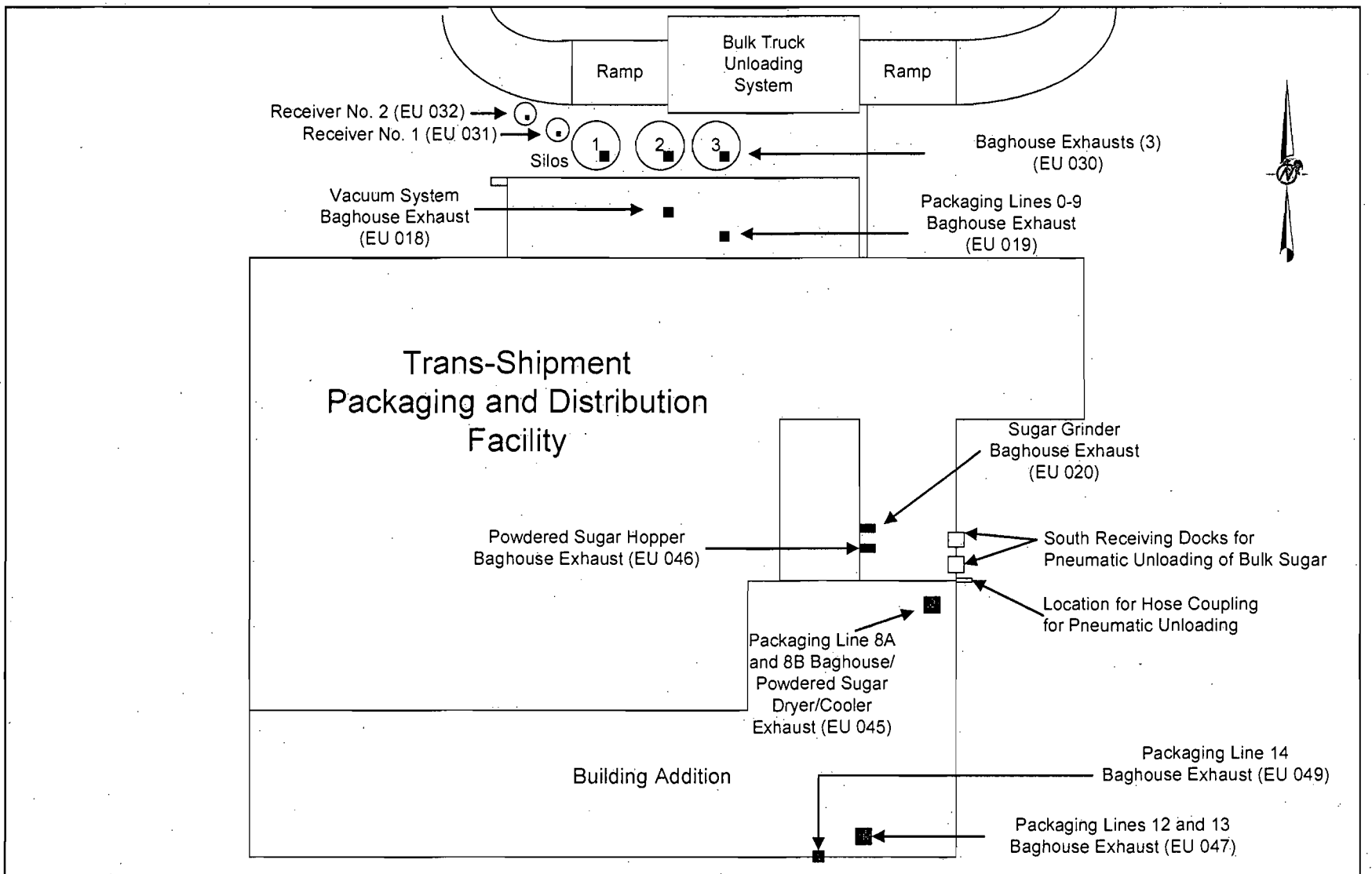
2. CAIR Part (DEP Form No. 62-210.900(1)(b)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a CAIR source)

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-C1

FACILITY PLOT PLAN



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

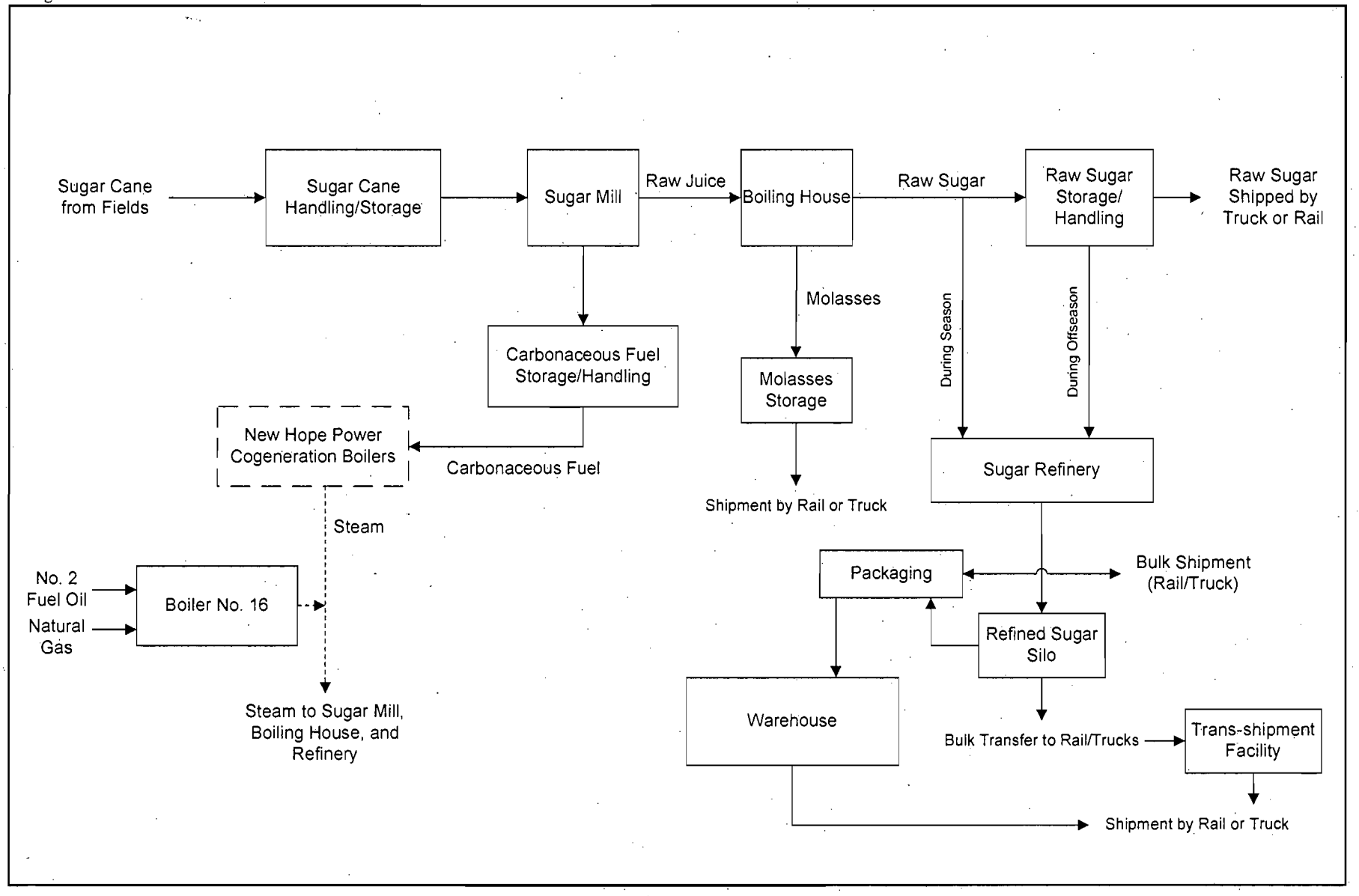
Attachment OC-FI-C1
Trans-Shipment Packaging and Distribution
Facility Plot Plan
Okeelanta Corporation

08387593/OC-FI-C1.vsd

Golder Associates

ATTACHMENT OC-FI-C2

PROCESS FLOW DIAGRAM



Attachment OC-FI-C2
Process Flow Diagram - Sugar Manufacturing
Okeelanta Corporation
South Bay, FL
08387593/4.4/OC-FI-C2.vsd

Overall Sugar Mill - Facility Flow Diagram

Process Flow Legend
Solid/Liquid
Steam
Gas

Golder Associates

ATTACHMENT OC-FI-CV3

COMPLIANCE REPORT AND PLAN

ATTACHMENT OC-FI-CV3
COMPLIANCE STATEMENT

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

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

A compliance statement will be submitted by March 1 of each year.

R A Lima 8-18-09

Ricardo A. Lima, Vice President
Okeelanta Corporation

DATE

ATTACHMENT OC-FI-CV6

REQUESTED CHANGES TO
CURRENT TITLE V AIR OPERATION PERMIT

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

Okeelanta Corporation has modified the existing Packaging and Distribution Facility (also known as the Trans-shipment Facility) at the Okeelanta sugar complex located near South Bay, Florida. This application is to incorporate the conditions of the Air Construction Permit No. 0990005-023-AC into the current Title V Operating Permit No. 0990005-012-AV.

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 Trans-Shipment Facility

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

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

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

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

Emissions Unit Description and Status

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

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

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

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

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

3. Emissions Unit Identification Number: **018, 019, 020, 030, 031, 032, 045, 046, 047, 049**

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 emissions unit consists of Multiple Emission Points: The Vacuum System Baghouse (EU 018), the Packaging Lines 0-9 Baghouse (EU 019), the Grinder Baghouse (EU 020), the three Sugar Silo Baghouses (EU 030), the Railcar Sugar Unloading Receivers Nos. 1 & 2 Baghouses (EU 031 & 032), the Packaging Lines 8A and 8B/Powdered Sugar Baghouse (EU 045), the Powdered Sugar Hopper Baghouse (EU 046), the Packaging Lines 12 and 13 Baghouse (EU 047), and the Packaging Line 14 Baghouse (049).

Emissions Unit Control Equipment/Method: Control **1** of **2**

1. Control Equipment/Method Description: **12 baghouses (refer to Attachment OC-EU1-C15)**
2. Control Device or Method Code: **018**

Emissions Unit Control Equipment/Method: Control **2** of **2**

1. Control Equipment/Method Description: **1 Cyclonic Separator (inlet side of vacuum pump of Vacuum System)**
2. Control Device or Method Code: **007**

Emissions Unit Control Equipment/Method: Control _____ of _____

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

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

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **Trans-shipment Facility**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: **12 baghouses: Packaging Lines; Vacuum System; Grinder & Hopper; Sugar Silos (3); Powdered Sugar Dryer/Cooler; Powdered Sugar Hopper; Railcar Unloading Receiver No. 1; and Railcar Unloading Receiver No. 2.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **27** feet	7. Exit Diameter: **1.5** Feet
8. Exit Temperature: **75°F**	9. Actual Volumetric Flow Rate: **10,000** acfm	10. Water Vapor: **0.025** %
11. Maximum Dry Standard Flow Rate: **9,869** dscfm	12. Nonstack Emission Point Height: Feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: **Parameters shown are for the existing Packaging Lines Baghouse (EU 019). See Attachment OC-EU1-C15 for stack/vent information on each separate emission point comprising this EU.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

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

Segment Description and Rate: Segment _____ of _____

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

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	018		NS
PM10	018		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:
3. Potential Emissions: **3.11** lb/hour **13.64** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference: **See Attachment OC-EU1-F1.10.**	7. Emissions Method Code: **0**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **See Attachment OC-EU1-F1.10 for calculations, and Permit No. 0990005-023-AC.**	
11. Potential, Fugitive, and Actual Emissions Comment:	

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 1

1. Visible Emissions Subtype: **VE05**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Existing permit condition in Permit No. 0990005-023-AC. Rule 62-297.620(4), F.A.C.**	

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

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

H. CONTINUOUS MONITOR INFORMATION

Complete 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**
   ☐ 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**
2. Compliance Assurance Monitoring: ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☒ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements Comment

Trans-shipment facility Permit No. 0990005-023-AC presented in Attachment OC-EU1-IV1.

ATTACHMENT OC-EU1-C15

STACK PARAMETERS SUMMARY

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

Emission Source	Control Device	Point ID	Discharge Type	Stack Height (ft)	Exit Diameter (ft)	Exit Temperature (° F)	Actual Volumetric Flow Rate (acfm)	Percent Water Vapor (%) [a]	Maximum Standard Flow Rate (scfm)
Central Vacuum System 1	Baghouse	018	Horizontal	8	0.33	75	284	0.025	280
Packaging Lines 0-9	Baghouse	019	Vertical	27	1.5	75	10,000	0.025	9,869
Sugar Grinder	Baghouse	020	Horizontal	39	1.0 [b]	75	3,000	0.025	2,961
Sugar Silo No. 1	Baghouse	030	Horizontal	65	0.5	90	521	0.025	500
Sugar Silo No. 2	Baghouse	030	Horizontal	65	0.5	90	521	0.025	500
Sugar Silo No. 3	Baghouse	030	Horizontal	65	0.5	90	521	0.025	500
Railcar Unloading Receiver #1	Baghouse	031	Horizontal	5.0	0.50	90	641	0.025	615
Railcar Unloading Receiver #2	Baghouse	032	Horizontal	5.0	0.50	90	641	0.025	615
Packaging Lines 8A & 8B/Powdered Sugar Dryer/Cooler	Baghouse	045	Vertical	48	2.0	90	9,000	0.025	8,640
Powdered Sugar Hopper	Baghouse	046	Horizontal	48	0.75	90	1,800	0.025	1,728
Packaging Lines 12 & 13	Baghouse	047	Vertical	48	1.75	90	3,780	0.025	3,629
Packaging Line 14	Baghouse	049	Horizontal	9	0.94[c]	70	2,220	0.025	2,212

Footnotes:

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

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

[c] Equivalent exit diameter based on a rectangular exhaust duct (10 inches by 10 inches) cross sectional area of 0.6944 sq. ft.
Equivalent diameter = 0.9403 ft.

ATTACHMENT OC-EU1-F1.10

EMISSIONS CALCULATIONS

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

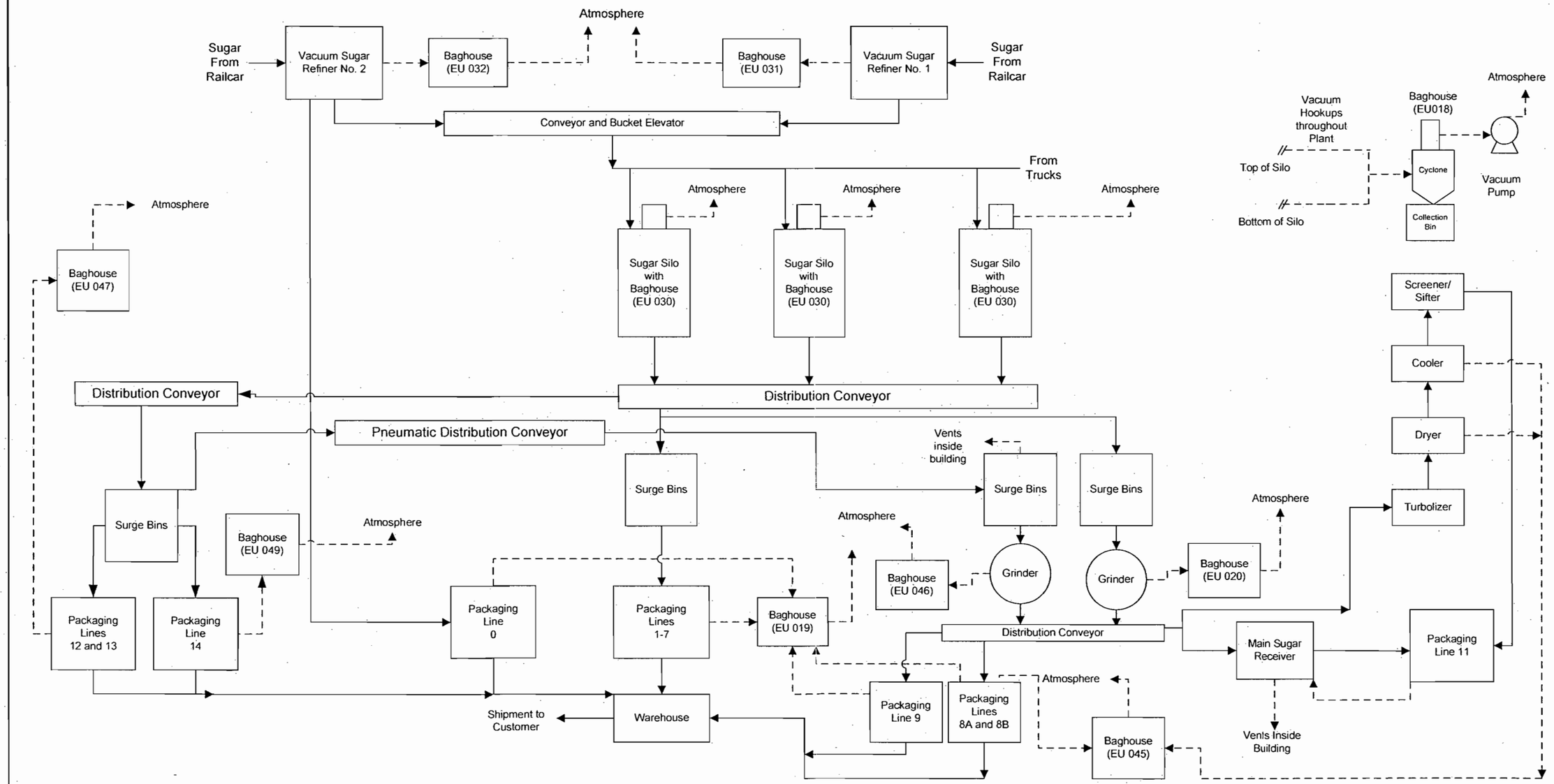
Emission Source	Point ID	Baghouse Guaranteed Manufacturer's Emission Rate	Baghouse Gas Flow Rate	Hourly Emissions (lb/hr)	Annual Emissions [a] (TPY)
Central Vacuum System 1	018	0.01 gr/scf	280 scfm	0.024	0.105
Packaging Lines 0-9	019	0.01 gr/scf	9,869 scfm	0.846	3.705
Sugar Grinder	020	0.0005 gr/scf	2,961 scfm	0.013	0.060
Sugar Silo No. 1	030	0.02 gr/scf	500 scfm	0.0857	0.375
Sugar Silo No. 2	030	0.02 gr/scf	500 scfm	0.0857	0.375
Sugar Silo No. 3	030	0.02 gr/scf	500 scfm	0.0857	0.375
Railcar Unloading Receiver #1	031	0.02 gr/scf	615 scfm [b]	0.105	0.462
Railcar Unloading Receiver #2	032	0.02 gr/scf	615 scfm [b]	0.105	0.462
Packaging Lines 8A & 8B/Powdered Sugar Dryer/Cooler	045	0.01 gr/scf	8,640 scfm	0.741	3.244
Powdered Sugar Hopper	046	0.01 gr/scf	1,728 scfm	0.148	0.649
Packaging Lines 12 & 13	047	0.01 gr/scf	5,760 scfm	0.494	2.162
Packaging Line 14	049	0.02 gr/scf	2,212 scfm	0.379	1.661
		Total Particulate Emissions All Sources		3.112 lb/hr	13.635 TPY

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

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

ATTACHMENT OC-EU1-I1

PROCESS FLOW DIAGRAM



Attachment OC-EU1-I1
Process Flow Diagram – Trans-shipment Facility
Okeelanta Corporation Refinery
South Bay, Florida
08387593/4.4/OC-EU1-I1

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

Golder Associates

ATTACHMENT OC-EU1-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT OC-EU1-I3a

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

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.024

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3b

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

Packaging Lines 0-9		
Manufacturer and Model No.	MAC Environmental Model 55AVSC64 Style III	
Outlet Gas Temp (°F)		75
Outlet Gas Flow Rate (acfm)		10,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		9,869
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Polyester Pleated
Total Area of Filter Media (sq. ft)		3,520
Air to Cloth Ratio		2.84
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.846

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3c

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

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

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

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

ATTACHMENT OC-EU1-I3d

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

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.0857

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3e

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

Powdered Sugar Dryer/Cooler		
Manufacturer and Model No.	Reimelt Corp. Model SL3-18	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		9,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		8,640
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Duratex II (pleated cartridges)
Total Area of Filter Media (sq. ft)		4,824
Air to Cloth Ratio		1.87
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.741

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

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

ATTACHMENT OC-EU1-I3f

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

Powdered Sugar Hopper Baghouse		
Manufacturer and Model No.	Reimelt Corp. Model 24TB-FRIP-32:S6	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		1,800
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		1,728
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Spun Bond Polyester (pleated elements)
Total Area of Filter Media (sq. ft)		325
Air to Cloth Ratio		5.54
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.148

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

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

ATTACHMENT OC-EU1-I3g

CONTROL EQUIPMENT PARAMETERS FOR THE PACKAGING LINES 12 AND 13 BAGHOUSE (EU 047) AT THE TRANS-SHIPMENT FACILITY

Packaging Lines 12 and 13		
Manufacturer and Model No.	MAC Equipment Inc. 55RTC52	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		6,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		5,760
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Polyester (pleated tubular cartridge)
Total Area of Filter Media (sq. ft)		2,662
Air to Cloth Ratio		2.25
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.494

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

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

ATTACHMENT OC-EU1-I3h

CONTROL EQUIPMENT PARAMETERS FOR THE VACUUM RECEIVERS NOS. 1 AND 2 BAGHOUSES (EU 031 AND EU 032) AT THE TRANS-SHIPMENT FACILITY

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

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

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

ATTACHMENT OC-EU1-I3i
CONTROL EQUIPMENT PARAMETERS FOR THE PACKAGING LINE 14 BAGHOUSE (EU 049) AT THE TRANS-SHIPMENT FACILITY

Packaging Line 14		
Manufacturer and Model No.	SLY Incorporated Model: SBR-66-8 TubeJet Dust Collector	
Outlet Gas Temp (°F)		70
Outlet Gas Flow Rate (acfm)		2,220
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		2,212
Cleaning Method		--
Bag Material		Polyester (Scrim supported felt type)
Total Area of Filter Media (sq. ft)		432
Air to Cloth Ratio		5.14
Manufacturer's Guaranteed Outlet Loading (grains/scf)		0.02
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.379

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

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

ATTACHMENT OC-EU1-I6

COMPLIANCE DEMONSTRATION REPORTS/RECORDS

April 24, 2009

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 packaging facility and sugar refinery at Okeelanta Corporation. The VE compliance tests were completed on March 18 and April 7, 2009 with South Florida Environmental Services, LLC (SFES).

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
Air Quality Specialists

VISIBLE EMISSIONS (METHOD 9) OPACITY TEST REPORT ON FOUR EMISSION UNITS

PREPARED FOR: OKEELANTA CORPORATION
21250 US HIGHWAY 27
SOUTH BAY, FLORIDA 33493

CONCERNING: SEVEN EMISSIONS UNITS
21250 US HIGHWAY 27
SOUTH BAY, FLORIDA 33943
MARCH 18 & APRIL 7, 200

PREPARED BY: SOUTH FLORIDA ENVIRONMENTAL SERVICES, LLC
2257 VISTA PARKWAY UNIT 25
WEST PALM BEACH, FL 33411

PROJECT #: 09-528

SOUTH FLORIDA ENVIRONMENTAL SERVICES
Air Quality Specialists

VISIBLE EMISSIONS TEST REPORT

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

CONCERNING:
Seven Emissions Units
21250 US Highway 27
Okeelanta Corporation
South Bay, Florida 33493

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

April 16, 2009
Date

COMPENDIUM:

South Florida Environmental Services performed compliance testing for visible emissions at Okeelanta Corporation on March 18 and April 7, 2009. 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 020, 022, 023, 024, 025, 046, & 049.

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 020	0.0%	0.0%	5%
EU 022	0.0%	0.0%	5%
EU 023	0.0%	0.0%	5%
EU 024	0.0%	0.0%	5%
EU025	0.0%	0.0%	5%
EU 046	0.0%	0.0%	5%
EU 049	0.0%	0.0%	5%

VISIBLE EMISSIONS TEST REPORT

Field Data Sheets

EPA
VISIBLE EMISSION OBSERVATION FORM I

Method Used (Circle One)
Method 9 | 203A | 203B | Other _____

Company Name: OKEELANTA CORPORATION
Facility Name: PACKAGING & DISTRIBUTION CTR.
Street Address: 21250 U.S. HIGHWAY 27 S.
City: SOUTH BAY | State: FL | Zip: 33493

Process: PACKAGING | Unit #: D20 | Operating Mode: NORMAL
Control Equipment: DUST COLLECTOR | Operating Mode: NORMAL

Describe Emission Point: RECTANGULAR EXHAUST

Height of Emiss Pt. Start 45 End 45 | Height of Emiss Pt. Rel to Observer Start 45 End 45
Distance to Emiss Pt. Start 250 End 250 | Direction to Emiss Pt. (Degrees) Start 280 End 280

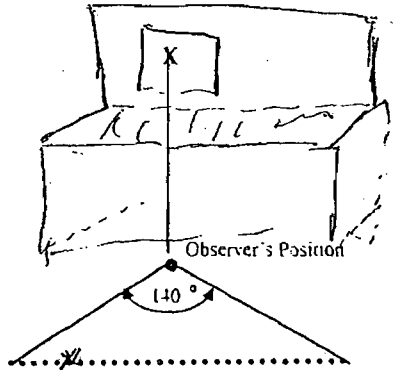
Vertical Angle to Obs Pt. Start 10 End 10 | Direction to Obs Pt. (Degrees) Start 280 End 280
Distance and Direction to Observation Pt. From Emission Pt. Start 250 @ 280 End SAME

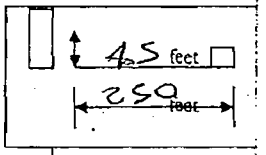
Describe Emissions Start NONE End NONE
Emission Color Start N/A End N/A | Water Droplet Plume Attached ☐ Detached ☐ None ☒

Describe Plume Background Start WALL End SAME
Background Color Start BROWN End BROWN | Sky Conditions Start CLOUDY End SAME
Wind Speed Start 0-5 End 0-5 | Wind Direction Start SE End SE
Ambient Temperature Start 70 End 70 | Wet Bulb Temp | RH Percent

Source Layout Sketch

Draw North Arrow ☐ TN ☐ MN





Stack With Plume
Sun
Wind

Longitude | Latitude | Declination

Additional Information:

Form Number | Page 1 of 1
Continued on VEO Form Number

Observation Date: 3/18/09 | Time Zone: EST | Start Time: 1035 | End Time: 1105 | Comments

Set/Min	0	15	30	45	Set/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				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
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				

Overall Opacity: 0 | Six-Minute Average: 0

Observer's Name (Print): FRANCIS MORLU
Observer's Signature: [signature] | Date: 3/18/09
Organization: South Florida Environmental Services
Certified By: ETA | Date: 2/11/09

EPA
VISIBLE EMISSION OBSERVATION FORM I

Method Used (Circle One)
(Method 9) 203A 203B Other _____

Company Name: OKEELANTA CORPORATION
Facility Name: SUGAR REFINERY
Street Address: 21250 U.S. HIGHWAY 27
City: SOUTH BAY State: FL Zip: 33493

Process: REFINING Unit #: EU022 Operating Mode: NORMAL
Control Equipment: DUST COLLECTOR Operating Mode: NORMAL
Describe Emission Point: VENT OF EU022

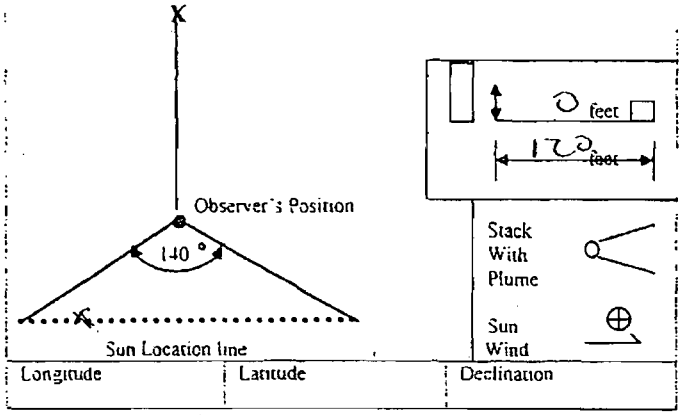
Height of Emiss Pt. Start 100 End 100
Height of Emiss Pt. Rel. to Observer Start 0 End 0
Distance to Emiss Pt. Start 120 End 120
Direction to Emiss Pt. (Degrees) Start 10 End 10
Vertical Angle to Obs Pt. Start 0 End 0
Direction to Obs Pt. (Degrees) Start 10 End 10
Distance and Direction to Observation Pt. From Emission Pt. Start 120 @ 10 End SAME

Describe Emissions Start NONE End NONE
Emission Color Start N/A End N/A
Water Droplet Plume: Attached ☐ Detached ☐ None ☐

Describe Plume Background Start SKY End SKY
Background Color Start WHITE End SAME
Sky Conditions Start Cloudy End SAME
Wind Speed Start 20-25 End 20-25
Wind Direction Start NW End NW
Ambient Temperature Start 60 End 60
Wet Bulb Temp
RH Percent

Source Layout Sketch

Draw North Arrow
☐ TN ☐ MN



Longitude	Latitude	Declination

Additional information:

Form Number: Page 1 of 1
Continued on VEO Form Number:

Observation Date: 4/7/09 Time Zone: EST Start Time: 1000 End Time: 1030 Comments:

Min	Sec 0	15	30	45	Min	Sec 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				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
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				

Overall Opacity: 0 Six-Minute Average: 0

Observer's Name (Print): FRANCIS MORLU
Observer's Signature: [signature] Date: 4/7/09
Organization: South Florida Environmental Services
Certified By: LTA Date: 2/11/09

EPA
VISIBLE EMISSION OBSERVATION FORM I

Method Used, Circle One
(Method 9) 203A 203B Other _____

Company Name: OLEBLANIA CORP.
Facility Name: SUGAR REFINERY
Street Address: 21250 U.S. HIGHWAY 27
City: SOUTH BAY State: FL Zip: 33493

Process: PERKINS GRAIN G | Unit #: EU023 | Operating Mode: NORMAL
Control Equipment: DUST COLLECTION | Operating Mode: NORMAL

Describe Emission Point: STACK OF EU 023

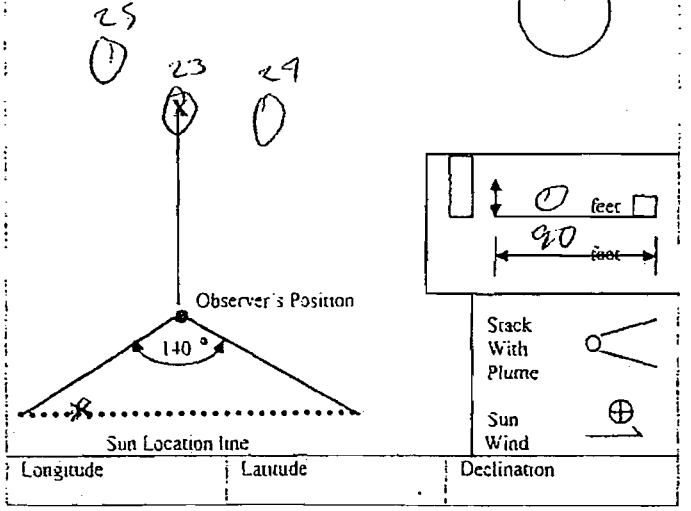
Height of Emiss Pt. Start 105 End 105 | Height of Emiss Pt. Rel to Observer Start 0 End 0
Distance to Emiss Pt. Start 90 End 90 | Direction to Emiss Pt. (Degrees) Start 360 End 360

Vertical Angle to Obs Pt. Start 0 End 0 | Direction to Obs Pt. (Degrees) Start 360 End 360
Distance and Direction to Observation Pt. From Emission Pt. Start 90 @ 360 End SAME

Describe Emissions Start NONE End SAME
Emission Color Start N/A End N/A | Water Droplet Plume Attached ☐ Detached ☐ None ☒

Describer Plume Background Start SKY End SAME
Background Color Start WHITE End SAME | Sky Conditions Start CLOUDY End SAME
Wind Speed Start 20-25 End SAME | Wind Direction Start NW End NW
Ambient Temperature Start 60 End 60 | Wet Bulb Temp | RH Percent

Source Layout Sketch



Longitude | Latitude | Declination

Additional Information:

Form Number | Page 1 of 1
Continued on VEO Form Number

Observation Date 4/7/09 | Time Zone EST | Start Time 0905 | End Time 0935 | Comments

Min	Sec 0	15	30	45	Min	Sec 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				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
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				

Overall Opacity: 0 | Six-Minute Average: 0

Observer's Name (Print): FRANCIS MORLU
Observer's Signature: F K Morlu | Date: 4/7/09
Organization: South Florida Environmental Services
Certified By: GTA | Date: 2/11/09

EPA
VISIBLE EMISSION OBSERVATION FORM I

Method Used (Circle One)
(Method 9) 203A 203B Other _____

Company Name: OKEELANTA CORPORATION
Facility Name: SUGAR REFINERY
Street Address: 21250 U.S. HIGHWAY 27
City: SOUTH BAY State: FL Zip: 33493

Process: REFINING | Unit #: EU028 | Operating Mode: NORMAL
Control Equipment: DUST COLLECTOR | Operating Mode: NORMAL

Describe Emission Point: EXHAUST OF EU 028

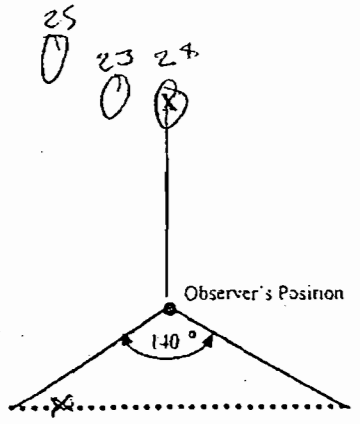
Height of Emiss Pt. Start 105 End 105 | Height of Emiss Pt. Rel. to Observer Start 0 End 0
Distance to Emiss Pt. Start 90 End 90 | Direction to Emiss Pt. (Degrees) Start S End S

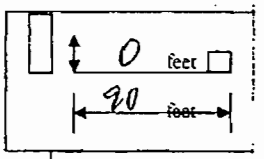
Vertical Angle to Obs Pt. Start 0 End 0 | Direction to Obs Pt. (Degrees) Start S End S
Distance and Direction to Observation Pt. From Emission Pt. Start 90 E S End SAME

Describe Emissions Start NONE End NONE
Emission Color Start N/A End N/A | Water Droplet Plume Attached ☐ Detached ☐ None ☒

Describe Plume Background Start SKY End SAME
Background Color Start WHITE End SAME | Sky Conditions Start CLOUDY End SAME
Wind Speed Start 20-25 End 20-25 | Wind Direction Start NW End NW
Ambient Temperature Start End | Wet Bulb Temp | RH Percent

Source Layout Sketch — Draw North Arrow ☐ TN ☐ MN





Stack With Plume
Sun
Wind

Longitude | Latitude | Destination

Additional Information:

Form Number | Page 1 of 1
Continued on VEO Form Number

Observation Date 4/7/09 | Time Zone | Start Time 0905 | End Time 0935 | Comments

Sec / Min	0	15	30	45	Sec / 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				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
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				

Overall Opacity: 0 | Six-Minute Average: 0

Observer's Name (Print): FRANCIS MORLU
Observer's Signature: FKMorlu | Date: 4/7/09
Organization: South Florida Environmental Services
Certified By: EPA | Date: 2/11/09

EPA
VISIBLE EMISSION OBSERVATION FORM I

Method Used (Circle One): (Method 9) 203A 203B Other _____

Company Name: OWEGLANNA CORP.
Facility Name: SUGAR REFINERY
Street Address: 2250 U.S. HIGHWAY 27
City: SOUTH BAY State: FL Zip: 33493

Process: REFINING Unit #: BOILERS Operating Mode: NORMAL
Control Equipment: DUST COLLECTOR Operating Mode: NORMAL

Describe Emission Point: STACK OF BOILERS

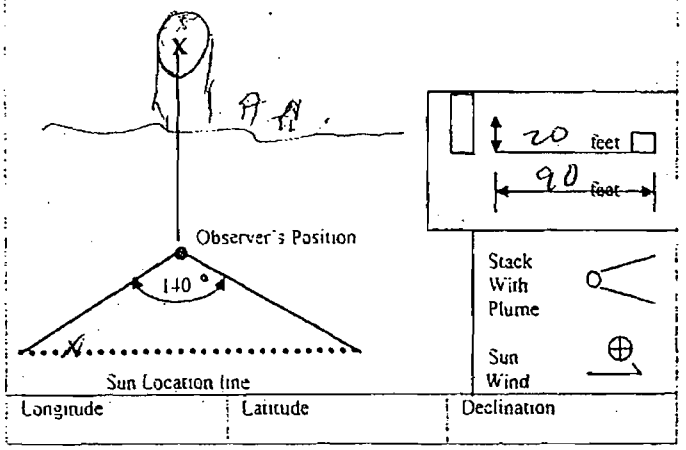
Height of Emiss Pt. Start 120 End 120
Height of Emiss Pt. Rel to Observer Start 20 End 20
Distance to Emiss Pt. Start 90 End 90
Direction to Emiss Pt. (Degrees) Start 355 End 355
Vertical Angle to Obs Pt. Start 12 End 12
Direction to Obs Pt. (Degrees) Start 355 End 355
Distance and Direction to Observation Pt. From Emission Pt. Start 90 @ 355 End SAME

Describe Emissions Start NONE End NONE
Emission Color Start N/A End N/A
Water Droplet Plume Attached ☐ Detached ☐ None ☒ X

Describer Plume Background Start SKY End SKY
Background Color Start WHITE End SAME
Sky Conditions Start CLOUDY End SAME
Wind Speed Start 20-25 End 20-25
Wind Direction Start NW End NW
Ambient Temperature Start 60 End 60
Wet Bulb Temp
RH Percent

Source Layout Sketch

Draw North Arrow ☐ TN ☐ MN



Longitude | Latitude | Declination

Additional Information.

Form Number Page 1 of 1
Continued on VEO Form Number

Observation Date 4/7/09 Time Zone EST Start Time 1000 End Time 1032 Comments

Sec/Min	0	15	30	45	Sec/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				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
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				

Overall Opacity: 0 Six-Minute Average: 0

Observer's Name (Print): FRANCIS K. MORLU
Observer's Signature: FKM Date: 4/7/09
Organization: South Florida Environmental Services
Certified By: EPA Date: 2/17/09

EPA

VISIBLE EMISSION OBSERVATION FORM I

Method Used (Circle One): (Method 9) 203A 203B Other _____

Company Name: OKEELANTA CORPORATION

Facility Name: PACKAGING PLANT

Street Address: 21250 U.S. HIGH WAY 27 S

City: SOUTH BAY | State: FL | Zip: 33493

Process: PACKAGING | Unit #: 046 | Operating Mode: NORMAL

Control Equipment: DUST COLLECTOR | Operating Mode: NORMAL

Describe Emission Point: HORIZONTAL CYLINDICAL EXHAUST

Height of Emiss Pt. Start 45 End 45 | Height of Emiss Pt. Rel to Observer Start 45 End 45

Distance to Emiss Pt. Start 250 End 250 | Direction to Emiss Pt. (Degrees) Start 270 End 270

Vertical Angle to Obs Pt. Start End | Direction to Obs Pt. (Degrees) Start 270 End 270

Distance and Direction to Observation Pt. From Emission Pt. Start 250 @ 270 End SAME

Describe Emissions Start NONE End NONE

Emission Color Start N/A End N/A | Water Droplet Plume Attached ☐ Detached ☐ None ☒

Describe Plume Background Start WALL End SAME

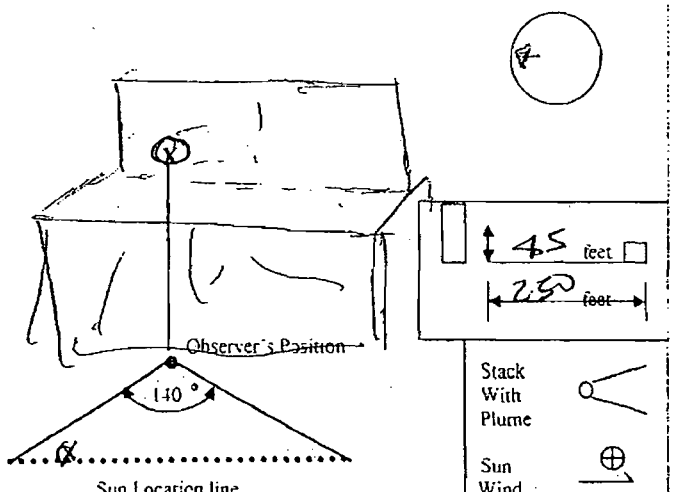
Background Color Start GRAY End SAME | Sky Conditions Start CLOUDY End SAME

Wind Speed Start 0-5 End 0-5 | Wind Direction Start SE End SE

Ambient Temperature Start 70 End 70 | Wet Bulb Temp | RH Percent

Source Layout Sketch

Draw North Arrow ☐ TN ☐ MN



Longitude | Latitude | Declination

Additional Information.

Form Number | Page 1 of 1

Continued on VEO Form Number

Observation Date | Time Zone | Start Time 0914 | End Time 0944 | Comments

Min	Sec 0	15	30	45	Min	Sec 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				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
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				

Overall Opacity: 0 | Six-Minute Average: 0

Observer's Name (Print): FRANCIS MORLU

Observer's Signature: | Date: 3/18/09

Organization: South Florida Environmental Services

Certified By: ETA | Date: 2/11/09

EPA
VISIBLE EMISSION OBSERVATION FORM I

Method Used (Circle One)
(Method 9) 203A 203B Other _____

Company Name: OKEELANTA CORPORATION
Facility Name: DISTRIBUTION & PACKAGING CTR.
Street Address: 21250 U.S. HIGHWAY 27 S
City: SOUTH BAY State: FL Zip: 33493

Process: PACKAGING Unit #: 049 Operating Mode: NORMAL
Control Equipment: DUST COLLECTOR Operating Mode: NORMAL

Describe Emission Point: HORIZONTAL EXHAUST

Height of Emiss Pt. Start 7 End 7
Height of Emiss Pt. Rel to Observer Start 2 End 2
Distance to Emiss Pt. Start 30 End 30
Direction to Emiss Pt. (Degrees) Start 260 End 260

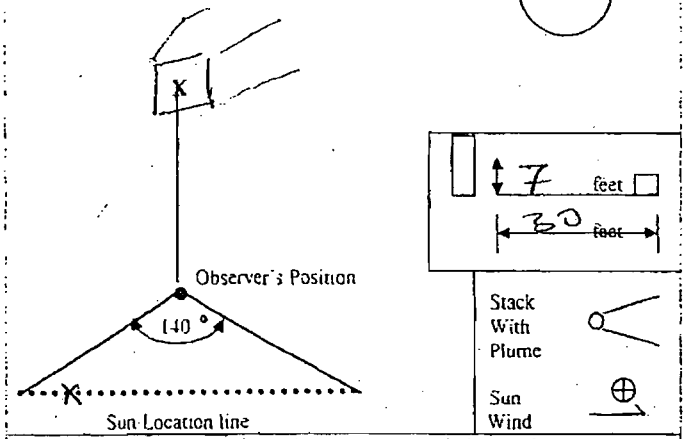
Vertical Angle to Obs Pt. Start End
Direction to Obs. Pt. (Degrees) Start 260 End 260
Distance and Direction to Observation Pt. From Emission Pt.
Start 30 @ 260 End SA

Describe Emissions Start NONE End NONE
Emission Color Start N/A End N/A
Water Droplet Plume Attached ☐ Detached ☐ None ☒

Describe Plume Background Start SKY End SKY
Background Color Start GRAY End SAME
Sky Conditions Start CLOUDY End SAME
Wind Speed Start 0-5 End 0-5
Wind Direction Start SE End SE
Ambient Temperature Start 70 End 70
Wet Bulb Temp
RH Percent

Source Layout Sketch

Draw North Arrow ☐ TN ☐ MN



Longitude | Latitude | Declination

Additional Information:

Form Number | Page 1 of 1
Continued on VEO Form Number

Observation Date: 3/18/09 | Time Zone: DST | Start Time: 1000 | End Time: 1030 | Comments

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				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
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				

Overall Opacity: 0 | Six-Minute Average: 0

Observer's Name (Print): FRANCIS MORLU
Observer's Signature: [signature] Date: 3/18/09
Organization: South Florida Environmental Services
Certified By: ETA Date: 2/11/09

VISIBLE EMISSIONS TEST REPORT

Process Rates

FLORIDA SUGAR DISTRIBUTORS (OKEELANTA TRANS-SHIPMENT FACILITY)

OKEELANTA TITLE V FACILITY 0990005-012-AV

Summary of VE Tests Performed on March 18, 2009

EU ID No. 020 – Sugar Grinder
VE Test period from10:35AM to 11:05AM
Amount Processed = 4,500 lbs. of sugar
Process Rate = 4.50 tons per hour

EU ID No. 046- Powdered Sugar Hopper
VE Test period from 9:14AM to 9:44AM
Amount Processed = 3,600 lbs. of sugar
Process Rate = 3.60 tons per hour

EU ID No. 049- Packaging Line 14 Baghouse (NEW)
VE Test period from 10:00AM to 10:30AM
Amount Processed = 1,620 lbs.
Process Rate = 1.62 tons per hour

FLORIDA CRYUSTALS REFINERY PROCESS RATES DURING COMPLIANCE TESTS

OKEELANTA TITLE V FACILITY 0990005-012-AV

Summary of Tests Performed on April 7, 2009

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

VE Test period 0905 to 0935
Refined Sugar Production Rate = 14.29 tons per hour

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

VE Test period 0905 to 0935
Refined Sugar Production Rate = 14.29 tons per hour

EU ID No. 025 – Fluidized Bed Dryer/Cooler

VE Test period 1000 to 1030
Refined Sugar Production Rate = 47.72 tons per hour

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

VE Test period 1000 to 1030
Combined Sugar Processing Rate = 93 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.

370799
CERT NUMBER

2/11/2009
DATE OF SCHOOL

TAMPA, FL
SCHOOL LOCATION

8/13/2009
CERTIFICATION EXP DATE

MOR522312
STUDENT ID NUMBER

Michael W. Lunsford
MANAGER OF TRAINING SERVICES

ATTACHMENT OC-EU1-IV1

IDENTIFICATION OF APPLICABLE REQUIREMENTS

NOTICE OF FINAL PERMIT

January 16, 2009

CERTIFIED MAIL 7008 0150 0003 1458 8404
RETURN RECEIPT REQUESTED

In the Matter of an
Application for Permit by:

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

Palm Beach County - AP
Okeelanta Sugar Mill
DEP File No. 0990005-023-AC

Enclosed is Final Permit Number 0990005-023-AC. This permit authorizes Okeelanta Corporation to construct or modify the following at its Okeelanta Sugar Mill trans-shipment facility: 1) construct a new baghouse to control sugar dust; 2) modify emission units as a result of changes to operational activities and equipment; and 3) redirect emissions from existing emission units to different existing and new emission units. This facility is located 21250 U.S. Highway 27 South, South Bay, Palm Beach County. This permit is issued pursuant to Section(s) 403.087, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

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

NOTICE OF FINAL PERMIT
Okeelanta Corporation
Okeelanta Sugar Mill
DEP File No. 0990005-023-AC
January 16, 2009

CERTIFICATE OF SERVICE

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

Ricardo A. Lima *
Matthew Capone – matthew_capone@floridacrystals.com
David Buff – dbuff@golder.com
James Stormer - james_stormer@doh.state.fl.us
Jeff Koerner, P.E. – Jeff.koerner@dep.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 Date

Attachments
JMI/SRM/jw

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

Facility I.D. No.: 0990005
Permit Number: 0990005-023-AC
Date of Issue: January 16, 2009
Expiration Date: January 15, 2010
County: Palm Beach
Latitude: 26° 35' 00" N
Longitude: 80° 45' 00" W
Project: Trans-Shipment Facility

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

PROJECT DESCRIPTION

This permit authorizes the construction of a new baghouse to control sugar dust from packaging line 14 (new EU049). This permit also authorizes the modification of emission units EU019 (sugar packaging lines 0-9), EU045 (powdered sugar dryer/cooler), and EU047 (sugar packaging lines 11-14). Emissions from packaging lines 14 and 11 will no longer be controlled by EU047. Packaging line 14 (new EU049) emissions will be controlled by new baghouse. Emissions from packaging line 11 will be vented to the main sugar receiver which vents inside the building. Packaging line 8 will be split into two separate packaging lines, 8A and 8B. Emissions from packaging lines 8A and 8B will be vented to the baghouse controlling emissions from EU019 and the baghouse controlling emissions from EU045. The new construction and modifications will increase the trans-shipment facility's total particulate matter (PM) emissions by an additional 1.35 TPY for a total of 13.65 TPY PM.

The facility is located at 21250 U.S. Highway 27 South, South Bay, Palm Beach County. The trans-shipment facility is located approximately one-half mile south of the sugar refinery.

I. FACILITY DESCRIPTION

Okeelanta Corporation operates a sugar mill, a sugar refinery, and a trans-shipment facility. The facility consists of two adjacent plants. New Hope Power Company operates a cogeneration plant that provides process steam for the sugar mill/refinery and generates electricity for sale to the power grid (SIC No. 4911). The cogeneration plant, sugar mill, and sugar refinery are all considered a single facility for purposes of the PSD and Title V regulatory programs.

Extra-fine granulated sugar (EFG) from the sugar refinery is delivered to the trans-shipment facility. The sugar is unloaded at one of three locations and transferred to either surge bins located above the packaging lines or storage silos. Sugar is transferred from each silo by screw conveyors into surge bins.

Sugar is packaged in one of 14 packaging lines. Thirteen packaging lines [lines 0-9 (EU019), line 12 and 13 (EU047), and line 14 (EU049)] are controlled by baghouses. Sugar is metered from the surge bins into the packaging lines for processing into a variety of packages and containers for wholesale and retail distribution.

PERMITTEE:
Okeelanta Corporation
Okeelanta Sugar Mill

Facility I.D. No.: 0990005
Permit Number: 0990005-023-AC
Date of Issue: January 16, 2009
Expiration Date: January 15, 2010

SPECIFIC CONDITIONS:

Summary of Emissions Units

This facility consists of the following emission units:

EU	Emission Unit Description	EU	Emission Unit Description
018	Central vacuum system No. 1	032	Railcar sugar unloading receiver No. 2
019	Sugar packaging lines 0-9, including packaging lines 8A and 8B	045	Powdered sugar dryer/cooler, packaging lines 8A and 8B
020	Sugar grinder	046	Powdered sugar hopper
030	Sugar silos Nos. 1, 2, and 3 (Points #1101-1103)	047	Sugar packaging lines 12 and 13
031	Railcar sugar unloading receiver No. 1	049	Packaging line 14

Regulatory Classification

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).
Title IV: The existing facility has no units subject to the acid rain provisions of the Clean Air Act.
Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
PSD: The existing facility is a PSD-major facility as defined in Rule 62-212.400, F.A.C.

II. FACILITY WIDE CONDITIONS:

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

2. Permitting Authority. All documents related to applications for permits to construct or operate shall be submitted to the Air Resource Section of Department's South District Office, Post Office Box 2549, Fort Myers, Florida, 33902-2549. Copies of all such documents shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-240 and the Air Pollution Control Section of the Palm Beach County Health Department, Post Office Box 29, West Palm Beach, Florida, 33402-0029.

3. Compliance Authority. The permittee shall submit all compliance related notifications and reports required by this permit to the Air Pollution Control Section of the Palm Beach County Health Department, Post Office Box 29, West Palm Beach, Florida, 33402-0029. Copies of all such documents shall be submitted to the Department's South District office at Post Office Box 2549, Fort Myers, Florida, 33902-2549.

4. Applicable Regulations, Forms and Application Procedures. Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit

does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

5. New or Additional Conditions. For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications. The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Title V Permit. This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, F.A.C., and Chapter 62-213, F.A.C.]

8. Objectionable Odor Prohibited. The transshipment facility shall not discharge air pollutants which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(219), F.A.C.]

9. Fugitive Dust Emissions. This permit requires the use of fans, filters, pneumatic unloading/loading, ductwork, storage silos and other similar equipment to contain, capture, and/or control particulate matter related to the storage and handling of sugar at the transshipment facility. The permittee shall also take the following reasonable precautions to prevent fugitive particulate matter emissions from any activity, including: vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling.
    a. Enclose or cover conveyor systems.
    b. Confine abrasive blasting where possible.
    c. As necessary, landscape and/or plant vegetation.
    d. As necessary, pave and maintain high-traffic roads, parking areas and yards.
    e. As necessary, remove particulate matter from roads, work areas, buildings, and other paved areas under the control of the permittee to prevent fugitive dust emissions.
    f. As necessary, apply water or other dust suppressants to control emissions from unpaved roads, yards, and other activities as road grading, land clearing, and the demolition of buildings.

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

10. Operating Permit. To obtain a permit to operate, the permittee must submit a timely and complete application for an operating permit {"Application for Air Permit –Title V Source" [DEP Form 62-210.900(1)]}, to the Department. A timely application is one which is submitted at least ninety days before expiration of the

construction permit, but no later than 180 days after commencing operation as a Title V source. An applicant making timely and complete application for a permit shall continue to operate the source under the authority and provisions of this permit. Upon completion of construction, the application shall include the appropriate application fee and required testing results that demonstrate compliance with all permitted emission limits. All applications shall be certified by a professional engineer registered in the State of Florida. [Rules 62-213.420(1)(a) & (b), 62-297.310(7)(a)1., and 62-4.050(3), F.A.C.]

11. 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.]

12. General Visibility Emissions (VE) Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).
    a. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.
    b. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

    [Rule 62-296.320(4)(b), F.A.C.]

13. 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.]

14. 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, 62-210.300 and (1)(a), and 62-4.210, F.A.C.]

15. Special Compliance Tests. When the Compliance Authority, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Compliance Authority. [Rule 62-297.310(7)(b), F.A.C.]

PERMITTEE:
Okeelanta Corporation
Okeelanta Sugar Mill

Facility I.D. No.: 0990005
Permit Number: 0990005-023-AC
Date of Issue: January 16, 2009
Expiration Date: January 15, 2010

SPECIFIC CONDITIONS:

III. EMISSIONS UNITS AND DESCRIPTION

This section of the permit addresses the following emissions units:

EU	Emission Unit Description
019	Sugar packaging lines 0-9, including packaging lines 8A and 8B
045	Powdered sugar dryer/cooler, packaging lines 8A and 8B
047	Sugar packaging lines 12 and 13
049	Packaging line 14

Equipment

16. New Operations. The permittee is authorized to the modify the operations of the trans-shipment process as follows:
    a. Packaging line 8 will be separated into packaging lines 8A and 8B. Packaging lines 8A and 8B will vent emissions to the baghouse controlling emissions from EU019 and the baghouse controlling emissions from EU045.
    b. Packaging line 11 and packaging line 14 will no longer vent emissions to EU047. Packaging line 11 will vent emissions to the main sugar receiver. The main sugar receiver vents inside the building and is not controlled by a baghouse. Packaging line 14 (new EU049) will vent to the new baghouse authorized by this permit.

17. New Baghouse. The permittee is authorized to the install a new baghouse to control emissions from packaging line 14 (new EU049). Packaging line 14 will no longer vent emissions to EU047.

18. Baghouse Design Specifications. Each of the following emissions units shall be controlled by a baghouse that is designed, operated, and maintained to achieve the particulate matter baghouse design specification (grains/scf) identified in the following table:

EU	Emission Unit Description	Baghouse Specification [a] (grains/scf)	Exhaust Rate scfm	Stack Height	Maximum Emissions [b]	
				(feet)	lb/hour	tons/year
019	Sugar packaging lines (0-9)	0.01	9869	27	0.85	3.71
045	Powdered sugar dryer/cooler, Packaging Lines 8A & 8B	0.01	8640	48	0.74	3.24
047	Sugar packaging lines (12,13)	0.01	3629	48	0.49	2.16
049	Packaging Line 14	0.02	2212	9	0.38	1.66

    a. New and replacement bags shall meet these specifications based on vendor information. No particulate matter emissions tests are required.
    b. These rates represent the maximum expected emissions based on the baghouse design specification, the maximum exhaust flow rates, and 8760 hours of operation per year. These rates are not enforceable emissions standards.

SPECIFIC CONDITIONS:

Essential Potential to Emit Parameters

19. Permitted Capacity. The maximum sugar packaging rate is 1300 tons per day. [Rule 62-210.200(PTE), F.A.C.]

20. Restricted Operation. The hours of operation are not limited. [Rules 62-4.070(3), and 62-210.200(PTE), F.A.C.]

21. Plant Operation – Problems. If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]

Emissions Limits and Standards

22. Opacity Standard. As determined by EPA Method 9 observations, visible emissions from each baghouse exhaust point shall not exceed 5% opacity. [Rule 62-4.070(3), F.A.C.; Permit No. 0990005-019-AC]

Excess Emissions

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

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

25. Excess Emissions – Notification. In case of excess emissions resulting from malfunctions, the permittee shall notify the Department Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Compliance Authority. [Rule 62-210.700(6), F.A.C.]

Test Methods and Procedures

26. Initial Compliance Tests. The new baghouse exhaust point for EU049 shall be tested to demonstrate initial compliance with the specified opacity standard. The initial test shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rule 62-297.310(7)(a)1, F.A.C.]

SPECIFIC CONDITIONS:

27. Annual Compliance Tests. During each federal fiscal year (October 1st to September 30th), each baghouse exhaust point shall be tested to demonstrate compliance with the specified opacity standard. [Rule 62-297.310(7)(a)4, F.A.C.]

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

29. Test Method. All tests shall be conducted in accordance with EPA Method 9, which is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. Tests shall also comply with the applicable requirements of Rule 62-297.310, F.A.C. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

30. Test Procedures. Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur. The permittee shall record the actual sugar processing rate for the emissions unit being controlled and tested. [Rules 62-297.310(4) and (5), F.A.C.]

31. Test Notification. At least 15 days prior to the date on which each formal compliance test is to begin, the permittee shall notify the Compliance Authority of: the date, time, and place of the test; and the contact person who will be responsible for coordinating and having the test conducted. [Rule 62-297.310(7)(a)9, F.A.C.]

Recordkeeping and Reporting Requirements

32. Test Reports. The permittee shall submit a report to the Compliance Authority on the results of each opacity test. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Compliance Authority to determine if the test was properly conducted and the test results properly computed. The test report shall include the information specified in Rule 62-297.310(8), F.A.C. The required test report shall be filed as soon as practical but no later than 45 days after completing the test. [Rule 62-297.310(8), F.A.C.]

33. Records Retention. All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Compliance Authority upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]

34. Annual Operating Reports (AOR). The permittee shall submit to Air Pollution Control Section of the Palm Beach County Health Department (with copies submitted to the Department's South District office) by April 1 of the following year, except that the annual operating report for year 2008 shall be submitted by May 1, 2009. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office. [Rule 62-210.370(3), F.A.C.]

35. Operational Data. The permittee shall maintain daily and monthly records of the sugar packaging rate to demonstrate compliance with the permit limitations specified in Condition 19. of this permit. [Rule 62-4.070(3), F.A.C.]

PERMITTEE:
Okeelanta Corporation
Okeelanta Sugar Mill

Facility I.D. No.: 0990005
Permit Number: 0990005-023-AC
Date of Issue: January 16, 2009
Expiration Date: January 15, 2010

SPECIFIC CONDITIONS:

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

Issued this 16th day of January 2009.

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

PERMITTEE:
Okeelanta Corporation
Okeelanta Sugar Mill

Facility I.D. No.: 0990005
Permit Number: 0990005-023-AC
Date of Issue: January 16, 2009
Expiration Date: January 15, 2010

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

PERMITTEE:
Okeelanta Corporation
Okeelanta Sugar Mill

Facility I.D. No.: 0990005
Permit Number: 0990005-023-AC
Date of Issue: January 16, 2009
Expiration Date: January 15, 2010

GENERAL CONDITIONS:

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).

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.

GENERAL CONDITIONS:

(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.