

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

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

Air Permit No. 0990005-007-AC
Okeelanta Sugar Mill and Refinery
Boiler No. 16 – Temporary,
Simultaneous Operations

Authorized Representative:

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

Palm Beach County, Florida

Enclosed is Final Permit No. 0990005-007-AC. This permit authorizes Okeelanta Corporation to temporarily operate Boiler No. 16 simultaneously with the cogeneration boilers to allow rapid processing of sugarcane damaged by recent severe freezes. This permit is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.



C. H. Fancy, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2/14/01 to the person(s) listed:

Mr. Ricardo A. Lima, Okeelanta Corp.*
Mr. Matthew Capone, Okeelanta Corp.
Mr. David Buff, Golder Associates Inc.

Mr. David Dee, Landers and Parsons
Mr. Ron Blackburn, SD
Mr. Jim Stormer, PBCHD

Clerk Stamp

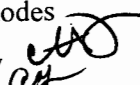


FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

2/14/01
(Date)

Florida Department of
Environmental Protection

Memorandum

TO: Howard Rhodes
THRU: Clair Fancy 
Al Linero 
FROM: Jeff Koerner 
DATE: February 12, 2001
SUBJECT: Final Permit No. 0990005-007-AC
Okeelanta Corporation's Sugar Mill and Refinery
Boiler No. 16, Temporary Simultaneous Operations

The Final Permit for Okeelanta Corporation's Boiler No. 16 is attached for your approval and signature. The permit authorizes temporary operation of this unit simultaneously with the three existing cogeneration boilers to allow rapid processing of sugarcane damaged by recent severe freezes. The authorization expires March 31, 2001, which is the end of the milling season.

The applicant published the Public Notice of Intent to Issue in The Palm Beach Post on January 29, 2001. We received no comments on the Draft Permit from the public, the South District Office, the Palm Beach County Health Department or the applicant. Day 90 for this project is May 15, 2001. I recommend your approval and signature.

Attachments

CHF/AAL/jfk

FINAL DETERMINATION
Okeelanta Corporation – Air Permit No. 0990005-007-AC

PUBLICATION

The Department distributed a Draft Permit package on January 26, 2001 that would authorize temporary operation of Boiler No. 16 simultaneously with the three existing cogeneration boilers to allow rapid processing of sugarcane damaged by recent severe freezes. The applicant published the "Public Notice of Intent to Issue" in The Palm Beach Post on January 29, 2001.

COMMENTS AND CHANGES

The Department received no comments on the Draft Permit from the public, the South District Office, the Palm Beach County Health Department or the applicant. Day 90 for this project is May 15, 2001.

CONCLUSION

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



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

PERMITTEE

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

Authorized Representative:

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

Permit No.	0990005-007-AC
Project:	Boiler No. 16, Temporary Simultaneous Operations
SIC No.	2061, 2062
Expires:	March 31, 2001

PROJECT AND LOCATION

The facility is located near Highway 27, approximately 6 miles south of South Bay in Palm Beach County, Florida. It includes an existing cogeneration plant and an existing sugar mill with refinery. Mill Boiler No. 16 is an existing (permitted) oil-fired boiler currently used as a standby unit for one or more of the cogeneration boilers. This permit authorizes temporary operation of Boiler No. 16 (existing BACT-level controls) simultaneously with the three cogeneration plant boilers for a two-month period to allow rapid processing of sugarcane damaged by recent severe freezes.

The UTM coordinates are Zone 17, 524.9 East, and 2940.1 North.

STATEMENT OF BASIS

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

APPENDICES

The attached appendices are a part of this permit:

- Appendix A - Terminology
- Appendix GC - General Permit Conditions

Howard L. Rhodes, Director
Division of Air Resources Management

**AIR CONSTRUCTION PERMIT
SECTION I. FACILITY INFORMATION**

FACILITY DESCRIPTION

Okeelanta Power L.P. operates a biomass cogeneration plant located near Highway 27, approximately 6 miles south of South Bay in Palm Beach County, Florida. Okeelanta Corporation operates a sugar mill with refinery at an adjacent location. For the purposes of the Department's Prevention of Significant Deterioration (PSD) and Title V operating permit programs, the two plants are considered to be a single facility.

PROJECT DESCRIPTION

The project is the temporary simultaneous operation of existing Boiler No. 16 with the existing three cogeneration plant boilers to quicken processing of sugarcane damaged by a recent freeze. Currently, Boiler No. 16 is permitted as a standby unit for one or more of the cogeneration boilers. This permit authorizes temporary simultaneous operation that would result in actual emissions less than the PSD significant emission rates. The potential emissions associated with this project are approximately: 12 tons per year of CO, 11 tons per year of NOx, 3 tons per year of PM, 2 tons per year of PM10, 32 tons per year of SO2, and 6 tons per year of VOC. A detailed description of the project is presented in the Department's "Technical Evaluation and Preliminary Determination". This permit addresses the following emissions unit:

EU No.	Emissions Unit Description
016	Mill Boiler No. 16: Oil-fired boiler with a maximum hourly steam production rate of 150,000 lb/hour

REGULATORY CLASSIFICATION

Title III: The facility is a major source of hazardous air pollutants (HAPs).

Title IV: The facility is not subject to the Title IV acid rain provisions of the Clean Air Act.

Title V: Because potential emissions of at least one regulated air pollutant exceeds 100 tons per year, the facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

PSD: The facility operates units classified as "fossil fuel steam electric plants with more than 250 mmBTU per hour of heat input". Because potential emissions are greater than 100 tons per year for at least one regulated air pollutant, the facility is also a major source of air pollution in accordance with Rule 62-212.400, F.A.C., the Prevention of Significant Deterioration (PSD) of Air Quality. Projects resulting in net emissions increases greater than the Significant Emissions Rates specified in Table 62-212.400-2, F.A.C. are subject to the PSD requirements of that rule.

NSPS: The facility operates several emissions units subject to a New Source Performance Standard (NSPS) of 40 CFR 60. Boiler No. 16 is subject to NSPS Subpart Db for boilers.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action and are on file with the Department.

- Permit application
- Department's Technical Evaluation and Determination
- Department's Intent to Issue

AIR CONSTRUCTION PERMIT
SECTION II. ADMINISTRATIVE REQUIREMENTS

1. **Permitting Authorities:** All documents related to applications for permits to construct or modify this emissions unit shall be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. Copies shall also be submitted to each Compliance Authority.
2. **Compliance Authorities:** All documents related to reports, tests, and notifications shall be submitted to the Air Pollution Control Section of the Palm Beach County Health Department at P.O. Box 29 in West Palm Beach, Florida 33402-0029. Copies of all documents shall also be submitted to the South District Office, Florida Department of Environmental Protection at 2295 Victoria Avenue, Suite 364 in Fort Myers, Florida 33902-2549.
3. **Definitions:** The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code and specifically, Rule 62-210.200, F.A.C. General terminology and rule citations are provided in *Appendix A* of this permit.
4. **General Conditions:** The owner and operator are subject to and shall operate under the attached General Conditions listed in *Appendix GC* of this permit. General conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
5. **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, 62-110, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the Code of Federal Regulations (CFR) adopted by reference in Chapter 62-204.800, F.A.C. Issuance of this permit does not relieve the facility owner or operator 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.]
6. **New or Additional Conditions:** Pursuant to Rule 62-4.080, F.A.C., 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.]
7. **Expiration:** This air construction permit shall expire on March 31, 2001. It shall not be extended for any reason. [Rules 62-210.300(1), 62-4.080, and 62-4.210, F.A.C.; Applicant Request]
8. **Modifications:** 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 must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

**AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**

EU-014 – MILL BOILER NO. 16

The specific conditions in this section address the following emissions unit.

ID	Emission Unit Description
014	<p>Mill Boiler No. 16 is a Babcock and Wilcox Model No. FM 120-97 package process steam boiler with low-NOx burners and 40% flue gas re-circulation. Fired with 205 mmBTU per hour of heat input from distillate oil, the boiler has a maximum short-term steam production rate of 150,000 pounds per hour. Exhaust gases exit the 5 feet diameter, 75 feet tall stack with a volumetric flow rate of 88,200 acfm and a temperature of 410° F. Opacity, NOx emissions, steam production rate, steam temperature, and steam pressure are recorded by continuous monitoring systems.</p> <p>SCC No. 1-02-005-01: External combustion boiler, distillate oil grades No. 1 and 2</p>

1. **Applicable Requirements:** Mill Boiler No. 16 is an existing (permitted) boiler that currently serves as a standby unit when one or more of the cogeneration boilers are off-line. This air construction permit authorizes temporary simultaneous operation of this unit with the existing three cogeneration plant boilers. Except where the conditions of this construction permit differ, the permittee shall comply with all other valid requirements, including:
 - a. The conditions, as amended, of air construction Permit No. PSD-FL-169 issued on July 30, 1991;
 - b. The NSPS requirements of 40 CFR 60 Subpart Db as incorporated by Rule 62-204.800, F.A.C. and specified in air construction Permit No. PSD-FL-169;
 - c. The applicable conditions of air construction Permit No. PSD-FL-196L (cogeneration plant) last revised on November 6, 2000; and
 - d. The conditions of Title V air operation Permit No. 0990005-003-AV issued on October 24, 2000.This air construction permit shall temporarily supplement the conditions of all existing valid air permits.
[Rule 62-210.300, F.A.C.; Permit Nos. PSD-FL-169, PSD-FL-196, and 0990005-003-AV]
2. **Limited Authorization for Temporary Period:** This permit authorizes simultaneous operation of Boiler No. 16 with the three cogeneration plant boilers from the date of permit issuance through March 31, 2001. This authorization expires at the end of March 31, 2001 and shall not be extended.
[Rule 62-210.300(1), F.A.C.]
3. **Restrictions:** For the specified temporary period, Boiler No. 16 may operate simultaneously with all three existing cogeneration boilers, providing:
 - a. Okeelanta Power L.P.'s cogeneration boilers supply steam to the Okeelanta Corporation's sugar mill and refinery to the maximum extent possible before operating Boiler No. 16.
 - b. Boiler No. 16 complies with all existing permit conditions and requirements.
 - c. Boiler No. 16 fires no more than 885,000 gallons of distillate oil during the specified temporary period of operation. Compliance with this condition shall be demonstrated by recording the fuel consumption rate for each week of operation during the temporary period of operation. The total fuel consumption for the temporary period shall be reported to the Department's South District Office and the Palm Beach County Health Department by April 15, 2001.

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

EU-014 – MILL BOILER NO. 16

- d. Any distillate oil added during the temporary period shall contain no more than 0.30% sulfur by weight.
- e. In addition to the other applicable standards, NO_x emissions shall not exceed 11.15 tons during the specified temporary period. Total NO_x emissions for the temporary period based on CEMS data shall be reported to the Department's South District Office and the Palm Beach County Health Department by April 15, 2001.
- f. Total actual annual emissions from Boiler No. 16 and the cogeneration plant shall not exceed the levels specified in the Palm Beach County special exception to zoning requirements, Petition No. 92-14. Emissions for the temporary period shall be calculated based on the best available data and reported to the Palm Beach County Health Department by April 15, 2001.

[Rules 62-4.070(3) and 62-212.400, F.A.C.]

4. Emissions Compliance Demonstrations: During the specified temporary period, the permittee shall demonstrate compliance with the existing emissions standards for Boiler No. 16 in accordance with the following conditions.
- a. Compliance with the visible emissions standards shall be demonstrated by conducting a DEP Method 9 test within 15 days of startup as well as data collected from the continuous opacity monitoring system (COMS). Compliance with the visible emissions standards shall also serve as surrogate standards for particulate matter. Unless the Department has good reason to believe the particulate matter emissions standard is being exceeded, a particulate matter test is not required during the specified temporary period.
 - b. Compliance with the NO_x emissions standards shall be demonstrated by data collected from the NO_x continuous emissions monitor (CEMS).
 - c. In accordance with the original construction permit, no tests are required for CO and VOC emissions, unless the Department has good reason to believe the emissions standards are being exceeded.
 - d. Compliance with the fuel oil sulfur limit shall be demonstrated by taking a sample, analyzing the sample for fuel sulfur, and reporting the results to the Departments' South District Office and the Palm Beach County Health Department before initial startup. Sampling the fuel oil sulfur content shall be conducted in accordance with ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90. A more recent version of these methods may be used. A certified fuel sulfur analysis from the fuel vendor shall be obtained for each subsequent fuel delivery. At the request of the Department's South District Office or the Palm Beach County Health Department, the permittee shall perform additional sampling and analysis for the fuel sulfur content.

[Rule 62-4.070(3), F.A.C.; Permit Nos. PSD-FL-169, PSD-FL-196, and 0990005-003-AV]

{Note: Amended Permit No. PSD-FL-169 and the latest letter modification for Permit No. PSD-FL-196 are attached for reference. The recently issued Title V air operation permit is available on the Department's web site at: <http://www.dep.state.fl.us/air/permitting.htm>.}

SECTION IV.
APPENDIX A - TERMINOLOGY

ABBREVIATIONS AND ACRONYMS

- DEP** - State of Florida, Department of Environmental Protection
DARM - Division of Air Resource Management
EPA - United States Environmental Protection Agency
F.A.C. - Florida Administrative Code
F.S. - Florida Statute
UTM - Universal Transverse Mercator

RULE CITATIONS

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, permit numbers, and identification numbers.

Florida Administrative Code (F.A.C.) Rules:

- Example:** [Rule 62-213.205, F.A.C.]
Where: 62 - refers to Title 62 of the Florida Administrative Code (F.A.C.)
62-213 - refers to Chapter 62-213, F.A.C.
62-213.205 - refers to Rule 62-213.205, F.A.C.

Facility Identification (ID) Number:

- Example:** Facility ID No. 099-0001
Where: 099 - 3 digit number indicates that the facility is located in Palm Beach County
0221 - 4 digit number assigned by state database identifies specific facility

New Permit Numbers:

- Example:** Permit No. 099-2222-001-AC or 099-2222-001-AV
Where: AC - identifies permit as an Air Construction Permit
AV - identifies permit as a Title V Major Source Air Operation Permit
099 - 3 digit number indicates that the facility is located in Palm Beach County
2222 - 4 digit number identifies a specific facility
001 - 3 digit sequential number identifies a specific permit project

Old Permit Numbers:

- Example:** Permit No. AC50-123456 or AO50-123456
Where: AC - identifies permit as an Air Construction Permit
AO - identifies permit as an Air Operation Permit
123456 - 6 digit sequential number identifies a specific permit project

SECTION IV.

APPENDIX GC - CONSTRUCTION PERMIT GENERAL CONDITIONS

- G.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.
- G.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.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.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.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.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.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

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

- G.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

SECTION IV.

APPENDIX GC - CONSTRUCTION PERMIT GENERAL CONDITIONS

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.

- G.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.
- G.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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (not applicable to project);
 - (b) Determination of Prevention of Significant Deterioration (not applicable to project); and
 - (c) Compliance with New Source Performance Standards (not applicable to project).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.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.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Ricardo A. Lima, V.P. and
 General Manager
 Okeelanta Corporation
 21250 U.S. Highway 27
 South Bay, FL 33493

2. Article Number (Copy from service label)
 7099 3400 0000 1449 3850

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **G. McPhee** B. Date of Delivery **2-16-01**

C. Signature: **[Signature]** Agent Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7099 3400 0000 1449 3850

Article Sent To:

Mr. Ricardo A. Lima, VP & Gen. Mgr.

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Okeelanta Corp.

Postmark Here

Name (Please Print Clearly) (to be completed by mailer)
Mr. Ricardo A. Lima

Street, Apt. No., or PO Box No.
 21250 US Highway 27
 City, State, ZIP+4
 South Bay, FL 33493

LANDERS & PARSONS, P.A.
ATTORNEYS AT LAW

DAVID S. DEE
DIANE K. KIESLING
JOSEPH W. LANDERS, JR.
JOHN T. LAVIA, III
FRED A. McCORMACK
PHILIP S. PARSONS
LESLIE J. PAUGH
ROBERT SCHEFFEL WRIGHT

VICTORIA J. TSCHINKEL
SENIOR CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

MAILING ADDRESS:
POST OFFICE BOX 271
TALLAHASSEE, FL 32302-0271

310 WEST COLLEGE AVENUE
TALLAHASSEE, FL 32301

TELEPHONE (850) 681-0311
TELECOPY (850) 224-5595
www.landersonparsons.com

February 5, 2001

Jeff Koerner
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

RECEIVED

FEB 06 2001

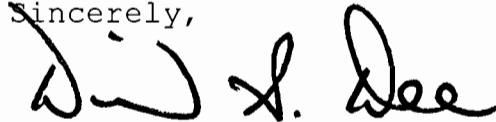
Re: Okeelanta Corporation Boiler No. 16 **BUREAU OF AIR REGULATION**
DEP File No. 0990005-007-AC

Dear Jeff:

On January 29, 2001, Okeelanta Corporation published notice in the Palm Beach Post concerning DEP's intent to issue an air construction permit for the temporary use of sugar mill Boiler No. 16. A copy of the newspaper notice, and the Proof of Publication from the Palm Beach Post, are enclosed for the Department's files.

Please call me if you have any questions.

Sincerely,



David S. Dee

Enclosures

cc: Bill Tarr (w/enc.)
Gus Cepero (w/enc.)
James Meriwether (w/enc.)
Matt Capone (w/enc.)

R. Blackburn, SD
G. Stamer, PBCHD

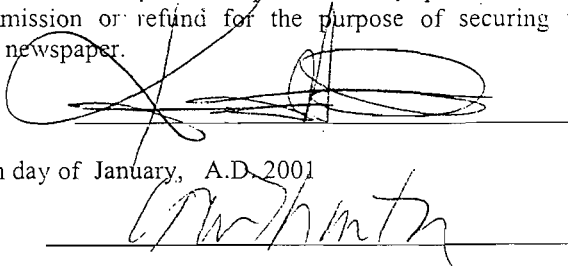
THE PALM BEACH POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

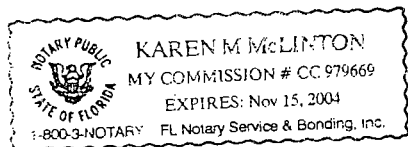
STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared **Kevin Austin**, who on oath says that he is **Classified Advertising Manager**, of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, a **Notice** in the matter of **Intent to Issue Air Construction Permit** in the --- Court, was published in said newspaper in the issues of **January 29, 2001**. Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before this 29th day of January, A.D. 2001

Personally known **XX** or Produced Identification _____
Type of Identification Produced _____



NO. 781465
PUBLIC NOTICE OF INTENT
TO ISSUE AIR
CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
DEP File No.
0990005-007-AC
Okeelanta Corporation
Existing Sugar Mill
Mill Boiler No. 16 -
Temporary Simultaneous
Operation

Palm Beach County
The Department of Environ-
mental Protection (Depart-
ment) gives notice of its intent
to issue an air construction
permit to the Okeelanta Cor-
poration the existing sugar
mill located approximately 6
miles south of South Bay in
Palm Beach County, Florida.
The applicant requests tempo-
rary operation of existing Boil-
er No. 16 simultaneously with
the existing cogeneration
plant boilers for approximately
a two-month period to allow
rapid processing of sugarcane
damaged by recent severe
freezes. The applicant's au-
thorized representative is Ri-
cardo A. Lima, the V.P. and
General Manager. The mailing
address is Okeelanta Corpora-
tion, 21250 U.S. Highway 27
South Bay, FL 33493.
Boiler No. 16 was previously
permitted in 1991 with Best
Available Control Technology
(BACT) determinations for
NOx and SO2 emissions. The
BACT-level controls were de-
termined to be low-NOx burn-
ers with 40% flue gas re-circu-
lation and the firing of low
sulfur distillate oil. The poten-
tial emissions associated with
this project are approximately:
12 tons per year of CO, 11
tons per year of NOx, 3 tons
per year of PM, 2 tons per
year of PM10, 32 tons per
year of SO2, and 6 tons per
year of VOC. Because the
emissions increases do not
exceed the Significant Emis-
sion Rates listed in Table 62-
212.400-2, F.A.C., the project
is not subject to the Preven-
tion of Significant Deteriora-
tion requirements of Rule 62-
212.400, F.A.C. A new
determination of the Best
Available Control Technology
(BACT) and an air quality im-
pact analyses were not re-
quired.

The Department will issue the
Final Permit with the attached
conditions unless a response
received in accordance with
the following procedures re-
sults in a different decision or
significant change of terms or
conditions.

The Department will accept
written comments concerning
the proposed permit issuance
action for a period of fourteen
(14) days from the date of
publication of this Public No-
tice of Intent to Issue Air Con-
struction Permit. Written com-
ments should be provided to
the Department's Bureau of
Air Regulation at 2600 Blair
Stone Road, Mail Station
#5505, Tallahassee, FL
32399-2400. Any written com-
ments filed shall be made
available for public inspection.
If written comments received
result in a significant change
in the proposed agency ac-
tion, the Department shall re-
vise the proposed permit and
require, if applicable, another
Public Notice.

The Department will issue the
permit with the attached con-
ditions unless a timely petition
for an administrative hearing
is filed pursuant to sections
120.569 and 120.57 F.S., be-
fore the deadline for filing a
petition. The procedures for
petitioning for a hearing are
set forth below.
Mediation is not available in
this proceeding.
A person whose substantial in-
terests are affected by the
proposed permitting decision
may petition for an adminis-
trative proceeding (hearing) un-
der sections 120.569 and
120.57, F.S. The petition must
contain the information set
forth below and must be filed
(received) in the Office of
General Counsel of the De-
partment at 3500 Common-
wealth Boulevard, Mail Station
#35, Tallahassee, Florida

Fl. Myers, FL 33901-3381
Telephone: 941/332-6975
Palm Beach County
Health Dept.
Air Pollution Control Section
901 Evernia Street
West Palm Beach, FL 33401
Telephone: 561/355-3136
The complete project file in-
cludes the application, techni-
cal evaluations, Draft Permit
and the information submitte
by the authorized represent-
ative, exclusive of confidential
records under Section 408
111, F.S. Interested person
may contact the Administrator
of the New Source Review
Section at 111 South Magnolia
Drive, Suite 4, Tallahassee
Florida 32301, or call
850/488-0114, for additional
information.
PUB: The Palm Beach Post
January 29, 2001

the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within Fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, FL 32301
Telephone: 850/488-0114
Dept. of Environmental Protection
South District Office
2295 Victoria Avenue,

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy, Chief, BAR
THROUGH: Al Linero, Administrator - New Source Review Section *AAL*
FROM: Jeff Koerner, New Source Review Section *JK*
DATE: January 24, 2001
SUBJECT: Okeelanta Corporation
Temporary Simultaneous Operation of Mill Boiler No. 16 with Cogeneration Boilers

Attached is the intent to issue permit and public notice package for the above referenced project. A detailed description of the PSD applicability determination is provided in the attached Technical Evaluation and Preliminary Determination. A brief summary of the project is provided in my attached certification. Day #74 is April 5, 2001. I recommend your approval of the attached Draft Permit for this project.

CHF/AAL/jfk

Attachments



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Air Permit No.	099-0005-007-AC
ARMS ID No.	0990005
SIC Nos.	2061, 2062

PROJECT DESCRIPTION

Okeelanta Power L.P. operates a biomass cogeneration plant located near Highway 27, approximately 6 miles south of South Bay in Palm Beach County, Florida. Okeelanta Corporation operates a sugar mill with refinery at an adjacent location. For the purposes of the Department's Prevention of Significant Deterioration (PSD) and Title V operating permit programs, the two plants are considered to be a single facility. Mill Boiler No. 16 is an existing oil-fired boiler currently permitted as a standby unit for one or more of the cogeneration boilers. Boiler No. 16 was originally permitted under the PSD requirements in 1991. The applicant requests temporary simultaneous operation of existing Boiler No. 16 with the existing three cogeneration boilers to rapidly process sugarcane damaged by a recent freeze. The request was consistent with that described during a pre-application meeting held in Tallahassee on January 16, 2001.

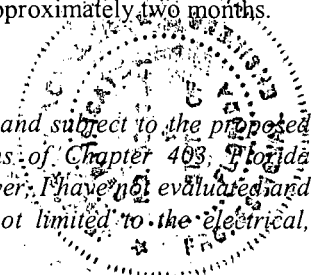
The Draft Permit authorizes temporary simultaneous operation of Boiler No. 16 with the three existing cogeneration boilers through March 31, 2001, providing:

- Okeelanta Power L.P.'s cogeneration boilers supply steam to the Okeelanta Corporation's sugar mill and refinery to the maximum extent possible before operating Boiler No. 16;
- Except where different from this construction permit, Boiler No. 16 complies with all existing permit conditions and requirements;
- Boiler No. 16 fires no more than 885,000 gallons of distillate oil during the temporary period of operation; and
- Any distillate oil added during the temporary period shall contain no more than 0.30% sulfur by weight.

These conditions limit the potential emissions below the PSD Significant Emissions Rates listed in Table 62-212.400-2, F.A.C.; therefore, the project is not subject to PSD requirements. The Department is approving the simultaneous use of an existing (permitted) boiler with BACT-level controls during a maximum temporary period of approximately two months.

CERTIFICATION

I hereby certify that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



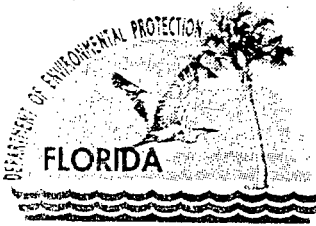
Jeffery F. Koerner

Jeffery F. Koerner, P.E.
Registration Number: 49441

01/24/01

Date

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, New Source Review Section



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Air Permit No.	099-0005-007-AC
ARMS ID No.	0990005
SIC Nos.	2061, 2062

PROJECT DESCRIPTION

Okeelanta Power L.P. operates a biomass cogeneration plant located near Highway 27, approximately 6 miles south of South Bay in Palm Beach County, Florida. Okeelanta Corporation operates a sugar mill with refinery at an adjacent location. For the purposes of the Department's Prevention of Significant Deterioration (PSD) and Title V operating permit programs, the two plants are considered to be a single facility. Mill Boiler No. 16 is an existing oil-fired boiler currently permitted as a standby unit for one or more of the cogeneration boilers. Boiler No. 16 was originally permitted under the PSD requirements in 1991. The applicant requests temporary simultaneous operation of existing Boiler No. 16 with the existing three cogeneration boilers to rapidly process sugarcane damaged by a recent freeze. The request was consistent with that described during a pre-application meeting held in Tallahassee on January 16, 2001.

The Draft Permit authorizes temporary simultaneous operation of Boiler No. 16 with the three existing cogeneration boilers through March 31, 2001, providing:

- Okeelanta Power L.P.'s cogeneration boilers supply steam to the Okeelanta Corporation's sugar mill and refinery to the maximum extent possible before operating Boiler No. 16;
- Except where different from this construction permit, Boiler No. 16 complies with all existing permit conditions and requirements;
- Boiler No. 16 fires no more than 885,000 gallons of distillate oil during the temporary period of operation; and
- Any distillate oil added during the temporary period shall contain no more than 0.30% sulfur by weight.

These conditions limit the potential emissions below the PSD Significant Emissions Rates listed in Table 62-212.400-2, F.A.C.; therefore, the project is not subject to PSD requirements. The Department is approving the simultaneous use of an existing (permitted) boiler with BACT-level controls during a maximum temporary period of approximately two months.

CERTIFICATION

I hereby certify that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

01/24/01

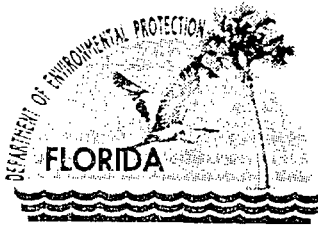
Jeffery F. Koerner, P.E.
Registration Number: 49441

Date

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, New Source Review Section

"More Protection, Less Process"

Printed on recycled paper.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

January 25, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Authorized Representative:

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

Re: Project No. 0990005-007-AC
Temporary Simultaneous Operation of Mill Boiler No. 16

Dear Mr. Lima:

Enclosed is one copy of the Draft Permit for the Okeelanta Corporation sugar mill located approximately 6 miles south of South Bay in Palm Beach County, Florida. The Technical Evaluation and Preliminary Determination, the Department's Intent to Issue Air Construction Permit and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice of Intent to Issue Air Construction Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Jeff Koerner at 850/414-7268.

Sincerely,

C. H. Fancy, Chief
Bureau of Air Regulation

CHF/AL/jfk

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

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

Authorized Representative:

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

Project No. 0990005-007-AC
Facility: Okeelanta Corporation
County: Palm Beach
Project: Mill Boiler No. 16, Temporary
Simultaneous Operation

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of Draft permit attached) for the proposed project, detailed in the application specified above and the enclosed Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Okeelanta Corporation, applied on January 22, 2001 to the Department for an air construction permit for the existing sugar mill located approximately 6 miles south of South Bay in Palm Beach County, Florida. The Draft Permit authorizes temporary operation of existing Boiler No. 16 (existing BACT-level controls) simultaneously with the existing biomass boilers for approximately a two-month period to allow rapid processing of sugarcane damaged by recent severe freezes. The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to install the proposed equipment.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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

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

Mediation is not available in this proceeding.

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

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

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

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

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

Executed in Tallahassee, Florida.


C. H. Fancy, Chief
Bureau of Air Regulation

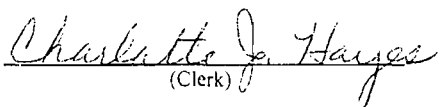
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Preliminary Determination, and the Draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/26/01 to the person(s) listed:

Mr. Ricardo A. Lima, Okeelanta Corporation*
Mr. Matthew Capone, Okeelanta Corporation
Mr. David Buff, Golder Associates Inc.
Mr. Ron Blackburn, SD
Mr. Jim Stormer, PBCHD

Clerk Stamp

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


(Clerk) 1/26/01
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0990005-007-AC

Okeelanta Corporation
Existing Sugar Mill

Mill Boiler No. 16 - Temporary Simultaneous Operation

Palm Beach County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to the Okeelanta Corporation the existing sugar mill located approximately 6 miles south of South Bay in Palm Beach County, Florida. The applicant requests temporary operation of existing Boiler No. 16 simultaneously with the existing cogeneration plant boilers for approximately a two-month period to allow rapid processing of sugarcane damaged by recent severe freezes. The applicant's authorized representative is Ricardo A. Lima, the V.P. and General Manager. The mailing address is Okeelanta Corporation, 21250 U.S. Highway 27 South Bay, FL 33493.

Boiler No. 16 was previously permitted in 1991 with Best Available Control Technology (BACT) determinations for NO_x and SO₂ emissions. The BACT-level controls were determined to be low-NO_x burners with 40% flue gas re-circulation and the firing of low sulfur distillate oil. The potential emissions associated with this project are approximately: 12 tons per year of CO, 11 tons per year of NO_x, 3 tons per year of PM, 2 tons per year of PM₁₀, 32 tons per year of SO₂, and 6 tons per year of VOC. Because the emissions increases do not exceed the Significant Emission Rates listed in Table 62-212.400-2, F.A.C., the project is not subject to the Prevention of Significant Deterioration requirements of Rule 62-212.400, F.A.C. A new determination of the Best Available Control Technology (BACT) and an air quality impact analyses were not required.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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

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

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

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, FL 32301
Telephone: 850/488-0114

Dept. of Environmental Protection
South District Office
2295 Victoria Avenue, Suite 364
Ft. Myers, FL 33901-3381
Telephone: 941/332-6975

Palm Beach County Health Dept.
Air Pollution Control Section
901 Evernia Street
West Palm Beach, FL 33401
Telephone: 561/355-3136

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the authorized representative, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator of the New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

**TECHNICAL EVALUATION,
PSD APPLICABILITY REVIEW, &
PRELIMINARY DETERMINATION**

OKEELANTA CORPORATION

Sugar Mill and Refinery

ARMS Facility ID No. 0990005

And

OKEELANTA POWER LIMITED PARTNERSHIP

Cogeneration Plant

ARMS Facility ID No. 0990332

Project: Temporary Simultaneous Operation of
Mill Boiler No. 16 with Cogeneration Boilers

Emissions Unit ID No. 0990005-014

Palm Beach County

Draft Permit No. 0990005-007-AC

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section

January 24, 2001

{Filename: 169D TEPD.DOC}

1. APPLICATION INFORMATION

1.1 Applicant Name and Address

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

Authorized Representative:

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

1.2 Processing Schedule

01/22/01 Department received application complete.

01/23/01 Department received verbal comments from the Palm Beach County Health Department.

1.3 Facility Description and Location

Okeelanta Corporation operates a sugar mill and refinery located near Highway 27, approximately 6 miles south of South Bay in Palm Beach County, Florida. Okeelanta Power L.P. operates a biomass cogeneration plant at an adjacent location. For the purposes of the Department's Prevention of Significant Deterioration (PSD) and Title V operating permit programs, the two plants are considered to be a single facility. The plant is located near the city of South Bay in western Palm Beach County, an area that is in attainment (or designated as "maintenance" or "unclassifiable") for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS). The UTM coordinates are Zone 17, 524.9 km E, 2940.1 km N.

1.4 Standard Industrial Classification Code (SIC)

Sugar Mill: 2061 (Sugar Processing) and 2062 (Sugar Refining)

Cogeneration Plant: 4911 (Electrical Generation)

1.5 Regulatory Categories

HAPs: Based on available data, the facility is believed to be a major source of hazardous air pollutants (Title III).

Acid Rain: Based on the initial Title V application, the facility is not subject to the acid rain provisions of the Clean Air Act (Title IV).

Title V Major Source: The facility is a Title V major source of air pollution because potential emissions of at least one regulated pollutant exceed 100 tons per year. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM/PM10), sulfur dioxide (SO2), and volatile organic compounds (VOC).

PSD Major Source: The facility is located in an area that is in attainment with, or designated as unclassifiable for, each pollutant subject to a National Ambient Air Quality Standard. It is classified as a fossil fuel-fired steam electric plant, which is one of the industries listed as one of the 28 PSD Major Facility Categories identified in Table 62-212.400-1, F.A.C. Emissions from the facility are greater than 100 tons per year for at least one regulated pollutant. Therefore, the facility is "major" with respect to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. Therefore, each new project requires a PSD applicability review.

NSPS Sources: The existing units remain subject to the New Source Performance Standards in 40 CFR 60 for the fossil fuel fired steam generating units (Subpart Da and Db) and fuel storage tanks (Subpart Kb).

2. PROPOSED PROJECT

The applicant, Okeelanta Corporation, proposes to temporarily operate existing sugar mill Boiler No. 16 simultaneously with the existing three biomass boilers at the collocated cogeneration plant. The additional steam is needed to rapidly process sugarcane damaged in recent freezes. Specifically, the applicant requests:

- Simultaneous operation from issuance through March 31, 2001.
- Simultaneous operation for up to 35 days during this period equivalent to 885,000 gallons of distillate oil.
- Boiler No. 16 will continue to operate in compliance with all other conditions of existing Air Permit Nos. PSD-FL-169, PSD-FL-196, and 0990005-003-AV.

3. EMISSIONS

Sugar mill Boiler No. 16 is a Babcock and Wilcox Model No. FM 120-97 package process steam boiler with low-NOx burners and 40% flue gas re-circulation. Fired with 205 mmBTU per hour of heat input from distillate oil, the boiler has a maximum short-term steam production rate of 150,000 pounds per hour. Exhaust gases exit the 5 feet diameter, 75 feet tall stack with a volumetric flow rate of 88,200 acfm and a temperature of 410° F. Stack opacity, NOx emissions, steam production rate, steam temperature, and steam pressure are recorded by continuous monitoring systems. Boiler No. 16 had no operation during the requested period for the last two years. Based on the proposed 885,000 gallons of distillate oil, the estimated potential emissions resulting from this project would be:

Table 3 Summary of Project Emissions

Pollutant	Project Emissions, Tons Per Year			
	Past Actual	Future Potential	Net Increase	PSD Significant Emission Rate
Be	0	0.0002	0.0002	0.0004
CO	0	12.4	12.4	100
Hg	0	0.0002	0.0002	0.2
NOx	0	11.2	11.2	40
Pb	0	0.0006	0.0006	0.6
PM	0	3.4	3.4	25
PM10	0	1.7	1.7	15
SAM	0	1.6	1.6	7
SO2	0	31.6	31.6	40
VOC	0	5.6	5.6	40

Notes:

1. Emission factors for CO, NOx, PM/PM10, SO2, and VOC are based on Permit No. PSD-FL-169.
2. SAM emissions are based on AP-42, Section 1.3, and the ratio of the MW of SAM to the MW of gaseous sulfate (98/80).
3. Emission factors for Be, Hg, and Pb were based on AP-42, Section 1.3.
4. Project emissions were based on firing 885,000 gallons for the requested period (approximately 100,000 pounds of steam per hour for 24 hours per day and for up to 35 days).

4. PSD APPLICABILITY REVIEW

4.1 PSD Applicability Requirements

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as defined in Rule 62-212.400, F.A.C. and approved by EPA in the State Implementation Plan. A PSD review is only required in areas that are currently in attainment (or maintenance) with the National Ambient Air Quality Standard (AAQS) for a given pollutant or areas designated as "unclassifiable" for the pollutant. A new facility is considered "major" with respect to PSD if the facility emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 Major Facility Categories (Table 62-212.400-1, F.A.C.), or
- 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants. In addition, projects subject to the PSD requirements are required to perform air quality modeling for each significant pollutant.

4.2 Available Information

In addition to the information submitted by the applicant, the Department also relied on the following information to make its determination:

- Applications for Permit Nos. PSD-FL-169 and PSD-FL-196;
- Rule 62-212.400(3), F.A.C. regarding temporary emissions;
- Rule 62-212.400(5), F.A.C. regarding Best Available Control Technology (BACT) requirements;
- Annual operating data available in the ARMS database;
- Previously submitted Title V fee reports; and
- Verbal comments received from the Palm Beach County Health Department on 01/23/01.

4.3 Brief Summary of Permitting History

- In July of 1991, Boiler No. 16 received original Permit No. PSD-FL-169 (AC50-191876) that allowed operation from March through October for up to 175 days (4200 hours).
- In February of 1993, this PSD permit was revised to allow restricted operation of Boiler No. 16 during November through February as a standby unit for one or more of the existing sugar mill boilers, replacing an equivalent amount of heat input from fuel oil for a down mill boiler. It could not replace a functional mill boiler.
- In March of 1993, the PSD permit expiration date was extended from March 1, 1993 to December 31, 1993.
- In September of 1993, Permit No. PSD-FL-196 (AC50-219413) was issued for three biomass boilers at the new cogeneration plant. This permit prevents operation of Boiler No. 16 unless one or more of the cogeneration boilers are shut down or in the process of immediately shutting down. The oil-fired mill boiler was intended to be a standby boiler for the cogeneration plant. (The latest modification of this permit was PSD-FL-196L issued in November of 2000.)

TECHNICAL EVALUATION, PSD APPLICABILITY AND PRELIMINARY DETERMINATION

- In March of 1994, the PSD permit expiration date was extended from December 31, 1993 to October 30, 1994 (AC50-245400).
- In July of 1996, air construction Permit No. 0990005-002-AC was issued for the sugar refinery, which referenced operation of Boiler No. 16 to provide process steam.
- In October of 2000, Title V air operation Permit No. 0990005-003-AV was issued for the facility.

4.5 PSD Applicability for the Proposed Project

Based on the permitting history, Boiler No. 16 is not currently permitted for simultaneous operation with the cogeneration boilers. The applicant requests temporary simultaneous operation of this boiler for a narrowly defined period to provide rapid processing of a damaged sugarcane crop caused by severe area freezes. In 1991, Boiler No. 16 was permitted with a BACT determination requiring low-NOx burners with flue gas recirculation and the firing of low sulfur distillate oil (< 0.30% sulfur by weight, annual basis). Information provided by the applicant (see Table 3) shows that the project, constrained to the temporary period of requested simultaneous operation, will not result in emissions increases that exceed the PSD significant emission rates defined in Table 62-212.400-2, F.A.C.

Based on the temporary nature of this request and the predicted potential emissions, the Department determines that PSD does not apply to this project. A construction permit is required to authorize the temporary operation and will include the following conditions:

1. Applicable Requirements: Except where the conditions of this construction permit differ, the permittee shall comply with all other valid requirements.
2. Limited Authorization for Temporary Period: This permit authorizes simultaneous operation of Boiler No. 16 with the three cogeneration boilers from the date of permit issuance through March 31, 2001. This authorization expires at the end of March 31, 2001 and shall not be extended.
3. Restrictions: For the specified temporary period, Boiler No. 16 may operate simultaneously with all three existing cogeneration boilers, providing:
 - a. Okeelanta Power L.P.'s cogeneration boilers supply steam to the Okeelanta Corporation's sugar mill and refinery to the maximum extent possible before operating Boiler No. 16;
 - b. Boiler No. 16 complies with all existing permit conditions and requirements;
 - c. Boiler No. 16 fires no more than 885,000 gallons of distillate oil during the temporary period of operation. Compliance with this condition shall be demonstrated by recording the fuel consumption rate for each week of operation during the temporary period of operation. The total fuel consumption for the temporary period shall be reported to the Department's South District Office and the Palm Beach County Health Department by April 15, 2001.
 - d. Any distillate oil added during the temporary period shall contain no more than 0.30% sulfur by weight.
 - e. In addition to the other applicable standards, NOx emissions shall not exceed 11.15 tons during the temporary period. Total NOx emissions for the temporary period based on CEMS data shall be reported to the Department's South District Office and the Palm Beach County Health Department by April 15, 2001.
 - f. Total actual annual emissions from Boiler No. 16 and the cogeneration plant shall not exceed the levels specified in the Palm Beach County special exception to zoning requirements, Petition No. 92-14. Emissions for the temporary period shall be calculated based on the best available data and reported to the Palm Beach County Health Department by April 15, 2001.

TECHNICAL EVALUATION, PSD APPLICABILITY AND PRELIMINARY DETERMINATION

4. Emissions Compliance Demonstrations: During the specified temporary period, the permittee shall demonstrate compliance with the existing emissions standards for Boiler No. 16 in accordance with the following conditions.
- Compliance with the visible emissions standards shall be demonstrated by conducting a DEP Method 9 test within 15 days of startup as well as data collected from the continuous opacity monitoring system (COMS). Compliance with the visible emissions standards shall also serve as surrogate standards for particulate matter. Unless the Department has good reason to believe the particulate matter emissions standard is being exceeded, a particulate matter test is not required during the specified temporary period.
 - Compliance with the NO_x emissions standards shall be demonstrated by data collected from the NO_x continuous emissions monitor (CEMS).
 - In accordance with the original construction permit, no tests are required for CO and VOC emissions.
 - Compliance with the fuel oil sulfur limit shall be demonstrated by taking a sample, analyzing the sample for fuel sulfur, and reporting the results to the Departments' South District Office and the Palm Beach County Health Department before initial startup. Sampling the fuel oil sulfur content shall be conducted in accordance with ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90. A more recent version of these methods may be used. A certified fuel sulfur analysis from the fuel vendor shall be obtained for each subsequent fuel delivery. At the request of the Department's South District Office or the Palm Beach County Health Department, the permittee shall perform additional sampling and analysis for the fuel sulfur content.

{Note: Although annual particulate matter testing is required by the PSD permit, it will not be required to be performed *during* this temporary period of operation. The last test performed in 1998 indicated particulate matter emissions that were less than half of the allowable emissions. CO and VOC emissions tests are not required unless specifically requested by the Department.}

Subject to these conditions, the Department will authorize simultaneous operation of the existing Boiler No. 16 (with existing BACT-level controls) simultaneously with the cogeneration plant boilers for approximately a two-month period to allow rapid processing of sugarcane damaged by recent severe freezes.

5. AIR QUALITY ANALYSIS

The Department notes the following rule in Chapter 62-212, F.A.C. for the Prevention of Significant Deterioration (PSD).

"Rule 62-212.400(3), F.A.C. Limited Exemptions and Special Provisions. The provisions of this subsection establish exemptions and exclusions from certain of the General Provisions of Rule 62-212.400(4), F.A.C., and PSD Review Requirements of Rule 62-212.400(5), F.A.C.

- (c) Temporary Emissions. A proposed facility or modification subject to the preconstruction review requirements of this rule shall be exempt from the requirements of Rules 62-212.400(5)(d), (e), (f), and (g), F.A.C., for a particular pollutant, provided:
- The duration of emissions of the facility or net emissions increase of the modification would not exceed two years;
 - The owner or operator of the facility or modification has provided the Department with reasonable assurance that the emissions of the facility or net emissions increase of the modification would not cause or contribute to a violation of any ambient air quality standard or have a significant impact on any Class 1 area or area where an applicable maximum allowable increase is known to be violated."

TECHNICAL EVALUATION, PSD APPLICABILITY AND PRELIMINARY DETERMINATION

If a specifically defined temporary project meets the above two provisions, this rule exempts the project from the requirements to perform an ambient impact analysis, an additional impact analysis, pre-construction monitoring, and post-construction monitoring. The remaining applicable portions of Rule 62-212.400(5), F.A.C., would require compliance with the Best Available Control Technology (BACT) requirements. Although the proposed project is not subject to the PSD requirements, this rule is presented to show that some temporary projects are exempt by rule from air quality modeling requirements.

6. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the Draft Permit. This determination is based on a technical review of the available information, reasonable assurances provided by the applicant, and the conditions specified in the Draft Permit. The Department notes that the determinations and conclusions made in this evaluation are specific to this project and do not establish any precedents for the sugar industry or any other industry. These determinations must be made on a case-by-case basis considering each unique set of circumstances. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at 850/488-0114 or the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE

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

Authorized Representative:

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

Permit No.	0990005-007-AC
Project:	Boiler No. 16, Temporary Simultaneous Operations
SIC No.	2061, 2062
Expires:	March 31, 2001

PROJECT AND LOCATION

The facility is located near Highway 27, approximately 6 miles south of South Bay in Palm Beach County, Florida. It includes an existing cogeneration plant and an existing sugar mill with refinery. Mill Boiler No. 16 is an existing (permitted) oil-fired boiler currently used as a standby unit for one or more of the cogeneration boilers. This permit authorizes temporary operation of Boiler No. 16 (existing BACT-level controls) simultaneously with the three cogeneration plant boilers for a two-month period to allow rapid processing of sugarcane damaged by recent severe freezes.

The UTM coordinates are Zone 17, 524.9 East, and 2940.1 North.

STATEMENT OF BASIS

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

APPENDICES

The attached appendices are a part of this permit:

- Appendix A - Terminology
- Appendix GC - General Permit Conditions

(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

**AIR CONSTRUCTION PERMIT (DRAFT)
SECTION I. FACILITY INFORMATION**

FACILITY DESCRIPTION

Okeelanta Power L.P. operates a biomass cogeneration plant located near Highway 27, approximately 6 miles south of South Bay in Palm Beach County, Florida. Okeelanta Corporation operates a sugar mill with refinery at an adjacent location. For the purposes of the Department's Prevention of Significant Deterioration (PSD) and Title V operating permit programs, the two plants are considered to be a single facility.

PROJECT DESCRIPTION

The project is the temporary simultaneous operation of existing Boiler No. 16 with the existing three cogeneration plant boilers to quicken processing of sugarcane damaged by a recent freeze. Currently, Boiler No. 16 is permitted as a standby unit for one or more of the cogeneration boilers. This permit authorizes temporary simultaneous operation that would result in actual emissions less than the PSD significant emission rates. The potential emissions associated with this project are approximately: 12 tons per year of CO, 11 tons per year of NOx, 3 tons per year of PM, 2 tons per year of PM₁₀, 32 tons per year of SO₂, and 6 tons per year of VOC. A detailed description of the project is presented in the Department's "Technical Evaluation and Preliminary Determination". This permit addresses the following emissions unit:

EU No.	Emissions Unit Description
016	Mill Boiler No. 16: Oil-fired boiler with a maximum hourly steam production rate of 150,000 lb/hour

REGULATORY CLASSIFICATION

Title III: The facility is a major source of hazardous air pollutants (HAPs).

Title IV: The facility is not subject to the Title IV acid rain provisions of the Clean Air Act.

Title V: Because potential emissions of at least one regulated air pollutant exceeds 100 tons per year, the facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

PSD: The facility operates units classified as "fossil fuel steam electric plants with more than 250 mmBTU per hour of heat input". Because potential emissions are greater than 100 tons per year for at least one regulated air pollutant, the facility is also a major source of air pollution in accordance with Rule 62-212.400, F.A.C., the Prevention of Significant Deterioration (PSD) of Air Quality. Projects resulting in net emissions increases greater than the Significant Emissions Rates specified in Table 62-212.400-2, F.A.C. are subject to the PSD requirements of that rule.

NSPS: The facility operates several emissions units subject to a New Source Performance Standard (NSPS) of 40 CFR 60. Boiler No. 16 is subject to NSPS Subpart Db for boilers.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action and are on file with the Department.

- Permit application
- Department's Technical Evaluation and Determination
- Department's Intent to Issue

AIR CONSTRUCTION PERMIT (DRAFT)
SECTION II. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authorities: All documents related to applications for permits to construct or modify this emissions unit shall be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. Copies shall also be submitted to each Compliance Authority.
2. Compliance Authorities: All documents related to reports, tests, and notifications shall be submitted to the Air Pollution Control Section of the Palm Beach County Health Department at P.O. Box 29 in West Palm Beach, Florida 33402-0029. Copies of all documents shall also be submitted to the South District Office, Florida Department of Environmental Protection at 2295 Victoria Avenue, Suite 364 in Fort Myers, Florida 33902-2549.
3. Definitions: The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code and specifically, Rule 62-210.200, F.A.C. General terminology and rule citations are provided in *Appendix A* of this permit.
4. General Conditions: The owner and operator are subject to and shall operate under the attached General Conditions listed in *Appendix GC* of this permit. General conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
5. 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, 62-110, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the Code of Federal Regulations (CFR) adopted by reference in Chapter 62-204.800, F.A.C. Issuance of this permit does not relieve the facility owner or operator 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.]
6. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., 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.]
7. Expiration: This air construction permit shall expire on March 31, 2001. It shall not be extended for any reason. [Rules 62-210.300(1), 62-4.080, and 62-4.210, F.A.C.; Applicant Request]
8. Modifications: 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 must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

AIR CONSTRUCTION PERMIT (DRAFT)
SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

EU-014 – MILL BOILER NO. 16

The specific conditions in this section address the following emissions unit.

ID	Emission Unit Description
014	<p>Mill Boiler No. 16 is a Babcock and Wilcox Model No. FM 120-97 package process steam boiler with low-NOx burners and 40% flue gas re-circulation. Fired with 205 mmBTU per hour of heat input from distillate oil, the boiler has a maximum short-term steam production rate of 150,000 pounds per hour. Exhaust gases exit the 5 feet diameter, 75 feet tall stack with a volumetric flow rate of 88,200 acfm and a temperature of 410° F. Opacity, NOx emissions, steam production rate, steam temperature, and steam pressure are recorded by continuous monitoring systems.</p> <p>SCC No. 1-02-005-01: External combustion boiler, distillate oil grades No. 1 and 2</p>

1. Applicable Requirements: Mill Boiler No. 16 is an existing (permitted) boiler that currently serves as a standby unit when one or more of the cogeneration boilers are off-line. This air construction permit authorizes temporary simultaneous operation of this unit with the existing three cogeneration plant boilers. Except where the conditions of this construction permit differ, the permittee shall comply with all other valid requirements, including:
 - a. The conditions, as amended, of air construction Permit No. PSD-FL-169 issued on July 30, 1991;
 - b. The NSPS requirements of 40 CFR 60 Subpart Db as incorporated by Rule 62-204.800, F.A.C. and specified in air construction Permit No. PSD-FL-169;
 - c. The applicable conditions of air construction Permit No. PSD-FL-196L (cogeneration plant) last revised on November 6, 2000; and
 - d. The conditions of Title V air operation Permit No. 0990005-003-AV issued on October 24, 2000.This air construction permit shall temporarily supplement the conditions of all existing valid air permits.
[Rule 62-210.300, F.A.C.; Permit Nos. PSD-FL-169, PSD-FL-196, and 0990005-003-AV]
2. Limited Authorization for Temporary Period: This permit authorizes simultaneous operation of Boiler No. 16 with the three cogeneration plant boilers from the date of permit issuance through March 31, 2001. This authorization expires at the end of March 31, 2001 and shall not be extended.
[Rule 62-210.300(1), F.A.C.]
3. Restrictions: For the specified temporary period, Boiler No. 16 may operate simultaneously with all three existing cogeneration boilers, providing:
 - a. Okeelanta Power L.P.'s cogeneration boilers supply steam to the Okeelanta Corporation's sugar mill and refinery to the maximum extent possible before operating Boiler No. 16.
 - b. Boiler No. 16 complies with all existing permit conditions and requirements.
 - c. Boiler No. 16 fires no more than 885,000 gallons of distillate oil during the specified temporary period of operation. Compliance with this condition shall be demonstrated by recording the fuel consumption rate for each week of operation during the temporary period of operation. The total fuel consumption for the temporary period shall be reported to the Department's South District Office and the Palm Beach County Health Department by April 15, 2001.
 - d. Any distillate oil added during the temporary period shall contain no more than 0.30% sulfur by weight.

AIR CONSTRUCTION PERMIT (DRAFT)
SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS
EU-014 – MILL BOILER NO. 16

- c. In addition to the other applicable standards, NO_x emissions shall not exceed 11.15 tons during the specified temporary period. Total NO_x emissions for the temporary period based on CEMS data shall be reported to the Department's South District Office and the Palm Beach County Health Department by April 15, 2001.
- f. Total actual annual emissions from Boiler No. 16 and the cogeneration plant shall not exceed the levels specified in the Palm Beach County special exception to zoning requirements, Petition No. 92-14. Emissions for the temporary period shall be calculated based on the best available data and reported to the Palm Beach County Health Department by April 15, 2001.

[Rules 62-4.070(3) and 62-212.400, F.A.C.]

4. Emissions Compliance Demonstrations: During the specified temporary period, the permittee shall demonstrate compliance with the existing emissions standards for Boiler No. 16 in accordance with the following conditions.
- a. Compliance with the visible emissions standards shall be demonstrated by conducting a DEP Method 9 test within 15 days of startup as well as data collected from the continuous opacity monitoring system (COMS). Compliance with the visible emissions standards shall also serve as surrogate standards for particulate matter. Unless the Department has good reason to believe the particulate matter emissions standard is being exceeded, a particulate matter test is not required during the specified temporary period.
 - b. Compliance with the NO_x emissions standards shall be demonstrated by data collected from the NO_x continuous emissions monitor (CEMS).
 - c. In accordance with the original construction permit, no tests are required for CO and VOC emissions, unless the Department has good reason to believe the emissions standards are being exceeded.
 - d. Compliance with the fuel oil sulfur limit shall be demonstrated by taking a sample, analyzing the sample for fuel sulfur, and reporting the results to the Departments' South District Office and the Palm Beach County Health Department before initial startup. Sampling the fuel oil sulfur content shall be conducted in accordance with ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90. A more recent version of these methods may be used. A certified fuel sulfur analysis from the fuel vendor shall be obtained for each subsequent fuel delivery. At the request of the Department's South District Office or the Palm Beach County Health Department, the permittee shall perform additional sampling and analysis for the fuel sulfur content.

[Rule 62-4.070(3), F.A.C.; Permit Nos. PSD-FL-169, PSD-FL-196, and 0990005-003-AV]

{Note: Amended Permit No. PSD-FL-169 and the latest letter modification for Permit No. PSD-FL-196 are attached for reference. The recently issued Title V air operation permit is available on the Department's web site at: <http://www.dep.state.fl.us/air/permitting.htm>.}

SECTION IV.

APPENDIX A - TERMINOLOGY

ABBREVIATIONS AND ACRONYMS

- DEP - State of Florida, Department of Environmental Protection
- DARM - Division of Air Resource Management
- EPA - United States Environmental Protection Agency
- F.A.C. - Florida Administrative Code
- F.S. - Florida Statute
- UTM - Universal Transverse Mercator

RULE CITATIONS

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, permit numbers, and identification numbers.

Florida Administrative Code (F.A.C.) Rules:

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

- Where:*
- 62 - refers to Title 62 of the Florida Administrative Code (F.A.C.)
 - 62-213 - refers to Chapter 62-213, F.A.C.
 - 62-213.205 - refers to Rule 62-213.205, F.A.C.

Facility Identification (ID) Number:

Example: Facility ID No. 099-0001

- Where:*
- 099 - 3 digit number indicates that the facility is located in Palm Beach County
 - 0221 - 4 digit number assigned by state database identifies specific facility

New Permit Numbers:

Example: Permit No. 099-2222-001-AC or 099-2222-001-AV

- Where:*
- AC - identifies permit as an Air Construction Permit
 - AV - identifies permit as a Title V Major Source Air Operation Permit
 - 099 - 3 digit number indicates that the facility is located in Palm Beach County
 - 2222 - 4 digit number identifies a specific facility
 - 001 - 3 digit sequential number identifies a specific permit project

Old Permit Numbers:

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

- Where:*
- AC - identifies permit as an Air Construction Permit
 - AO - identifies permit as an Air Operation Permit
 - 123456 - 6 digit sequential number identifies a specific permit project

SECTION IV.

APPENDIX GC - CONSTRUCTION PERMIT GENERAL CONDITIONS

- G.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.
- G.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.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.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.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.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.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

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

- G.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

SECTION IV.

APPENDIX GC - CONSTRUCTION PERMIT GENERAL CONDITIONS

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.

- G.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.
- G.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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (not applicable to project);
 - (b) Determination of Prevention of Significant Deterioration (not applicable to project); and
 - (c) Compliance with New Source Performance Standards (not applicable to project).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.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.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Ricardo A. Lima
 V.P. and Gen. Mgr.
 Okeelanta Corporation
 21250 U.S. Highway 27
 South Bay, FL 33493

2. Article Number (Copy from service label)
 7099 3400 0000 1449 4666

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *B. M. PHELPS* B. Date of Delivery *01/29/04*

C. Signature *B. M. Phelps* Agent Addressee

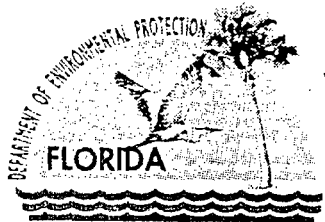
D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes No

7099 3400 0000 1449 4666

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only, No Insurance Coverage Provided)	
Article Sent To: <i>Mr Ricardo Lima</i>	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Name (Please Print Clearly) (to be completed by mailer) <i>Mr Ricardo Lima</i>	
Street, Apt. No., or PO Box No. <i>21250 U.S. Highway 27</i>	
City, State, ZIP+4 <i>South Bay, FL 33493</i>	
PS Form 3800, July 1999 See Reverse for Instructions	



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 25, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ricardo Lima, Vice President and General Manager
Okeelanta Power Limited Partnership
8001 U.S. Highway 27 South
South Bay, FL 33493

Re: Request for Additional Information
Project No. 0990332-014-AC (PSD-FL-196M)
Okeelanta Power L.P. Cogeneration Plant
Application to Modify CO and SO₂ Emissions Standards

Dear Mr. Lima:

On January 2, 2001 the Department received an application requesting changes to the CO and SO₂ emissions standards for the biomass boilers at Okeelanta's cogeneration plant located 6 miles south of South Bay on U.S. Highway 27. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. For each boiler during the period of 05/01/99 through 12/31/00, please provide the following information in a tabled format. Provide data for each day during a one-month period representative of operations before the violations, during the violations, and after the violations.
 - a. 24-hour averages for CO, NO_x, and SO₂ emissions. If possible, also provide line chart representing the 24-hour averages of each pollutant (on the same chart) over the entire period separately for each boiler.
 - b. Daily average of tons of bagasse fired, tons of wood fired, gallons of oil fired, and the bagasse/wood firing ratio.
 - c. The daily average steam production, power production, stack gas moisture, stack gas oxygen content; and the F-factor used.

In detail, please describe the method of calculating the heat input for use in the compliance averages. What is the thermal efficiency of each boiler? Has the thermal efficiency been tested for each boiler?

2. Okeelanta speculates that the increased CO emissions result from a high moisture content of the biomass fuel due to increased rainfall. The data presented does not appear to establish any conclusive correlation between rainfall and CO emissions. However, does Okeelanta maintain a dry source of biomass fuel or attempt to prevent some biomass from being rained upon? Has Okeelanta made any provisions to attempt drying the fuel before firing in the cogeneration boilers? Please provide a list of actions taken by Okeelanta to adjust operations in response to gradually increasing CO emissions. Has Okeelanta researched changes in equipment or processes that could be implemented to correct the elevated levels of CO emissions?
3. From the information provided, the samples of bagasse appear to be within the range of sulfur contents stated in the initial application. Most samples of the wood materials show sulfur contents within the range stated in the initial application. However, several samples of the wood materials show sulfur contents as much as two to three times higher than expected. Please describe the plan for sampling the biomass fuels and analyzing for the sulfur content. When a sample indicates an unusually high sulfur content, what provisions does Okeelanta make to separate the shipment and proportionally blend with lower sulfur biomass to comply with the SO₂ standards? What other methods are used or could be used to adjust operations for biomass fuels detected to have high sulfur contents? Has Okeelanta evaluated the option of using a lime/activated carbon product for additional SO₂ control?

"More Protection, Less Process"

The data presented does not conclusively show that the addition of dust collectors resulted in higher SO2 emissions due to less SO2 adsorption. Please sample the bottom ash from a cogeneration boiler for both sulfur and unburned carbon. Compare the results with those from a cogeneration boiler prior to the dust collectors (or a sugar mill bagasse boiler).

4. The following table is presented to document the original CO standards, subsequent changes, and current request:

Table 6. Summary of CO Standards

Year	Average	Biomass	Oil	Coal
1993	8-hour	0.35 lb/mmBTU	0.2 lb/mmBTU	0.2 lb/mmBTU
1997	24-hour	0.35 lb/mmBTU	0.35 lb/mmBTU	0.35 lb/mmBTU
1999	30-day	0.35 lb/mmBTU	0.35 lb/mmBTU	0.35 lb/mmBTU
Request	12-month	0.35 lb/mmBTU	0.35 lb/mmBTU	0.35 lb/mmBTU

- a. The Department notes that the Ambient Air Quality Standards (AAQS) are defined for CO in terms of 1-hour and 8-hour averages. The initial Ambient Air Quality Analysis was based on maximum emissions rates reflecting these averaging periods. Please review the available operating data and provide the expected maximum CO emission rates based on the 1-hour and 8-hour averages from the CO CEMS. Provide a summary of the CO data and describe the methods used to select the expected maximum CO emission rates.
- b. Please provide a tabled comparison of the CO emission rates used in the initial Ambient Air Quality Analysis versus the expected maximum CO emission rates. If the expected maximum CO emission rates are higher, please revise the PSD significant impact analysis and the AAQS analysis accordingly. Please provide a report of the revised modeling effort as well as the modeling files for review.
- c. If additional modeling is necessary and indicates a significant impact, the Department is considering new short-term CO limits. If revised modeling indicates an insignificant impact, the Department is considering providing the short-term CO emission rates in the revised permit for informational purposes.

5. The following table is presented to document the original SO2 standards, subsequent changes, and the current request:

Table 6. Summary of SO2 Standards

Year	Average	Biomass	Oil	Coal
1993	3-hour	NA	NA	1.2 lb/mmBTU
	24-hour	0.10 lb/mmBTU	0.05 lb/mmBTU	1.2 lb/mmBTU
	30-day	0.02 lb/mmBTU	NA	1.2 lb/mmBTU
	Annual	0.02 lb/mmBTU	NA	1.2 lb/mmBTU
1997	3-hour	NA	NA	1.2 lb/mmBTU
	24-hour	0.10 lb/mmBTU	0.05 lb/mmBTU	1.2 lb/mmBTU
	30-day	0.02 lb/mmBTU (Bagasse) 0.05 lb/mmBTU (Wood)	NA	1.2 lb/mmBTU
	Annual	0.02 lb/mmBTU (Bagasse) 0.05 lb/mmBTU (Wood)	NA	1.2 lb/mmBTU
Request	3-hour	NA	NA	1.2 lb/mmBTU
	24-hour	0.20 lb/mmBTU	0.05 lb/mmBTU	1.2 lb/mmBTU
	30-day	0.10 lb/mmBTU	NA	1.2 lb/mmBTU
	Annual	0.10 lb/mmBTU	NA	1.2 lb/mmBTU

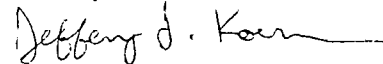
- a. The Department notes that the Ambient Air Quality Standards (AAQS) are defined for SO2 in terms of 3-hour, 24-hour, and annual averages. The initial Ambient Air Quality Analysis was based on maximum emissions rates reflecting these averaging periods. Please review the available operating data and provide the expected maximum SO2 emission rates based on the 3-hour, 24-hour, and annual averages from the SO2 CEMS. Provide a summary of the SO2 data and describe the methods used to select the expected maximum SO2 emission rates.
- b. Please provide a tabled comparison of the modeled SO2 emission rates used for the original PSD Air Quality Analysis versus the expected maximum (and requested) SO2 emission rates. If the expected maximum (or

requested) SO₂ emission rates are higher, please revise the PSD significant impact analysis, Class I and Class I increment consumption, and the AAQS analysis accordingly. Please provide a report of the revised modeling effort as well as the modeling files for review.

- c. If additional modeling is necessary and indicates a significant impact, the Department is considering new short-term SO₂ limits. If revised modeling indicates an insignificant impact, the Department is considering providing the short-term SO₂ emission rates in the revised permit for informational purposes.
6. As the Department has pointed out during previous permitting actions, the initial PSD air construction permit authorized the installation of coal handling facilities and the firing of low sulfur coal. However, the coal handling facilities were never constructed and coal has never been fired at this plant. Okeelanta Power L.P. must obtain new authorization from the Department (through a permit modification) to fire any coal in the future. At the very least, such a request shall evaluate current "Best Available Control Technologies" for each significant pollutant. Also, it is inappropriate to use the "potential emissions" for a fuel (coal) that is no longer authorized and has never been fired as emissions decreases to offset increases in actual emissions from the proposed project. Please revise the request accordingly.
7. The Department intends to update the PSD permit to incorporate all of the previous revisions. Please include any other requests for amendments at this time.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/414-7268.

Sincerely,



Jeffery F. Koerner, P.E.
New Source Review Section

AAL/jfk

cc: Mr. Ricardo Lima, Okeelanta Power
Mr. James Meriwether, Okeelanta Power
Mr. David Buff, Golder Associates
Mr. David Knowles, SD
Mr. Darrel Graziani, PBCHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

SENDER: COMPLETE THIS SECTION:

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Ricardo Lima
 Vice President & General Mgr.
 8001 US Highway 27 South
 South Bay, FL 33493

2. Article Number (Copy from service label)
 7099 3400 0000 1453 2535

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *D. McWHEE* B. Date of Delivery *01/29/84*
 C. Signature *[Signature]* Agent
 Addressee
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No.

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7099 3400 0000 1453 2535

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
 Mr. Ricardo Lima

Postage	\$	Okeelanta Power Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Name (Please Print Clearly) (to be completed by mailer)
 Mr. Ricardo Lima
 Street, Apt. No., or PO Box No.
 8001 U.S. Highway 27 South
 City, State, ZIP+4
 South Bay, FL 33493

PS Form 3800, July, 1999. See Reverse for Instructions.

RECEIVED

JAN 22 2001

BUREAU OF AIR REGULATION

**AIR PERMIT APPLICATION
FOR TEMPORARY OPERATIONS
BOILER NO. 16
OKEELANTA CORPORATION**

Prepared For:

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

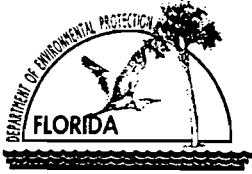
Prepared By:

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

**January 2001
0137514\4.4\4.4.2**

DISTRIBUTION:

**4 Copies – DEP
2 Copies – Okeelanta Corporation
2 Copies - Golder Associates Inc.**



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Okeelanta Corporation	
2. Site Name: Okeelanta Corporation	
3. Facility Identification Number: 0990005 [] Unknown	
4. Facility Location: Street Address or Other Locator: 6 Miles South of South Bay on US 27 City: South Bay County: Palm Beach Zip Code: 33493	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Matthew Capone, Director of Environmental Programs	
2. Application Contact Mailing Address: Organization/Firm: Okeelanta Corporation Street Address: 21250 U.S. Highway 27 City: South Bay State: FL Zip Code: 33493	
3. Application Contact Telephone Numbers: Telephone: (561) 996-9072 Fax: (561) 992-8212	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>1-22-01</i>
2. Permit Number:	<i>0990005-007-AC</i>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

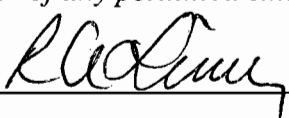
- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.
Current construction permit number: _____
- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.
Current construction permit number: _____
Operation permit number to be revised: _____
- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)
Operation permit number to be revised/corrected: _____
- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.
Operation permit number to be revised: _____
Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Ricardo A. Lima, Vice President - General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Okeelanta Corporation Street Address: 21250 U.S. Highway 27 City: South Bay State: FL Zip Code: 33493
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (561) 996 - 9072 Fax: (561) 992 - 7326
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.</i> <p style="text-align: center;"> _____ Signature</p> <p style="text-align: right;"><u>1/18/01</u> _____ Date</p>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: David Buff Registration Number: 19011
2. Professional Engineer Mailing Address: Organization/Firm: Golder Associates Inc. Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653
3. Professional Engineer Telephone Numbers: Telephone: (352) 336 - 5600 Fax: (352) 336 - 6603

4. 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.

If the purpose of this application is to obtain a Title V source 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 schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], 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.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision 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

01/19/01

Date

Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

To modify permit to allow Boiler No. 16 to operate on a temporary basis up to 35 days.
Maximum oil consumption during period = 885,000 gallons.

2. Projected or Actual Date of Commencement of Construction 01/25/01

3. Projected Date of Completion of Construction: 04/30/01

Application Comment

[Empty box for Application Comment]

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): See Attachment OC-AI-AD	

List of Applicable Regulations

See attached Title V Core List, eff. 3/25/97	

Title V Core List

Effective:03/25/97

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

Requirements that apply to emissions units must be identified in Subsection III.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form.

Applicants must identify all "applicable requirements" in order to claim the "permit shield" described at Rule 62-213.460, F.A.C.]

Federal: (description)

- 40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP)
- 40 CFR 61: Subpart M: NESHAP for Asbestos.
- 40 CFR 64: Compliance Assurance Monitoring
- 40 CFR 82: Protection of Stratospheric Ozone.
- 40 CFR 82: Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).
- 40 CFR 82: Subpart F: Recycling and Emissions Reduction.

State: (description)

CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95

- 62-4.030, F.A.C.: General Prohibition.
- 62-4.040, F.A.C.: Exemptions.
- 62-4.050, F.A.C.: Procedure to Obtain Permits; Application
- 62-4.060, F.A.C.: Consultation.
- 62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.
- 62-4.080, F.A.C.: Modification of Permit Conditions.
- 62-4.090, F.A.C.: Renewals.
- 62-4.100, F.A.C.: Suspension and Revocation.
- 62-4.110, F.A.C.: Financial Responsibility.
- 62-4.120, F.A.C.: Transfer of Permits.
- 62-4.130, F.A.C.: Plant Operation - Problems.
- 62-4.150, F.A.C.: Review
- 62-4.160, F.A.C.: Permit Conditions.
- 62-4.210, F.A.C.: Construction Permits.
- 62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95

- 62-103.150, F.A.C.: Public Notice of Application and Proposed Agency Action.
- 62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding

Title V Core List

Effective:03/25/97

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 03-21-96

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

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

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

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

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

62-210.300(3)(b), F.A.C.: Temporary Exemption.

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

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

62-210.350, F.A.C.: Public Notice and Comment.

62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to
Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.

62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.

62-210.650, F.A.C.: Circumvention.

62-210.900, F.A.C.: Forms and Instructions.

62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.

62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and
Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96

62-213.205, F.A.C.: Annual Emissions Fee.

62-213.400, F.A.C.: Permits and Permit Revisions Required.

62-213.410, F.A.C.: Changes Without Permit Revision.

62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.

62-213.420, F.A.C.: Permit Applications.

62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.

62-213.440, F.A.C.: Permit Content.

62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.

62-213.900(1) Major Air Pollution Source Annual Emissions Fee Form, Form and
Instructions.

Title V Core List

Effective:03/25/97

CHAPTER 62-256, F.A.C.: OPEN BURNING AND FROST PROTECTION FIRES,
effective 11-30-94

CHAPTER 62-257, F.A.C: ASBESTOS NOTIFICATION AND FEE, effective 03/24/96

**CHAPTER 62-281, F.A.C: MOTOR VEHICLE AIR CONDITIONING REFRIGERANT
RECOVERY AND RECYCLING,** effective 03-07-96

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS,
effective 03-13-96

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

62-296.320(3), F.A.C.: Industrial, Commercial, and Municipal Open Burning
Prohibited

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

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
PM	A				Particulate Matter – Total
PM ₁₀	A				Particulate Matter – PM ₁₀
SO ₂	A				Sulfur Dioxide
NO _x	A				Nitrogen Oxides
CO	A				Carbon Monoxide
VOC	A				Volatile Organic Compounds
PB	B				Lead
H114	B				Mercury
H021	B				Beryllium Compounds
FL	B				Fluorides - Total
SAM	B				Sulfuric Acid Mist
HAPs	A				Hazardous Air Pollutants

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT OC-AI-AD

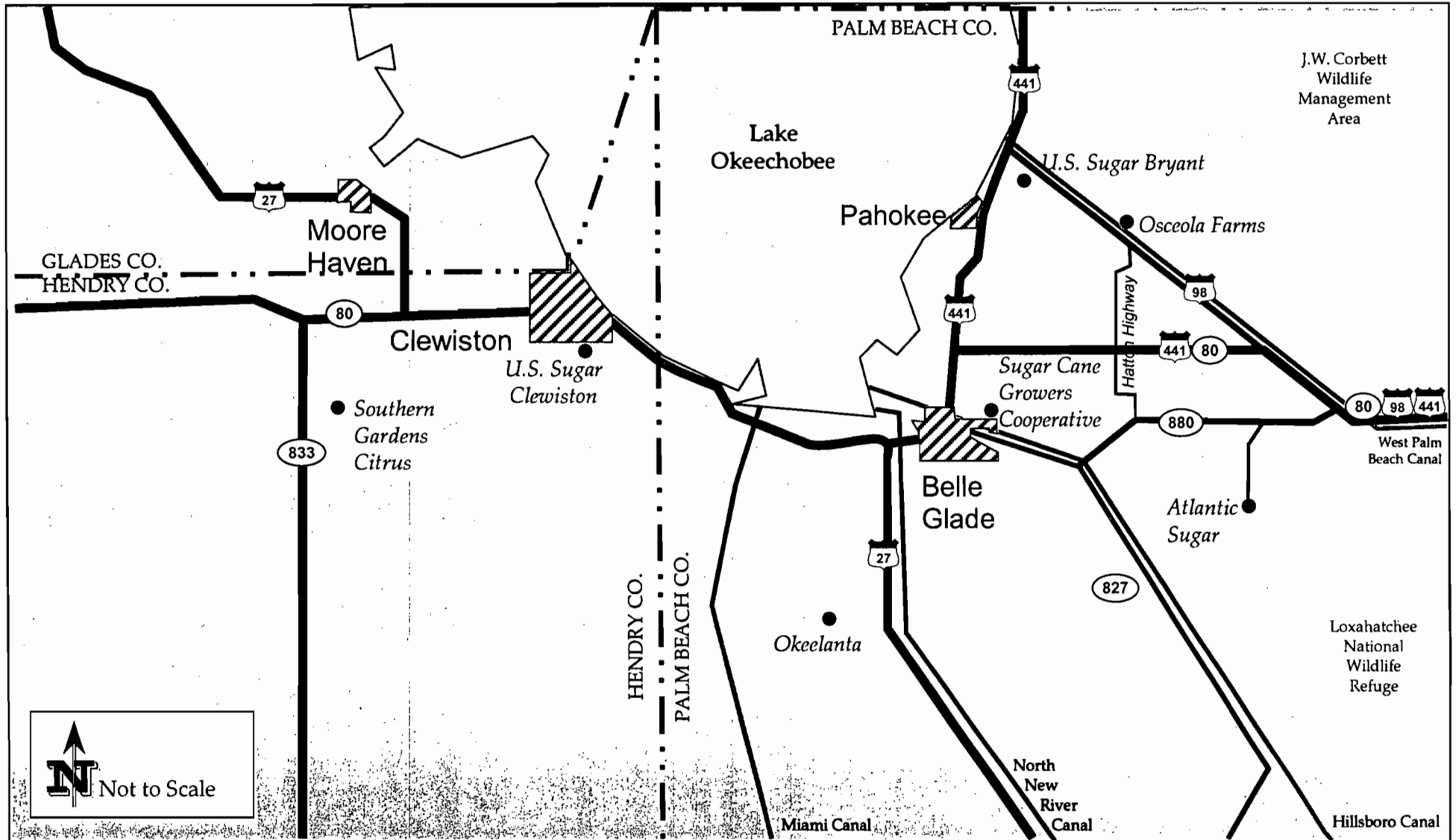
FACILITY POLLUTANTS COMMENT

**ATTACHMENT OC-AI-AD
FACILITY POLLUTANTS COMMENT**

At this time, it is unclear whether Okeelanta Corporation or Okeelanta Power L.P. should be classified as major for HAPs. Okeelanta Power L.P. has no emissions test data indicating significant HAP emissions from its boilers. Emissions test data from the Pulp and Paper Industry indicate HAPs emissions from wood-fired boilers. However, these emissions data may not be representative of Okeelanta Power HAP emissions. In addition, recent sugar industry test data indicate HAPs emissions from sugar industry bagasse fired boilers. However, Okeelanta Power believes the HAPs emissions from its boilers are much lower than the emissions from the older boilers at the sugar mill. Okeelanta is currently not operating its sugar mill boilers, as steam is being supplied by Okeelanta Power.

ATTACHMENT OC-FI-C1

AREA MAP SHOWING FACILITY LOCATION



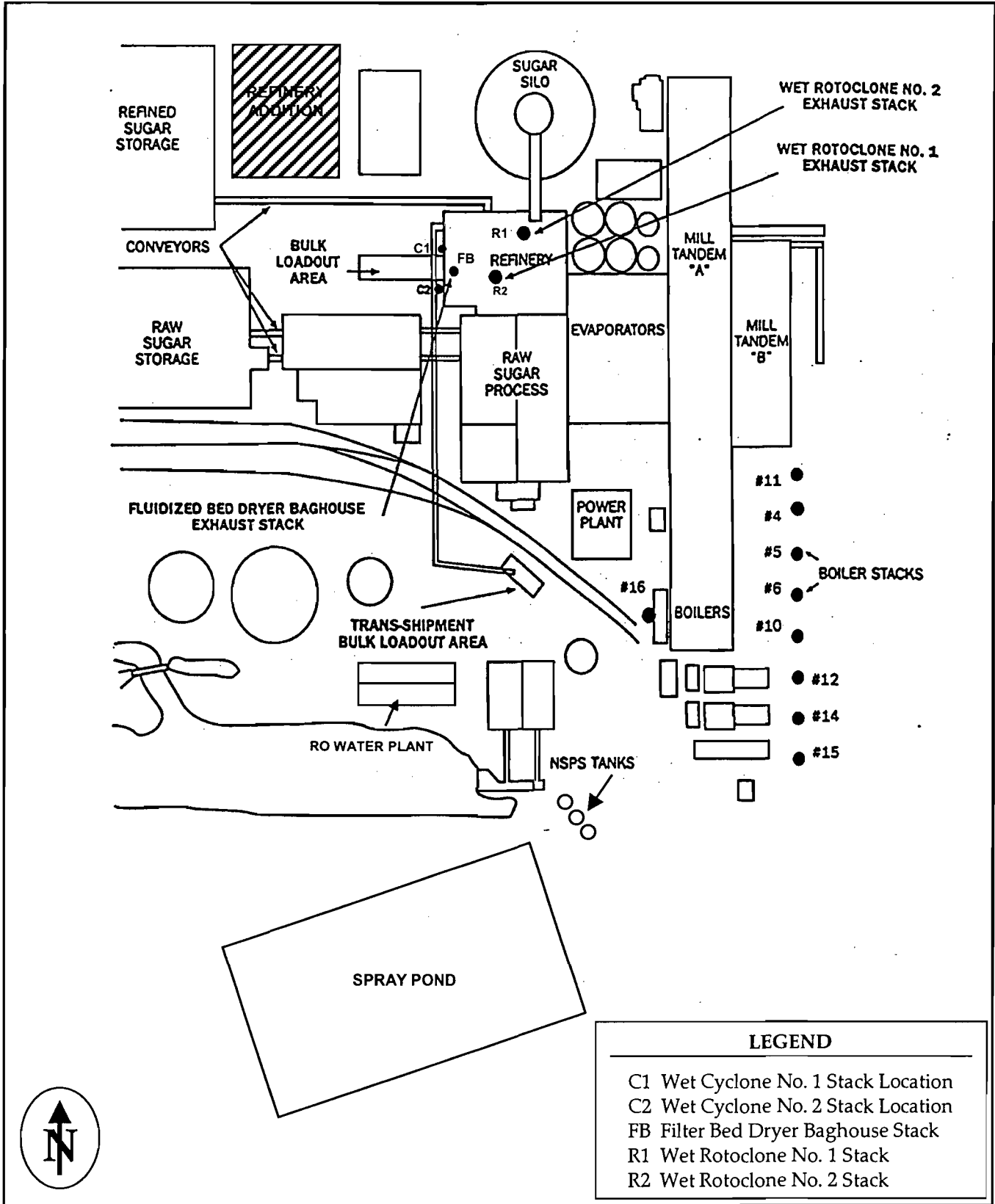
Attachment OC-FI-C1
Location of Okeelanta Corporation

Source: Golder Associates Inc., 2000



ATTACHMENT OC-FI-C2

FACILITY PLOT PLAN



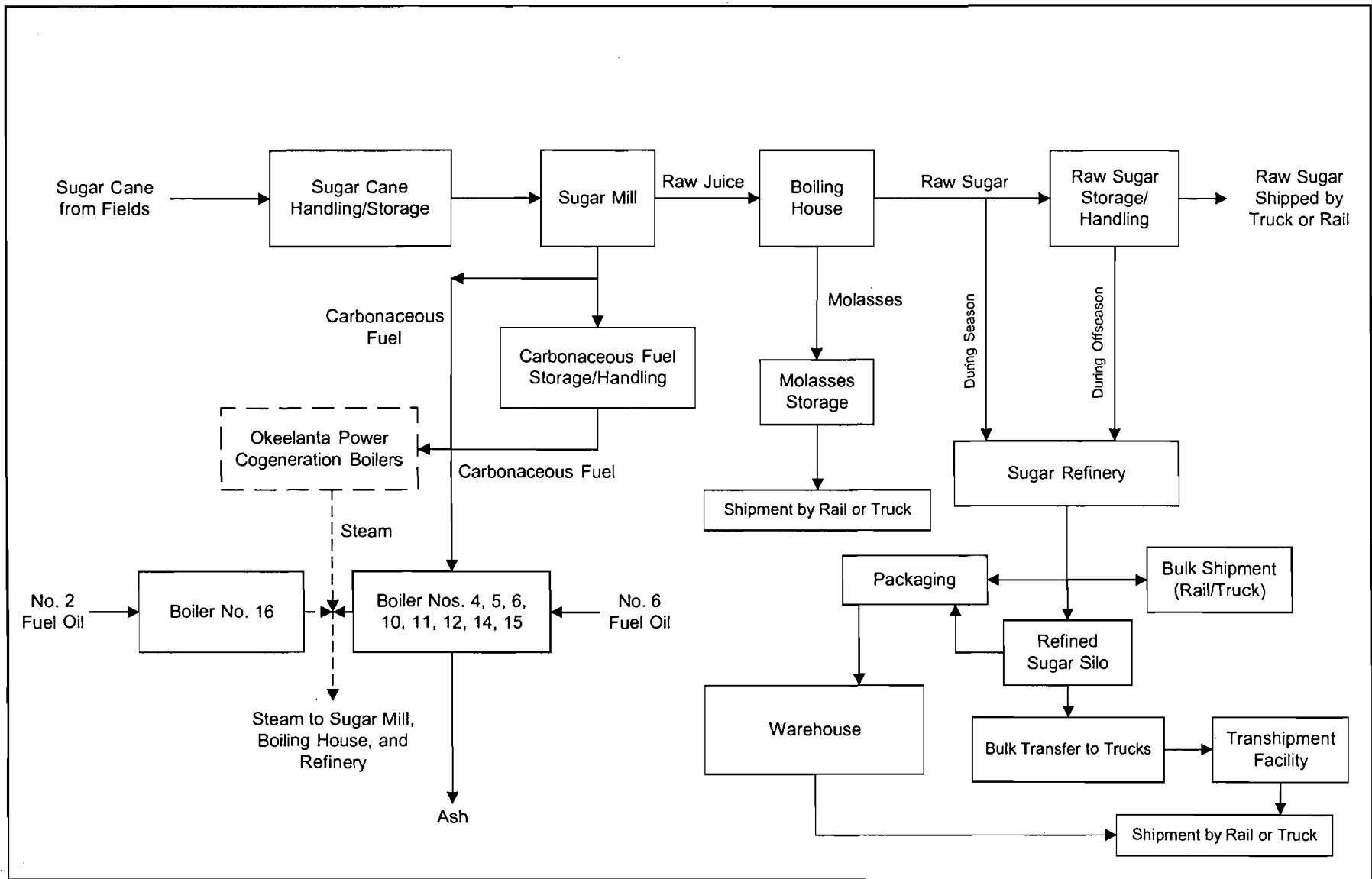
Attachment OC-FI-C2
 Facility Plot Plan of Okeelanta Sugar Mill and Refinery

Note: Plot Plan is a general arrangement for informational purposes only. Plot plan is not to scale

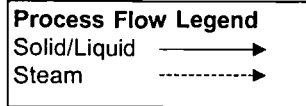


ATTACHMENT OC-FI-C3

PROCESS FLOW DIAGRAM



Attachment OC-FI-C3
 Sugar Manufacturing
 Process Flow Diagram
 Okeelanta Corporation
 South Bay, FL



Overall Sugar Mill - Facility Flow Diagram

Filename: 0137514\4.4\4.4.2\OCFIC3.VSD (Page 1)

Date: 01/19/01



III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> 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).			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Mill Boiler No. 16			
4. Emissions Unit Identification Number: [] No ID			
ID: 014 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 20	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters)			
Package Boiler equipped with Coen's Lo-NO_x burners fired with No. 2 distillate fuel oil. This unit is designed for 40% flue gas recirculation.			

Emissions Unit Control Equipment

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p>Coen's Lo-NO_x Burners</p>
<p>2. Control Device or Method Code(s): 024</p>

Emissions Unit Details

<p>1. Package Unit: Manufacturer: Babcock and Wilcox Model Number: FM 120-97</p>
<p>2. Generator Nameplate Rating: MW</p>
<p>3. Incinerator Information:</p> <p style="text-align: right;">Dwell Temperature: °F</p> <p style="text-align: right;">Dwell Time: seconds</p> <p style="text-align: right;">Incinerator Afterburner Temperature: °F</p>

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	205	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		tons/hr
4. Maximum Production Rate:	150,000	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	5 weeks/year	840 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 60.11 General NSPS Requirement	40 CFR 60.44b(i) 40 CFR 60 Subpart Db
40 CFR 60.12 General NSPS Requirement	40 CFR 60.45b(j) 40 CFR 60 Subpart Db
40 CFR 60.13(a) General NSPS Requirement	40 CFR 60.46b(a) 40 CFR 60 Subpart Db
40 CFR 60.13(b) General NSPS Requirement	40 CFR 60.46b(c) 40 CFR 60 Subpart Db
40 CFR 60.13(c) General NSPS Requirement	40 CFR 60.46b(d)(7) 40 CFR 60 Subpart Db
40 CFR 60.13(d) General NSPS Requirement	40 CFR 60.46b(e)(1) 40 CFR 60 Subpart Db
40 CFR 60.13(e) General NSPS Requirement	40 CFR 60.46b(e)(4) 40 CFR 60 Subpart Db
40 CFR 60.13(f) General NSPS Requirement	40 CFR 60.47b(f) 40 CFR 60 Subpart Db
40 CFR 60.13(h) General NSPS Requirement	40 CFR 60.48b(a) 40 CFR 60 Subpart Db
40 CFR 60.13(i) General NSPS Requirement	40 CFR 60.48b(b) 40 CFR 60 Subpart Db
40 CFR 60.13(j) General NSPS Requirement	40 CFR 60.48b(c) 40 CFR 60 Subpart Db
40 CFR 60.19 General NSPS Requirement	40 CFR 60.48b(d) 40 CFR 60 Subpart Db
40 CFR 60.42b(a) 40 CFR 60 Subpart Db	40 CFR 60.48b(e)(2) 40 CFR 60 Subpart Db
40 CFR 60.42b(g) 40 CFR 60 Subpart Db	40 CFR 60.48b(e)(3) 40 CFR 60 Subpart Db
40 CFR 60.42b(j) 40 CFR 60 Subpart Db	40 CFR 60.48b(f) 40 CFR 60 Subpart Db
40 CFR 60.43b(f) 40 CFR 60 Subpart Db	40 CFR 60.49b(b) 40 CFR 60 Subpart Db
40 CFR 60.43b(g) 40 CFR 60 Subpart Db	40 CFR 60.49b(d) 40 CFR 60 Subpart Db
40 CFR 60.44b(a)(1)(ii) 40 CFR 60 Subpart Db	40 CFR 60.49b(f) 40 CFR 60 Subpart Db
40 CFR 60.44b(h) 40 CFR 60 Subpart Db	40 CFR 60.49b(g) 40 CFR 60 Subpart Db

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations (continued)

40 CFR 60.49b(h) 40 CFR 60 Subpart Db	
40 CFR 60.49b(i) 40 CFR 60 Subpart Db	
40 CFR 60.49b(o) 40 CFR 60 Subpart Db	
40 CFR 60.49b(r) 40 CFR 60 Subpart Db	
40 CFR 60.7 General NSPS Requirements	
40 CFR 60.8 General NSPS Requirements	

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? BLR 16		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 75 feet	7. Exit Diameter: 5.0 feet	
8. Exit Temperature: 410 °F	9. Actual Volumetric Flow Rate: 88,200 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Stack parameters are based on stack test data.			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Industrial Boiler - Distillate Oil, Grades 1 and 2 Oil		
2. Source Classification Code (SCC): 1-02-005-01		3. SCC Units: Thousand Gallons Burned (all liquid fuels)
4. Maximum Hourly Rate: 1,464	5. Maximum Annual Rate: 885	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 140
10. Segment Comment (limit to 200 characters): Maximum annual rate based on 100,000 lb/hr steam (average) for 35 days.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
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 (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			EL
PM ₁₀			EL
SO ₂			EL
NO _x			EL
CO			EL
VOC			EL
SAM			NS
Pb			NS
H114			NS
H021			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 11.07 lb/hour		4. Synthetically Limited? []	
		3.35 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.054 lb/MMBtu Reference: Permit No. AO50-257065		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): lb/hr = 0.054 lb/MMBtu x 205 MMBtu/hr = 11.07 lb/hr See Attachment, Table 1 for annual emissions.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.054 lb/MMBtu		4. Equivalent Allowable Emissions: 11.07 lb/hour 3.35 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 5			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Emission limit from current permit (No. AO50-257065).			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control:
3. Potential Emissions: 5.54 lb/hour 1.67 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.027 lb/MMBtu Reference: Permit No. AO50-257065	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): lb/hr = 0.027 lb/MMBtu x 205 MMBtu/hr = 5.54 lb/hr See Attachment A, Table 1 for annual emissions.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.027 lb/MMBtu	4. Equivalent Allowable Emissions: 5.54 lb/hour 1.67 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Emission limit from current permit (No. AO50-257065).	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂	2. Total Percent Efficiency of Control:
3. Potential Emissions: 104.55 lb/hour 31.59 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.51 lb/MMBtu Reference: Permit No. AO50-257065	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): lb/hr = 0.51 lb/MMBtu x 205 MMBtu/hr = 104.55 lb/hr See Attachment A, Table 1 for annual emissions.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.51 lb/MMBtu	4. Equivalent Allowable Emissions: 104.55 lb/hour 31.59 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 6	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Emission limit from current permit (No. AO50-257065).	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: NO_x	2. Total Percent Efficiency of Control:
3. Potential Emissions: 36.90 lb/hour 11.15 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.18 lb/MMBtu Reference: Permit No. AO50-257065	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): lb/hr = 0.18 lb/MMBtu x 205 MMBtu/hr = 36.90 See Attachment A, Table 1 for annual emissions.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.18 lb/MMBtu	4. Equivalent Allowable Emissions: 36.90 lb/hour 11.15 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 7, 7A, or 7E	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Emission limit from current permit (No. AO50-257065).	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control:
3. Potential Emissions: 41.00 lb/hour 12.39 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.20 lb/MMBtu Reference: Permit No. AO50-257065	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): lb/hr = 0.20 lb/MMBtu x 205 MMBtu/hr - 41.00 lb/hr See Attachment A, Table 1 for annual emissions.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.20 lb/MMBtu	4. Equivalent Allowable Emissions: 41.00 lb/hour 12.39 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 10	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Emission limit from current permit (No. AO50-257065).	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control:
3. Potential Emissions: 18.45 lb/hour 5.58 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.09 lb/MMBtu Reference: Permit No. AO50-257065	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): lb/hr - 0.09 lb/MMBtu x 205 MMBtu/hr = 18.45 lb/hr See Attachment A, Table 1 for annual emissions	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.09 lb/MMBtu	4. Equivalent Allowable Emissions: 18.45 lb/hour 5.58 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 25	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Emission limit from current permit (No. AO50-257065).	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: SAM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 5.27 lb/hour		4. Synthetically Limited? []	
		1.59 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.0257 lb/MMBtu Reference: See Comment		7. Emissions Method Code: 3	
8. Calculation of Emissions (limit to 600 characters): lb/hr = 0.0257 lb/MMBtu x 205 MMBtu/hr = 5.27 lb/hr See Attachment A, Table 1 for annual emissions.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission factor based on the factor for SO₃ from fuel oil in AP-42, Section 1.3, then take into account the ratio of sulfuric acid mist and gaseous sulfate molecular weights (98/80).			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: Pb	2. Total Percent Efficiency of Control:
3. Potential Emissions: 0.0018 lb/hour 0.00056 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 9.00×10^{-6} lb/MMBtu Reference: AP-42, Table 1.3-10 (9/98)	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): lb/hr = 9.00×10^{-6} lb/MMBtu x 205 MMBtu/hr = 0.0018 lb/hr See Attachment A, Table 1 for annual emissions.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: H114	2. Total Percent Efficiency of Control:
3. Potential Emissions: 0.00062 lb/hour 0.00019 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 3×10^{-6} lb/MMBtu Reference: AP-42, Table 1.3-10 (9/98)	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): lb/hr = 3×10^{-6} lb/MMBtu x 205 MMBtu/hr = 0.00062 lb/hr See Attachment A, Table 1 for annual emissions.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: H021	2. Total Percent Efficiency of Control:
3. Potential Emissions: 0.00062 lb/hour 0.00019 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 3×10^{-6} lb/MMBtu Reference: AP-42, Table 1.3-10 (9/98)	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): lb/hr = 3×10^{-6} lb/MMBtu x 205 MMBtu/hr = 0.00062 lb/hr See Attachment A, Table 1 for annual emissions.	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: 20	2. Basis for Allowable Opacity: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 27 % Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: EPA Method 9	
5. Visible Emissions Comment (limit to 200 characters): 40 CFR 60 Subpart Db 60.43b	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 5

1. Parameter Code: VE	2. Pollutant(s):
3. CMS Requirement:	[<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
4. Monitor Information: Manufacturer: Rosemount Model Number: OPM2000 Serial Number: See Comment	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 40 CFR 60 Subpart Db 60.42b(a). No serial number or installation date provided because monitor is routinely replaced to ensure optimum performance.	

H. VISIBLE EMISSIONS INFORMATION
 (Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: EM	2. Pollutant(s): NO_x
3. CMS Requirement:	[<input checked="" type="checkbox"/>] Rule [] Other
4. Monitor Information: Manufacturer: Rosemount Model Number: NGA2000 Serial Number: See Comment	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 40 CFR 60 Subpart Db 60.48b(b). No serial number or installation date provided because monitor is routinely replaced to ensure optimum performance.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information: Manufacturer: Honeywell Model Number: DR4500 Truline Serial Number: See Comment	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Existing permit condition requires monitoring of the steam production. No serial number or installation date provided because meter is routinely replaced to ensure optimum performance.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: TEMP	2. Pollutant(s):
3. CMS Requirement:	[] Rule [X] Other
4. Monitor Information: Manufacturer: Honeywell Model Number: DR4500 Truline Serial Number: See Comment	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Existing permit condition required monitoring of the steam temperature. No serial number or installation date provided because meter is routinely replaced to ensure optimum performance.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 5 of 5

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [X] Other
4. Monitor Information: Manufacturer: Honeywell Model Number: DR4500 Truline Serial Number: See Comment	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Existing permit condition requires monitoring of steam pressure. No serial number or installation date provided because meter is routinely replaced to ensure optimum performance.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)****Supplemental Requirements**

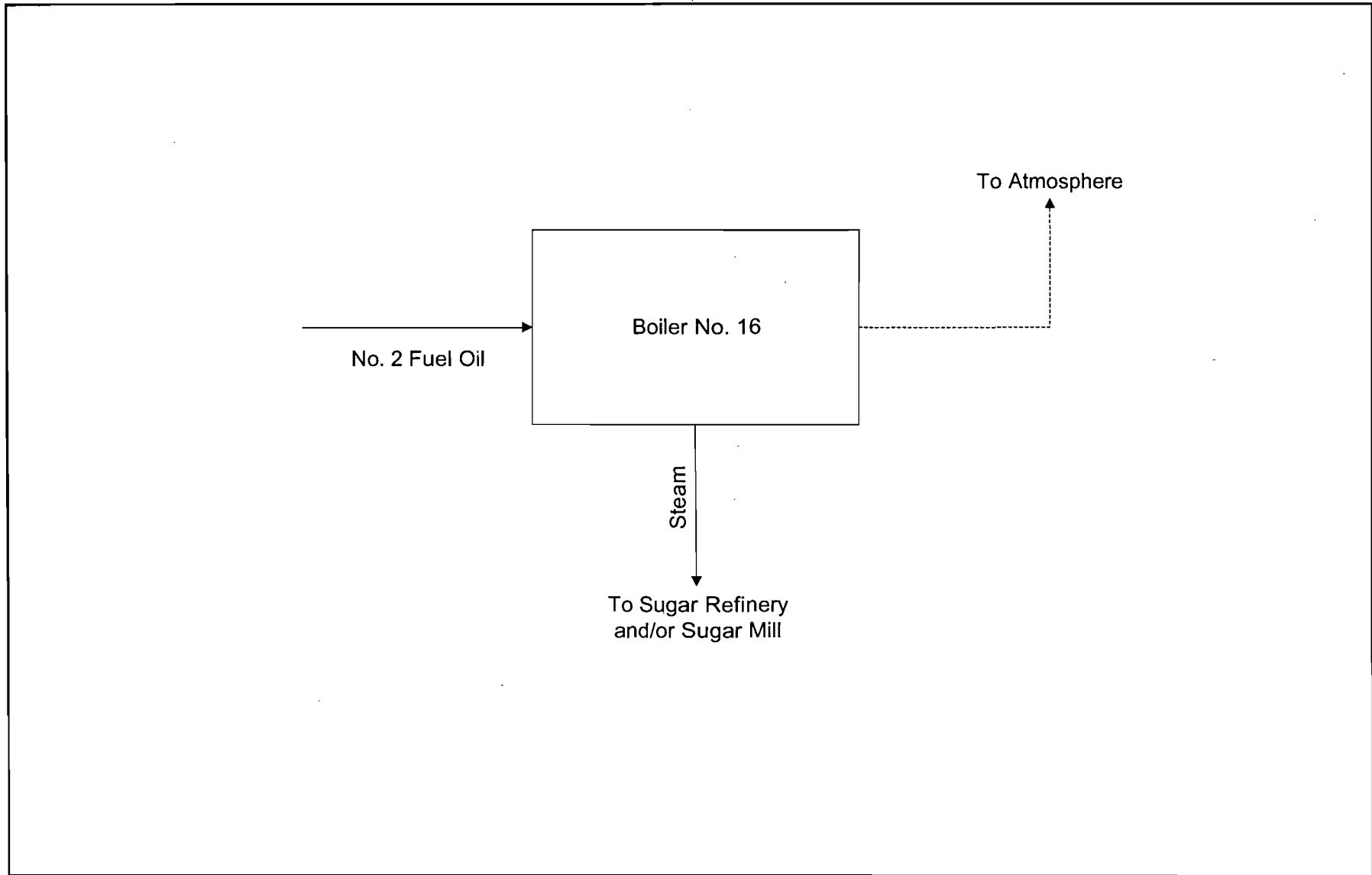
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>OC-EU1-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: <u>OC-EU1-J13</u> <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT OC-EU1-J1

PROCESS FLOW DIAGRAM



Attachment OC-EU1-J1
Boiler No. 16
Process Flow Diagram
Okeelanta Corporation
South Bay, FL

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

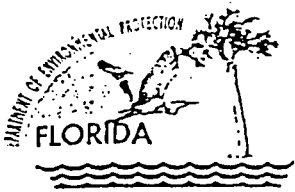
Boiler No. 16	
Filename:	OCEU1J1.VSD
Date:	01/19/01



ATTACHMENT OC-EU1-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS

AIR OPERATING PERMIT



Department of Environmental Protection

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

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

I.D. No: 52FTM50000514
Permit/Certification
Number: A050-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999
County: Palm Beach
Latitude: 26° 35' 00" N
Longitude: 80° 45' 00" W
Section/Town/Range: 16/45S/36E
Project: Boiler No. 16

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, 62-296, 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:

Operation of a 150,000 lbs steam/hr, No. 2 oil fired, 205 MMBtu/hr heat input Babcock & Wilcox Model FM 120-97 package boiler using Coen's LO-NO_x burners and designed for 40% flue gas recirculation.

The boiler is located at the permittee's existing sugar mill that is approximately 6 miles south of South Bay, Palm Beach County, Florida, off of U.S. Highway 27.

Pertinent Documents

Dated

BACT		
PSD	PSD-FL-169	
NSPS	40 CFR Part 60 Subpart Db	
Construction Permit	AC50-191876	29 July 1991
Revision of	AC50-191876	18 Feb. 1993
DEP Form	62-1.202(3) CoCoC	31 Aug. 1994

Title V Permit
SIC Number 2061
SCC Numbers 1-02-005-01

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: AO50-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: AO50-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

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

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

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

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: AO50-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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 62-30.300, F.A.C. as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

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

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

(c) Records of monitoring information shall include:

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

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: AO50-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

FACILITY OPERATIONS:

1. All fugitive dust generated at this site shall be adequately controlled. [Reference Rule 62-296.310(3), F.A.C.]
2. This facility shall be operated in such a fashion so as to preclude objectionable odors. [Reference Rule 62-296.320(2), F.A.C.]
3. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.

CONDITIONS OF COMPLIANCE:

4. Stack sampling facilities provided by the owner shall be in accordance with the requirements of Chapter 62-297.345, F.A.C.
5. The boiler shall be equipped with instruments to measure the opacity of the stack emissions and the steam production, temperature, and pressure.
6. Air pollutant emissions shall not exceed any of the quantities listed below:

Pollutant	lbs/MMBtu	Emissions		Compliance Test Method
		lbs/hr	TPY**	EPA Test Methods (July 1, 1990)
PM	0.054	11.0	23.1	5
Pm10	0.027	5.5	11.6	201 or 201A
SO ₂	0.51	105.5	132.9	Certified Fuel Analysis
NO _x	0.18*	36.9	77.5	7, 7A, 7E
CO	0.20	41.0	86.1	10
VOC	0.09	18.5	38.7	25
VE	20% opacity (6-minute average) except 27% (max.) for 1 6-minute period/hr.			9

* 30-day rolling average as determined from the NO_x monitor data.
** Emissions during the period from March 1 to October 31.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: AO50-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

SPECIFIC CONDITIONS:

CONDITIONS OF COMPLIANCE:

7. Boiler No. 16 shall comply with all applicable requirements of 40 CFR 60, including Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Unit (December 18, 1989).

40 CFR 60.7, Notification and record keeping. Timely notification of the items listed to the Department (South District), Palm Beach County Public Health Unit (PBCPHU), and EPA.

40 CFR 60.42b, Standard for sulfur dioxide. Sulfur content of the No. 2 distillation oil fuel shall not exceed 0.5%. Annual off-season average shall not exceed 0.3% sulfur. The Permittee shall maintain fuel analysis or receipts to confirm compliance with this condition.

40 CFR 60.43b, Standard for particulate matter. Visible emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

40 CFR 60.44b, Standard for nitrogen oxides for high heat release boiler No. 16, expressed as NO₂, is 0.20 lbs/MMBtu.

40 CFR 60.45b, Sulfur dioxide compliance tests, fuel receipts or analysis for sulfur content is required to confirm compliance with this condition.

40 CFR 60.46b, Particulate and nitrogen oxides compliance tests. Method 9 test required to determine compliance with the opacity standard. Method 7, 7A, or 7E test for nitrogen oxides.

40 CFR 60.47b, Sulfur dioxide monitoring. Fuel analysis or receipts required to confirm compliance with this condition.

40 CFR 60.48b, Particulate and nitrogen oxides monitoring. Continuous emissions monitor required to measure opacity.

40 CFR 60.49b, Reporting and record keeping requirements. Permittee required to report date of initial start up, design heat input capacity, fuels used, annual capacity factor, performance test data, plan to monitor NO_x, nitrogen content of the distillate oil, opacity, nitrogen dioxide emissions, monitor down time, "F" factor, exceedances, and other information required by this paragraph.

8. Only No. 2 fuel oil containing a maximum of 0.5% sulfur (off-season average of 0.3% sulfur) shall be used as fuel.

Best Available Copy

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: AO50-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

SPECIFIC CONDITIONS:

CONDITIONS OF COMPLIANCE:

9. Maximum heat input to the boiler shall not exceed 1,463 gallons per hour of No. 2 distillate fuel oil (205 MMBtu/hr).

10. The boiler shall not operate more than 175 days (4,200 hours) during the off-season months of March through October. During the crop season (November through February), the heat input to boiler No. 16 is limited to the equivalent reduction in heat input from No. 6 fuel oil for the existing bagasse/No. 6 fuel oil fired boilers at this facility. It is (not) to be operated as a replacement to a functional bagasse fired boiler when bagasse fuel is available. Total oil consumption (fuel oils No. 2 and No. 6) by all boilers at this facility (boilers Nos. 4,5,6,10,11,12,14,15, and 16) shall not exceed 3.2 million gallons during the crop season (November through February) and total maximum steam production shall not exceed 1.012 million pounds per hour.

Nov 30
Dec 31
Jan 31
Feb 29
12
175
292
x 2
7104

11. Steam production shall not exceed 150,000 lbs/hr.

REQUIRED TESTING:

12. Various emission tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Test shall be conducted in accordance with the EPA Methods specified in Specific Condition 6 and as published in 40 CFR-60, Appendix A, or State approved equivalent method. Such tests shall be conducted once per year within 60 days prior to August 4th. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

13. Particulate matter, visible emissions, and nitrogen oxides emissions tests shall be conducted annually while the boiler is operating between 90-100% of its permitted capacity (135-150,000 lbs steam/hr). The volume and sulfur content of each fuel oil delivery shall be kept in a log for a minimum of 3 years. The continuous emissions monitoring data will be evaluated to determine the highest concentration of NO_x in lbs/MMBtu for any 30-day rolling average during the proceeding year. Tests for other pollutants may be required when the Department has good reason to believe the emission standard is being exceeded.

REPORTS AND RECORDKEEPING:

14. The permittee shall maintain a log that shows the boiler's operation time, steam production, and fuel consumption.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: AO50-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

SPECIFIC CONDITIONS:

REPORTS AND RECORDKEEPING:

15. Stack test results shall be submitted to the Department and the PBCPHU within 45 days of the test.

16. An annual operation report (DER Form 62-210.900(4) attached) shall be submitted by March 1st each year. The attached form shall be reproduced by the permittee and used for future annual submittals. [Reference Rule 62-4.070(3), and Rule 62-210.370(2), F.A.C.]

NOTE: In the event of an emergency the permittee shall contact the Department by calling (904) 413-9911 for "call back immediately", or (904) 413-9912 for "call back quickly, but not necessarily immediately". During normal business hours, the permittee shall call (813) 332-6975.

Issued this 29th day of November, 1993.

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL PROTECTION



Peter J. Ware
Director of
District Management

PJW/AEL/jw

11 Pages Attached

AIR CONSTRUCTION PERMIT



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

February 18, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Pablo A. Carreno
Director of Mill & Refinery Operation
Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

Dear Mr. Carreno:

Re: Revision to Construction Permit No. AC50-191876
(PSD-FL-169)

The Department is in receipt of your request and supporting data to operate No. 2 fuel oil fired boiler No. 16 during the sugar cane crop season (November through February) in lieu of firing No. 6 fuel oil in the other boilers at the Okeelanta Corporation mill which is located in Palm Beach County, 6 miles south of South Bay. This request is acceptable, with conditions, and the referenced permit is amended:

FROM

Specific Condition No. 5:

Air pollutant emissions shall not exceed any of the quantities listed below:

Pollutant	lbs/MMBtu	Emissions		Compliance Test Method
		lbs/hr	TPY	EPA Test Methods (July 1, 1990)
PM	0.054	11.0	23.1	5
PM ₁₀	0.027	5.5	11.6	201 or 201A
SO ₂	0.51	105.5	132.9	Certified Fuel Analysis
NO _x	0.18*	36.9	77.5	7, 7A, 7E
CO	0.20	41.0	86.1	10
VOC	0.09	18.5	38.7	25
VE	20% opacity (6-minute average) except 27% (max.) for 1 6-minute period/hr.			9

* 30-day rolling average as determined from the NO_x monitor data.

Specific Condition No. 10:

The boiler shall not operate for more than 175 days (4,200 hours) during any 12 month period. The boiler shall only operate during the off-season months (March through October).

TO:

Specific Condition No. 5:

Air pollutant emissions shall not exceed any of the quantities listed below:

Pollutant	lbs/MMBtu	Emissions		Compliance Test Method
		lbs/hr	TPY**	EPA Test Methods (July 1, 1990)
PM	0.054	11.0	23.1	5
PM ₁₀	0.027	5.5	11.6	201 or 201A
SO ₂	0.51	105.5	132.9	Certified Fuel Analysis
NO _x	0.18*	36.9	77.5	7, 7A, 7E
CO	0.20	41.0	86.1	10
VOC	0.09	18.5	38.7	25
VE	20% opacity (6-minute average) except 27% (max.) for 1 6-minute period/hr.			9

* 30-day rolling average as determined from the NO_x monitor data.

** Emissions during the period from March 1 to October 31.

Specific Condition No. 10:

The boiler shall not operate for more than 175 days (4,200 hours) during the off-season months (March through October). During the crop season (November through February), the heat input to boiler No. 16 is limited to the equivalent reduction in heat input from No. 6 fuel oil for the existing bagasse/No. 6 fuel oil fired boilers at this sugar mill. It shall not be operated as a replacement to a functional bagasse fired boiler when bagasse fuel is available. Total oil consumption (fuel oils No. 2 and No. 6) by all boilers at this facility (boilers Nos. 4, 5, 6, 10, 11, 12, 14, 15, and 16) shall not exceed 3.2×10^6 gallons during the crop season (November through February) and total maximum steam production shall not exceed 1,012,000 lbs/hr.

Mr. Pablo A. Carreno
Revision to AC50-191876
Page 3

A copy of this letter shall be attached to the referenced permit and shall become a part of that permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/plm

Attach: Okeelanta's September 25, 1992, letter
DER's October 15, 1992, letter
Okeelanta's November 13, 1992, letter
Okeelanta's January 25, 1993, letter

cc: David Knowles, SD
Stephanie Brooks, SED
Gregg Worley, EPA
Jim Stormer, PBC
David Buff, P.E.
Brian Mitchell, NPS

PERMIT # 16

Boiler # 16

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC 50-191876
Palm Beach County

Mr. Pablo A. Carreno
Director of Mill and Refinery Operations
Okeelanta Corporation
P. O. Box 86
South Bay, Florida 33493

Expires 3/1/23

Enclosed is Permit Number AC 50-191876 to construct an oil fired steam boiler (No. 16) at your sugar mill located on U.S. Highway 27, 6 miles south of South Bay, Palm Beach County, Florida, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

C. H. Fancy
C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 7-30-91 to the listed persons.

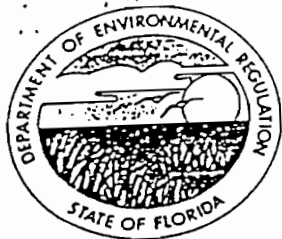
Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

Keri Baker
(Clerk)

7-30-91
(Date)

- Copies furnished to:
- David Knowles, South Dist.
 - Isidore Goldman SE Dist.
 - Jim Stormer, Palm Beach Co.
 - David Buff, P.E.
 - Jewell Harper, EPA
 - C. Shaver, NPS



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2

Lawton Chiles, Governor

Carol M. Browner, Sec.

PERMITTEE:

Okeelanta Corporation
P.O. Box 86
South Bay, Florida 33493

Permit Number: AC 50-191876
PSD-FL-169

Expiration Date: March 1, 1993
County: Palm Beach

Latitude/Longitude: 26°35'00" N
80°45'00" W

Project: Oil Fired Steam Boiler
No. 16

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Construction of a 150,000 lbs steam/hr, No. 2 oil fired, 205 MMBtu/hr heat input Babcock & Wilcox Model FM 120-97 package boiler using Coen's LO-NO_x burners and designed for 12% flue gas recirculation (or equivalent boiler with controls) equipped with a 5 ft. diameter by 75 ft. high stack. The boiler will be located at the permittee's existing sugar mill (SIC 2061) that is approximately 6 miles south of South Bay, Palm Beach County, Florida off of U.S. Highway 27. The UTM coordinates of this site are Zone 17, 524.9 km E and 2940.1 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received Jan. 29, 1991.
2. KBN letter dated Feb. 19, 1991.
3. BACT Determination.
4. KBN letter dated June 5, 1991.
5. Palm Beach County Health Unit letter dated June 5, 1991.
6. NPS letter dated July 1, 1991.
7. KBN letter dated July 9, 1991.

PERMITTEE:
Okeelanta Corporation

Permit Number: AC 50-191876
PSD-FL-169
Expiration Date: March 1, 1993

GENERAL CONDITIONS:

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

PERMITTEE:
Okeelanta Corporation

Permit Number: AC 50-191876
PSD-FL-169
Expiration Date: March 1, 1993

GENERAL CONDITIONS:

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.

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

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

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

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

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

PERMITTEE:
Okeelanta Corporation

Permit Number: AC 50-191876
PSD-FL-169
Expiration Date: March 1, 1993

GENERAL CONDITIONS:

Statues. 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 the 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 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes Determination of Prevention of Significant Deterioration (PSD), Determination of Best Available Control Technology (BACT), and Compliance with New Source Performance Standards (NSPS).

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulation by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:
Okeelanta Corporation

Permit Number: AC 50-191876
PSD-FL-169
Expiration Date: March 1, 1993

GENERAL CONDITIONS:

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

15. When request 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.

SPECIFIC CONDITIONS:

Construction Details

1. The boiler shall be a flue gas recirculation type and equipped with low NO_x distillate oil burners. The design shall be for a heat release rate greater than 70,000 Btu/hr-ft³.
2. The stack sampling facilities shall comply with F.A.C. Rule 17-2.700(4).
3. The 5 ft. diameter stack shall have a minimum height of 75 ft.
4. The boiler shall be equipped with instruments to measure the opacity of the stack emissions and the steam production, temperature, and pressure.

PERMITTEE:
Okeelanta Corporation

Permit Number: AC 50-191876
PSD-FL-169
Expiration Date: March 1, 1993

SPECIFIC CONDITIONS:

Emission Restrictions

5. Air pollutant emissions shall not exceed any of the quantities listed below:

Pollutant	lbs/MMBtu	Emissions		Compliance Test Method
		lbs/hr	TPY	EPA Test Methods (July 1, 1990)
PM	0.054	11.0	23.1	5
PM10	0.027	5.5	11.6	201 or 201A
SO ₂	0.51	105.5	132.9	Certified Fuel Analysis
NO _x	0.18*	36.9	77.5	7, 7A, 7E
CO ^x	0.20	41.0	86.1	10
VOC	0.09	18.5	38.7	25
VE	20% opacity (6-minute average) except 27% (max.) for 1 6-minute period/hr.			9

* 30-day rolling average as determined from the NO_x monitor data.

Compliance Requirements

6. Particulate matter, visible emissions, and nitrogen oxides emissions tests shall be conducted annually while the boiler is operating between 90-100% of its permitted capacity (135-150,000 lbs steam/hr). The volume and sulfur content of each fuel oil delivery shall be kept in a log for a minimum of 3 years. The continuous emissions monitoring data will be evaluated to determine the highest concentration of NO_x in lbs/MMBtu for any 30-day rolling average during the preceding year. Tests for other pollutants may be required when the Department has good reason to believe the emission standard is being exceeded.

Federal Requirements

7. Boiler No. 16 shall comply with all applicable requirements of 40 CFR 60, including Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Unit (December 18, 1989).

40 CFR 60.7, Notification and record keeping. Timely notification of the items listed to the Department (South District), Palm Beach County Public Health Unit (PBCPHU), and EPA.

PERMITTEE:
Okeelanta Corporation

Permit Number: AC 50-191876
PSD-FL-169
Expiration Date: March 1, 1993

SPECIFIC CONDITIONS:

40 CFR 60.8, Compliance tests. Minimum of 30 days prior notice of the initial compliance tests which must be conducted between 60 to 180 days of initial startup of the source to the Department and EPA.

40 CFR 60.42b, Standard for sulfur dioxide. Sulfur content of the No. 2 distillation oil fuel shall not exceed 0.5%. Annual off-season average shall not exceed 0.3% sulfur. The permittee shall maintain fuel analysis or receipts to confirm compliance with this condition.

40 CFR 60.43b, Standard for particulate matter. Visible emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

40 CFR 60.44b, Standard for nitrogen oxides for high heat release boiler No. 16, expressed as NO₂, is 0.20 lbs/MMBtu.

40 CFR 60.45b, Sulfur dioxide compliance tests, fuel receipts or analysis for sulfur content is required to confirm compliance with this condition.

40 CFR 60.46b, Particulate and nitrogen oxides compliance tests. Method 9 test required to determine compliance with the opacity standard. Method 7, 7A, or 7E test for nitrogen oxides.

40 CFR 60.47b, Sulfur dioxide monitoring. Fuel analysis or receipts required to confirm compliance with this condition.

40 CFR 60.48b, Particulate and nitrogen oxides monitoring. Continuous emissions monitor required to measure opacity.

40 CFR 60.49b, Reporting and record keeping requirements. Permittee required to report date of initial start up, design heat input capacity, fuels used, annual capacity factor, performance test data, plan to monitor NO_x, nitrogen content of the distillate oil, opacity, nitrogen dioxide emissions, monitor down time, "F" factor, exceedances, and other information required by this paragraph.

Operation Requirements

8. Only No. 2 fuel oil containing a maximum of 0.5% sulfur (off-season average of 0.3% sulfur) shall be used as fuel.

PERMITTEE:
Okeelanta Corporation

Permit Number: AC 50-191876
PSD-FL-169
Expiration Date: March 1, 1993

SPECIFIC CONDITIONS:


9. Maximum heat input to the boiler shall not exceed 1,463 gallons per hour of No. 2 distillate fuel oil (205 MMBtu/hr).
10. The boiler shall not operate for more than 175 days (4,200 hours) during any 12 month period. The boiler shall only operate during the off-season months (March through October).
11. Steam production shall not exceed 150,000 lbs/hr.

Administrative Requirements

12. The permittee shall maintain a log that shows the boiler's operation time, steam production, and fuel consumption.
13. The Department's South District and the PBCPHU shall be notified in writing at least 30 days in advance of the initial compliance test and 15 days in advance of any annual compliance tests to be conducted on this boiler.
14. Stack test results shall be submitted to the Department and the PCBPHU within 45 days of the test.
15. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
16. An application for an operation permit must be submitted to the South District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 29th day
of July, 1991.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Carol M. Browner, Secretary

Best Available Copy

Best Available Control Technology (BACT) Determination Okeelanta Corporation Palm Beach County

The applicant plans to permanently install a 205 MMBtu/hr No. 2 oil-fired steam boiler at their facility 6 miles south of South Bay, Florida. The boiler will be used to supply process steam. The boiler is scheduled to operate during the off-season of April through October (4,200 hours) when the other boilers at this facility are shutdown.

A BACT determination is required for particulates and sulfur dioxide as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emissions Limiting and Performance Standards. In addition, the Department performed a BACT determination for nitrogen oxides (NOx) since those emissions are greater than the PSD significant rate of 40 tons per year.

BACT Determination Request by the Applicant:

Particulate, sulfur dioxide, nitrogen oxides emissions to be controlled by the firing of No. 2 fuel oil with a 0.5% sulfur content

Date of Receipt of a BACT Application:

January 29, 1991

BACT Determined by DER:

The amount of particulate and sulfur dioxide emissions from the boiler will be limited by the firing of No. 2 fuel oil with a 0.3% off season average and a 0.5% maximum sulfur content.

Nitrogen oxides emissions shall not exceed 0.18 lbs/MMBtu heat input using low NOx burners/flue gas recirculation.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern in that most of the fuel sulfur becomes SO₂ and particulate emissions from fuel burning are related to the sulfur content. The Department has determined that the firing of No. 2 fuel oil with an off-season average of 0.3% sulfur and maximum of 0.5% sulfur content is BACT for particulates and SO₂. These sulfur content limitations are representative of what has been recently established as BACT for oil-fired equipment.

ATTACHMENT A

SUPPLEMENTAL INFORMATION FOR TEMPORARY PERMIT

1.0 INTRODUCTION

Okeelanta Corporation (Okeelanta) is proposing temporary simultaneous operation of existing Boiler No. 16 located at its sugar mill south of South Bay, Palm Beach County, Florida. In late December, 2000 and again in early January, 2001, Palm Beach County experienced several periods of prolonged freezing temperatures. As a result of those freezes, Okeelanta sustained significant freeze damage to its sugarcane crop in Palm Beach County. It is noteworthy that the freeze damage to Palm Beach County and 17 other Florida counties is so extensive that on January 16, 2001 governor Bush made a formal request to the federal government to declare these counties agricultural disaster areas.

Freeze-damaged sugarcane becomes susceptible to microbial degradation at increasing rates each day as the temperature rises. The rate of degradation accelerates further with precipitation. The ongoing degradation process reduces the sucrose content and produces invert components that make raw sugar manufacturing more and more arduous and costly with time. If Okeelanta does not accelerate its rate of harvesting, a portion of its sugarcane crop will be completely lost with the potential revenue it represents. If this occurs, Okeelanta will be forced to cut the sugarcane, haul it to fallow land, and then plow it into the field. Thus, Okeelanta would not only incur the loss of the sugarcane, but also expend significant resources to properly dispose of the freeze-damaged sugarcane.

Consequently, Okeelanta must accelerate its sugarcane harvesting and processing activities to avoid losing a significant portion of its crop. To do so, the Okeelanta sugar mill must generate additional steam to increase its milling rate. At the present time, the mill capacity is limited by the steam supply from the Okeelanta cogeneration facility. The purpose of this application is to obtain a permit authorizing Okeelanta to operate Boiler No. 16 simultaneously with the boilers located at the adjacent cogeneration facility for up to 35 days. During this temporary period of simultaneous operation, Boiler No. 16 will operate up to 24 hours a day for 35 days at an average operating rate of approximately 100,000 lb of steam per hour. Due to the urgency of accelerating the harvest, Okeelanta needs this permit immediately and will not need the temporary authorization for simultaneous operation of Boiler No. 16 to extend beyond March 31, 2001.

2.0 PROJECT DESCRIPTION

Okeelanta made application and was issued a U.S. Environmental Protection Agency (EPA) prevention of significant deterioration (PSD) permit (Permit No. PSD-FL-169) in 1991 for Boiler No. 16. Boiler No. 16 was originally constructed to provide steam to the Okeelanta sugar refining operations during the off-season. The permit was modified in 1993, and the boiler currently operates under permit AO50-257065, issued November 29, 1994. On September 27, 1993, Florida DEP issued Permit No. AC50-219413/PSD-FL-196 for three boilers at the Okeelanta Power L.P. cogeneration facility adjacent to the mill. This permit allowed simultaneous operation of Boiler No. 16 during startup, debugging, and testing of the cogeneration boilers.

Recently (October 2000), Okeelanta Power obtained a revised permit, which addressed the operation of Boiler No. 16 as a standby boiler for the Okeelanta Power cogeneration boilers (Permit No. 0990332-011-AC; PSD-FL-196K). In this permit, Boiler No. 16 is allowed to operate only when one or more of the cogeneration boilers are shut down. Okeelanta is requesting that this restriction be lifted temporarily until April 1, 2001, while retaining the existing permit authorization for backup operation.

Boiler No. 16 is designed to generate 150,000 lb/hr steam and is currently permitted to burn only No. 2 fuel oil. Boiler No. 16 is permitted to operate during any season of the year, but operation is limited to 7,080 hours per year. During the off-season months of March through October, Boiler No. 16 is only permitted to operate 175 days (4,200 hours). Maximum heat input is limited to 205 MMBtu/hr.

Currently, the three boilers operated by the Okeelanta cogeneration facility provide the steam to operate Okeelanta's sugar mill and refinery. Due to freezing temperatures during this crop season, Okeelanta must process the sugar cane in an accelerated manner, which will result in an increase in steam demand that cannot be met by the three cogeneration boilers alone. Okeelanta proposes to use Boiler No. 16 temporarily to provide the additional steam for up to 35 days, 24 hours a day. During this time, Boiler No. 16 will be operated to generate an average of about 100,000 lb/hr of steam. The associated average heat input rate is 147.5 million British thermal units per hour (MMBtu/hr). This heat input rate is based on a steam enthalpy of 1,475 Btu/lb of steam, based on past compliance test data. The equivalent No. 2 fuel oil usage to generate the required steam over the 35-day period is 885,000 gallons.

The maximum potential emissions for the temporary operation of Boiler No. 16 are presented in Table 1. The emission factors for particulate matter (both PM and PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) are based on the current permit limits for Boiler No. 16 (Permit No. AO50-257065). The emission factors for lead (Pb), mercury (Hg) and beryllium (Be) are based on emission factors from AP-42, Table 1.3-10 (9/98).

A summary of the last five compliance tests for PM and NO_x is presented in Table 2. Estimating maximum potential emissions based on the current emission limits is conservative based on these previous compliance test results. The annual activity factor is based on 100,000 lb/hr steam for 24 hours a day and 35 days at 1,475 Btu/lb of steam, and is equivalent to 885,000 gal/yr of No. 2 fuel oil.

3.0 REGULATORY REQUIREMENTS

The EPA has implemented regulations requiring prevention of significant deterioration (PSD) review for new or modified sources that increase air emissions above certain threshold amounts. These threshold amounts are referred to as the PSD significant emission rate and are presented in Table 1. PSD regulations are promulgated under Title 40 of the Code of Federal Regulations (CFR), Part 52.21, and are implemented in Florida through delegation to the FDEP. FDEP has adopted the EPA PSD regulations as Rule 62-212.400, Florida Administrative Code (F.A.C.). The proposed project is a modification to an existing air emission source at a major facility.

The current actual emissions for Boiler No. 16 were assumed to be zero, since the boiler has operated very little in the last several years. The last time the boiler operated was over two years ago (January 14, 1999) for the purpose of completing a relative accuracy test audit of the NO_x monitor. Therefore, the net increases in emissions for the project are the potential annual emissions. The potential annual emissions of Boiler No. 16 due to this project are compared to the PSD significant emission rate in Table 1. As shown in Table 1, the temporary operation of Boiler No. 16, described in this application, will not result in potential emission increases that will exceed PSD significant emission rates. Therefore, this project is not subject to PSD review.

Any limitation based on the projection of No. 2 fuel oil usage (885,000 gallons) should be applicable only while operating Boiler No. 16 simultaneously with all three cogeneration boilers. Okeelanta Corporation and Okeelanta Power L.P. will continue to abide by the existing conditions in permits AO50-257065, 0990332-011-AC/PSD-FL-196K, and Title V Permit No. 0990005-003-AV.

Table 1. Maximum Emissions for 100,000 lb/hr Steam @ 35 Days Operation, Boiler No. 16

Regulated Pollutant	No. 2 Fuel Oil Combustion			Annual Emissions (TPY)	PSD Significant Emission Rate (TPY)	Subject to PSD Review? (Yes/No)
	Emission Factor (lb/MMBtu)	Ref.	Activity Factor ^a (MMBtu/yr)			
Particulate Matter (PM)	0.054	1	123,900	3.35	25	NO
Particulate Matter (PM ₁₀)	0.027	1	123,900	1.67	15	NO
Sulfur dioxide (SO ₂)	0.51	1	123,900	31.59	40	NO
Nitrogen oxides (NO _x)	0.18	1	123,900	11.15	40	NO
Carbon monoxide (CO)	0.20	1	123,900	12.39	100	NO
VOC	0.09	1	123,900	5.58	40	NO
Sulfuric acid mist (SAM)	0.0257	2	123,900	1.59	7	NO
Lead (Pb)	9.00E-06	3	123,900	0.00056	0.6	NO
Mercury (Hg)	3.00E-06	3	123,900	0.00019	0.1	NO
Beryllium (Be)	3.00E-06	3	123,900	0.00019	0.0004	NO
Fluorides (F1)	--		123,900	--	3	--

References:

1. Based on current permit limit for Boiler No. 16.
2. Based on factor for SO₃ from fuel oil in AP-42, Section 1.3; then take into account the ratio of sulfuric acid mist and gaseous sulfate molecular weights (98/80).
3. Factors for No. 2 fuel oil combustion, AP-42 Table 1.3-1, 1.3-3, and 1.3-10 (9/98) (Pb: 9 lb/10¹² Btu, Hg: 3 lb/10¹² Btu and Be: 3 lb/10¹² Btu).

Footnotes:

- ^a Equivalent to 885,000 gallons of oil to produce an average of 100,000 lb/hr steam for 24 hrs/day and 35 days, at 1,475 Btu/lb of steam. The heating value of the No. 2 fuel oil was assumed to be 140,000 Btu/gal.

Table 2. Compliance Testing Results for Okeelanta Boiler 16

Test Data	Steam Rate (lb/hr)	Heat Input Rate (MMBtu/hr)	Heat Input per 1000 lbs steam (Btu/lb steam)	Particulate Matter		Nitrogen Oxides	
				lbs/hr	lbs/MMBtu	lbs/hr	lbs/MMBtu
August 4, 1994	140,117	196	1,398	1.29	0.0066	24.29	0.124
August 3, 1995	139,600	196	1,407	1.22	0.0067	25.15	0.128
June 5, 1996	143,000	211	1,475	2.91	0.013	27.42	0.130
July 23, 1997	135,900	194	1,425	3.37	0.014	24.21	0.125
August 4, 1998	133,073	171	1,283	4.81	0.028	24.08	0.141

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Ricardo Lima
 Vice President & General Mgr.
 8001 US Highway 27 South
 South Bay, FL 33493

2. Article Number (Copy from service label)
 7099 3400 0000 1453 2535

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **D. MICHEE** B. Date of Delivery **01/29/84**

C. Signature *[Signature]* Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

7099 3400 0000 1453 2535

Article Sent To:

Mr. Ricardo Lima

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Okeelanta Power

Postmark
Here

Name (Please Print Clearly) (to be completed by mailer)

Mr. Ricardo Lima

Street, Apt. No., or PO Box No.

8001 U.S. Highway 27 South

City, State, ZIP+4

South Bay, FL 33493

PS Form 3800, July 1999

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Ricardo A. Lima
 V.P. and Gen. Mgr.
 Okeelanta Corporation
 21250 U.S. Highway 27
 South Bay, FL 33493

2. Article Number (Copy from service label)
 7099 3400 0000 1449 4666

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *B. M. PHEC* B. Date of Delivery *01/29/01*

C. Signature *B. M. PHEC* Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

Article Sent To:

Mr. Ricardo Lima

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Name (Please Print Clearly) (to be completed by mailer)
Mr. Ricardo Lima
 Street, Apt. No., or PO Box No.
21250 U.S. Highway 27
 City, State, ZIP+4
South Bay, FL 33493

PS Form 3800, July 1999

See Reverse for Instructions

7099 3400 0000 1449 4666

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p>Mr. Ricardo A. Lima, V.P. and General Manager Okeelanta Corporation 21250 U.S. Highway 27 South Bay, FL 33493</p>	<p>A. Received by (Please Print Clearly) B. MICHEE B. Date of Delivery 2-16-01</p> <p>C. Signature X B. Michee <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Copy from service label) 7099 3400 0000 1449 3850</p>	

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Mr. Ricardo A. Lima, VP & Gen. Mgr.

Postage	\$	Okeelanta Corp. Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

7099 3400 0000 1449 3850

Name (Please Print Clearly) (to be completed by mailer)
Mr. Ricardo A. Lima

Street, Apt. No., or PO Box No.
21250 US Highway 27

City, State, ZIP+4
South Bay, FL 33493

PS Form 3800, July, 1999 See Reverse for Instructions

THE PALM BEACH POST

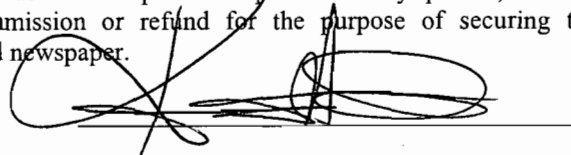
Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

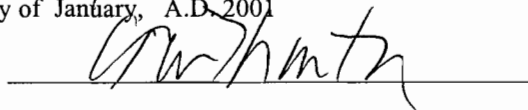
STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared **Kevin Austin**, who on oath says that he is **Classified Advertising Manager**, of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, a Notice in the matter of Intent to Issue Air Construction Permit in the --- Court, was published in said newspaper in the issues of January 29, 2001.

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before this 29th day of January, A.D. 2001



Personally known XX or Produced Identification _____
Type of Identification Produced _____



NO. 781465
PUBLIC NOTICE OF INTENT
TO ISSUE AIR
CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
DEP File No.
0990005-007-AC
Okeelanta Corporation
Existing Sugar Mill
Mill Boiler No. 16 -
Temporary Simultaneous
Operation
Palm Beach County

Suite 364
Ft. Myers, FL 33901-3381
Telephone: 941/332-6975
Palm Beach County
Health Dept.
Air Pollution Control Section
901 Evernie Street
West Palm Beach, FL 33401
Telephone: 561/355-3138
The complete project file in-
cludes the application, techni-
cal evaluations, Draft Permit,
and the information submitted
by the authorized representa-
tive, exclusive of confidential
records under Section 403-
111, F.S. Interested persons
may contact the Administrator
of the New Source Review
Section at 111 South Magnolia
Drive, Suite 4, Tallahassee,
Florida 32301, or call
850/488-0114, for additional
information.
PUB: The Palm Beach Post
January 29, 2001

The Department of Environ-
mental Protection (Depart-
ment) gives notice of its intent
to issue an air construction
permit to the Okeelanta Cor-
poration the existing sugar
mill located approximately 6
miles south of South Bay in
Palm Beach County, Florida.
The applicant requests tempo-
rary operation of existing Boil-
er No. 16 simultaneously with
the existing cogeneration
plant boilers for approximately
a two-month period to allow
rapid processing of sugarcane
damaged by recent severe
freezes. The applicant's au-
thorized representative is Ri-
cardo A. Lima, the V.P. and
General Manager. The mailing
address is Okeelanta Corpora-
tion, 21250 U.S. Highway 27
South Bay, FL 33493.
Boiler No. 16 was previously
permitted in 1991 with Best
Available Control Technology
(BACT) determinations for
NOx and SO2 emissions. The
BACT-level controls were de-
termined to be low-NOx burn-
ers with 40% flue gas recircu-
lation and the firing of low
sulfur distillate oil. The poten-
tial emissions associated with
this project are approximately:
12 tons per year of CO, 11
tons per year of NOx, 3 tons
per year of PM, 2 tons per
year of PM10, 32 tons per
year of SO2, and 6 tons per
year of VOC. Because the
emissions increases do not
exceed the Significant Emission
Rates listed in Table 62-
212.400-2, F.A.C., the project
is not subject to the Preven-
tion of Significant Deteriora-
tion requirements of Rule 62-
212.400, F.A.C. A new
determination of the Best
Available Control Technology
(BACT) and an air quality im-
pact analyses were not re-
quired.

The Department will issue the
Final Permit with the attached
conditions unless a response
received in accordance with
the following procedures re-
sults in a different decision or
significant change of terms or
conditions.

The Department will accept
written comments concerning
the proposed permit issuance
action for a period of fourteen
(14) days from the date of
publication of this Public No-
tice of Intent to Issue Air Con-
struction Permit. Written com-
ments should be provided to
the Department's Bureau of
Air Regulation at 2600 Blair
Stone Road, Mail Station
#5505, Tallahassee, FL
32399-2400. Any written com-
ments filed shall be made
available for public inspection.
If written comments received
result in a significant change
in the proposed agency ac-
tion, the Department shall re-
vise the proposed permit and
require, if applicable, another
Public Notice.

The Department will issue the
permit with the attached con-
ditions unless a timely petition
for an administrative hearing
is filed pursuant to sections
120.569 and 120.57 F.S. be-
fore the deadline for filing a
petition. The procedures for
petitioning for a hearing are
set forth below.

Mediation is not available in
this proceeding.

A person whose substantial in-
terests are affected by the
proposed permitting decision
may petition for an adminis-
trative proceeding (hearing) un-
der sections 120.569 and
120.57, F.S. The petition must
contain the information set
forth below and must be filed
(received) in the Office of
General Counsel of the De-
partment at 3900 Common-
wealth Boulevard, Mail Station
#35, Tallahassee, Florida,
32397-3000. Petitions filed by

the person, applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within Fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, FL 32301
Telephone: 850/488-0114
Dept. of Environmental Protection
South District Office
2205 Victoria Avenue,