Memorandum

Florida Department of Environmental Protection

TO: Michael G. Cooke, DARM Director

THRU: Trina Vielhauer, BAR Chief

FROM: Jeff Koerner, Air Permitting North Program

DATE: April 5, 2006

SUBJECT: Project No. 0990005-018-AC
Okeelanta Sugar Mill and Refinery
Boiler No. 16 – Capacity Reduction

The Final Permit for this project is attached for your approval and signature, which is for Okeelanta Corporation's existing sugar mill and sugar refinery located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida. This permit restricts fossil fuel firing in Boiler 16 (EU-014) to an annual capacity factor of 10% or less. This change reduces potential emissions of all pollutants below the PSD significant emission rates and substantially reduces NSPS Subpart Db emissions standards and monitoring requirements. Therefore, the boiler is no longer subject to PSD preconstruction review.

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

I recommend your approval of the attached Final Permit for this project.

Attachments

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

Authorized Representative:
Mr. Ricardo Lima, V.P and General Manager

Okeelanta Sugar Mill and Refinery
Facility ID No. 0990005
Project No. 0990005-018-AC
Boiler No. 16 – Capacity Reduction

Enclosed is Final Air Permit No. 0990005-018-AC, which restricts fossil fuel firing in Boiler 16 (EU-014) to an annual capacity factor of 10% or less, which reduces all emissions below the PSD significant emission rates and avoids the continuous monitoring requirements of NSPS Subpart Db. Boiler 16 is installed at Okeelanta Corporation's existing sugar mill and sugar refinery located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida. As noted in the attached Final Determination, only minor changes and clarifications were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

Trina L Vielhauer

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/12/06 to the persons listed:

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

Clerk Stamp

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

Barbara J. Friday (Clerk) 4/12/06 (Date)

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

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

PROJECT

Air Permit No. 0990005-018-AC
Okeelanta Corporation - Sugar Mill and Refinery

This permit restricts fossil fuel firing in Boiler 16 (EU-014) to an annual capacity factor of 10% or less, which reduces all emissions below the PSD significant emission rates and avoids the continuous monitoring requirements of NSPS Subpart Db. Boiler 16 is installed at Okeelanta Corporation's existing sugar mill and sugar refinery located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida.

NOTICE AND PUBLICATION

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

COMMENTS

No comments on the Draft Permit were received from the public, the Department's District Office, the Palm Beach County Health Department or the applicant.

On March 1st, the Department received an email from EPA Region 4 clarifying the February 2006 revisions to NSPS Subpart Db for industrial boilers. If the facility combusts only oil containing no more than 0.3% sulfur by weight, the revisions now exempt affected facilities constructed, reconstructed, or modified after February 18, 2005 from particulate matter and opacity limits. Boiler 16 is permitted to fire only natural gas or distillate oil containing no more than 0.05% sulfur by weight. In accordance with § 60.46b(i), compliance must be demonstrated obtaining fuel supplier certifications of sulfur content. Appendix Db of the permit was corrected to reflect this recent change.

CONCLUSION

In addition to the above referenced revisions, only minor changes were made to correct typographical errors. The final action of the Department is to issue the permit with the changes described above.

Department of Environmental Protection

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

Jeb Bush
Governor

Colleen M. Castille
Secretary

PERMITTEE:

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

Authorized Representative:
Mr. Ricardo Lima, V.P and General Manager

Okeelanta Sugar Mill and Refinery
Facility ID No. 0990005
Project No. 0990005-018-AC
Boiler No. 16 – Capacity Reduction
Expires: April 1, 2007

PROJECT AND LOCATION

The project is associated with Okeelanta Corporation's existing sugar mill (SIC No. 2061) and sugar refinery (SIC No. 2062) located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida. The facility is collocated next to New Hope Power's Okeelanta Cogeneration Plant. The UTM coordinates are Zone 17, 524.9 km East, and 2940.1 km North. The project restricts fossil fuel firing in Boiler 16 (EU-014) to an annual capacity factor of 10% or less, which reduces all emissions below the PSD significant emission rates and avoids the continuous monitoring requirements of NSPS Subpart Db. This permit supersedes previous Permit No. PSD-FL-169A (Project No. 0990005-009-AC).

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 52, Section 21 of the Code of Federal Regulations. The permittee is authorized to perform the work and operate the equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

Michael G. Cooke 4/11/06

Michael G. Cooke, Director (Date)
Division of Air Resource Management

FACILITY DESCRIPTION

The facility consists of two adjacent plants. Okeelanta Corporation operates a sugar mill (SIC No. 2061) and sugar refinery (SIC No. 2062) including packaging and transshipment activities. New Hope Power operates the Okeelanta Cogeneration Plant that provides process steam for the sugar mill/sugar refinery and generates electricity for sale to the power grid (SIC 4911).

EMISSIONS UNITS

This permit modifies the following existing emissions unit.

ID	Emission Unit Description
014	Boiler No. 16 is a 211/202 MMBtu per hour package boiler fired with natural gas/distillate oil.

REGULATORY CLASSIFICATION

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

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

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

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

NSPS: The facility operates emissions units subject to the New Source Performance Standards (NSPS) of 40 CFR 60 including: Subparts Da (boilers) and Db (boilers).

NESHAP: The facility operates emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63 including Subpart DDDDD (boilers).

APPENDICES

The following Appendices are attached in Section IV as part of this permit.

Appendix CF. Citation Format

Appendix Db. NSPS Subpart Db Requirements for Boilers

Appendix GC. General Conditions

Appendix SC. Standard Conditions

RELEVANT DOCUMENTS

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action and are on file with the Department.

- Application No. 0990005-018-AC received on 12/14/05.
- Permit No. PSD-FL-169A (Project No. 0990005-009-AC).

SECTION II. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate an emissions unit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall be submitted to the Air Resources Section of the Department's South District Office (2295 Victoria Avenue, Suite 364 in Fort Myers, Florida 33902-2549) and the Air Pollution Control Section of the Palm Beach County Health Department (P.O. Box 29, West Palm Beach, Florida 33402-0029).

2. Compliance Authorities: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite 364 in Fort Myers, Florida 33902-2549. Copies of all such documents shall be submitted to the Air Pollution Control Section of the Palm Beach County Health Department at P.O. Box 29, West Palm Beach, Florida 33402-0029.

3. Appendices: The following Appendices are attached as part of this permit: Appendix CF. (Citation Format); Appendix Db (NSPS Subpart Db Requirements for Boilers); Appendix GC (General Conditions); and Appendix SC (Standard Conditions).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); Title 40, Part 60 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C.; and Title 40, Part 63 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

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

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

7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. Because there is no work to be performed, the permittee shall apply for a revised Title V operation permit within 45 days of issuance of this final permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

A. MILL BOILER NO. 16

This section of the permit addresses the following modified emissions unit.

Emissions Unit 014: Mill Boiler No. 16

Description: This unit is Babcock and Wilcox Model No. FM 120-97 package boiler with a maximum steam production rate of 150,000 pounds per hour (24-hour average). The design heat release rate for this unit is greater than 70,000 BTU/hour-ft^3.

Fuels: This unit is fired with pipeline-quality natural gas or very low sulfur distillate oil.

Capacity: The heat input rate is 211 MMBtu per hour when firing natural gas, which is approximately 0.207 million cubic feet of gas per hour based on a heat content of 1020 MMBtu per million SCF. The heat input rate is 202 MMBtu per hour when firing very low sulfur distillate oil, which is approximately 1485 gallons per hour based on a heat content of 136 MMBtu per thousand gallons.

Controls: The efficient combustion of clean fuels minimizes emissions of CO, PM/PM_{10}, SO_2, and VOC. Emissions of NOx are reduced with low NOx burners and flue gas recirculation (approximately 15%).

Stack Parameters: Exhaust gases exit a 75' tall stack that is 5.0' in diameter at 393° F with a volumetric flow rate of 118,600 acfm.

CONTROL EQUIPMENT

1. NOx Emissions: The permittee shall tune, maintain and operate the low-NOx burner system along with flue gas recirculation (FGR) to achieve the emissions standards specified in this permit. The burner system shall be capable of firing natural gas and distillate oil. [Design; Rule 62-4.070(3), F.A.C.]

PERFORMANCE RESTRICTIONS

2. Authorized Fuel: The boiler shall fire only natural gas or No. 2 distillate oil with a maximum sulfur content of 0.05% sulfur by weight. [Design; Rule 62-210.200(PTE), F.A.C.; Rule 62-296.406 (BACT), F.A.C.]

3. Permitted Capacity: The maximum design heat input rates to the boiler are 211 MMBtu per hour when firing natural gas and 202 MMBtu per hour when firing distillate oil. The maximum steam production rate shall not exceed 150,000 pounds per hour based on a 24-hour block average. The boiler shall be equipped with integrating fuel flow meters to monitor the consumption of natural gas and distillate oil. The boiler shall be equipped with instruments to continuously monitor the steam production rate (pounds per hour), steam temperature (° F), and steam pressure (psig). [Design; Rule 62-210.200(PTE), F.A.C.]

4. Restricted Operation: The hours of operation are not limited (8760 hours per year); however, the annual capacity factor for the combined firing of distillate oil and natural gas shall not exceed 10% during any calendar year. The heat input rate to the boiler shall not exceed 184,836 MMBtu per year (10% of the maximum permitted heat input rate). The annual heat input rate shall be determined from records of the higher heating value of each authorized fuel and the actual fuel consumption for the calendar year. Each year, the annual capacity factor and annual heat input rate shall be reported with the required Annual Operating Report. *{Permitting Note: This restriction limits potential emissions below all PSD significant emission rates and allows the unit to avoid the continuous monitoring requirements of NSPS Subpart Db.}* [Applicant Request; § 60.41b (Definitions); § 60.44b (Nitrogen Oxides); Rule 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

5. Stack Opacity: As determined by EPA Method 9 observations, visible emissions from the boiler stack shall not exceed 20% opacity, except for one 6-minute period per hour that does not exceed 27% opacity. [Rule 62-296.406(1), F.A.C.]

6. Nitrogen Oxides (NOx) Emissions: As determined by EPA Method 7E, NOx emissions shall not exceed 0.20 lb/MMBtu (42.2 lb/hour) when firing natural gas based on the average of three test runs. As determined by EPA Method 7E, NOx emissions shall not exceed 0.20 lb/MMBtu (40.4 lb/hour) when firing distillate oil based on the average of three test runs. [Design; Rule 62-4.070(3), F.A.C.; Rule 62-212.400(2)(g), F.A.C.]

7. Fuel Specification: The boiler shall fire only natural gas or No. 2 distillate oil with a maximum sulfur content of 0.05% sulfur by weight. Emissions of carbon monoxide (CO), particulate matter (PM/PM_{10}), sulfur dioxide (SO_2), and

volatile organic compounds (VOC) shall be minimized by the efficient combustion of these authorized fuels. *{Permitting Note: The expected maximum CO emissions are 0.11 lb/MMBtu (natural gas or distillate oil). The expected maximum PM/PM10 emissions are 0.002 lb/MMBtu (natural gas) and 0.03 lb/MMBtu (distillate oil). The expected maximum SO2 emissions are 0.001 lb/MMBtu (natural gas) and 0.06 lb/MMBtu (distillate oil). The expected maximum VOC emissions are 0.03 lb/MMBtu (natural gas or distillate oil).}* [Rule 62-4.070(3), F.A.C.; Rule 62-296.406(2) and (3)]

EMISSIONS PERFORMANCE TESTING

8. Test Methods: As required, tests shall be performed in accordance with the following reference methods.

EPA Method	Description of Method and Comments
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

In addition, it may be necessary to perform EPA Methods 1 through 4 as part of the above test methods. These test methods are specified in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used to demonstrate compliance unless prior written approval is received from the Department. Other applicable testing requirements are included in Appendix SC of the permit. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

9. Compliance Tests: Within 12 months of issuance of this permit, the permittee shall conduct performance tests to determine compliance with the opacity and NOx emissions for each authorized fuel. Thereafter, the permittee shall conduct NOx performance testing within 12 months before the expiration date of the Title V operation permit. NOx emissions shall be reported in terms of "pounds per MMBtu of heat input" and "pounds per hour" using the appropriate F-factors for each fuel. Subsequent opacity tests shall be conducted during any federal fiscal year (October 1st to September 30th) that the boiler fires distillate oil for 400 hours or more. [Rule 62-4.070(3), F.A.C.; Rule 62-297.310(7)(a)1, F.A.C.]

RECORDS AND REPORTS

10. Fuel Sulfur Records: Compliance with the distillate oil fuel sulfur limit shall be demonstrated by taking an initial sample, analyzing the sample for fuel sulfur, and reporting the results with the initial emissions compliance test report. Sampling and analyzing 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. More recent versions or equivalent methods may be used. For each subsequent distillate oil delivery, the permittee shall maintain a permanent file of the certified fuel sulfur analysis from the vendor. At the request of a Compliance Authority, the permittee shall perform additional sampling and analysis for the fuel sulfur content. [Rule 62-4.070(3), F.A.C.; Rule 62-4.160(15), F.A.C.; Rule 62-297.310(7)(b), F.A.C.; §§60.42b (j), 60.45b (j), 60.47b (f), and 60.49b (r)]

11. Operational Records: The permittee shall maintain records sufficient to determine compliance with the following: fuel consumptions rates and hours of operation for each authorized fuel; higher heating value of each authorized fuel; maximum annual heat input rate for the calendar year; and steam production records. Information shall be available for inspection within at least three days of a request from the Department or a Compliance Authority. [Rules 62-4.160(15) and 62-4.070(3), F.A.C.]

12. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Section 4, Appendix SC of this permit. [Rule 62-297.310(8), F.A.C.]

OTHER REQUIREMENTS

13. Applicable Requirements: The boiler is also subject to the NSPS Subpart Db requirements for commercial boilers in Appendix Db and the standard conditions in Appendix SC. These appendices are found in Section IV of this permit.

CONTENTS

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

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

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

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

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

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001"identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

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

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

Code of Federal Regulations (CFR)

Example: [40 CRF 60.7]

Means: Title 40, Part 60, Section 7

The NSPS requirements of this section apply to the following emissions unit:

ID	Emission Unit Description
014	Mill Boiler No. 16 is a 211/202 MMBtu per hour package boiler fired with natural gas/distillate oil.

NSPS General Provisions

The emissions unit is subject to the applicable General Provisions of the New Source Performance Standards including 40 CFR 60.7 (Notification and Record Keeping), 40 CFR 60.8 (Performance Tests), 40 CFR 60.11 (Compliance with Standards and Maintenance Requirements), 40 CFR 60.12 (Circumvention), 40 CFR 60.13 (Monitoring Requirements), and 40 CFR 60.19 (General Notification and Reporting Requirements). The General Provisions are not included in this permit, but can be obtained from the Department upon request.

NSPS Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

The boiler shall comply with all applicable requirements of 40 CFR 60, Subpart Db adopted by reference in Rule 62-204.800(7)(b), F.A.C. Inapplicable provisions have been deleted in the following conditions, but the numbering of the original rules has been preserved for ease of reference. The term "Administrator" when used in 40 CFR 60 shall mean the Department's Secretary or the Secretary's designee. Department notes related to the Subpart Db requirements are shown in *italics* immediately following the section to which they refer.

§ 60.40b Applicability and Delegation of Authority

(a) The affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 million Btu/hour.

{Note: With a maximum capacity of 211 MMBtu per hour, Boiler 16 is an affected unit subject to NSPS Subpart Db.}

§ 60.41b Definitions

"Annual capacity factor" means the ratio between the actual heat input to a steam generating unit from the fuels listed in §§60.42b(a), 60.43b(a), or 60.44b(a), as applicable, during a calendar year and the potential heat input to the steam generating unit had it been operated for 8,760 hours during a calendar year at the maximum steady state design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility in a calendar year.

"Distillate oil" means fuel oils that contain 0.05 weight percent nitrogen or less and comply with the specifications for fuel oil numbers 1 and 2, as defined by the American Society of Testing and Materials in ASTM D396-78, Standard Specifications for Fuel Oils (incorporated by reference -see §60.17).

"Very low sulfur oil" means an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 215 ng/J (0.5 lb/million Btu) heat input.

"Conventional technology" means wet flue gas desulfurization (FGD) technology, dry FGD technology, atmospheric fluidized bed combustion technology, and oil hydro-desulfurization technology.

"Emerging technology" means any sulfur dioxide control system that is not defined as a conventional technology under this section, and for which the owner or operator of the facility has applied to the Administrator and received approval to operate as an emerging technology under §60.49b(a)(4).

§ 60.42b Standard for Sulfur Dioxide

(j) Percent reduction requirements are not applicable to affected facilities combusting only very low sulfur oil. The owner or operator of an affected facility combusting very low sulfur oil shall demonstrate that the oil meets the definition of very low sulfur oil by: (2) maintaining fuel receipts as described in §60.49b(r).

§ 60.43b Standard for Particulate Matter

§ 60.43b Standard for Particulate Matter

{Note: On March 1st, the Department received an email from EPA Region 4 clarifying the February 2006 revisions to NSPS Subpart Db for industrial boilers. If the facility combusts only oil containing no more than 0.3% sulfur by weight, the revisions now exempt affected facilities constructed, reconstructed, or modified after February 18, 2005 from particulate matter and opacity limits. Boiler 16 is permitted to fire only natural gas or distillate oil containing no more than 0.05% sulfur by weight. In accordance with § 60.46b(i), compliance must be demonstrated obtaining fuel supplier certifications of sulfur content.}

§ 60.44b Standard for Nitrogen Oxides

(k) Affected facilities that meet the criteria described in paragraphs (j) (1), (2), and (3) of this section, and that have a heat input capacity of 73 MW (250 million Btu/hour) or less, are not subject to the nitrogen oxides emission limits under this section.

(j) The sub-paragraphs in paragraph (j) state:

(1) Combust, alone or in combination, only natural gas, distillate oil, or residual oil with a nitrogen content of 0.30 weight percent or less;

(2) Have a combined annual capacity factor of 10 percent or less for natural gas, distillate oil, and residual oil with a nitrogen content of 0.30 weight percent or less; and

(3) Are subject to a Federally enforceable requirement limiting operation of the affected facility to the firing of natural gas, distillate oil, and/or residual oil with a nitrogen content of 0.30 weight percent or less and limiting operation of the affected facility to a combined annual capacity factor of 10 percent or less for natural gas, distillate oil, and residual oil and a nitrogen content of 0.30 weight percent or less.

{Note: The boiler is authorized to fire only natural gas and distillate oil (≤ 0.05% sulfur by weight). The permit restricts the annual capacity to no more than 10%. Therefore, there is no applicable NOx standard.}

§ 60.45b Compliance and Performance Test Methods and Procedures for Sulfur Dioxide

(j) The owner or operator of an affected facility that combusts very low sulfur oil is not subject to the compliance and performance testing requirements of this section if the owner or operator obtains fuel receipts as described in §60.49b(r).

§ 60.46b Compliance and Performance Test Methods and Procedures for Particulate Matter and Nitrogen Oxides

(i) Units burning only oil that contains no more than 0.3 weight percent sulfur or liquid or gaseous fuels with a potential sulfur dioxide emission rates of 140 ng/J (0.32 lb/MMBtu) heat input or less may demonstrate compliance by maintaining fuel supplier certifications of the sulfur content of the fuels burned.

{Note: There are no applicable standards for particulate matter or nitrogen oxides.}

§ 60.47b Emission Monitoring for Sulfur Dioxide

(f) The owner or operator of an affected facility that combusts very low sulfur oil is not subject to the emission monitoring requirements of this section if the owner or operator obtains fuel receipts as described in §60.49b(r).

§ 60.48b Emissions Monitoring for Particulate Matter and Nitrogen Oxides

{Note: There are no applicable standards for particulate matter or nitrogen oxides. Therefore, continuous monitoring is not required.}

§ 60.49b Reporting and Recordkeeping Requirements

(a) The owner or operator of each affected facility shall submit notification of the date of initial startup, as provided by §60.7. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of the fuels to be combusted in the affected facility.

(2) If applicable, a copy of any §§ 60.42b(d)(1), 60.43b(a)(2), (a)(3)(iii), (c)(2)(ii), (d)(2)(iii), 60.44b(c), (d), (e), (i), (j), (k), 60.45b(d), (g), 60.46b(h), or 60.48b(i).

(3) The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired.

{Note: The permittee has previously complied with the above initial requirement.}

(o) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record.

(p) The owner or operator of an affected facility described in §60.44b(j) or (k) shall maintain records of the following information for each steam generating unit operating day:

(1) Calendar date,

(2) The number of hours of operation, and

(3) A record of the hourly steam load.

(q) The owner or operator of an affected facility described in §60.44b(j) or §60.44b(k) shall submit to the Administrator on a quarterly basis:

(1) The annual capacity factor over the previous 12 months;

(2) The average fuel nitrogen content during the quarter, if residual oil was fired; and

(3) If the affected facility meets the criteria described in §60.44b(j), the results of any nitrogen oxides emission tests required during the quarter, the hours of operation during the quarter, and the hours of operation since the last nitrogen oxides emission test.

(r) The owner or operator of an affected facility who elects to demonstrate that the affected facility combusts only very low sulfur oil under Sec. 60.42b(j)(2) shall obtain and maintain at the affected facility fuel receipts from the fuel supplier which certify that the oil meets the definition of distillate oil as defined in Sec. 60.41b. For the purposes of this section, the oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Quarterly reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition was combusted in the affected facility during the preceding quarter.

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

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

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

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

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

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

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

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

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

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

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

   a. A description of and cause of non-compliance; and

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

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

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

    a. Determination of Best Available Control Technology ( );
    b. Determination of Prevention of Significant Deterioration ( ); and
    c. Compliance with New Source Performance Standards (X).

    {Permitting Note: Based on the enforceable restrictions in this permit, Boiler 16 is not longer subject to PSD review.}

14. The permittee shall comply with the following:

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

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

    c. Records of monitoring information shall include:

        1) The date, exact place, and time of sampling or measurements;
        2) The person responsible for performing the sampling or measurements;
        3) The dates analyses were performed;
        4) The person responsible for performing the analyses;
        5) The analytical techniques or methods used; and
        6) The results of such analyses.

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

{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(203), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

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

13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.

    a. *Required Sampling Time.* Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.

    b. *Minimum Sample Volume.* Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

    c. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

14. Determination of Process Variables

    a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

    b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

    [Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.

16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

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

18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the

test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

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

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

RECORDS AND REPORTS

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

BEST AVAILABLE COPY

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

South Bay, FL 33493

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
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PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

Mr. Ricardo Lima, Vice President & General Mgr.

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

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Mr. Ricardo Lima, Vice President & General Mgr.
Street, Apt. No.; or PO Box No.
21250 U.S. Highway 27 South
City, State, ZIP+4
South Bay, Florida 33493

PS Form 3800, May 2000 See Reverse for Instructions

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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 **Kristi Morrow**, who on oath says that she is **Customer Service Supervisor** 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 for a **Notice** in the matter of **Intent to Issue Air Permits** was published in said newspaper in the issues of **March 17, 2006**. 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 17th day of March, A.D. 2006

Personally known XX or Produced Identification_____
Type of Identification Produced_____

Karen M. McLinton
Commission # DD359566
Expires: NOV 15, 2008
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RECEIVED
MAR 2006
BUREAU OF AIR REGULATION

NO. 5453426
PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS
Florida Department of Environmental Protection
Okeelanta Corporation - Okeelanta Sugar Mill and Refinery
Draft Air Permit No. 0990005-018-AC - Revised Boiler 16 Permit
Draft Air Permit No. 0990005-019-AC - Railcar Unloading Expansion Project
Palm Beach County, Florida

Applicant: The applicant's name and mailing address are: Okeelanta Corporation; 22250 U.S. Highway 27; South Bay, FL 33493. The applicant's authorized representative is Mr. Richardo Lima, V.P. and General Manager.

Facility Location: Okeelanta Corporation operated the existing Okeelanta Sugar Mill and Refinery, which is located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida.

Projects: The applicant proposed two air permit projects. Project No. 0990005-018-AC establishes an enforceable restriction on existing Boiler 16 such that the annual capacity factor will be no more than 10%. The boiler fires only natural gas and distillate oil. This reduces potential emissions of all pollutants well below the PSD significant emission rates (10 tons/year of carbon monoxide; 19 tons/year of nitrogen oxides; 3 tons/year of particulate matter; 5 tons/year of sulfur dioxide; and 3 tons/year of volatile organic compounds. Therefore, the boiler is no longer subject to PSD preconstruction review. In addition, the revision substantially reduces the federal emissions standards and *monitoring requirements* of Subpart Db in 40 CFR 60.

Project No. 0990005-019-AC authorizes construction of a new railcar unloading operation in the existing transshipment facility. The transshipment facility handles, stores, and packages refined sugar. The proposed project will add packaging line "0" and two railcar unloading receivers. The trans-shipment facility has been permitted such that total potential particulate matter emissions from all emissions units (12 tons/year) are below the PSD significant emission rate of 15 tons per year of PM10. Therefore, the project is not *subject to PSD preconstruction* review.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The *proposed projects are not exempt* from air permitting requirements and air permits are required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for these projects. The Permitting Authority's *physical address is*: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number *is* 850/488-0114.

Project Files: Complete *project files are available* for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. A complete project file includes the Draft Permit, the Technical Evaluation and Preliminary *Determination*, the application, and the information submitted by the applicant, exclusive of confidential

records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permits: The Permitting Authority gives notice of its intent to issue air permits to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue Final Permits in accordance with the conditions of the proposed Draft Permits unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days form the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Section 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petition 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 this Public Notice or receipt of written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (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 that time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, 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 the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available for this proceeding.

PUB: The Palm Beach Post
March 17, 2006

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

February 24, 2006

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

Re: Okeelanta Corporation – Okeelanta Sugar Mill and Refinery
Draft Air Permit No. 0990005-018-AC - Revised Boiler 16 Permit (≤ to 10% Annual Capacity Factor)
Draft Air Permit No. 0990005-019-AC - Railcar Unloading Expansion Project

Dear Mr. Lima:

You submitted applications requesting minor source air construction permits for the following projects: a revised permit for Boiler 16 to restrict the maximum annual capacity factor to 10%; and a permit to install a new railcar unloading operation at the existing transshipment facility. Both projects are located at the existing facility, which is approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida. Enclosed for each project are the "Technical Evaluation and Preliminary Determination" and "Draft Permit". Also enclosed are a single "Written Notice of Intent to Issue Air Permit" and a single "Public Notice of Intent to Issue Air Permit". Please note that these documents have combined the notice requirements for these projects. This will allow you to publish a single public notice that covers both projects.

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

FOR Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

In the Matter of an
Application for Air Permit by:

Okeelanta Corporation
Okeelanta Sugar Mill and Refinery
21250 U.S. Highway 27
South Bay, FL 33493

Authorized Representative:
Mr. Ricardo Lima, V.P. and General Manager

Facility ID No. 0990005
Project No. 0990005-018-AC
(Revised Boiler 16 Permit)
Project No. 0990005-019-AC
(Railcar Unloading Expansion Project)
Palm Beach County, Florida

Facility Location: Okeelanta Corporation operates the existing Okeelanta Sugar Mill and Refinery, which is located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida. The facility address is 21250 U.S. Highway 27, South Bay, FL 33493.

Projects: The applicant proposes two air permit projects. Project No. 0990005-018-AC establishes an enforceable restriction on existing Boiler 16 such that the annual capacity factor will be no more than 10%. The boiler fires only natural gas and distillate oil. This reduces potential emissions of all pollutants below the PSD significant emission rates as follows: (10 tons/year of carbon monoxide; 19 tons/year of nitrogen oxides; 3 tons/year of particulate matter; 5 tons/year of sulfur dioxide; and 3 tons/year of volatile organic compounds. Therefore, the boiler is no longer subject to PSD preconstruction review. In addition, the revision substantially reduces the federal emissions standards and monitoring requirements of Subpart Db in 40 CFR 60.

Project No. 0990005-019-AC authorizes construction of a new railcar unloading operation in the existing transshipment facility. The trans-shipment facility handles, stores, and packages refined sugar. The proposed project will add packaging line "0" and two railcar unloading receivers. The trans-shipment facility has been permitted such that total potential particulate matter emissions from all emissions units (12 tons/year) are below the PSD significant emission rate of 15 tons per year of PM_{10}. Therefore, the project is not subject to PSD preconstruction review.

Details of the projects are provided in the in the application and the enclosed "Technical Evaluation and Preliminary Determination".

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed projects are not exempt from air permitting requirements and air permits are required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for these projects. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.

Project Files: Complete project files are available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. A complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permits: The Permitting Authority gives notice of its intent to issue air permits to the applicant for the projects described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue Final Permits in accordance with the conditions of the proposed Draft Permits unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permits" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet 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 Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning each proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to a Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decisions may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permits. 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 attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permits, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (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 Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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 the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.

FOR Jeffery F. Koerner

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permits" package (including the Public Notice, the Technical Evaluation and Preliminary Determinations, and the Draft Permits) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2/27/06 to the persons listed below.

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

Clerk Stamp

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

Barbara J. Friday 2/27/06
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Florida Department of Environmental Protection

Okeelanta Corporation – Okeelanta Sugar Mill and Refinery
Draft Air Permit No. 0990005-018-AC - Revised Boiler 16 Permit
Draft Air Permit No. 0990005-019-AC - Railcar Unloading Expansion Project

Palm Beach County, Florida

Applicant: The applicant's name and mailing address are: Okeelanta Corporation; 21250 U.S. Highway 27; South Bay, FL 33493. The applicant's authorized representative is Mr. Ricardo Lima, V.P and General Manager.

Facility Location: Okeelanta Corporation operates the existing Okeelanta Sugar Mill and Refinery, which is located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida.

Projects: The applicant proposes two air permit projects. Project No. 0990005-018-AC establishes an enforceable restriction on existing Boiler 16 such that the annual capacity factor will be no more than 10%. The boiler fires only natural gas and distillate oil. This reduces potential emissions of all pollutants well below the PSD significant emission rates (10 tons/year of carbon monoxide; 19 tons/year of nitrogen oxides; 3 tons/year of particulate matter; 5 tons/year of sulfur dioxide; and 3 tons/year of volatile organic compounds. Therefore, the boiler is no longer subject to PSD preconstruction review. In addition, the revision substantially reduces the federal emissions standards and monitoring requirements of Subpart Db in 40 CFR 60.

Project No. 0990005-019-AC authorizes construction of a new railcar unloading operation in the existing transshipment facility. The trans-shipment facility handles, stores, and packages refined sugar. The proposed project will add packaging line "0" and two railcar unloading receivers. The trans-shipment facility has been permitted such that total potential particulate matter emissions from all emissions units (12 tons/year) are below the PSD significant emission rate of 15 tons per year of PM_{10}. Therefore, the project is not subject to PSD preconstruction review.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed projects are not exempt from air permitting requirements and air permits are required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for these projects. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project Files: Complete project files are available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. A complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permits: The Permitting Authority gives notice of its intent to issue air permits to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue Final Permits in accordance with the conditions of the proposed Draft Permits unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permits for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decisions may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the

information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. 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 this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (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 Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, 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 the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available for this proceeding.

TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

PROJECT

Draft Air Construction Permit No. 0990005-018-AC
Boiler 16 – Restricted Annual Capacity
Supersedes Permit No. PSD-FL-169A (Project No. 0990005-009-AC)

COUNTY

Palm Beach County, Florida

APPLICANT

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

ARMS Facility ID No. 0990005

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Air Permitting North Program

February 23, 2006

{Filename: TEPD - 0990005-018-AC}

1. GENERAL PROJECT INFORMATION

Facility Description and Location

The existing facility consists of two plants. Okeelanta Corporation operates an existing sugar mill (SIC No. 2061) that produces raw sugar from sugarcane and a sugar refinery (SIC No. 2062) that produces refined sugar from raw sugar. New Hope Power operates an existing cogeneration plant (SIC No. 4911) that fires biomass to produce steam for the mill and generate electricity for sale to the power grid. The facility is located approximately six miles south of South Bay on U.S. 27 in Palm Beach County, Florida. The UTM coordinates are Zone 17, 524.9 km East, and 2940.1 km North. This is an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS). The location is approximately 92 km from the nearest Class I area, the Everglades National Park.

Regulatory Categories

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

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

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

PSD: The facility is a PSD-major facility in accordance with Chapter 62-212, F.A.C.

NSPS: The facility operates units subject to Subpart Db of the New Source Performance Standards (NSPS) in 40 CFR 60.

NESHAP: The facility operates units subject to Subpart DDDDD of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 63.

Project Description

In October of 2001, the Department issued Permit No. PSD-FL-169A authorizing Okeelanta Corporation to modify the burner system of existing Boiler No. 16 (Emissions Unit No. 014) to accommodate natural gas as the primary fuel and distillate oil as an alternate fuel. Okeelanta Corporation installed low NOx burners with flue gas recirculation to reduce NOx emissions. In accordance with the PSD permit and NSPS Subpart Db, a NOx CEMS and opacity COMS were required.

This boiler is used to supply steam to the refinery in case the cogeneration boilers are unavailable. The unit has seen little use since the PSD permit was issued in October of 2001. In recent years, the plant has had to startup and run the boiler simply to conduct the RATAs to maintain the NOx CEMS. On 12/14/05, the Department received an application for a minor source air construction permit. The applicant requests a permit restriction to limit fuel consumption to an annual capacity factor of 10% or less, which is equivalent to a limit on the annual heat input rate of 184,836 MMBtu per year as established by the maximum heat input rate for the boiler when firing natural gas.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

Chapter	Description
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER
62-213	Title V Air Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards 62-296.406 – Fossil fuel steam generators < 250 MMBtu per hour of heat input
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

Federal Regulations

This project is also subject to the applicable federal provisions regarding air quality as established by the EPA in the following sections of the Code of Federal Regulations (CFR).

Title 40, CFR	Description
Part 60	Subpart A - General Provisions for NSPS Sources
	NSPS Subpart Db - Industrial, Commercial and Institutional Steam Generating Units
	Applicable Appendices
Part 63	Subpart A - General Provisions for NESHAP Sources
	NESHAP Subpart DDDDD for Industrial Boilers

General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it 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 PSD 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 and evaluate the air quality impacts. 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.

PSD Applicability for Project

The purpose of this project is to limit the annual capacity factor of existing Boiler 16 to less than 10%. The following table shows the previous potential emissions, the potential emissions for the requested project, and a comparison of the potential emissions with the PSD significant emission rates.

Table 1A. PSD Applicability

Pollutant	2004 Actual Emissions [a] (Tons Per Year)	Current Permit Potential Emissions [b] (Tons Per Year)	New Project Potential Emissions [b] (Tons Per Year)	PSD Significant Emissions Rate (Tons Per Year)	Subject To PSD?
CO	0.08	96	**10.2**	**100**	No
NOx	0.05	96	**18.5**	**40**	No
PM/PM10 [c]	0.001	22	**2.7**	**25/15**	No
SO2	0.0005	35	**5.3**	**40**	No
VOC	0.02	28	**2.8**	**40**	No

a. Actual emissions based on 2004 Annual Operating Report.

b. Potential emissions are based on permitted capacity and enforceable restrictions.

c. All particulate matter is emitted is assumed to be PM10.

3. DEPARTMENT REVIEW

Minor Source Preconstruction Review – State Requirements

Description of Boiler

The existing unit is a Babcock and Wilcox Model No. FM 120-97 package boiler with a maximum steam production rate of 150,000 pounds per hour (24-hour average). The design heat release rate for this unit is greater than 70,000 BTU/hour-ft^3. The boiler fires natural gas or distillate oil (≤ 0.05% sulfur by weight). The maximum heat input rate is 211 MMBtu per hour when firing natural gas, which is approximately 0.207 million cubic feet of gas per hour based on a heat content of 1020 MMBtu per million SCF. The maximum heat input rate is 202 MMBtu per hour when firing distillate oil, which is approximately 1485 gallons per hour based on a heat content of 136 MMBtu per thousand gallons. The efficient combustion of clean fuels minimizes emissions of CO, PM/PM10, SO2, and VOC. Emissions of NOx are reduced with low NOx burners and flue gas recirculation (approximately 15%). Exhaust gases exit a 75' tall stack that is 5.0' in diameter at 393° F with a volumetric flow rate of 118,600 acfm.

Carbon Monoxide (CO) Emissions

The modified boiler was designed to achieve CO standards of 0.10 lb/MMBtu (natural gas) and 0.11 lb/MMBtu (distillate oil) based on compliance by EPA Method 10 testing. Tests conducted in 2003 and 2004 show CO emission rates of approximately 0.01 lb/MMBtu, which is approximately 10% of the current CO emission standards. Restricted to an annual capacity factor of 10%, actual CO emissions will likely be less than 1 ton per year. Therefore, the Department will not impose a CO limit or testing requirement based on the efficient combustion design of this unit.

NOx Emissions

The boiler was modified to include low-NOx burners and approximately 15% flue gas recirculation to reduce NOx emissions. The boiler was designed to achieve a 24-hour NOx standard of 0.10 lb/MMBtu (natural gas) and 0.20 lb/MMBtu (distillate oil) based on compliance by CEMS. If applicable, the NSPS Subpart Db standard would be 0.20 lb/MMBtu for these fuels based on compliance by CEMS. For this project, the applicant requests a NOx limit of 0.20 lb/MMBtu based on testing conducted in accordance with EPA Method 7E. Based on the restricted operation, the Department will establish a NOx limit of 0.20 lb/MMBtu based on testing conducted in accordance with EPA Method 7E.

Particulate Matter (PM/PM10) Emissions

For purposes of Rule 62-296.406, F.A.C., the Department determines BACT to be the firing of natural gas or distillate oil containing no more than 0.05% sulfur by weight. When firing natural gas, the expected maximum PM/PM10 emissions are 0.002 lb/MMBtu (0.4 lb/hour). When firing distillate oil, the maximum expected PM/PM10 emissions are 0.03 lb/MMBtu (6.1 lb/hour). The emission rate when firing distillate oil was verified by a 2001 emissions performance test. No stack testing is required. In accordance with Rule 62-296.406, F.A.C., visible emissions from the boiler stack shall not exceed 20% opacity, except for one 6-minute period per hour that does not exceed 27% opacity.

Sulfur Dioxide (SO2) Emissions

For purposes of Rule 62-296.406, F.A.C., the Department determines BACT to be the firing of natural gas or distillate oil containing no more than 0.05% sulfur by weight. The fuel specifications of this permit effectively limit the potential SO2 emissions. When firing natural gas, the expected maximum SO2 emissions are 0.001 lb/MMBtu (0.2 lb/hour). When firing very low sulfur distillate oil, the expected maximum SO2 emissions are 0.06 lb/MMBtu (12.1 lb/hour). No stack testing is required.

Volatile Organic Compounds (VOC)

When firing natural gas, the expected maximum VOC emissions are 0.03 lb/MMBtu (6.3 lb/hour). When firing distillate oil, the expected maximum VOC emissions are 0.03 lb/MMBtu (6.1 lb/hour). These low emissions levels are reinforced by the very low actual CO levels (0.01 lb/MMBtu) reported in compliance stack tests. Therefore, the Department will not impose a VOC limit or testing requirement based on the efficient combustion design of this unit.

NSPS Subpart Db Provisions

§ 60.40b Applicability and Delegation of Authority

(a) The affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour).

(g) In delegating implementation and enforcement authority to a State under section 111(c) of the Act, the following authorities shall be retained by the Administrator and not transferred to a State.

(1) §60.44b(f), (2) §60.44b(g), and (3) §60.49b(a)(4).

Comment: With a maximum capacity of 211 MMBtu per hour, Boiler 16 is an affected unit subject to Subpart Db.

§ 60.41b Definitions

"Annual capacity factor" means the ratio between the actual heat input to a steam generating unit from the fuels listed in §§60.42b(a), 60.43b(a), or 60.44b(a), as applicable, during a calendar year and the potential heat input to the steam generating unit had it been operated for 8,760 hours during a calendar year at the maximum steady state design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility in a calendar year.

"Distillate oil" means fuel oils that contain 0.05 weight percent nitrogen or less and comply with the specifications for fuel oil numbers 1 and 2, as defined by the American Society of Testing and Materials in ASTM D396-78, Standard Specifications for Fuel Oils (incorporated by reference -see §60.17).

"Very low sulfur oil" means an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 215 ng/J (0.5 lb/million Btu) heat input.

"Conventional technology" means wet flue gas desulfurization (FGD) technology, dry FGD technology, atmospheric fluidized bed combustion technology, and oil hydro-desulfurization technology.

"Emerging technology" means any sulfur dioxide control system that is not defined as a conventional technology under this section, and for which the owner or operator of the facility has applied to the Administrator and received approval to operate as an emerging technology under §60.49b(a)(4).

§ 60.42b Standard for Sulfur Dioxide

(j) Percent reduction requirements are not applicable to affected facilities combusting only very low sulfur oil. The owner or operator of an affected facility combusting very low sulfur oil shall demonstrate that the oil meets the definition of very low sulfur oil by: (2) maintaining fuel receipts as described in §60.49b(r).

§ 60.43b Standard for Particulate Matter

(b) On and after the date on which the performance test is completed or required to be completed under 60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts oil (or mixtures of oil with other fuels) and uses a conventional or emerging technology to reduce sulfur dioxide emissions shall cause to be discharged into the atmosphere from that affected facility any gases that contain particulate matter in excess of 43 ng/J (0.10 lb/million Btu) heat input.

(f) On and after the date on which the initial performance test is completed or is required to be completed under 60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts coal, oil, wood, or mixtures of these fuels with any other fuels shall cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Comment: As described in the above definitions (§60.41b), Boiler 16 does not use conventional or emerging technology to reduce sulfur dioxide emissions. In addition, §60.48b (a) states, "The owner or operator of an affected facility subject to the opacity standard under §60.43b shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system." The wording of this provision implies that some affected units will not be subject to an opacity standard (i.e., a boiler firing distillate oil or

natural gas with an annual capacity factor of 10% or less). The Department determines that the opacity standard specified in §60.43b (f) does not apply because there is no underling particulate matter standard for this limited-use boiler firing only natural gas and distillate oil..

§ 60.44b Standard for Nitrogen Oxides

(k) Affected facilities that meet the criteria described in paragraphs (j) (1), (2), and (3) of this section, and that have a heat input capacity of 73 MW (250 million Btu/hour) or less, are not subject to the nitrogen oxides emission limits under this section.

Comments: These sub-paragraphs in paragraph (j) state:

(1) Combust, alone or in combination, only natural gas, distillate oil, or residual oil with a nitrogen content of 0.30 weight percent or less;

(2) Have a combined annual capacity factor of 10 percent or less for natural gas, distillate oil, and residual oil with a nitrogen content of 0.30 weight percent or less; and

(3) Are subject to a Federally enforceable requirement limiting operation of the affected facility to the firing of natural gas, distillate oil, and/or residual oil with a nitrogen content of 0.30 weight percent or less and limiting operation of the affected facility to a combined annual capacity factor of 10 percent or less for natural gas, distillate oil, and residual oil and a nitrogen content of 0.30 weight percent or less.

The boiler is authorized to fire only natural gas and distillate oil and the annual capacity factor will be restricted to no more than 10%. Therefore, the unit is not subject to any NOx standard of NSPS Subpart Db.

§ 60.45b Compliance and Performance Test Methods and Procedures for Sulfur Dioxide

(j) The owner or operator of an affected facility that combusts very low sulfur oil is not subject to the compliance and performance testing requirements of this section if the owner or operator obtains fuel receipts as described in §60.49b(r).

§ 60.46b Compliance and Performance Test Methods and Procedures for Particulate Matter and Nitrogen Oxides

Comment: There are no applicable standards for particulate matter or nitrogen oxides.

§ 60.47b Emission Monitoring for Sulfur Dioxide

(f) The owner or operator of an affected facility that combusts very low sulfur oil is not subject to the emission monitoring requirements of this section if the owner or operator obtains fuel receipts as described in §60.49b(r).

§ 60.48b Emissions Monitoring for Particulate Matter and Nitrogen Oxides

(i) The owner or operator of an affected facility described in §§60.44b(j) or 60.44b(k) is not required to install or operate a continuous monitoring system for measuring nitrogen oxides emissions.

Comment: There are no applicable standards for particulate matter or nitrogen oxides. Therefore, continuous monitoring is not required. At the time of issuance for the draft permit, the Department was uncertain as to whether EPA Region 4 was in agreement with the Department's interpretation that the opacity standard did not apply because there was no underlying particulate matter standard. Therefore, if the §60.43b opacity standard does apply, the permittee proposes the following alternate sampling procedure for this limited use boiler in lieu of a COMS.

When Boiler 16 fires distillate oil, the permittee shall use the following procedures in lieu of a continuous opacity monitoring system to determine compliance with the opacity standard:

a. The permittee shall conduct a 12-minute opacity observation once the boiler has achieved normal operation following a cold boiler startup on distillate oil.

b. The permittee shall conduct a 12-minute opacity observation at least once per daylight shift during the period of highest distillate oil firing.

c. All observation shall be conducted in accordance with EPA Method 9 and by individuals certified as a visible emissions observer by the State of Florida.

d. The permittee shall notify the Compliance Authority within one working day of observing visible emissions exceeding the opacity standard. If the boiler is unable to regularly comply with the opacity standard based on these manual

observations, the permittee shall install, operate, and maintain a continuous opacity monitoring system (COMS) to determine continuous compliance with the opacity standard.

e. The permittee shall maintain a log of the opacity observations and the oil firing rate during the observations.

f. If distillate oil is fired during a calendar quarter, the permittee shall submit a copy of the observation log to the Compliance Authority within 30 days following the calendar quarter.

g. Along with the Annual Operating Report, the permittee shall identify the quantities of natural gas and distillate oil fired and the annual capacity factor based on annual heat input rates from these fuels. If the annual capacity factor is greater than 10%, the permittee shall install, operate, and maintain a continuous opacity monitoring system (COMS) to determine compliance with the opacity standard.

§ 60.49b Reporting and Recordkeeping Requirements

(a) The owner or operator of each affected facility shall submit notification of the date of initial startup, as provided by §60.7. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of the fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §§60.42b(d)(1), 60.43b(a)(2), (a)(3)(iii), (c)(2)(ii), (d)(2)(iii), 60.44b(c), (d), (e), (i), (j), (k), 60.45b(d), (g), 60.46b(h), or 60.48b(i).

(3) The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired.

Comment: The permittee has previously complied with the above initial requirement.

(o) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record.

(p) The owner or operator of an affected facility described in §60.44b(j) or (k) shall maintain records of the following information for each steam generating unit operating day:

(1) Calendar date,

(2) The number of hours of operation, and

(3) A record of the hourly steam load.

(q) The owner or operator of an affected facility described in §§60.44b(j) or 60.44b(k) shall submit to the Administrator on a quarterly basis:

(1) The annual capacity factor over the previous 12 months;

(2) The average fuel nitrogen content during the quarter, if residual oil was fired; and

(3) If the affected facility meets the criteria described in §60.44b(j), the results of any nitrogen oxides emission tests required during the quarter, the hours of operation during the quarter, and the hours of operation since the last nitrogen oxides emission test.

(r) The owner or operator of an affected facility who elects to demonstrate that the affected facility combusts only very low sulfur oil under §60.42b(j)(2) shall obtain and maintain at the affected facility fuel receipts from the fuel supplier which certify that the oil meets the definition of distillate oil as defined in §60.41b. For the purposes of this section, the oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Quarterly reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition was combusted in the affected facility during the preceding quarter.

NESHAP Subpart DDDDD Requirements

NESHAP Subpart DDDDD applies to industrial, commercial, and institutional boilers and process heaters located at major HAP sources. The federal regulation establishes maximum available control technology (MACT) standards for hydrogen chloride, mercury, and HAP metals (with particulate matter used as a surrogate). The compliance date for existing boilers is September 13, 2007. Boiler 16 is subject to this regulation as an existing, limited-use, liquid fuel boiler. Applicable

requirements for this type of unit include only initial notification and record keeping requirements. NESHAP provisions will be identified in the Title V renewal permit currently being processed.

Draft Permit Requirements

The draft permit will include the following primary conditions:

- Restricted Operation: The hours of operation are not limited (8760 hours per year); however, the annual capacity factor for the combined firing of distillate oil and natural gas shall not exceed 10% during any calendar year. The heat input rate to the boiler shall not exceed 184,836 MMBtu per year (10% of the maximum permitted heat input rate). The annual heat input rate shall be determined from records of the higher heating value of each authorized fuel and the actual fuel consumption for the calendar year. *{Permitting Note: This restriction limits potential emissions below all PSD significant emission rates and allows the unit to avoid the continuous monitoring requirements of NSPS Subpart Db.}* [Applicant Request; § 60.41b (Definitions); §.60.44b (Nitrogen Oxides); Rule 62-210.200(PTE), F.A.C.].
- Stack Opacity: As determined by EPA Method 9 observations, visible emissions from the boiler stack shall not exceed 20% opacity, except for one 6-minute period per hour that does not exceed 27% opacity. [Rule 62-296.406(1), F.A.C.]
- Nitrogen Oxides (NOx) Emissions: As determined by EPA Method 7E, NOx emissions shall not exceed 0.20 lb/MMBtu (42.2 lb/hour) when firing natural gas. As determined by EPA Method 7E, NOx emissions shall not exceed 0.20 lb/MMBtu (40.4 lb/hour) when firing distillate oil. [Design; Rule 62-4.070(3), F.A.C.; Rule 62-212.400(2)(g), F.A.C.]
- Fuel Specification: The boiler shall fire only natural gas or No. 2 distillate oil with a maximum sulfur content of 0.05% sulfur by weight. Emissions of carbon monoxide (CO), particulate matter (PM/PM_{10}), sulfur dioxide (SO_2), and volatile organic compounds (VOC) shall be minimized by the efficient combustion of these authorized fuels. *{Permitting Note: The expected maximum CO emissions are 0.11 lb/MMBtu (natural gas or distillate oil). The expected maximum PM/PM_{10} emissions are 0.002 lb/MMBtu (natural gas) and 0.03 lb/MMBtu (distillate oil). The expected maximum SO_2 emissions are 0.001 lb/MMBtu (natural gas) and 0.06 lb/MMBtu (distillate oil). The expected maximum VOC emissions are 0.03 lb/MMBtu (natural gas or distillate oil).}* [Rule 62-4.070(3), F.A.C.; Rule 62-296.406(2) and (3)]
- Compliance Tests: Within 12 months of issuance of this permit, the permittee shall conduct performance tests to determine compliance with the opacity and NOx emissions for each authorized fuel. Thereafter, the permittee shall conduct NOx performance testing within 12 months before the expiration date of the Title V operation permit. NOx emissions shall be reported in terms of "pounds per MMBtu of heat input" and "pounds per hour" using the appropriate F-factors for each fuel. [Rule 62-4.070(3), F.A.C.; Rule 62-297.310(7)(a)1, F.A.C.]
- Fuel Sulfur Records: Compliance with the distillate oil fuel sulfur limit shall be demonstrated by taking an initial sample, analyzing the sample for fuel sulfur, and reporting the results with the initial emissions compliance test report. Sampling and analyzing 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. More recent versions or equivalent methods may be used. For each subsequent distillate oil delivery, the permittee shall maintain a permanent file of the certified fuel sulfur analysis from the vendor. At the request of a Compliance Authority, the permittee shall perform additional sampling and analysis for the fuel sulfur content. [Rule 62-4.070(3), F.A.C.; Rule 62-4.160(15), F.A.C.; Rule 62-297.310(7)(b), F.A.C.; §§60.42b (j), 60.45b (j), 60.47b (f), and 60.49b (r)]
- Operational Records: The permittee shall maintain records sufficient to determine compliance with the following: fuel consumptions rates and hours of operation for each authorized fuel; higher heating value of each authorized fuel; maximum annual heat input rate for the calendar year; and steam production records. Information shall be available for inspection within at least three days of a request from the Department or a Compliance Authority. [Rules 62-4.160(15) and 62-4.070(3), F.A.C.]
- Alternate Sampling Procedure - Opacity: If EPA Region 4 later determines that the opacity standard in §60.43b applies, Appendix Db includes the previously described procedures for conducting opacity observations in lieu of a COMS for this limited use boiler.

4. 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 complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. The project substantially restricts the operation of this existing unit. 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 the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

PERMITTEE:

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

Authorized Representative:
Mr. Ricardo Lima, V.P. and General Manager

Okeelanta Sugar Mill and Refinery
Facility ID No. 0990005
Project No. 0990005-018-AC
Boiler No. 16 – Capacity Reduction
Expires: *{1 year}*

PROJECT AND LOCATION

The project is associated with Okeelanta Corporation's existing sugar mill (SIC No. 2061) and sugar refinery (SIC No. 2062) located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida. The facility is collocated next to New Hope Power's Okeelanta Cogeneration Plant. The UTM coordinates are Zone 17, 524.9 km East, and 2940.1 km North. The project restricts fossil fuel firing in Boiler 16 (EU-014) to an annual capacity factor of 10% or less, which reduces all emissions below the PSD significant emission rates and avoids the continuous monitoring requirements of NSPS Subpart Db. This permit supersedes previous Permit No. PSD-FL-169A (Project No. 0990005-009-AC).

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 52, Section 21 of the Code of Federal Regulations. The permittee is authorized to perform the work and operate the equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

(DRAFT)

Michael G. Cooke, Director
Division of Air Resource Management

(Date)

FACILITY DESCRIPTION

The facility consists of two adjacent plants. Okeelanta Corporation operates a sugar mill (SIC No. 2061) and sugar refinery (SIC No. 2062) including packaging and transshipment activities. New Hope Power operates the Okeelanta Cogeneration Plant that provides process steam for the sugar mill/sugar refinery and generates electricity for sale to the power grid (SIC 4911).

EMISSIONS UNITS

This permit modifies the following existing emissions unit.

ID	Emission Unit Description
014	Boiler No. 16 is a 211/202 MMBtu per hour package boiler fired with natural gas/distillate oil.

REGULATORY CLASSIFICATION

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

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

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

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

NSPS: The facility operates emissions units subject to the New Source Performance Standards (NSPS) of 40 CFR 60 including: Subparts Da (boilers) and Db (boilers).

NESHAP: The facility operates emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63 including Subpart DDDDD (boilers).

APPENDICES

The following Appendices are attached in Section IV as part of this permit.

Appendix CF. Citation Format

Appendix Db. NSPS Subpart Db Requirements for Boilers

Appendix GC. General Conditions

Appendix SC. Standard Conditions

RELEVANT DOCUMENTS

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action and are on file with the Department.

- Application No. 0990005-018-AC received on 12/14/05.
- Permit No. PSD-FL-169A (Project No. 0990005-009-AC).

SECTION II. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate an emissions unit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall be submitted to the Air Resources Section of the Department's South District Office (2295 Victoria Avenue, Suite 364 in Fort Myers, Florida 33902-2549) and the Air Pollution Control Section of the Palm Beach County Health Department (P.O. Box 29, West Palm Beach, Florida 33402-0029).

2. Compliance Authorities: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite 364 in Fort Myers, Florida 33902-2549. Copies of all such documents shall be submitted to the Air Pollution Control Section of the Palm Beach County Health Department at P.O. Box 29, West Palm Beach, Florida 33402-0029.

3. Appendices: The following Appendices are attached as part of this permit: Appendix CF. (Citation Format); Appendix Db (NSPS Subpart Db Requirements for Boilers); Appendix GC (General Conditions); and Appendix SC (Standard Conditions).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); Title 40, Part 60 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C.; and Title 40, Part 63 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

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

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

7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. Because there is no work to be performed, the permittee shall apply for a revised Title V operation permit within 45 days of issuance of this final permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

A. MILL BOILER NO. 16

This section of the permit addresses the following modified emissions unit.

Emissions Unit 014: Mill Boiler No. 16

Description: This unit is Babcock and Wilcox Model No. FM 120-97 package boiler with a maximum steam production rate of 150,000 pounds per hour (24-hour average). The design heat release rate for this unit is greater than 70,000 BTU/hour-ft^3.

Fuels: This unit is fired with pipeline-quality natural gas or very low sulfur distillate oil.

Capacity: The heat input rate is 211 MMBtu per hour when firing natural gas, which is approximately 0.207 million cubic feet of gas per hour based on a heat content of 1020 MMBtu per million SCF. The heat input rate is 202 MMBtu per hour when firing very low sulfur distillate oil, which is approximately 1485 gallons per hour based on a heat content of 136 MMBtu per thousand gallons.

Controls: The efficient combustion of clean fuels minimizes emissions of CO, PM/PM10, SO2, and VOC. Emissions of NOx are reduced with low NOx burners and flue gas recirculation (approximately 15%).

Stack Parameters: Exhaust gases exit a 75' tall stack that is 5.0' in diameter at 393° F with a volumetric flow rate of 118,600 acfm.

CONTROL EQUIPMENT

1. NOx Emissions: The permittee shall tune, maintain and operate the low-NOx burner system along with flue gas recirculation (FGR) to achieve the emissions standards specified in this permit. The burner system shall be capable of firing natural gas and distillate oil. [Design; Rule 62-4.070(3), F.A.C.]

PERFORMANCE RESTRICTIONS

2. Authorized Fuel: The boiler shall fire only natural gas or No. 2 distillate oil with a maximum sulfur content of 0.05% sulfur by weight. [Design; Rule 62-210.200(PTE), F.A.C.; Rule 62-296.406 (BACT), F.A.C.]

3. Permitted Capacity: The maximum design heat input rates to the boiler are 211 MMBtu per hour when firing natural gas and 202 MMBtu per hour when firing distillate oil. The maximum steam production rate shall not exceed 150,000 pounds per hour based on a 24-hour block average. The boiler shall be equipped with integrating fuel flow meters to monitor the consumption of natural gas and distillate oil. The boiler shall be equipped with instruments to continuously monitor the steam production rate (pounds per hour), steam temperature (° F), and steam pressure (psig). [Design; Rule 62-210.200(PTE), F.A.C.]

4. Restricted Operation: The hours of operation are not limited (8760 hours per year); however, the annual capacity factor for the combined firing of distillate oil and natural gas shall not exceed 10% during any calendar year. The heat input rate to the boiler shall not exceed 184,836 MMBtu per year (10% of the maximum permitted heat input rate). The annual heat input rate shall be determined from records of the higher heating value of each authorized fuel and the actual fuel consumption for the calendar year. Each year, the annual capacity factor and annual heat input rate shall be reported with the required Annual Operating Report. *{Permitting Note: This restriction limits potential emissions below all PSD significant emission rates and allows the unit to avoid the continuous monitoring requirements of NSPS Subpart Db.}* [Applicant Request; § 60.41b (Definitions); § 60.44b (Nitrogen Oxides); Rule 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

5. Stack Opacity: As determined by EPA Method 9 observations, visible emissions from the boiler stack shall not exceed 20% opacity, except for one 6-minute period per hour that does not exceed 27% opacity. [Rule 62-296.406(1), F.A.C.]

6. Nitrogen Oxides (NOx) Emissions: As determined by EPA Method 7E, NOx emissions shall not exceed 0.20 lb/MMBtu (42.2 lb/hour) when firing natural gas based on the average of three test runs. As determined by EPA Method 7E, NOx emissions shall not exceed 0.20 lb/MMBtu (40.4 lb/hour) when firing distillate oil based on the average of three test runs. [Design; Rule 62-4.070(3), F.A.C.; Rule 62-212.400(2)(g), F.A.C.]

7. Fuel Specification: The boiler shall fire only natural gas or No. 2 distillate oil with a maximum sulfur content of 0.05% sulfur by weight. Emissions of carbon monoxide (CO), particulate matter (PM/PM10), sulfur dioxide (SO2), and

volatile organic compounds (VOC) shall be minimized by the efficient combustion of these authorized fuels. *{Permitting Note: The expected maximum CO emissions are 0.11 lb/MMBtu (natural gas or distillate oil). The expected maximum PM/PM10 emissions are 0.002 lb/MMBtu (natural gas) and 0.03 lb/MMBtu (distillate oil). The expected maximum SO2 emissions are 0.001 lb/MMBtu (natural gas) and 0.06 lb/MMBtu (distillate oil). The expected maximum VOC emissions are 0.03 lb/MMBtu (natural gas or distillate oil).}* [Rule 62-4.070(3), F.A.C.; Rule 62-296.406(2) and (3)]

EMISSIONS PERFORMANCE TESTING

8. Test Methods: As required, tests shall be performed in accordance with the following reference methods.

EPA Method	Description of Method and Comments
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

In addition, it may be necessary to perform EPA Methods 1 through 4 as part of the above test methods. These test methods are specified in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used to demonstrate compliance unless prior written approval is received from the Department. Other applicable testing requirements are included in Appendix SC of the permit. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

9. Compliance Tests: Within 12 months of issuance of this permit, the permittee shall conduct performance tests to determine compliance with the opacity and NOx emissions for each authorized fuel. Thereafter, the permittee shall conduct NOx performance testing within 12 months before the expiration date of the Title V operation permit. NOx emissions shall be reported in terms of "pounds per MMBtu of heat input" and "pounds per hour" using the appropriate F-factors for each fuel. Subsequent opacity tests shall be conducted during any federal fiscal year (October 1st to September 30th) that the boiler fires distillate oil for 400 hours or more. [Rule 62-4.070(3), F.A.C.; Rule 62-297.310(7)(a)1, F.A.C.]

RECORDS AND REPORTS

10. Fuel Sulfur Records: Compliance with the distillate oil fuel sulfur limit shall be demonstrated by taking an initial sample, analyzing the sample for fuel sulfur, and reporting the results with the initial emissions compliance test report. Sampling and analyzing 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. More recent versions or equivalent methods may be used. For each subsequent distillate oil delivery, the permittee shall maintain a permanent file of the certified fuel sulfur analysis from the vendor. At the request of a Compliance Authority, the permittee shall perform additional sampling and analysis for the fuel sulfur content. [Rule 62-4.070(3), F.A.C.; Rule 62-4.160(15), F.A.C.; Rule 62-297.310(7)(b), F.A.C.; §§60.42b (j), 60.45b (j), 60.47b (f), and 60.49b (r)]

11. Operational Records: The permittee shall maintain records sufficient to determine compliance with the following: fuel consumptions rates and hours of operation for each authorized fuel; higher heating value of each authorized fuel; maximum annual heat input rate for the calendar year; and steam production records. Information shall be available for inspection within at least three days of a request from the Department or a Compliance Authority. [Rules 62-4.160(15) and 62-4.070(3), F.A.C.]

12. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Section 4, Appendix SC of this permit. [Rule 62-297.310(8), F.A.C.]

OTHER REQUIREMENTS

13. Applicable Requirements: The boiler is also subject to the NSPS Subpart Db requirements for commercial boilers in Appendix Db and the standard conditions in Appendix SC. These appendices are found in Section IV of this permit.

CONTENTS

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

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

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

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

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

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001"identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

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

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

Code of Federal Regulations (CFR)

Example: [40 CRF 60.7]

Means: Title 40, Part 60, Section 7

The NSPS requirements of this section apply to the following emissions unit:

ID	Emission Unit Description
014	Mill Boiler No. 16 is a 211/202 MMBtu per hour package boiler fired with natural gas/distillate oil.

NSPS General Provisions

The emissions unit is subject to the applicable General Provisions of the New Source Performance Standards including 40 CFR 60.7 (Notification and Record Keeping), 40 CFR 60.8 (Performance Tests), 40 CFR 60.11 (Compliance with Standards and Maintenance Requirements), 40 CFR 60.12 (Circumvention), 40 CFR 60.13 (Monitoring Requirements), and 40 CFR 60.19 (General Notification and Reporting Requirements). The General Provisions are not included in this permit, but can be obtained from the Department upon request.

NSPS Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

The boiler shall comply with all applicable requirements of 40 CFR 60, Subpart Db adopted by reference in Rule 62-204.800(7)(b), F.A.C. Inapplicable provisions have been deleted in the following conditions, but the numbering of the original rules has been preserved for ease of reference. The term "Administrator" when used in 40 CFR 60 shall mean the Department's Secretary or the Secretary's designee. Department notes related to the Subpart Db requirements are shown in *italics* immediately following the section to which they refer.

§ 60.40b Applicability and Delegation of Authority

(a) The affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 million Btu/hour.

{Note: With a maximum capacity of 211 MMBtu per hour, Boiler 16 is an affected unit subject to NSPS Subpart Db.}

§ 60.41b Definitions

"Annual capacity factor" means the ratio between the actual heat input to a steam generating unit from the fuels listed in §§60.42b(a), 60.43b(a), or 60.44b(a), as applicable, during a calendar year and the potential heat input to the steam generating unit had it been operated for 8,760 hours during a calendar year at the maximum steady state design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility in a calendar year.

"Distillate oil" means fuel oils that contain 0.05 weight percent nitrogen or less and comply with the specifications for fuel oil numbers 1 and 2, as defined by the American Society of Testing and Materials in ASTM D396-78, Standard Specifications for Fuel Oils (incorporated by reference -see §60.17).

"Very low sulfur oil" means an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 215 ng/J (0.5 lb/million Btu) heat input.

"Conventional technology" means wet flue gas desulfurization (FGD) technology, dry FGD technology, atmospheric fluidized bed combustion technology, and oil hydro-desulfurization technology.

"Emerging technology" means any sulfur dioxide control system that is not defined as a conventional technology under this section, and for which the owner or operator of the facility has applied to the Administrator and received approval to operate as an emerging technology under §60.49b(a)(4).

§ 60.42b Standard for Sulfur Dioxide

(j) Percent reduction requirements are not applicable to affected facilities combusting only very low sulfur oil. The owner or operator of an affected facility combusting very low sulfur oil shall demonstrate that the oil meets the definition of very low sulfur oil by: (2) maintaining fuel receipts as described in §60.49b(r).

§ 60.43b Standard for Particulate Matter

§ 60.43b Standard for Particulate Matter

(f) On and after the date on which the initial performance test is completed or is required to be completed under 60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts coal, oil, wood, or mixtures of these fuels with any other fuels shall cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

{Note: As described in the above definitions (§60.41b), Boiler 16 does not use conventional or emerging technology to reduce sulfur dioxide emissions. Therefore, the particulate matter standards of this section do not apply. This includes the opacity standard specified in (§60.43b (f).}

§ 60.44b Standard for Nitrogen Oxides

(k) Affected facilities that meet the criteria described in paragraphs (j) (1), (2), and (3) of this section, and that have a heat input capacity of 73 MW (250 million Btu/hour) or less, are not subject to the nitrogen oxides emission limits under this section.

(j) The sub-paragraphs in paragraph (j) state:

(1) Combust, alone or in combination, only natural gas, distillate oil, or residual oil with a nitrogen content of 0.30 weight percent or less;

(2) Have a combined annual capacity factor of 10 percent or less for natural gas, distillate oil, and residual oil with a nitrogen content of 0.30 weight percent or less; and

(3) Are subject to a Federally enforceable requirement limiting operation of the affected facility to the firing of natural gas, distillate oil, and/or residual oil with a nitrogen content of 0.30 weight percent or less and limiting operation of the affected facility to a combined annual capacity factor of 10 percent or less for natural gas, distillate oil, and residual oil and a nitrogen content of 0.30 weight percent or less.

{Note: The boiler is authorized to fire only natural gas and distillate oil (≤ 0.05% sulfur by weight). The permit restricts the annual capacity to no more than 10%. Therefore, there is no applicable NOx standard.}

§ 60.45b Compliance and Performance Test Methods and Procedures for Sulfur Dioxide

(j) The owner or operator of an affected facility that combusts very low sulfur oil is not subject to the compliance and performance testing requirements of this section if the owner or operator obtains fuel receipts as described in §60.49b(r).

§ 60.46b Compliance and Performance Test Methods and Procedures for Particulate Matter and Nitrogen Oxides

{Note: There are no applicable standards for particulate matter or nitrogen oxides.}

At the time of issuance for the draft permit, the Department was uncertain as to whether EPA Region 4 was in agreement with the Department's interpretation that the opacity standard did not apply because there was no underlying particulate matter standard. Therefore, if the § 60.43b opacity standard does apply, the permittee proposes the following alternate sampling procedure for this limited use boiler in lieu of a COMS.

When Boiler 16 fires distillate oil, the permittee shall use the following procedures in lieu of a continuous opacity monitoring system to determine compliance with the opacity standard:

a. The permittee shall conduct a 12-minute opacity observation once the boiler has achieved normal operation following a cold boiler startup on distillate oil.

b. The permittee shall conduct a 12-minute opacity observation at least once per daylight shift during the period of highest distillate oil firing.

c. All observation shall be conducted in accordance with EPA Method 9 and by individuals certified as a visible emissions observer by the State of Florida.

d. The permittee shall notify the Compliance Authority within one working day of observing visible emissions exceeding the opacity standard. If the boiler is unable to regularly comply with the opacity standard based on these manual observations, the permittee shall install, operate, and maintain a continuous opacity monitoring system (COMS) to determine continuous compliance with the opacity standard.

e. The permittee shall maintain a log of the opacity observations and the oil firing rate during the observations.

f. If distillate oil is fired during a calendar quarter, the permittee shall submit a copy of the observation log to the Compliance Authority within 30 days following the calendar quarter.

g. Along with the Annual Operating Report, the permittee shall identify the quantities of natural gas and distillate oil fired and the annual capacity factor based on annual heat input rates from these fuels. If the annual capacity factor is greater than 10%, the permittee shall install, operate, and maintain a continuous opacity monitoring system (COMS) to determine compliance with the opacity standard.

§ 60.47b Emission Monitoring for Sulfur Dioxide

(f) The owner or operator of an affected facility that combusts very low sulfur oil is not subject to the emission monitoring requirements of this section if the owner or operator obtains fuel receipts as described in §60.49b(r).

§ 60.48b Emissions Monitoring for Particulate Matter and Nitrogen Oxides

{Note: There are no applicable standards for particulate matter or nitrogen oxides. Therefore, continuous monitoring is not required.}

§ 60.49b Reporting and Recordkeeping Requirements

(a) The owner or operator of each affected facility shall submit notification of the date of initial startup, as provided by §60.7. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of the fuels to be combusted in the affected facility.

(2) If applicable, a copy of any §§ 60.42b(d)(1), 60.43b(a)(2), (a)(3)(iii), (c)(2)(ii), (d)(2)(iii), 60.44b(c), (d), (e), (i), (j), (k), 60.45b(d), (g), 60.46b(h), or 60.48b(i).

(3) The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired.

{Note: The permittee has previously complied with the above initial requirement.}

(o) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record.

(p) The owner or operator of an affected facility described in §60.44b(j) or (k) shall maintain records of the following information for each steam generating unit operating day:

(1) Calendar date,

(2) The number of hours of operation, and

(3) A record of the hourly steam load.

(q) The owner or operator of an affected facility described in §60.44b(j) or §60.44b(k) shall submit to the Administrator on a quarterly basis:

(1) The annual capacity factor over the previous 12 months;

(2) The average fuel nitrogen content during the quarter, if residual oil was fired; and

(3) If the affected facility meets the criteria described in §60.44b(j), the results of any nitrogen oxides emission tests required during the quarter, the hours of operation during the quarter, and the hours of operation since the last nitrogen oxides emission test.

(r) The owner or operator of an affected facility who elects to demonstrate that the affected facility combusts only very low sulfur oil under Sec. 60.42b(j)(2) shall obtain and maintain at the affected facility fuel receipts from the fuel supplier which certify that the oil meets the definition of distillate oil as defined in Sec. 60.41b. For the purposes of this section, the oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Quarterly reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition was combusted in the affected facility during the preceding quarter.

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

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

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

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

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

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

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

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

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

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

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

   a. A description of and cause of non-compliance; and

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

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

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

    a. Determination of Best Available Control Technology ( );
    b. Determination of Prevention of Significant Deterioration ( ); and
    c. Compliance with New Source Performance Standards (X).

{Permitting Note: Based on the enforceable restrictions in this permit, Boiler 16 is not longer subject to PSD review.}

14. The permittee shall comply with the following:

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

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

    c. Records of monitoring information shall include:

        1) The date, exact place, and time of sampling or measurements;
        2) The person responsible for performing the sampling or measurements;
        3) The dates analyses were performed;
        4) The person responsible for performing the analyses;
        5) The analytical techniques or methods used; and
        6) The results of such analyses.

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

{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(203), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

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

13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.

    a. *Required Sampling Time.* Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.

    b. *Minimum Sample Volume.* Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

    c. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

14. Determination of Process Variables

    a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

    b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

    [Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.

16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

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

18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the

test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

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

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

RECORDS AND REPORTS

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

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Chief
Bureau of Air Regulation

FROM: Jeff Koerner, Air Permitting North Program

DATE: February 24, 2006

SUBJECT: Okeelanta Corporation – Okeelanta Sugar Mill and Refinery
Draft Air Permit No. 0990005-018-AC - Revised Boiler 16 Permit
Draft Air Permit No. 0990005-019-AC - Railcar Unloading Expansion Project

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

There are two draft air construction permit projects with a single combined public notice package. Project No. 0990005-018-AC establishes an enforceable restriction on Boiler 16 such that the annual capacity factor will be 10% or less. This reduces potential emissions of all pollutants below the PSD significant emission rates and greatly reduces NSPS Subpart Db emissions standards and monitoring requirements. Project No. 0990005-019-AC authorizes construction of a new railcar unloading operation in the existing transshipment facility. The draft permit is also a "re-permitting" of all emissions units at the transshipment facility to recognize an increase in production capacity as well as ensure that the original project remains below the PSD significant emission rates for particulate matter. The existing facility is located approximately six miles south of South Bay on U.S. 27 in Palm Beach County, Florida.

The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The P.E. certification briefly summarizes the proposed project. Day #74 is February 26, 2006 for the Boiler 16 project and April 13, 2006 for the transshipment project. I recommend your approval of the attached Draft Permits for these projects.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Okeelanta Sugar Mill and Refinery
Facility ID No. 0990005
Project No. 0990005-018-AC
Boiler No. 16 – Capacity Reduction
County, Florida

PROJECT DESCRIPTION

This project establishes an enforceable restriction on Boiler 16 such that the annual capacity factor will be 10% or less. This reduces potential emissions of all pollutants below the PSD significant emission rates and substantially reduces NSPS Subpart Db emissions standards and monitoring requirements. The boiler is no longer subject to PSD preconstruction review.

I HEREBY CERTIFY *that the air pollution control 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, geological, and meteorological features).*

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

2-24-06
(Date)

BEST AVAILABLE COPY

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

B. Received by (Printed Name) Harold Hill Jr. C. Date of Delivery 3/1/06

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

2. Article Number (Transfer from service label) 7000 1670 0013 3110 0475

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

7000 1670 0013 3110 0475

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

Postmark Here

Sent To Mr. Ricardo Lima, Vice President
and General Manager
Street, Okeelanta Corporation
21250 U.S. Highway 27 South
City, S. South Bay, Florida 33493

PS Form [illegible] Instructions

Golder Associates Inc.

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

December 13, 2005

053-7520

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

Attention: Mr. Al A. Linero, Air Permitting South

RE: OKEELANTA CORPORATION
AIR CONSTRUCTION PERMIT APPLICATION
APPLICATION TO REVISE THE ANNUAL CAPACITY FACTOR
FOR MILL BOILER NO. 16

Dear Mr. Linero:

Please find enclosed four (4) copies of the air construction permit application to revise the annual capacity factor limit for Okeelanta Corporation's Mill Boiler No. 16. Thank you for consideration of this information. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

DB/kdk

Enclosures

cc: Bill Tarr
Matt Capone
James Meriwether
David Dee
Jose Garcia, Palm Beach County Heath Department
Ron Blackburn, SD

Y:\Projects\2005\0537520 Okeelanta Boiler 16\L120905.doc

AIR CONSTRUCTION PERMIT APPLICATION FOR OKEELANTA BOILER NO. 16

OKEELANTA CORPORATION

Prepared For:
Okeelanta Corporation

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

December 2005
0537520

APPLICATION

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

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

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

To ensure accuracy, please see form instructions.

Identification of Facility

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

Application Contact

1. Application Contact Name: **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) 993-1658** ext. Fax: **(561) 992-7326**
4. Application Contact Email Address: **matthew_capone@floridacrystals.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	12-14-05
2. Project Number(s):	0990005-018-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

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

Air Construction Permit

☒ Air construction permit.

Air Operation Permit

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

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

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

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

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

Application Comment

Application to modify Mill Boiler No. 16 by limiting operation of the boiler to an annual capacity factor of 10 percent.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
014	Okeelanta Mill Boiler No. 16		

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name :
   Ricardo A. Lima, Vice President and General Manager
2. Owner/Authorized Representative 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 Telephone Numbers...
   Telephone: **(561) 993-1600** ext. Fax: **(561) 992-7326**
4. Owner/Authorized Representative Email Address: **ricardo_lima@floridacrystals.com**
5. Owner/Authorized Representative Statement:

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

   Signature

   12-9-05
   Date

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name:

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
   - ☐ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
   - ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
   - ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
   - ☐ The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

4. Application Responsible Official Telephone Numbers...
   Telephone: ( ) - ext. Fax: ( ) -

5. Application Responsible Official Email Address:

6. Application Responsible Official Certification:

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

   _____ _____
   Signature Date

APPLICATION INFORMATION

Professional Engineer Certification

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

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

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

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

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

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

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

David A. Buff
Signature

12/13/05
Date

(seal)

* Attach any exception to certification statement.

Board of Professional Engineers Certificate of Authorization #00001670

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

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

Facility Contact

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

Facility Primary Responsible Official

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

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

FACILITY INFORMATION

Facility Regulatory Classifications

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

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

FACILITY INFORMATION

List of Pollutants Emitted by Facility

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

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

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

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

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☒ Attached, Document ID: **OC-FI-C1** ☐ Previously Submitted, Date:_____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☒ Attached, Document ID: **OC-FI-C2** ☐ Previously Submitted, Date:_____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: **May 20, 2005**

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: ☒ Attached, Document ID: **OC-FI-CC1** ☐ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: ☒ Attached, Document ID: **Part B**
3. Rule Applicability Analysis: ☒ Attached, Document ID: **Part B**
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

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

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
   ☐ Attached, Document ID:____ ☐ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
   ☐ Attached, Document ID:____
   ☐ Not Applicable (revision application with no change in applicable requirements)

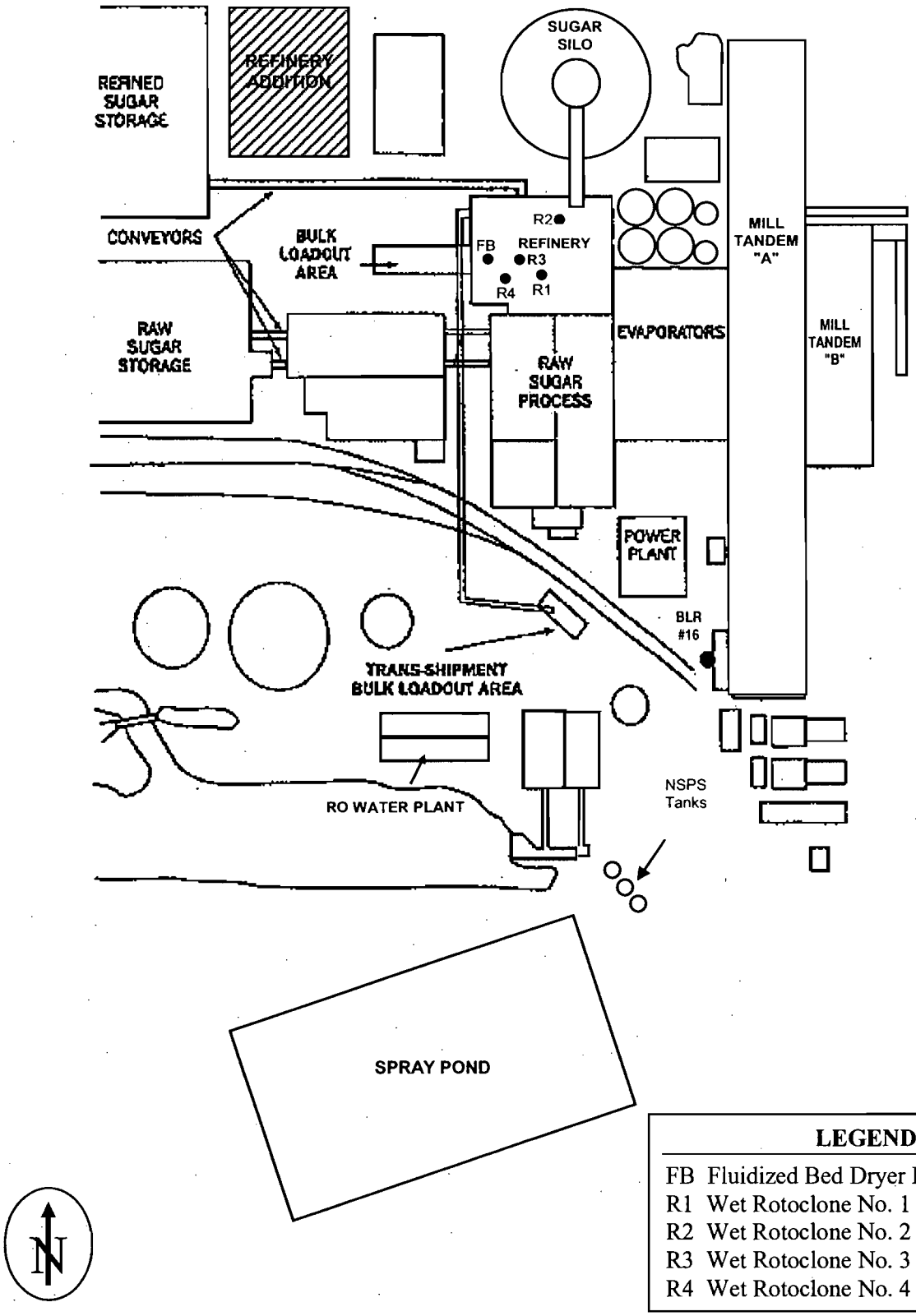
3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
   ☐ Attached, Document ID:____
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
   ☐ Attached, Document ID:____
   ☐ Equipment/Activities On site but Not Required to be Individually Listed
   ☐ Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:____ ☐ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID:____ ☐ Not Applicable

Additional Requirements Comment



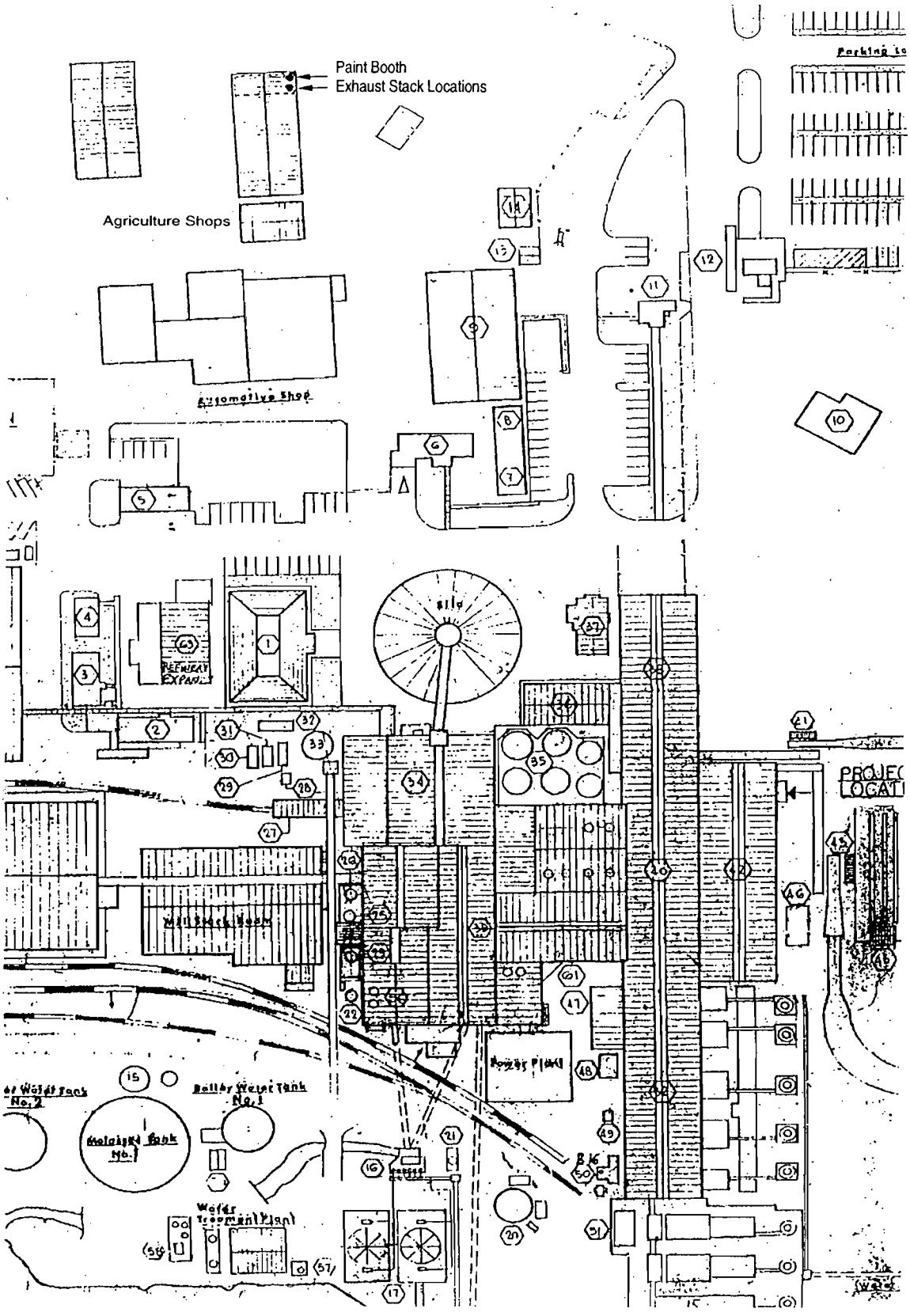
LEGEND

FB Fluidized Bed Dryer Baghouse Stack
R1 Wet Rotoclone No. 1 Stack
R2 Wet Rotoclone No. 2 Stack
R3 Wet Rotoclone No. 3 Stack
R4 Wet Rotoclone No. 4 Stack

Attachment OC-FI-C1a
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

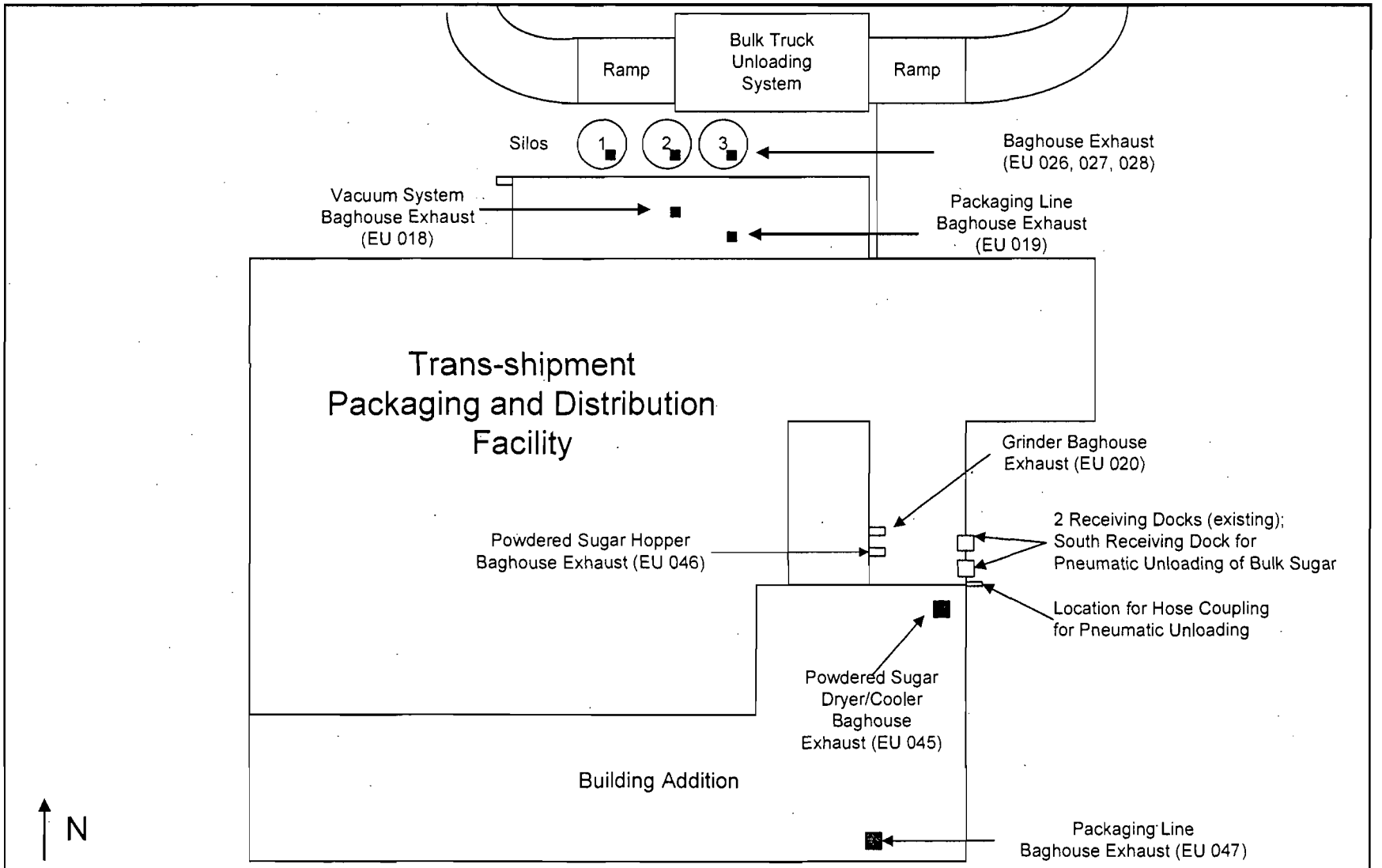
Golder Associates



Attachment OC-FI-C1b
Facility Plot Plan, including Paint Booth

Source: Golder, 2005.

Golder Associates

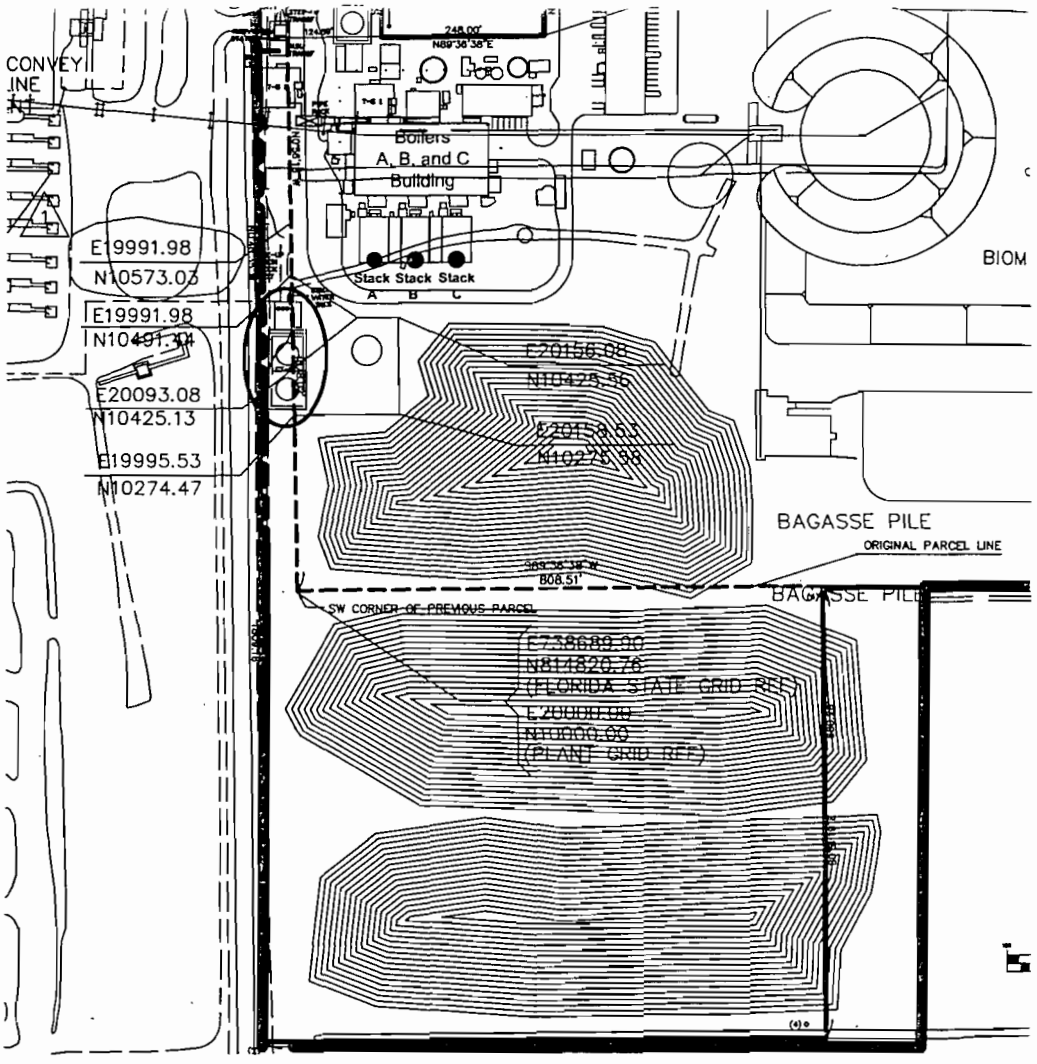


Plot plan is a general arrangement for informational purposes only. Locations are approximate. Plot plan is not to scale.

Attachment OC-FI-C1c
Trans-shipment Packaging and Distribution
Facility Plot Plan
Okeelanta Corporation

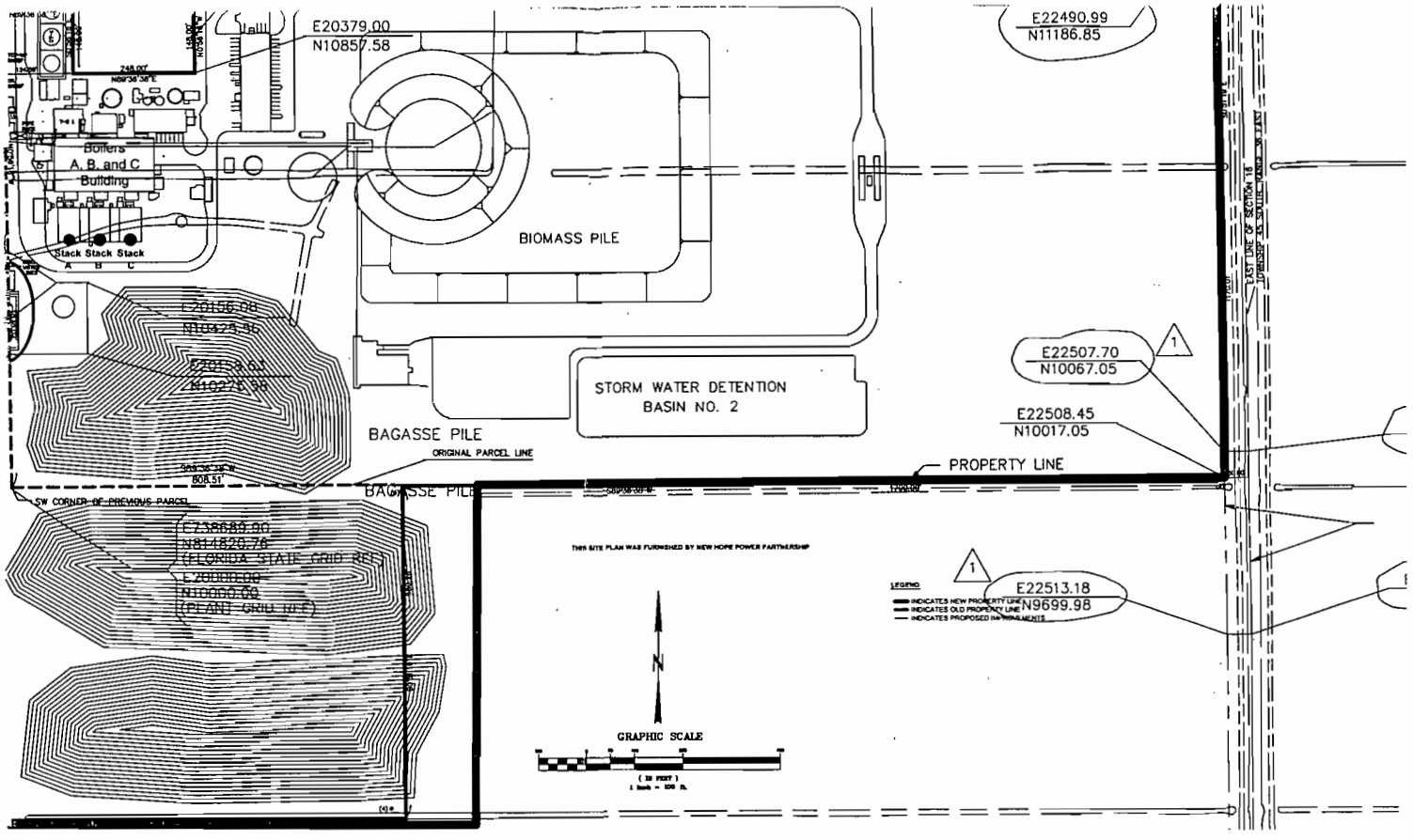
Golder Associates

BEST AVAILABLE COPY



PAG SURVEYORS, INC. L.B. 3411 1016 SOUTHEAST 4TH STREET BELLE GLADE, FL 33430-4330 PHONE (561) 996-6615	SEAL	DATE 8-18-03 SCALE 1"=100' DRAWN SB FB No. CHECKED PAG	NO.	REVISIONS

BEST AVAILABLE COPY

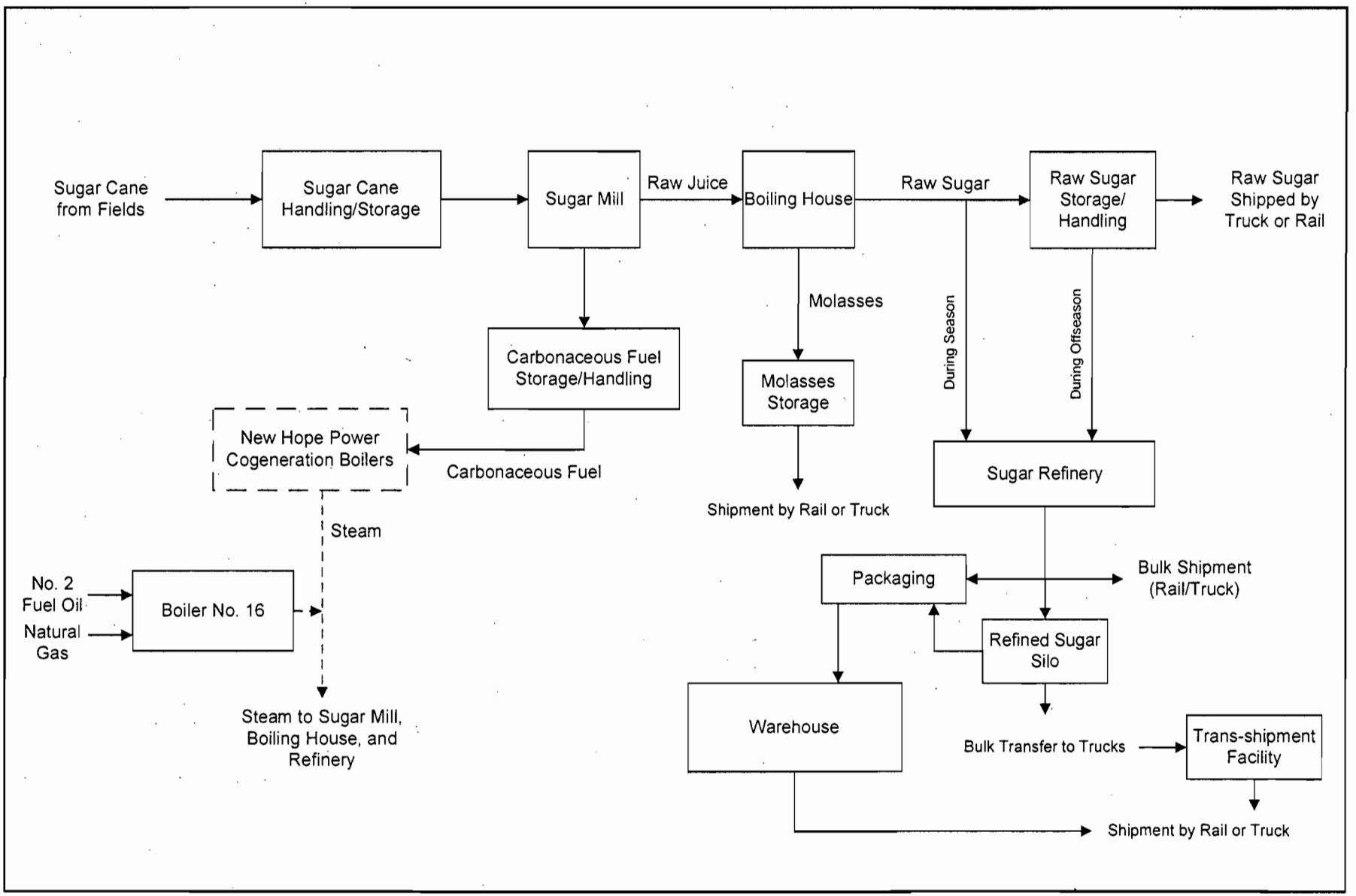


L.B. 3411		DATE	8-18-03					ATTACHMENT OC-FI-C1d. Facility Plot Plan	SHEET NO. 1 OF 1
		SCALE	1"=100'					NEW HOPE POWER PARTNERSHIP P.O. BOX 9 SOUTH BAY, FL 33493	WORK ORDER NO. 03-3-182
		DRAWN	SB						
		FB No.							
15	SEAL	CHECKED	PAG	NO.	REVISIONS	BY	DATE	PALM BEACH COUNTY, FLORIDA	

0537537/4/4.4/OC-FI-C1c.dwg

ATTACHMENT OC-FI-C2

PROCESS FLOW DIAGRAM

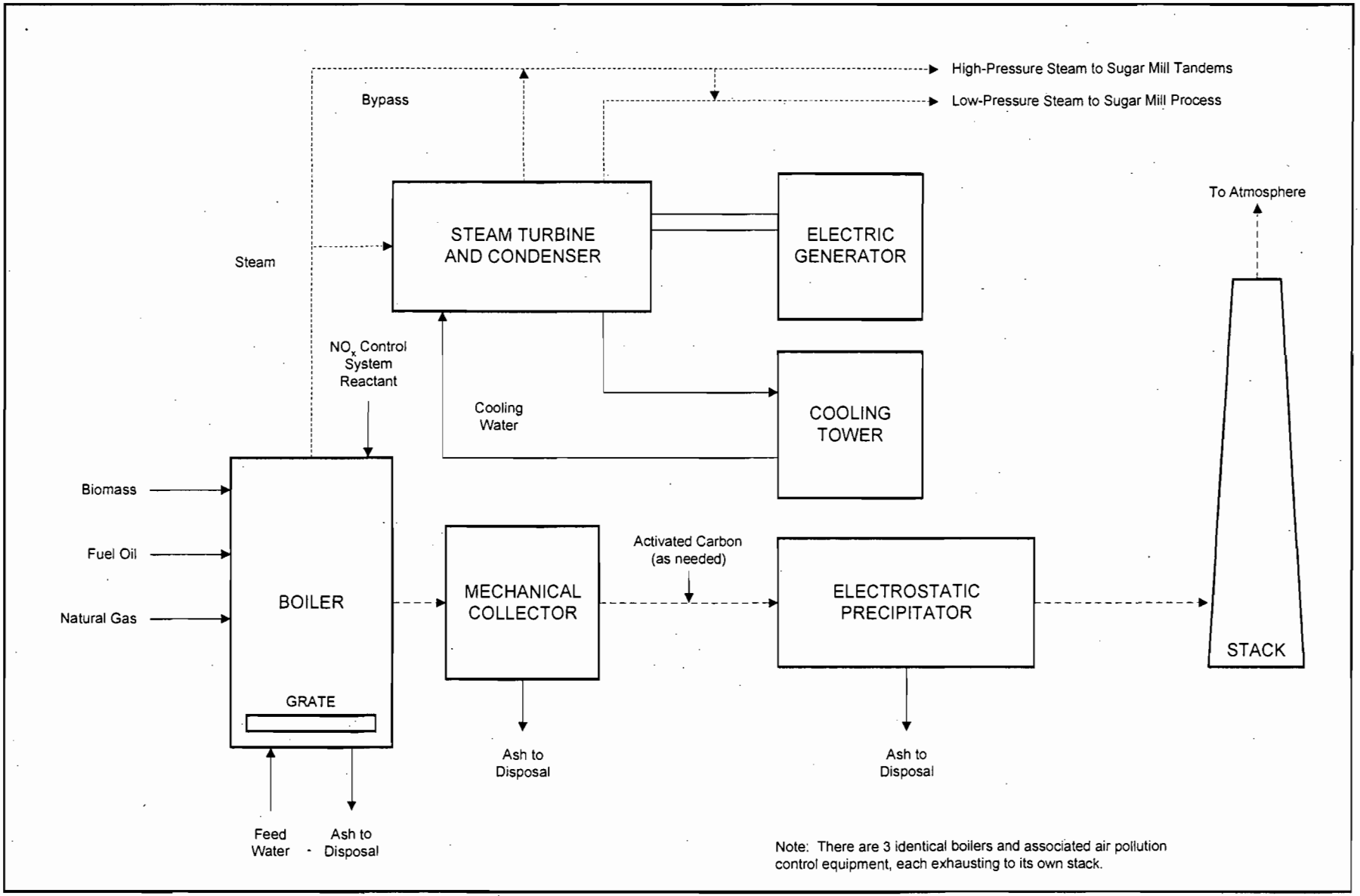


Attachment OC-FI-C2a
Sugar Manufacturing
Process Flow Diagram
Okeelanta Corporation
South Bay, FL

Overall Sugar Mill - Facility Flow Diagram

Process Flow Legend
Solid/Liquid
Steam
Gas

Golder Associates



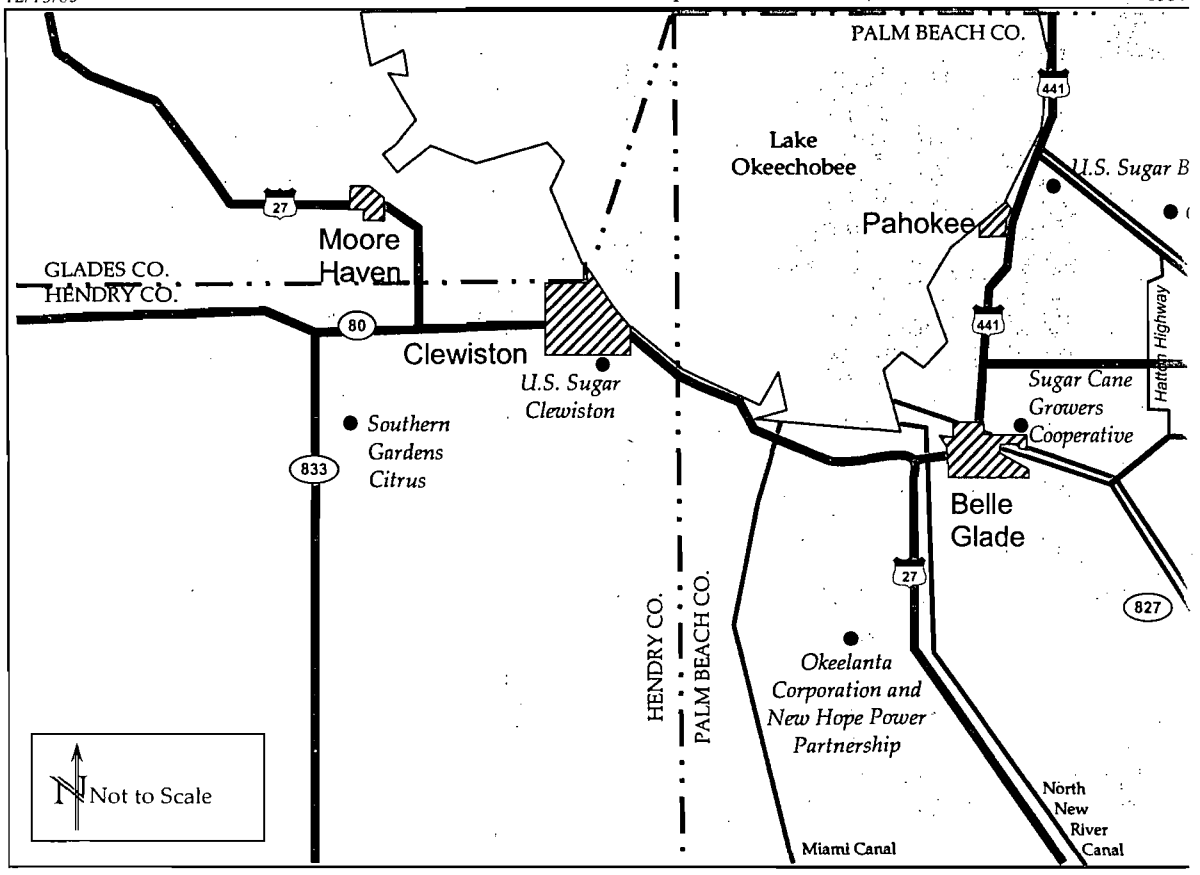
Attachment OC-FI-C2b
Simplified Flow Diagram
New Hope Power Partnership Cogeneration Facility
South Bay, FL

Process Flow Legend
Solid/Liquid
Steam
Gas

Golder Associates

ATTACHMENT OC-FI-CC1

AREA MAP SHOWING FACILITY LOCATION



Attachment OC-FI-CC1
Location of Okeelanta Corporation and New Hope Power Partnership

Source: Golder Associates Inc., 2005.

III. EMISSIONS UNIT INFORMATION

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

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

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

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

EMISSIONS UNIT INFORMATION
Section [1]
Mill Boiler No. 16

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

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

Emissions Unit Description and Status

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

2. Description of Emissions Unit Addressed in this Section:
   Mill Boiler No. 16

3. Emissions Unit Identification Number: **014**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A			**20**	☐ Yes ☒ No

9. Package Unit:
   Manufacturer: **Babcock and Wilcox** Model Number: **FM 120-97**

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
    Package Boiler equipped with Low-NO_x burners for No. 2 distillate fuel oil and natural gas. This unit is designed for approximately 15-percent flue gas recirculation.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

   Low-NO_x Burners

   Flue gas recirculation

2. Control Device or Method Code(s): **205, 026**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate: **150,000 lb/hr steam, 24-hour average**	
3. Maximum Heat Input Rate: **211** million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8,760** hours/year

6. Operating Capacity/Schedule Comment:

Maximum heat input rate represents natural gas burning. The maximum heat input rate for fuel oil is 202 MMBtu/hr. Annual capactiy factor will be limited to 10 percent.

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **BLR 16**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:		
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: **393** °F	9. Actual Volumetric Flow Rate: **118,600** acfm	10. Water Vapor: **9** %
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 Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: **Stack parameters are based on 2001 stack test data.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type): **External Combustion Boilers; Industrial; Distiillate Oil; Grades 1 and 2 Oil**		
2. Source Classification Code (SCC): **1-02-005-01**	3. SCC Units: **1,000 Gallons Burned**	
4. Maximum Hourly Rate: **1.485**	5. Maximum Annual Rate: **1,301**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **0.05**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **136**
10. Segment Comment: **Based on 202 MMBtu/hr while firing No.2 fuel oil. Maximum Annual Rate based on annual capacity factor of 10 percent.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): **External Combustion Boilers; Industrial; Natural Gas; Over 100 MMBtu/hr**		
2. Source Classification Code (SCC): **1-02-006-01**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.207**	5. Maximum Annual Rate: **181.2**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,020**
10. Segment Comment: **Based on 211 MMBtu/hr while firing natural gas. Maximum Annual Rate based on annual capacity factor of 10 percent.**		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			NS
PM_{10}			NS
SO_2			EL
NO_x	205	026	EL
CO			EL
VOC			NS

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

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

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

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **12.12** lb/hour **5.31** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.06 lb/MMBtu** Reference: **Permit No. 0990005-009-AC**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **See Table 2-1 for calculations.**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **Maximum emissions based on firing maximum No. 2 fuel oil. Limit applies to both fuel oil and natural gas. Limited annual capacity factor to 10 percent, which is equivalent to a fuel oil usage of 1,301,117 gallons per year.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.05 percent S**	4. Equivalent Allowable Emissions: **12.12** lb/hour **5.31** tons/year
5. Method of Compliance: **Fuel Analysis**	
6. Allowable Emissions Comment (Description of Operating Method): **Limit is maximum sulfur content of No. 2 fuel oil and a 10 percent annual capacity factor.**	

Allowable Emissions Allowable Emissions _____ of _____

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

Allowable Emissions Allowable Emissions _____ of _____

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

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

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

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

1. Pollutant Emitted: **NOx**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **42.2** lb/hour **18.48** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.20 lb/MMBtu** Reference: **Permit No. 0990005-009-AC**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **See Table 2-1 for calculations.**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **Maximum emissions based on natural gas firing. Emission factor applies to both fuel oil firing and natural gas. Annual emissions based on 10 percent annual capacity factor.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.20 lb/MMBtu**	4. Equivalent Allowable Emissions: **42.2** lb/hour **18.48** tons/year
5. Method of Compliance: **Annual testing using EPA Method 7, 7A, or 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on Permit No. 0990005-009-AC. Limit applies to both fuel oil and natural gas. Annual limit is based on 10 percent annual capacity factor.**	

Allowable Emissions Allowable Emissions _____ of _____

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

Allowable Emissions Allowable Emissions ____ of ____

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

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

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

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

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **23.21** lb/hour **10.17** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.11 lb/MMBtu** Reference: **Permit No. 0990005-009-AC**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **See Table 2-1 for calculations.**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **Maximum emissions based on natural gas firing. Emission factor applies to both fuel oil firing and natural gas. Annual emissions based on annual capacity factor of 10 percent.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

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

Allowable Emissions Allowable Emissions _____ of _____

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

Allowable Emissions Allowable Emissions _____ of _____

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

Allowable Emissions Allowable Emissions _____ of _____

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

G. VISIBLE EMISSIONS INFORMATION

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: **27** % Maximum Period of Excess Opacity Allowed: **6** min/hour	
4. Method of Compliance: **EPA Method 9 and Alternative Monitoring Plan for Opactiy (see Attachment OC-EU1-G1)**	
5. Visible Emissions Comment: **40 CFR 60.43b(f). During startup, shutdown, or malfunction, opacity shall not exceed 20 percent, except for one 6-minute period per hour that does not exceed 27 percent.**	

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

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

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor **1** of **3**

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

Continuous Monitoring System: Continuous Monitor **2** of **3**

1. Parameter Code: **Steam Production**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: **Honeywell** Model Number: **DR4500 Truline**	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **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. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor **3** of **3**

1. Parameter Code: **TEMP**	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☒ Other	
4. Monitor Information... Manufacturer: **Honeywell** Model Number: **DR4500 Truline** Serial Number:	
5. Installation Date: **01 OCT 1995**	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Existing permit condition requires monitoring of the steam temperature. No serial number provided because meter is routinely replaced to ensure optimum performance.**	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

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

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **OC-EU1-I2** ☐ Previously Submitted, Date _____

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

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **OC-EU1-I4** ☐ Previously Submitted, Date _____
   ☐ Not Applicable (construction application)

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

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

7. Other Information Required by Rule or Statute
   ☒ Attached, Document ID: **Part B** ☐ Not Applicable

EMISSIONS UNIT INFORMATION
Section [1]
Mill Boiler No. 16

Additional Requirements for Air Construction Permit Applications

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

Additional Requirements for Title V Air Operation Permit Applications

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

Additional Requirements Comment

ATTACHMENT OC-EU1-G1

BOILER NO. 16

ALTERNATE SAMPLING PROCEDURE FOR OPACITY MONITORING

ATTACHMENT OC-EU1-G1

BOILER NO. 16

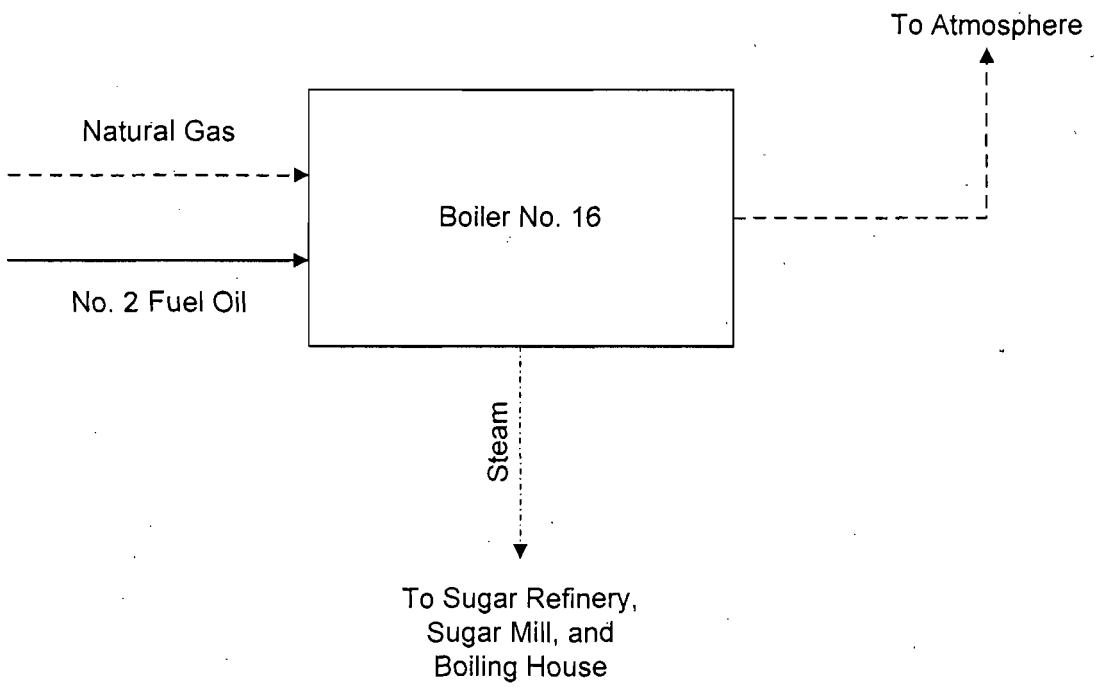
ALTERNATE SAMPLING PROCEDURE FOR OPACITY MONITORING

In accordance with 40 CFR 60, Subpart A, the following procedures are specified in lieu of the requirement for the continuous opacity monitoring requirement under 40 CFR 60.48b(a) for fuel oil firing.

1. Visible Emissions: In lieu of continuous opacity monitoring, the permittee may use the following procedure in order to determine the opacity of emissions when Boiler No. 16 burns distillate fuel oil.
   a. An individual who is trained in the use of EPA Reference Method 9 and is currently certified as a visible emissions observer by the State of Florida shall perform a twelve-minute opacity test once per daylight shift during the period that the highest oil firing rate occurs;
   b. An individual who is trained in the use of EPA Reference Method 9 and is currently certified as a visible emissions observer by the State of Florida shall perform a twelve-minute opacity test when the boiler achieves the normal operational load after a cold boiler startup with distillate fuel oil;
   c. Required observations shall be made in accordance with the provisions of EPA Reference Method 9;
   d. The observer shall maintain a log, which includes all of the information required by EPA Reference Method 9 for each set of observations and the quantity of distillate oil being burned at the time of the observations;
   e. A copy of the observation log shall be submitted to the South District Office of the Department once per calendar quarter if distillate oil was fired during that quarter. Information regarding fuel usage and fuel analysis shall also be submitted to the South District Office on a quarterly basis to verify that the 10 percent annual capacity factor limit is not exceeded;
   f. The permittee shall follow the boiler manufacturer's maintenance schedule and procedure to assure that serviceable components are well maintained, and;
   g. Permittee shall install and operate a continuous opacity monitor if either the annual capacity factor limit of 10 percent for combustion of distillate fuel oil is exceeded, or the applicable visible emission limiting standard in 40 CFR 60.43b(f) is not regularly complied with when Boiler No. 16 is operated on distillate oil.

ATTACHMENT OC-EU1-I1

PROCESS FLOW DIAGRAM



Attachment OC-EU1-I1
Boiler No. 16 - Process Flow Diagram

Okeelanta Corporation - South Bay, FL

Process Flow Legend
Solid/Liquid
Gas
Steam

Golder Associates

ATTACHMENT OC-EU1-I2

DESIGN FUEL SPECIFICATIONS

ATTACHMENT OC-EU1-I2

DESIGN FUEL SPECIFICATIONS FOR BOILER NO. 16[a]

Parameter		No. 2 Fuel Oil	Natural Gas
Specific Gravity		0.865	–
Heating Value	(Btu/lb)	19,175	–
Heating Value	(Btu/gal)	136,000	–
Heating Value	(Btu/scf)	–	1,020
Ultimate Analysis (dry basis percentage):			
Carbon		87.01	82.96
Hydrogen		12.47	5.41
Nitrogen		0.02	1.58
Oxygen		–	5.72
Sulfur		0.05	0.67
Ash/Inorganic		–	3.66
Moisture		–	4.5

[a] Represents average fuel characteristics.

Sources: Okeelanta Corp., 2002.
Combustion Engineering, 1981.

ATTACHMENT OC-EU1-I4

BOILER NO. 16
PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT OC-EU1-I4

PROCEDURES FOR STARTUP AND SHUTDOWN
BOILER NO. 16

During startup and shutdown of the boiler, excess emissions for more than 2 hours in a 24-hour period are possible. Pursuant to Rule 62-210.700(1), F.A.C., the following procedures and precautions are taken to minimize the magnitude and duration of excess emissions during startup and shutdown of Boiler No. 16.

Startup Procedures

1. Check to ensure all the boiler doors/registers are closed.
2. Propane supply to the gun is opened and compressed air is admitted to atomizing system.
3. The start switch is turned on to activate the startup sequence. Once oil firing is established, minimum fire (10%) is maintained for 30 minutes on and 30 minutes off for approximately 2 hours.
4. Continuous firing is established and steam pressure increased to about 150 psig. Firing continues on low fire until operating pressure (350 psig) is available on the line (about 5 hours after initial firing). Atomization is changed to steam.
5. Once consistent steam flow to user(s), e.g., turboalternator, is established, boiler controls are placed in automatic.

Shutdown Procedures

1. Control is turned off and the fuel pump is shut off.
2. The atomizing steam valve is closed. The FD fan is shut off.
3. After about 3 hours, the drum level is set at maximum level.

PART B

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LIST OF ACRONYMS AND ABBREVIATIONS

AAQS	Ambient Air Quality Standards
BACT	Best Available Control Technology
Be	Beryllium
Btu/gal	British thermal units per gallon
Btu/hr-ft^3	British thermal units per hour per cubic feet
Btu/scf	British thermal units per standard cubic feet
CAA	Clean Air Act
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
CO	carbon monoxide
COMS	continuous opacity monitoring system
EPA	U.S. Environmental Protection Agency
ENP	Everglades National Park
F.A.C.	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
ft	feet
gal/hr	gallons per hour
gal/yr	gallons per year
GEP	Good Engineering Practice
Hg	mercury
hr/yr	hours per year
km	kilometers
lb/hr	pounds per hour
lb/MMBtu	pounds per million British thermal units
m	meters
MMBtu/hr	million British thermal units per hour
MMBtu/yr	million British thermal units per year
MMscf/hr	million standard cubic feet per hour
MMscf/yr	million standard cubic feet per year
NO_2	nitrogen dioxide
NO_x	nitrogen oxides

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LIST OF ACRONYMS AND ABBREVIATIONS (cont'd)

NSPS	New Source Performance Standards
Pb	lead
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter equal to or less than 10 micrometers
PSD	prevention of significant deterioration
RATA	relative accuracy test audit
SAM	sulfuric acid mist
SIP	State Implementation Plan
SO_2	sulfur dioxide
TPY	tons per year
$\mu g/m^3$	micrograms per cubic meter
VE	visible emissions
VOC	volatile organic compounds

1.0 INTRODUCTION

Okeelanta Corporation (Okeelanta) is proposing to revise the annual capacity factor limit of its existing Boiler No. 16, located at the Okeelanta sugar mill south of South Bay, Palm Beach County, Florida. The proposed revision consists of limiting Boiler No. 16 to a 10 percent annual capacity factor, which restricts No. 2 fuel oil usage to 1,301,118 gallons per year (gal/yr) and natural gas usage to 181.2 million standard cubic feet per year (MMscf/yr). The boiler will retain no limits on its annual operating hours [8,760 hours per year (hr/yr)].

Boiler No. 16 is a package boiler with a maximum steam production rate of 150,000 pounds per hour (lb/hr) (24-hour average). It is currently subject to the provisions of the new source performance standards (NSPS), Subpart Db, contained in Title 40 of the Code of Federal Regulations (CFR), Part 60. Under its current permit conditions, the boiler may fire natural gas at up to 211 million British thermal units per hour (MMBtu/hr) for 8,760 hr/yr, or No. 2 fuel oil at up to 202 MMBtu/hr, with an annual restriction on fuel oil firing of 10,000,000 gal/yr. This operation level subjects the boiler to a nitrogen oxide (NO_x) emission standard and an opacity standard under Subpart Db.

Since the boiler is subject to NO_x and opacity limits, Subpart Db requires a continuous emissions monitoring system (CEMS) for NO_x and a continuous opacity monitoring system (COMS) for opacity. Quality assurance requirements for the NO_x CEMS include daily zero and span gas calibrations, and an annual relative accuracy test audit (RATA). Quality assurance requirements for the COMS include daily zero and span calibrations. Quarterly excess emissions and monitor downtime reports for the monitors must be submitted to the Florida Department of Environmental Protection (FDEP). Okeelanta has encountered problems with the NO_x CEMS 7-day drift test as reported in the Quarterly Reports and Annual Statement of Compliance.

During the calendar year 2003, Boiler No. 16 operated only 1,244 hours. During 2004, Boiler No. 16 operated only 20 hours for the sole purpose of performing a RATA for the NO_x CEMS. Boiler No. 16 has not operated during 2005 to date. Therefore, Okeelanta is proposing to limit the annual capacity factor of the boiler in order to exempt Boiler No. 16 from the CEMS requirement for NO_x. By limiting the annual capacity factor to 10 percent, which is equivalent to a maximum heat input of 184,836 million British thermal units per year (MMBtu/yr), the boiler will no longer be subject to a NO_x emissions limit under Subpart Db, and a NO_x CEMS is not required. Okeelanta's Title V permit

(Permit No. 0990005-012-AV), which is currently in the process of being renewed, does not include an annual capacity factor restriction.

Even with the annual capacity factor limitation, Boiler No. 16 is still subject to the opacity limitation, and due to fuel oil firing, the requirement for a COMS under Subpart Db. However, since the most recent construction permit was issued on October 30, 2001 (Permit No. 0990005-009-AC), Boiler No. 16 has not fired any fuel oil. Subpart A, General Provisions of Part 60, provides for alternative monitoring procedures to be requested when the affected facility is infrequently operated [40 CFR 60.13(i)(2)]. The Environmental Protection Agency (EPA) has approved a number of alternative opacity monitoring plans for Subpart Db boilers. These plans require a 12-minute visible observation by a certified visible emissions (VE) reader once per daylight shift during the period that the highest oil-firing rate occurs, and each time the boiler is started from a cold startup and once it achieves normal operational load on fuel oil. Logs must be kept of these operations. This alternative sampling procedure for opacity in lieu of the COMS is proposed for Boiler No. 16 while firing fuel oil.

Through this application, Okeelanta requests that the FDEP limit Boiler No. 16 operation to a 10 percent annual capacity factor, retain the ability to burn both natural gas and fuel oil, drop the requirements for the NO_x CEMS and COMS, and include the alternative sampling procedures described above for opacity when firing fuel oil.

2.0 PROJECT DESCRIPTION

2.1 OVERVIEW

Okeelanta is proposing to revise the operating limits on Boiler No. 16, which currently operates at the Okeelanta sugar mill south of South Bay, Palm Beach County, Florida under Title V Permit No. 0990005-012-AV. Under the current Title V permit, Boiler No. 16 is restricted to 10,000,000 gal/yr of fuel oil and is subject to NSPS, 40 CFR 60, Subpart Db. Subpart Db imposes an emission limit for NO_x and an opacity limit, and requires a CEMS for NO_x and a COMS for opacity. By proposing to limit the annual capacity factor of the boiler to 10 percent, the necessary criteria is met for exemption from the NO_x emission limit and a NO_x CEMS. In addition, an alternate monitoring procedure for opacity for fuel oil firing is proposed based on previous plans approved by EPA.

Boiler No. 16 is an existing package boiler that was originally constructed to provide steam to the Okeelanta sugar refining operations during the off-season. In 1991, a Prevention of Significant Deterioration (PSD) permit (Permit No. PSD-FL-169) was issued, and in 2001, this permit was modified to allow the boiler to fire natural gas and very low sulfur distillate oil (Permit No. PSD-FL-169A/0990005-009-AV). The operation of Boiler No. 16 is unrestricted (8,760 hr/yr).

The proposed revision now requested will restrict the annual capacity factor of the boiler to 10 percent. An annual capacity factor of 10 percent corresponds to an annual heat input of 176,952 MMBtu/yr for No. 2 fuel oil, which is equivalent to 1,301,118 gal/yr of No. 2 fuel oil, or 184,836 MMBtu/yr for natural gas, equivalent to 181.2 MMscf/yr of natural gas. The following sections describe the project in more detail.

2.2 BOILER

2.2.1 CAPACITY

Boiler No. 16 fires pipeline-quality natural gas or very low sulfur No. 2 fuel oil. The maximum heat input rate is 211 MMBtu/hr when firing natural gas, which is approximately 0.207 million standard cubic feet per hour (MMscf/hr) based on a heat content of 1,020 British thermal units per standard cubic feet (Btu/scf). The maximum heat input rate is 202 MMBtu/hr when firing No. 2 fuel oil, which is approximately 1,485 gal/hr based on a heat content of 136,000 British thermal units per gallon (Btu/gal). A 10 percent annual capacity factor is equivalent to 184,836 MMBtu/yr for natural gas firing, and 176,952 MMBtu/yr for No. 2 fuel oil firing based on unrestricted operating hours (8,760 hr/yr). By limiting the boiler to these maximum annual heat inputs, Boiler No. 16 will be restricted to firing 1,301,118 gal/yr of No. 2 fuel oil or 181.2 MMscf/yr of natural gas.

2.2.2 FUELS

Boiler No. 16 has a maximum steam production rate of 150,000 lb/hr and a design heat release rate greater than 70,000 British thermal units per hour per cubic feet (Btu/hr-ft^3). It is fueled with pipeline-quality natural gas or very low sulfur No. 2 fuel oil. The annual capacity for burning No. 2 fuel oil will be limited to 10 percent and the maximum sulfur content for the fuel oil is 0.05 percent.

2.3 AIR POLLUTION CONTROL EQUIPMENT

2.3.1 CONTROLS

The efficient combustion of clean fuels minimizes emissions of carbon monoxide (CO), particulate matter (PM), particulate matter less than 10 microns (PM_{10}), sulfur dioxide (SO_2), and volatile organic compounds (VOC). Emissions of NO_x from Boiler No. 16 are reduced with low NO_x burners, capable of firing pipeline-quality natural gas and very low sulfur No. 2 fuel oil, and flue gas recirculation (approximately 15 percent).

2.3.2 GOOD ENGINEERING PRACTICE

The 1977 Clean Air Act (CAA) Amendments require that the degree of emission limitation required for control of any pollutant not be affected by a stack height that exceeds Good Engineering Practice (GEP) or any other dispersion technique. On July 8, 1985, EPA promulgated final stack height regulations (EPA, 1985a). The FDEP has adopted identical regulations (Rule 62-210.550, F.A.C.). GEP stack height is defined as the highest of:

- 65 meters (m); or
- A height established by applying the formula:

  $$Hg = H + 1.5L$$

  where: Hg = GEP stack height

  H = Height of the structure of nearby structure, and

  L = lesser dimension (height or projected width) of nearby structure(s); or
- A height demonstrated by a fluid model or field study.

"Nearby" is defined as a distance up to five times the lesser of the height or width dimensions of a structure or terrain feature, but not greater than 0.8 kilometers (km). Although GEP stack height regulations require that the stack height used in modeling for determining compliance with Ambient Air Quality Standards (AAQS) and PSD increments not exceed the GEP stack height, the actual stack height may be greater.

The stack height regulations also allow increased GEP stack height beyond that resulting from the above formula in cases where plume impaction occurs. Plume impaction is defined as concentrations measured or predicted to occur when the plume interacts with elevated terrain. Elevated terrain is defined as terrain that exceeds the height calculated by the GEP stack height formula.

The stack for Boiler No. 16 is 75 feet (ft) tall and 5.0 ft in diameter. According to Rule 62-210.555, F.A.C., as defined above, the stack height is less than 65 meters (213.25 ft). Therefore, the boiler will comply with the GEP stack height rule.

2.4 MAXIMUM EMISSIONS

Emissions of CO, PM/PM_{10}, SO_2, and VOC are minimized by the efficient combustion of clean fuels by Boiler No. 16. In addition, emissions of NO_x are reduced with low NO_x burners and flue gas recirculation (approximately 15 percent). Emission-limited pollutants from the boiler include SO_2, NO_x, and CO, which are limited according to Permit No. 0990005-009-AC/PSD-FL-169A under a best available control technology (BACT) determination. By limiting the annual capacity factor to 10 percent, the maximum annual emissions are greatly reduced and PSD review is not triggered for the boiler modification.

The estimated annual emissions from Boiler No. 16 are presented in Table 2-1 for both natural gas and No. 2 fuel oil. By limiting the annual capacity factor for fuel oil firing to 10 percent, the maximum annual heat input to the boiler is limited to 184,836 MMBtu/yr. The maximum annual emissions predicted for either natural gas combustion only or No. 2 fuel oil combustion only include PM/PM_{10} emissions of 2.65 tons per year (TPY), SO_2 emissions of 5.31 TPY, NO_x emissions of 18.48 TPY, CO emissions of 10.17 TPY, VOC emissions of 2.77 TPY, and sulfuric acid mist (SAM) emissions of 0.23 TPY. Lead (Pb), mercury (Hg), and beryllium (Be) maximum annual emissions are all less than 8.0×10^{-4} TPY. For all pollutants except PM, PM_{10}, SO_2, Pb, Hg, and Be, the maximum annual emissions are based on emissions from firing natural gas. Because the emission limited pollutants are below PSD significance levels, and because the emission rates are based on the heat input of the boiler, the natural gas emission factors for NO_x and CO are set equal to the fuel oil emission factors to represent the worst-case fuel, i.e. the fuel oil factor.

The estimated hourly emissions from Boiler No. 16 are also presented in Table 2-1. The maximum heat input for firing natural gas is 211 MMBtu/hr and 202 MMBtu/hr for firing No. 2 fuel oil. The maximum hourly emissions predicted for either natural gas combustion only or No. 2 fuel oil combustion only include PM/PM_{10} emissions of 6.06 lb/hr, SO_2 emissions of 12.12 lb/hr, NO_x

emissions of 42.20 lb/hr, CO emissions of 23.21 lb/hr, VOC emissions of 6.33 lb/hr, and SAM emissions of 0.52 lb/hr. Pb, Hg, and Be maximum hourly emissions are all less than $2.0x10^{-3}$ lb/hr. For all pollutants except PM, PM_{10}, SO_2, Pb, Hg, and Be, the maximum hourly emissions are based on emissions from firing natural gas. Because the emission limited pollutants are below PSD significance levels, and because the emission rates are based on the heat input of the boiler, the natural gas emission factors for NO_x and CO are set equal to the fuel oil emission factors to represent the worst-case fuel, i.e. the fuel oil factor.

2.5 MONITORING REQUIREMENTS

Due to the limited annual capacity factor of 10 percent, Boiler No. 16 is no longer subject to a NO_x emission limit, and as a result, a NO_x CEMS is no longer required. However, even with the limited annual capacity factor, the boiler is still subject to the opacity limitations and the requirement for a COMS due to fuel oil firing. Since the most recent construction permit was issued on October 30, 2001, Boiler No. 16 has not fired any fuel oil.

Subpart A, General Provisions, of 40 CFR Part 60 provides for alternative monitoring procedures to be requested in lieu of the COMS. Over the years, EPA has approved a number of alternative opacity monitoring plans for Subpart Db boilers. These plans are the basis for the proposed alternate monitoring procedure for Okeelanta Boiler No. 16. This plan is detailed in Attachment OC-EU1-G1 of the permit application and includes a 12-minute visible observation by a certified VE reader once per daylight shift during the period that the highest oil-firing rate occurs, and each time the boiler is started from a cold startup and once it achieves normal operational load on fuel oil. Logs, which include all of the information required by EPA Method 9, shall be maintained by the VE certified individual.

Table 2-1. Maximum Emissions from Boiler No. 16, Okeelanta Corporation

Regulated Pollutant	Natural Gas Combustion							No. 2 Fuel Oil Combustion							Maximum Hourly Emissions Due to Either Fuel[c] (lb/hr)	Maximum Annual Emissions Due to Either Fuel[c] (TPY)
	Emission Factor ($lb/10^6$ scf)	Emission Factor (lb/MMBtu)	Ref.	Activity Factor[a] (MMBtu/hr)	Activity Factor[b] (MMBtu/yr)	Hourly Emissions (lb/hr)	Annual Emissions (TPY)	Emission Factor (lb/1000 gal)	Emission Factor (lb/MMBtu)	Ref.	Activity Factor[a] (MMBtu/hr)	Activity Factor[b] (MMBtu/yr)	Hourly Emissions (lb/hr)	Annual Emissions (TPY)		
Particulate Matter (PM)	1.9	1.86E-03	1	211	184,836	0.39	0.17	--	0.03	4	202	176,952	6.06	2.65	6.06	2.65
Particulate Matter (PM_{10})	1.9	1.86E-03	1	211	184,836	0.39	0.17	--	0.03	4	202	176,952	6.06	2.65	6.06	2.65
Sulfur dioxide (SO_2)	--	1.00E-03	4	211	184,836	0.21	0.09	7.85	0.06	4	202	176,952	12.12	5.31	12.12	5.31
Nitrogen oxides (NO_x)	--	0.20	7	211	184,836	42.20	18.48	--	0.20	4	202	176,952	40.40	17.70	42.20	18.48
Carbon monoxide (CO)	--	0.11	7	211	184,836	23.21	10.17	--	0.11	4	202	176,952	22.22	9.73	23.21	10.17
Volatile Organic Compounds (VOC)	--	0.03	2	211	184,836	6.33	2.77	--	0.03	2	202	176,952	6.06	2.65	6.33	2.77
Sulfuric acid mist (SAM)	--	6.13E-05	3	211	184,836	1.29E-02	5.66E-03	--	2.57E-03	6	202	176,952	0.52	0.23	0.52	0.23
Lead (Pb)	5.E-04	4.90E-07	1	211	184,836	1.03E-04	4.53E-05	--	9.00E-06	5	202	176,952	1.82E-03	7.96E-04	1.82E-03	7.96E-04
Mercury (Hg)	2.6E-04	2.55E-07	1	211	184,836	5.38E-05	2.36E-05	--	3.00E-06	5	202	176,952	6.06E-04	2.65E-04	6.06E-04	2.65E-04
Beryllium (Be)	1.2E-05	1.18E-08	1	211	184,836	2.49E-06	1.09E-06	--	3.00E-06	5	202	176,952	6.06E-04	2.65E-04	6.06E-04	2.65E-04
Fluorides (Fl)	--	--		--		--	--	--	--		--		--	--	--	--

References:

1. Factors for natural gas combustion from AP-42, Tables 1.4-1, 1.4-2 and 1.4-4 (7/98). Factors were converted to lb/MMBtu by dividing by 1,020 Btu/scf.
2. Based on emission guarantees from vendor.
3. Based on similar derivation of sulfuric acid mist from AP-42 for fuel oil. 5% of SO_2 becomes SO_3 then take into account the ratio of sulfuric acid mist and gaseous sulfate molecular weights (98/80).
4. Based on Permit No. 0990005-009-AC.
5. Factors for No. 2 fuel oil combustion, AP-42 Table 1.3-1, 1.3-3, and 1.3-10 (9/98). A heating value of 136,000 Btu/gal and a maximum sulfur content of 0.05% were used for the No. 2 fuel oil.
6. The emission factor for SO_3 emissions from a No. 2 fuel fired boiler with low NOx burners (5.7S $lb/10^3$ gal where S is the sulfur content) was multiplied by the ratio of sulfuric acid mist and gaseous sulfate molecular weights (98/80).
7. Natural gas emission factor based on worst-case fuel, i.e. fuel oil factor.

Footnotes:

[a] The maximum permitted heat input rate is 211 MMBtu/hr for natural gas and 202 MMBtu/hr for fuel oil.

[b] Based on 10% annual capacity factor: fuel oil usage of 1,301,118 gal/yr or 176,952 MMBtu/yr and natural gas usage of 181.2 MMscf/yr or 184,836 MMBtu/yr.

[c] Maximum emissions predicted for either natural gas combustion only or No. 2 fuel oil combustion only.

Sample Calculations:

Hourly Emissions = Emission Factor (lb/MMBtu) x Activity Factor (MMBtu/yr)

Annual Emissions = Activity Factor (MMBtu/yr) x Emission Factor (lb/MMBtu) / 2,000 (lb/ton)

Table 2-2.
Summary of Stack Parameters for Boiler No. 16

	Steam Production Rate (lb/hr)	Stack Height (ft)	Stack Diameter (ft)	Gas Parameters		
				Flow Rate (acfm)	Velocity (ft/s)	Temperature (°F)
Boiler No. 16	150,000	75	5	118,600	100.7	393

Notes:
acfm = actual cubic feet per minute
°F = degrees Fahrenheit
ft = feet
ft/s = feet per second
lb/hr = pound per hour

3.0 AIR QUALITY REVIEW REQUIREMENTS

The following discussion pertains to federal and state new source review requirements and their applicability to Okeelanta's proposed revision to Boiler No. 16.

3.1 NATIONAL AND STATE AMBIENT AIR QUALITY STANDARDS (AAQS)

The existing applicable national and Florida Ambient Air Quality Standards (AAQS) are presented in Table 3-1. Primary national AAQS were promulgated to protect the public health, and secondary national AAQS were promulgated to protect the public welfare from any known or anticipated adverse effects associated with the presence of pollutants in the ambient air. Areas of the country in violation of AAQS are designated as nonattainment areas, and new sources to be located in or near these areas may be subject to more stringent air permitting requirements.

Florida has adopted State AAQS in Rule 62-204.240, F.A.C. These standards are the same as the national AAQS, except in the case of SO_2. For SO_2, Florida has adopted the former 24-hour secondary standard of 260 micrograms per cubic meter ($\mu g/m^3$) and former annual average secondary standard of 60 $\mu g/m^3$.

3.2 PSD REQUIREMENTS

3.2.1 GENERAL REQUIREMENTS

Under federal and State of Florida PSD review requirements, all major new or modified sources of air pollutants regulated under the CAA must be reviewed and a pre-construction permit issued. Florida's State Implementation Plan (SIP), which contains PSD regulations, has been approved by the EPA. Therefore, PSD approval authority has been granted to FDEP.

According to PSD regulations, a "major facility" is defined as any one of the 28 named source categories that have the potential to emit 100 TPY or more, or any other stationary facility that has the potential to emit 250 TPY or more of any pollutant regulated under the CAA. An "emission unit" is defined as any part of activity of a facility that has the potential to emit any air pollutant. "Potential to emit" means the capability, at a maximum design capacity, to emit a pollutant, considering the application of control equipment and any other federally enforceable limitations on the emission units' capacity. A "major modification" is defined under PSD regulations as a change at an existing major stationary facility that increases emissions by greater than significant amounts. PSD significant emission rates are presented in Table 3-2.

Three classifications of areas in which a new source (or modification) will be located or have an impact are designated based on criteria established in the 1990 CAA Amendments. Congress promulgated areas as Class I (international parks, national wilderness areas, and memorial parks larger than 5,000 acres and national parks larger than 6,000 acres) or as Class II (all areas not designated as Class I). No Class III areas, which would be allowed greater deterioration than Class II areas, were designated. The State of Florida has adopted the EPA class designations and allowable PSD increments for SO_2, PM_{10}, and NO_2.

PSD review is used to determine whether significant air quality deterioration will result from the new or modified facility. Federal PSD requirements are contained in 40 CFR 52.21 (Prevention of Significant Deterioration of Air Quality). The State of Florida has adopted PSD regulations that are equivalent to the federal PSD regulations (Rule 62-212.400, F.A.C.).

3.2.2 CONTROL TECHNOLOGY REVIEW

The control technology review requirements of the federal and state PSD regulations require that all applicable federal and state emission-limiting standards be met, and that the best available control technology (BACT) be applied to control emissions from the source. The BACT requirements are applicable to all regulated pollutants for which the increase in emissions from the facility exceeds the significant emission rate (see Table 3-2).

BACT was promulgated within the framework of the PSD requirements in the 1977 amendments of the CAA [Public Law 95-95; Part C, Section 165(a)(4)]. The BACT requirements are intended to ensure that the control systems incorporated in the design of a proposed facility reflect the latest in control technologies used in a particular industry and take into consideration existing and future air quality in the vicinity of the proposed facility. BACT must, as a minimum, demonstrate compliance with NSPS for a source (if applicable). An evaluation of the air pollution control techniques and systems, including a cost-benefit analysis of alternative control technologies capable of achieving a higher degree of emission reduction than the proposed control technology, is required.

3.3 POTENTIALLY APPLICABLE EMISSION STANDARDS

3.3.1 NEW SOURCE PERFORMANCE STANDARDS

NSPS are a set of national emission standards that apply to specific categories of new sources. As stated in the CAA Amendments of 1977, these standards "shall reflect the degree of emission limitation and the percentage reduction achievable through application of the best technological

system of continuous emission reduction the Administrator determines has been adequately demonstrated."

Existing non-NSPS sources may become subject to the NSPS if such sources undergo a "modification" or reconstruction". "Modification" means any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

"Reconstruction" means the replacement of components of an affected facility to such an extent that:

1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility; and
2) It is technologically and economically feasible to meet the applicable standards set forth in this part.

40 CFR 60.5 defines "fixed capital cost" as the capital needed to provide all the depreciable components. 40 CFR 60.2 defines "capital expenditure" as:

> an expenditure for a physical or operational change to an existing facility which exceeds the project of the applicable "annual asset guideline repair percentage" specified in the latest edition of IRS Publication 534 and the existing facility's basis, as defined by Section 1012 of the IRS Code. However, the total expenditure for a physical or operational change to an existing facility must not be reduced by any "excluded additions" as defined in IRS Publication 534, as would be done for tax purposes.

Federal NSPS exist for fossil fuel industrial-commercial-institutional steam boilers constructed or modified after June 19, 1984 and with a maximum heat input capacity of greater than 100 MMBtu/hr. Boiler No. 16 is subject to NSPS, which are contained in 40 CFR 60, Subpart Db.

3.3.2 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

Maximum Achievable Control Technology (MACT) standards, codified in 40 CFR 63, Subpart DDDDD, were promulgated for industrial boilers on September 13, 2004, with an effective date of November 12, 2004. Subpart DDDDD, also known as the Industrial, Commercial, and Institutional Boiler and Process Heater MACT, regulates HAP metals (with PM as a surrogate), hydrogen chloride, and mercury emissions for new or reconstructed large and limited-use liquid fuel-fired industrial boilers. The compliance date for existing boilers is September 13, 2007.

Existing MACT sources may become subject to new source MACT if such sources are "reconstructed". In the General Provisions for the MACT Rules, 40 CFR 63, Subpart A, "reconstruction" is defined as follows:

> Reconstruction, unless otherwise defined in a relevant standard, means the replacement of components of an affected or previously non-affected source to such an extent that:
>
> 1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and
>
> 2) It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator pursuant to Section 112 of the Act. Upon reconstruction, an affected source, or a stationary source that becomes an affected source, is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.

Since Okeelanta Boiler No. 16 is not a new or "reconstructed" boiler, but will become an existing limited-use liquid fuel boiler with the restrictions being proposed in this application, it will only be subject to the initial notification requirements in 40 CFR 63.9(b) and not subject to any emission limits [40 CFR 63.7506(b)].

3.3.3 FLORIDA RULES

Emission limitations applicable to fossil fuel generators with less than 250 MMBtu/hr of heat input are contained in Rule 62-296.406, F.A.C. This rule requires that "existing" fossil fuel steam generators meet a visible emissions limit of 20 percent opacity, except for either one six-minute period per hour during which opacity does not exceed 27 percent, or one two-minute period per hour during which opacity does not exceed 40 percent. PM and SO_2 emissions are subject to BACT.

3.4 SOURCE APPLICABILITY

3.4.1 AREA CLASSIFICATION

The project site is located in Palm Beach County, which has been designated by EPA and FDEP as an attainment or maintenance area for all criteria pollutants. Palm Beach County and the surrounding counties are designated as PSD Class II areas for SO_2, PM_{10}, and NO_2. The nearest Class I area to the site is the Everglades National Park (ENP), located about 92 km (57 miles) south of the Okeelanta facility.

3.4.2 PSD REVIEW

3.4.2.1 Pollutant Applicability

The existing Okeelanta facility is considered to be a major facility under the category "Fossil fuel fired boilers (or combinations thereof) totaling more than 250 MMBtu/hr of heat input" as listed in Table 212.400-1, F.A.C. Therefore, PSD review is required for any pollutant for which the increase in emissions due to the modification is greater than the PSD significant emission rates. For the proposed Boiler No. 16 modification, which includes an annual capacity factor limit of 10 percent, there is no increase in any pollutant emissions due to the modification, and therefore, no PSD review is required.

3.4.3 EMISSION STANDARDS

3.4.3.1 New Source Performance Standards

Based on a maximum heat input of greater than 100 MMBtu/hr, Boiler No. 16 is subject to the federal NSPS for Industrial, Commercial, Institutional Steam Generating Units (40 CFR 60, Subpart Db). Subpart Db regulates PM, SO_2 and NO_x emissions. However, due to the fuels Boiler No. 16 will fire, and the 10 percent annual capacity factor limitation, only an opacity standard will apply to Boiler No. 16. Subpart Db requires a COMS for opacity. Quality assurance requirements for the COMS include daily zero and span calibrations. Quarterly excess emissions and monitor downtime reports for the monitors must be submitted to the FDEP.

Subpart A, General Provisions, of Part 60, provides for alternative monitoring procedures to be requested when the affected facility is infrequently operated [40 CFR 60.13(i)(2)]. The EPA has approved a number of alternative opacity monitoring plans for Subpart Db boilers. These plans require a 12-minute visible observation by a certified VE reader once per daylight shift during the period that the highest oil-firing rate occurs, and each time the boiler is started from a cold startup and once it achieves normal operational load on fuel oil. Logs must be kept of these operations. This alternative sampling procedure for opacity in lieu of the COMS is proposed for Boiler No. 16.

3.4.3.2 NESHAPs for Source Categories

Okeelanta Boiler No. 16 is only subject to the initial notification requirements in 40 CFR 63, Subpart DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters.

3.4.3.3 State of Florida Standards

Okeelanta Boiler No. 16 is subject to Rule 62-296.406 (BACT), F.A.C. Rule 62-296.406 (BACT) regulates existing fossil fuel steam generators with less than 250 MMBtu/hr and contains standards for PM and SO_2. The standard applicable to Boiler No. 16 requires that BACT must be used to limit emissions. When firing natural gas, the expected maximum SO_2 emissions are 0.001 lb/MMBtu, and when firing very low sulfur No. 2 oil, the expected maximum SO_2 emissions are 0.06 lb/MMBtu. When firing natural gas, the expected maximum PM emissions are 0.0019 lb/MMBtu, and when firing very low sulfur No. 2 oil, the expected maximum PM emissions are 0.03 lb/MMBtu. These low emission rates represent BACT for Boiler No. 16.

Table 3-1. National and State AAQS, Allowable PSD Increments, and Significant Impact Levels ($\mu g/m^3$)

		AAQS			PSD Increments		Significant Impact Levels[d]	
Pollutant	Averaging Time	National Primary Standard	National Secondary Standard	State of Florida	Class I	Class II	Class I (proposed)	Class II
Particulate Matter[a]	Annual Arithmetic Mean	50	50	50	4	17	0.2	1
(PM_{10})	24-Hour Maximum[b]	150[b]	150[b]	150[b]	8	30	0.3	5
Sulfur Dioxide	Annual Arithmetic Mean	80	NA	60	2	20	0.1	1
	24-Hour Maximum[e]	365[b]	NA	260[b]	5	91	0.2	5
	3-Hour Maximum[b]	NA	1,300[b]	1,300[b]	25	512	1	25
Carbon Monoxide	8-Hour Maximum[b]	10,000[b]	10,000[b]	10,000[b]	N/A	N/A	N/A	500
	1-Hour Maximum[b]	40,000[b]	40,000[b]	40,000[b]	N/A	N/A	N/A	2,000
Nitrogen Dioxide	Annual Arithmetic Mean	100	100	100	2.5	25	0.1	1
Ozone[a]	1-Hour Maximum	235[c]	235[c]	235[c]	N/A	N/A	N/A	N/A
	1-Hour Maximum	235	235	NA	N/A	N/A	N/A	N/A
Lead	Calendar Quarter Arithmetic Mean	1.5	1.5	1.5	N/A	N/A	N/A	N/A

Note: NA = Not applicable, *i.e.*, no standard exists.

PM_{10} = particulate matter with aerodynamic diameter less than or equal to 10 micrometers.

[a] On July 18, 1997, EPA promulgated revised AAQS for particulate matter and ozone. For particulate matter, $PM_{2.5}$ standards were introduced with a 24-hour standard of 65 $\mu g/m^3$ (3-year average of 98th percentile) and an annual standard of 15 $\mu g/m^3$ (3-year average at community monitors). The ozone standard was modified to be 0.08 ppm (157 $\mu g/m^3$) for 8-hour average; achieved when 3-year average of 99th percentile is 0.08 ppm or less. FDEP has not yet adopted either of these standards.

[b] Short-term maximum concentrations are not to be exceeded more than once per year except for the PM_{10} AAQS (these do not apply to significant impact levels). The PM_{10} 24-hour AAQS is attained when the expected number of days per year with a 24-hour concentration above 150 $\mu g/m^3$ is equal to or less than 1. For modeling purposes, compliance is based on the sixth-highest 24-hour average value over a 5-year period.

[c] Achieved when the expected number of days per year with concentrations above the standard is fewer than 1.

[d] Maximum concentrations.

Sources: Federal Register, Vol. 43, No. 118, June 19, 1978; 40 CFR 50; 40 CFR 52.21; Rule 62-204, F.A.C.

Table 3-2. PSD Significant Emission Rates and *De Minimis* Monitoring Concentrations

Pollutant	Significant Emission Rate (TPY)	De Minimis Monitoring Concentration[a] ($\mu g/m^3$)
Sulfur Dioxide	40	13, 24-hour
Particulate Matter [PM(TSP)]	25	NA
Particulate Matter (PM_{10})	15	10, 24-hour
Nitrogen Dioxide	40	14, annual
Carbon Monoxide	100	575, 8-hour
Volatile Organic Compounds (Ozone)	40	100 TPY[b]
Lead	0.6	0.1, 3-month
Sulfuric Acid Mist	7	NM
Total Fluorides	3	0.25, 24-hour
Total Reduced Sulfur	10	10, 1-hour
Reduced Sulfur Compounds	10	10, 1-hour
Hydrogen Sulfide	10	0.2, 1-hour
Mercury	0.1	0.25, 24-hour
MWC Organics	$3.5x10^{-6}$	NM
MWC Metals	15	NM
MWC Acid Gases	40	NM
MSW Landfill Gases	50	NM

Note: Ambient monitoring requirements for any pollutant may be exempted if the impact of the increase in emissions is below *de minimis* monitoring concentrations.

NA = Not applicable.
NM = No ambient measurement method established; therefore, no *de minimis* concentration has been established.
$\mu g/m^3$ = micrograms per cubic meter.
MWC = Municipal waste combustor
MSW = Municipal solid waste

[a] Short-term concentrations are not to be exceeded.
[b] No *de minimis* concentration; an increase in VOC emissions of 100 TPY or more will require monitoring analysis for ozone.

Sources: 40 CFR 52.21.
Rule 62-212.400, F.A.C.

4.0 REFERENCES

U.S. Environmental Protection Agency (EPA). 1985a. Guideline for Determination of Good Engineering Practice Stack Height (Technical Support Document for the Stack Height Regulations) (Revised). Research Triangle Park, NC. EPA-450/4-80-023.

ATTACHMENT A

ATTACHMENT A

EU ID 014 : Mill Boiler No. 16 Rule Applicability for Okeelanta Corporation

APPLIC STAT	RULE DESCRIP	RULE NUMBER	RULE TITLE	RATIONALE FOR NON-APPLICABILITY
APPLICABLE	60 Subpart A	40CFR60.1	Subpart A -- General Provisions	
APPLICABLE	60 Subpart A	40CFR60.7	Notification and Record Keeping	
APPLICABLE	60Subpart A	40CFR60.8	Performance Testing	
APPLICABLE	60 Subpart A	40CFR60.11	Compliance with standards and maintenance requirements.	
APPLICABLE	60 Subpart A	40CFR60.12	Circumvention.	
APPLICABLE	60 Subpart A	40CFR60.13	Monitoring requirements.	
APPLICABLE	60 Subpart A	40CFR60.13(a)	Monitoring requirements.	
APPLICABLE	60 Subpart A	40CFR60.13(b)	Monitoring requirements.	
NON-APPLICABLE	60 Subpart A	40CFR60.13(c)	Monitoring requirements.	Alternate monitoring procedure instead of COMs for opacity.
APPLICABLE	60 Subpart A	40CFR60.13(i)	Monitoring requirements.	
APPLICABLE	60 Subpart A	40CFR60.19	General notification and reporting requirements	
NON-APPLICABLE	60 Subpart Da	40CFR60.40a	Subpart Da - NSPS for Electric Utility Units for which construction commenced after Sept. 18, 1978.	Boiler No. 16 is not an electric utility unit.
APPLICABLE	60 Subpart Db	40CFR60.40b	Subpart Db - Applicability and delegation of authority	
APPLICABLE	60 Subpart Db	40CFR60.42b	Standard for sulfur dioxide.	
APPLICABLE	60 Subpart Db	40CFR60.42b(a)		
NON-APPLICABLE	60 Subpart Db	40CFR60.42b(c)		Boiler No. 16 does not combust coal and oil as part of a combined cycle system.
NON-APPLICABLE	60 Subpart Db	40CFR60.42b(d)		Boiler No. 16 does not combust coal refuse alone.
APPLICABLE	60 Subpart Db	40CFR60.42b(e)		
NON-APPLICABLE	60 Subpart Db	40CFR60.42b(f)		Boiler No. 16 combusts oil and natural gas.
APPLICABLE	60 Subpart Db	40CFR60.42b(g)		
NON-APPLICABLE	60 Subpart Db	40CFR60.42b(h)		Boiler No. 16 does not use a fuel pretreatment to reduce sulfur dioxide emissions.
NON-APPLICABLE	60 Subpart Db	40CFR60.42b(i)		Boiler No. 16 does not use a sulfur dioxide control system.
APPLICABLE	60 Subpart Db	40CFR60.42b(j)		
APPLICABLE	60 Subpart Db	40CFR60.43b	Standard for particulate matter	
NON-APPLICABLE	60 Subpart Db	40CFR60.43b(a)		Boiler No. 16 does not combust coal.
NON-APPLICABLE	60 Subpart Db	40CFR60.43b(b)		Facility does not use conventional or emerging technology to reduce sulfur dioxide emissions.
NON-APPLICABLE	60 Subpart Db	40CFR60.43b(c)		Boiler No. 16 does not combust wood.
NON-APPLICABLE	60 Subpart Db	40CFR60.43b(d)		Boiler No. 16 does not combust municipal type solid waste.
NON-APPLICABLE	60 Subpart Db	40CFR60.43b(e)		Boiler No. 16 does not combust coal, wood, or municipal-type solid waste.
APPLICABLE	60 Subpart Db	40CFR60.43b(f)		
APPLICABLE	60 Subpart Db	40CFR60.43b(g)		
APPLICABLE	60 Subpart Db	40CFR60.44b	Standard for nitrogen oxides	
APPLICABLE	60 Subpart Db	40CFR60.44b(k)		
NON-APPLICABLE	60 Subpart Db	40CFR60.44b(l)		Facility commenced construction/modification before July 9, 1997.
APPLICABLE	60 Subpart Db	40CFR60.45b	Compliance and performance test methods and procedures for sulfur dioxide	
APPLICABLE	60 Subpart Db	40CFR60.45b(a)		
APPLICABLE	60 Subpart Db	40CFR60.45b(j)		
APPLICABLE	60 Subpart Db	40CFR60.46b	Compliance and performance test methods and procedures for particulate matter and nitrogen oxides	Boiler No. 16 is subject to opacity standards.
APPLICABLE	60 Subpart Db	40CFR60.46b(a)		
APPLICABLE	60 Subpart Db	40CFR60.46b(d)		
APPLICABLE	60 Subpart Db	40CFR60.46b(d)(7)		EPA Method 9 is used for opacity.
APPLICABLE	60 Subpart Db	40CFR60.47b	Emission monitoring for sulfur dioxide	
APPLICABLE	60 Subpart Db	40CFR60.47b(f)		
APPLICABLE	60 Subpart Db	40CFR60.48b	Emission monitoring for particulate matter and nitrogen oxides	
APPLICABLE	60 Subpart Db	40CFR60.48b(a)	Continuous opacity monitor required	An alternative monitoring procedure is requested instead of a COMS.

EU ID 014 : Mill Boiler No. 16 Rule Applicability for Okeelanta Corporation

APPLIC STAT	RULE DESCRIP	RULE NUMBER	RULE TITLE	RATIONALE FOR NON-APPLICABILITY
APPLICABLE	60 Subpart Db	40CFR60.48b(i)		
APPLICABLE	60 Subpart Db	40CFR60.49b	Reporting and recordkeeping requirements	
APPLICABLE	60 Subpart Db	40CFR60.49b(a)		
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(b)		No CEMS required.
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(c)		Boiler No. 16 not subject to nitrogen oxide limits set forth in 40CFR60.44b.
APPLICABLE	60 Subpart Db	40CFR60.49b(d)		
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(e)		Boiler No. 16 does not burn No. 6 oil.
APPLICABLE	60 Subpart Db	40CFR60.49b(f)		
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(g)		Boiler No. 16 not subject to nitrogen oxide limits set forth in 40CFR60.44b.
APPLICABLE	60 Subpart Db	40CFR60.49b(h)		
APPLICABLE	60 Subpart Db	40CFR60.49b(h)(1)		
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(i)		No continuous monitoring requirements for nitrogen oxides required.
APPLICABLE	60 Subpart Db	40CFR60.49b(j)		
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(k)		
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(l)		
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(m)		Minimim amount of data obtained during reporting period.
NON-APPLICABLE	60 Subpart Db	40CFR60.49b(n)		Fuel pretreatment not used.
APPLICABLE	60 Subpart Db	40CFR60.49b(o)		
APPLICABLE	60 Subpart Db	40CFR60.49b(r)		
APPLICABLE	60 Subpart Db	40CFR60.49b(v)		
APPLICABLE	63 Subpart A	40 CFR 63.9(b)	Subpart DDDDD - NESHAP for Industrial, Commercial, and Institutional Boiler and Process Heaters - Notification Requirements	Boiler is an existing limited-use liquid fuel unit and subject to notification requirements only.
APPLICABLE	63 Subpart DDDDD	40 CFR 63.7506(b)	Subpart DDDDD - NESHAP for Industrial, Commercial, and Institutional Boiler and Process Heaters	Boiler is an existing limited-use liquid fuel unit and subject to notification requirements only.
APPLICABLE	62-204	62-204.8(b)3.	NSPS Subpart Db adopted by reference.	
APPLICABLE	62-296 <	62-296	STATIONARY SOURCES - EMISSION STANDARDS	
NON-APPLICABLE	62-296 <	62-296.405	Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input.	Boiler No. 16 has a heat input of <250 MMBtu/hr
APPLICABLE	62-296 <	62-296.406	Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Em	
NON-APPLICABLE	62-296 >	62-296.500	Reasonably Available Control Technology (RACT) - Volatile Organic Compounds (VOC) and Nitrogen Oxide	Boiler No. 16 was subject to PSD/BACT for Nox emissions.
NON-APPLICABLE	62-296 >	62-296.570	Reasonably Available Control Technology (RACT) - Requirements for Major VOC- and NOx-Emitting Facility	Boiler No. 16 was subject to PSD/BACT for Nox emissions.
NON-APPLICABLE	62-296 >	62-296.700	Reasonably Available Control Technology (RACT) Particulate Matter.	Okeelanta is located in Palm Beach County, which is not a nonattainment or maintenance area for particulate matter.
NON-APPLICABLE	62-296 >	62-296.702	Fossil Fuel Steam Generators.	Okeelanta is located in Palm Beach County, which is not a nonattainment or maintenance area for particulate matter.
APPLICABLE	62-297	62-297	STATIONARY SOURCES - EMISSIONS MONITORING	
APPLICABLE	62-297	62-297.310	General Compliance Test Requirements.	
APPLICABLE	62-297	62-297.310(1)	Required number of test runs.	
APPLICABLE	62-297	62-297.310(2)	Operating rate during testing.	
APPLICABLE	62-297	62-297.310(3)	Calculation of emission rate.	
APPLICABLE	62-297	62-297.310(4)	Applicable test procedures.	
APPLICABLE	62-297	62-297.310(5)	Determination of process variables.	
APPLICABLE	62-297	62-297.310(6)	Required stack sampling facilities.	
APPLICABLE	62-297	62-297.310(7)	Frequency of compliance tests.	
APPLICABLE	62-297	62-297.310(8)	Test reports.	
APPLICABLE	62-297	62-297.401	Compliance Test Methods.	
APPLICABLE	62-297	62-297.401(1)(a)	EPA Method 1 - Sample and Velocity Traverses for Stationary sources - 40 CFR 60 Appendix A.	

EU ID 014 : Mill Boiler No. 16 Rule Applicability for Okeelanta Corporation

APPLIC STAT	RULE DESCRIP	RULE NUMBER	RULE TITLE	RATIONALE FOR NON-APPLICABILITY
APPLICABLE	62-297	62-297.401(2)	EPA Method 2 - Determination of Stack Gas Velocity and Volumetric Flow Rate - 40 CFR 60 Appendix A.	
APPLICABLE	62-297	62-297.401(3)	EPA Method 3 - Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight - 40 CFR 60 Appendix A.	
APPLICABLE	62-297	62-297.401(4)	EPA Method 4 - Determination of Moisture Content in Stack Gases - 40 CFR 60 Appendix A.	
APPLICABLE	62-297	62-297.401(5)	EPA Method 5 - Determination of Particulate Emissions from Stationary Sources - 40 CFR 60 Appendix A.	
APPLICABLE	62-297	62-297.401(6)	EPA Method 5 - Determination of Sulfur Dioxide Emissions from Stationary Sources - 40 CFR 60 Appendix A.	
APPLICABLE	62-297	62-297.401(10)	EPA Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources - 40 CFR 60	
APPLICABLE	62-297	62-297.401(9)	EPA Test Method 22 - Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares - 40 CFR 60 Appendix A.	
APPLICABLE	62-297	62-297.401(25)	EPA Method 25 - Determination of Total Gaseous Nonmethane Organic Emissions as Carbon - 40 CFR 60 Appendix A.	
APPLICABLE	62-297	62-297.401(41)	EPA Method 201 - Determination of PM10 Emissions (Exhaust Gas Recycle Procedure) - 40 CFR 51	
APPLICABLE	62-297	62-297.401(41)(a)	EPA Method 201 - Determination of PM10 Emissions (Exhaust Gas Recycle Procedure) - 40 CFR 51	
	62-297	62-297.620	Exceptions and Approval of Alternate Procedures and Requirements.	

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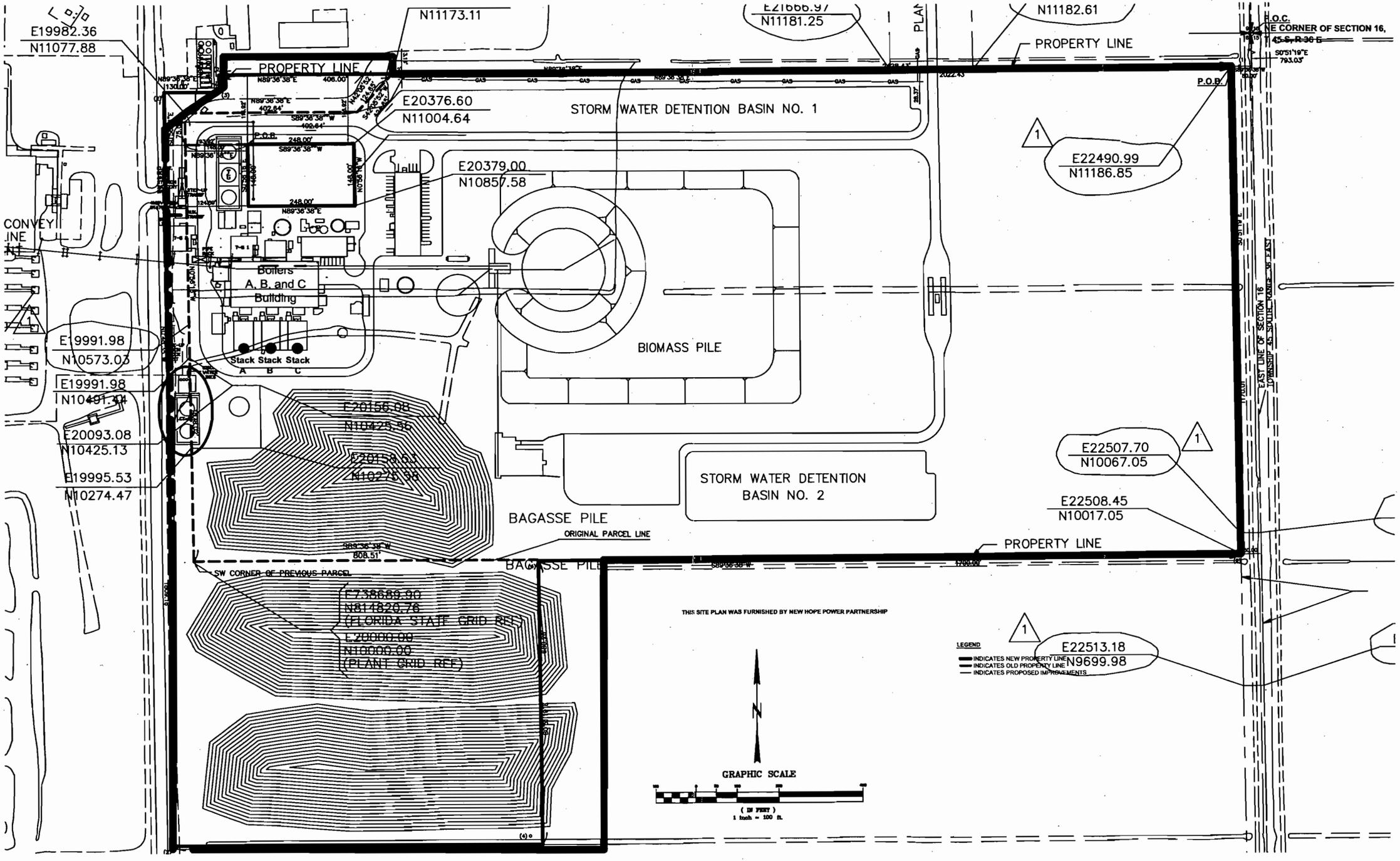


PAG SURVEYORS, INC. L.B. 3411
1016 SOUTHEAST 4TH STREET
BELLE GLADE, FL 33430-4330 PHONE (561) 996-6615

SEAL

DATE	8-18-03				
SCALE	1"=100'				
DRAWN	SB				
FB No.					
CHECKED	PAG	NO.	REVISIONS	BY	DATE

ATTACHMENT OC-FI-C1d. Facility Plot Plan

NEW HOPE POWER PARTNERSHIP
P.O. BOX 9
SOUTH BAY, FL 33493

PALM BEACH COUNTY, FLORIDA

SHEET NO. 1 OF 1
WORK ORDER NO. 03-3-182

0537537/4/4.4/OC-FI-C1c.dwg

Table 2-1. Maximum Emissions from Boiler No. 16, Okeelanta Corporation

Regulated Pollutant	Natural Gas Combustion							No. 2 Fuel Oil Combustion							Maximum Hourly Emissions Due to Either Fuel[c] (lb/hr)	Maximum Annual Emissions Due to Either Fuel[c] (TPY)
	Emission Factor ($lb/10^6$ scf)	Emission Factor (lb/MMBtu)	Ref.	Activity Factor[a] (MMBtu/hr)	Activity Factor[b] (MMBtu/yr)	Hourly Emissions (lb/hr)	Annual Emissions (TPY)	Emission Factor (lb/1000 gal)	Emission Factor (lb/MMBtu)	Ref.	Activity Factor[a] (MMBtu/hr)	Activity Factor[b] (MMBtu/yr)	Hourly Emissions (lb/hr)	Annual Emissions (TPY)		
Particulate Matter (PM)	1.9	1.86E-03	1	211	184,836	0.39	0.17	--	0.03	4	202	176,952	6.06	2.65	6.06	2.65
Particulate Matter (PM_{10})	1.9	1.86E-03	1	211	184,836	0.39	0.17	--	0.03	4	202	176,952	6.06	2.65	6.06	2.65
Sulfur dioxide (SO_2)	--	1.00E-03	4	211	184,836	0.21	0.09	7.85	0.06	4	202	176,952	12.12	5.31	12.12	5.31
Nitrogen oxides (NO_x)	--	0.20	7	211	184,836	42.20	18.48	--	0.20	4	202	176,952	40.40	17.70	42.20	18.48
Carbon monoxide (CO)	--	0.11	7	211	184,836	23.21	10.17	--	0.11	4	202	176,952	22.22	9.73	23.21	10.17
Volatile Organic Compounds (VOC)	--	0.03	2	211	184,836	6.33	2.77	--	0.03	2	202	176,952	6.06	2.65	6.33	2.77
Sulfuric acid mist (SAM)	--	6.13E-05	3	211	184,836	1.29E-02	5.66E-03	--	2.57E-03	6	202	176,952	0.52	0.23	0.52	0.23
Lead (Pb)	5.E-04	4.90E-07	1	211	184,836	1.03E-04	4.53E-05	--	9.00E-06	5	202	176,952	1.82E-03	7.96E-04	1.82E-03	7.96E-04
Mercury (Hg)	2.6E-04	2.55E-07	1	211	184,836	5.38E-05	2.36E-05	--	3.00E-06	5	202	176,952	6.06E-04	2.65E-04	6.06E-04	2.65E-04
Beryllium (Be)	1.2E-05	1.18E-08	1	211	184,836	2.49E-06	1.09E-06	--	3.00E-06	5	202	176,952	6.06E-04	2.65E-04	6.06E-04	2.65E-04
Fluorides (Fl)	--	--		--		--	--	--	--		--		--	--	--	--

References:

1. Factors for natural gas combustion from AP-42, Tables 1.4-1, 1.4-2 and 1.4-4 (7/98). Factors were converted to lb/MMBtu by dividing by 1,020 Btu/scf.
2. Based on emission guarantees from vendor.
3. Based on similar derivation of sulfuric acid mist from AP-42 for fuel oil. 5% of SO_2 becomes SO_3 then take into account the ratio of sulfuric acid mist and gaseous sulfate molecular weights (98/80).
4. Based on Permit No. 0990005-009-AC.
5. Factors for No. 2 fuel oil combustion, AP-42 Table 1.3-1, 1.3-3, and 1.3-10 (9/98). A heating value of 136,000 Btu/gal and a maximum sulfur content of 0.05% were used for the No. 2 fuel oil.
6. The emission factor for SO_3 emissions from a No. 2 fuel fired boiler with low NOx burners (5.7S $lb/10^3$ gal where S is the sulfur content) was multiplied by the ratio of sulfuric acid mist and gaseous sulfate molecular weights (98/80).
7. Natural gas emission factor based on worst-case fuel, i.e. fuel oil factor.

Footnotes:

[a] The maximum permitted heat input rate is 211 MMBtu/hr for natural gas and 202 MMBtu/hr for fuel oil.

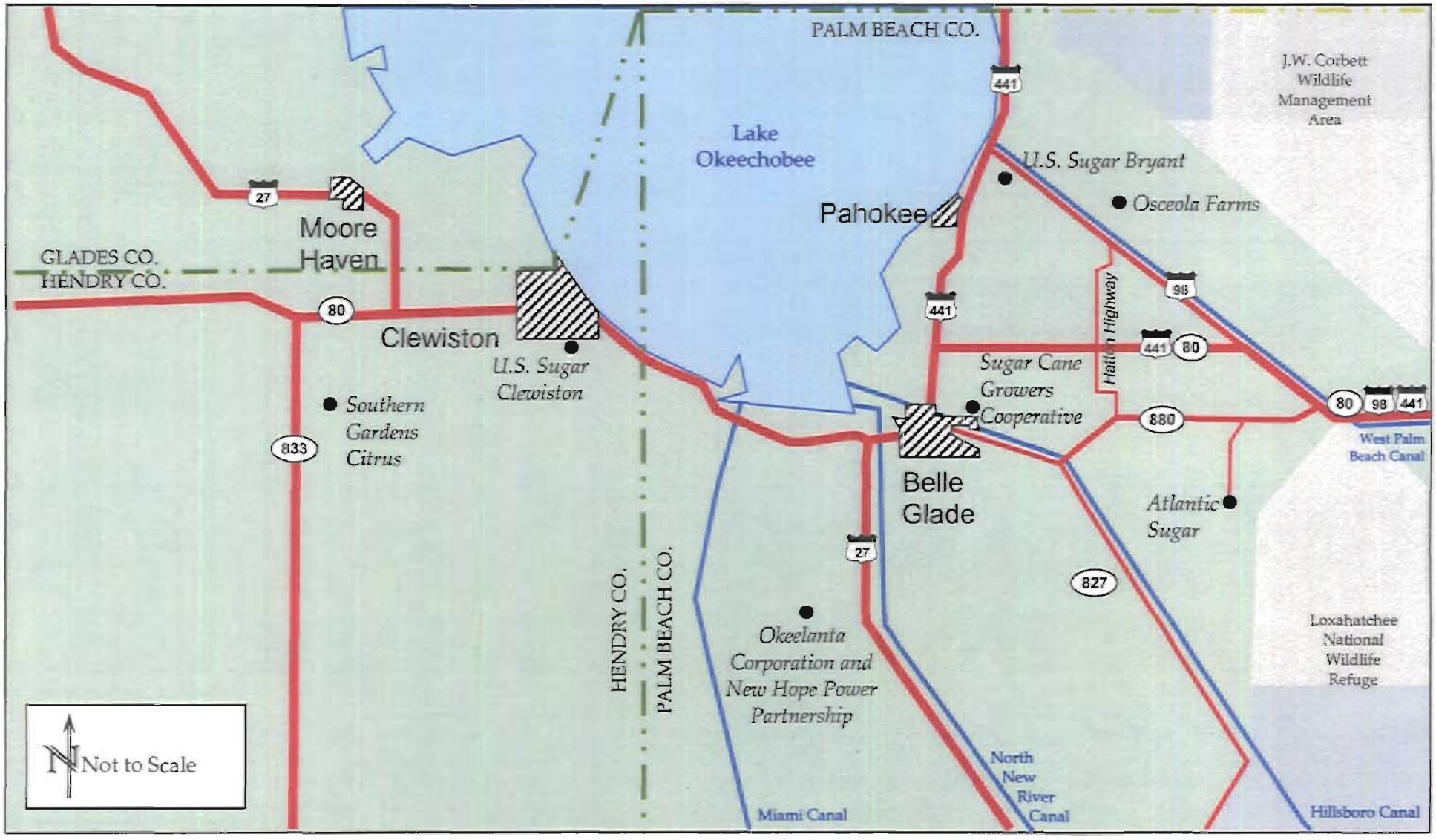
[b] Based on 10% annual capacity factor: fuel oil usage of 1,301,118 gal/yr or 176,952 MMBtu/yr and natural gas usage of 181.2 MMscf/yr or 184,836 MMBtu/yr.

[c] Maximum emissions predicted for either natural gas combustion only or No. 2 fuel oil combustion only.

Sample Calculations:

Hourly Emissions = Emission Factor (lb/MMBtu) x Activity Factor (MMBtu/yr)

Annual Emissions = Activity Factor (MMBtu/yr) x Emission Factor (lb/MMBtu) / 2,000 (lb/ton)



Attachment OC-FI-CC1
Location of Okeelanta Corporation and New Hope Power Partnership

Source: Golder Associates Inc., 2005.

Golder Associates

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Billy Blackmon ☐ Agent ☐ Addressee

B. Received by (Printed Name) Billy Blackmon C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No
P. O. Box 86
South Bay, FL 33493

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7000 1670 0013 3110 0703

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

7000 1670 0013 3110 0703

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

Mr. Ricardo Lima, Vice President & General Mgr.

OFFICIAL USE

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

Postmark Here

Sent To
Mr. Ricardo Lima, Vice President & General Mgr.
Street, Apt. No.; or PO Box No.
21250 U.S. Highway 27 South
City, State, ZIP+4
South Bay, Florida 33493

PS Form 3800, May 2000 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 Lima, Vice President
and General Manager
Okeelanta Corporation
21250 U.S. Highway 27 South
South Bay, Florida 33493

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Howard Hill Jr. ☐ Agent ☐ Addressee

B. Received by (*Printed Name*) Howard Hill Jr. C. Date of Delivery 3/1/06

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

2. Article Number (*Transfer from service label*) 7000 1670 0013 3110 0475

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

7000 1670 0013 3110 0475

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

OFFICIAL USE

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

Postmark Here

Sent To Mr. Ricardo Lima, Vice President and General Manager
Street, Okeelanta Corporation
City, St 21250 U.S. Highway 27 South
South Bay, Florida 33493

PS Form 3800, May 2000 ... Instructions