APPLICATION FOR AIR CONSTRUCTION PERMIT

TRANS-SHIPMENT FACILITY EXPANSION

OKEELANTA CORPORATION
SOUTH BAY, FLORIDA

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

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

January 2006

0637507

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

APPLICATION FOR AIR PERMIT – LONG FORM

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for 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 & New Hope Power Partnership Facilities**	
3. Facility Identification Number: **0990005 and 0990332**	
4. Facility Location...: Street Address or Other Locator: **21250 U.S. Highway 27 South** City: **South Bay** County: **Palm Beach** Zip Code: **33493**	
5. Relocatable Facility? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Matt Capone, Director of Environmental Programs**
2. Application Contact Mailing Address... Organization/Firm: **Okeelanta Corporation** Street Address: **21250 U.S. Highway 27** City: **South Bay** State: **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:	1-30-06
2. Project Number(s):	0990005-019-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 construct two sugar receivers to pneumatically unload sugar from railcars and increase sugar packaging capacity of the Trans-Shipment facility from 865 tons per day to 1,300 tons per day.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
018-020, 026-028, 045-047	Okeelanta Sugar Trans-Shipment Facility	ACIF	

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 South**
   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 Date

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name:
   Ricardo A. Lima, Vice President and General Manager
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
   - ☐ 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.
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**
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.

   R A Lima — Signature

   1-14-06 — 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

1/19/06
Date

(seal)

* Attach any exception to certification statement.

Board of Professional Engineers Certificate of Authorization #00001670

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

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

Facility Contact

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

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: **April, 2005**

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: ☒ Attached, Document ID: **Attachment A** ☐ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: ☒ Attached, Document ID: **Attachment A**
3. Rule Applicability Analysis: ☒ Attached, Document ID: **OC-FI-CC3**
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: **Attachment A** ☐ 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)

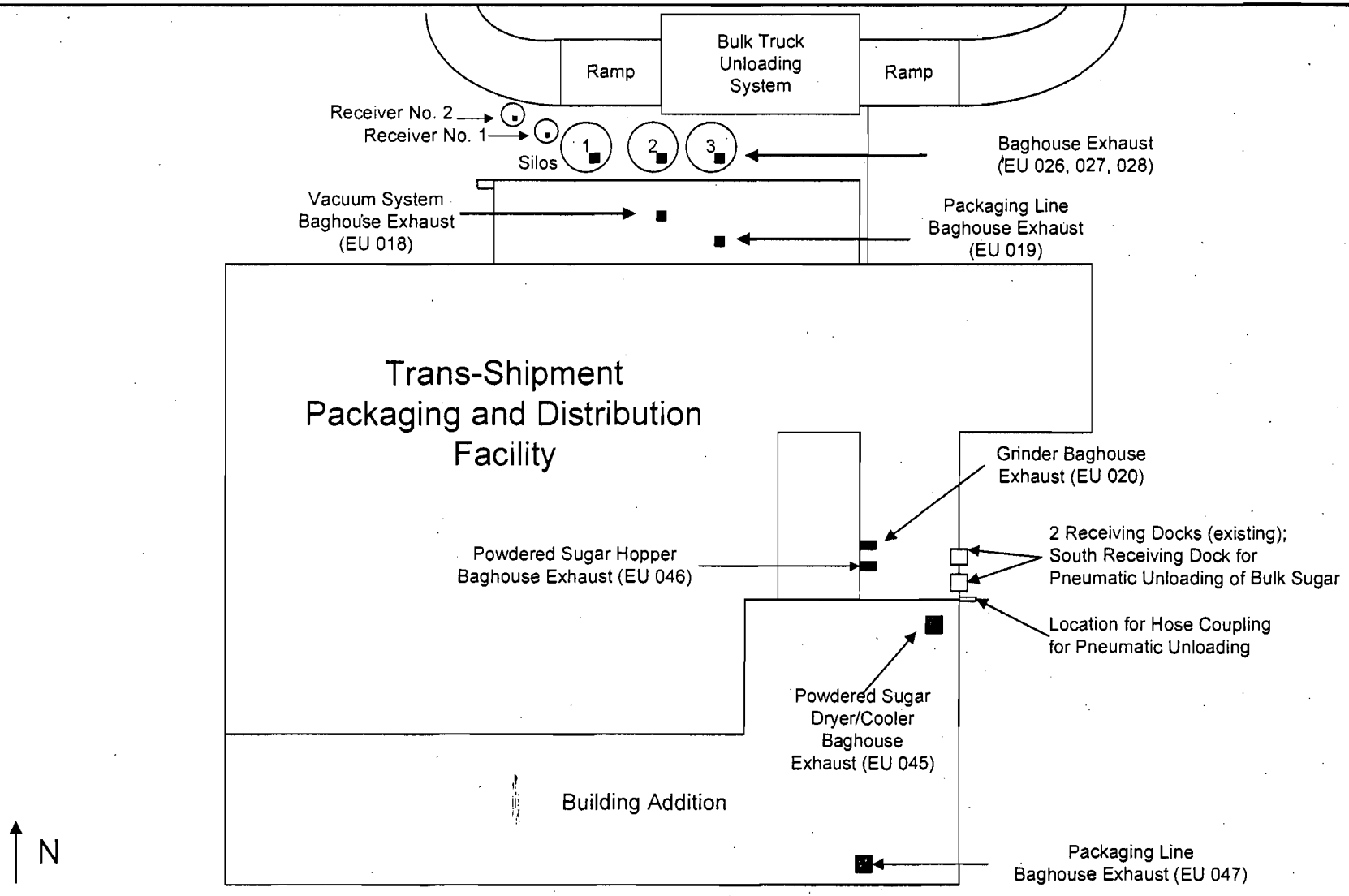
Additional Requirements for Title V Air Operation Permit Applications

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

ATTACHMENT OC-FI-C1

FACILITY PLOT PLAN



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

Attachment OC-FI-C1a
Trans-Shipment Packaging and Distribution
Facility Plot Plan
Okeelanta Corporation

0637507/4.4/OC-FI-C1a.vsd

Golder Associates

RAMP UP

END ELEVATION VIEW:

Silo 1 Silo 2 Silo 3

CHUTE BY FL. CRYSTALS

VACUUM RECEIVER #2

VACUUM RECEIVER #1

HOPPER #6 HOPPER #5 HOPPER #4 HOPPER #3 HOPPER #2 HOPPER #1

VAC. BRKR. #2 VAC. BRKR. #1

MOTO VALVE ACTUATOR MOUNTED HORIZONTALLY

W 8 X 9 HORIZONTAL BEAM

GIMBALY USE TO VERIFY VALVE ORIENTATION PRIOR TO INSTALLATION

SLIDE GATE VALVE & MANIFOLD (SUPPORT REQUIRED BY INSTALLER)

DIVERTER VALVE ASSEMBLY

DIVERTER #4 CYLINDER DOWN

DIVERTER #3 CYLINDER UP

DIVERTER #2 CYLINDER UP

DIVERTER #1 CYLINDER DOWN

FAR VACUUM CONVEYING MANIFOLD #2

NEAR VACUUM CONVEYING MANIFOLD #1

NOTE: TWO TUBES ON SALINA DIVERTERS AT MANIFOLD ELEVATION LINE #2 AT EQUAL ELEVATION

VACUUM BLOWER CONNECTION SPECIFIED BY VENDOR

VACUUM BLOWER

VACUUM BLOWER

ELEVATION "2"

ELEVATION "1"

4

7

RAILCAR MANIFOLD LATERAL DETAIL (4X)

6" DIA. LINE GATE VALVE

6" MALE CAMLOCK

6" FLG.

12"

CONVEYING VACUUM HOSE:
GOODYEAR "HARVEST" HOSE; 6" I.D.
TWO BOLT CLAMPS:
DIXON #769 (ONE FOR EACH END OF HOSE)

END ELEVATION VIEW:
(VIEW FROM FILTER RECEIVERS)

SIDE ELEVATION VIEW:

Vacuum Receiver No. 2

Vacuum Receiver No. 1

SALINA WYE DIVERTER VALVES (SUPPORT REQUIRED BY INSTALLER) (4) PL

NOTE: RAILS SHOWN ABOVE GROUND

116 150 299 423 541 652 694 836 877 1019 1060

25 67 187 284

Figure OC-Fl-C1b

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

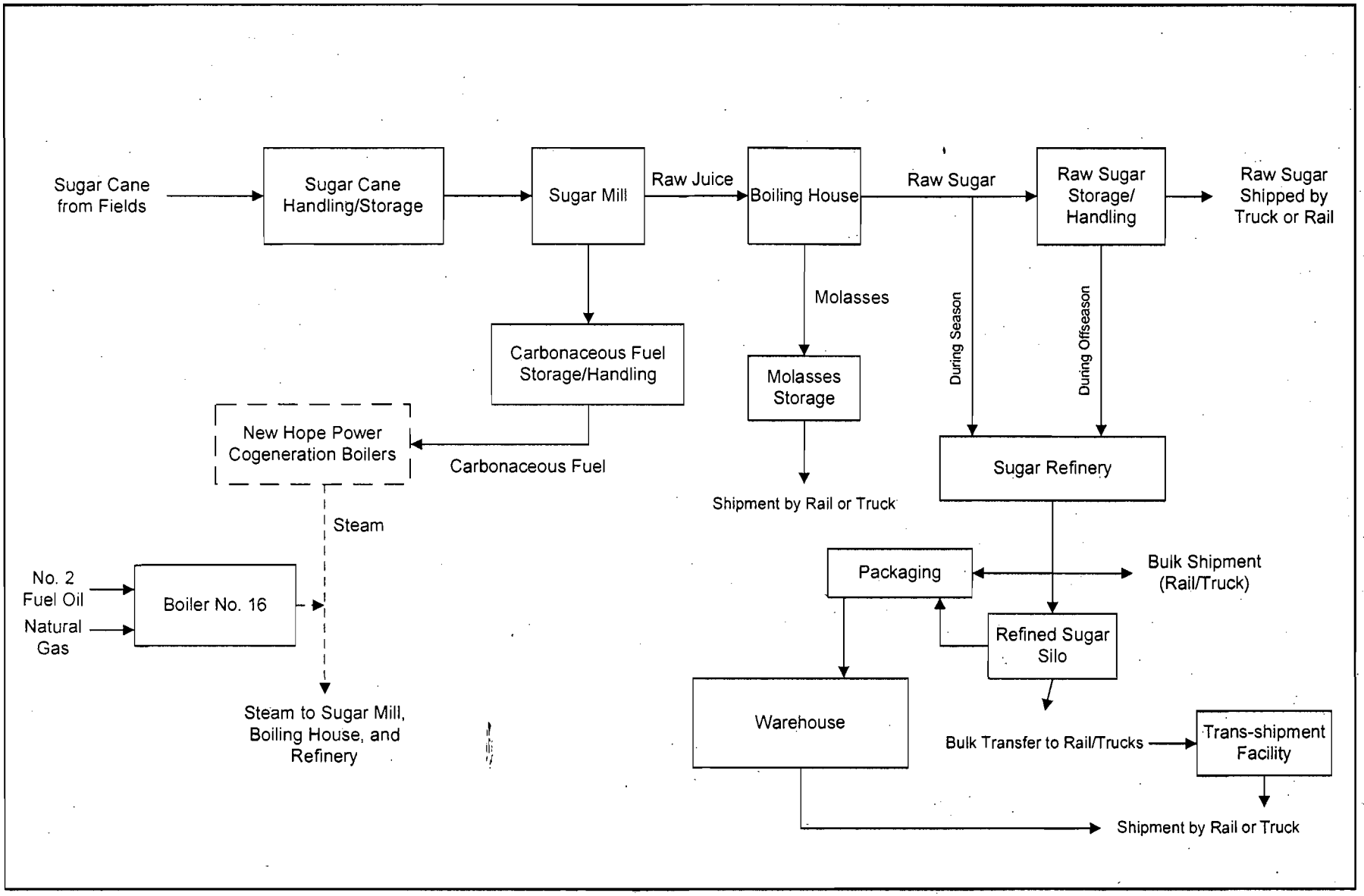
USS UNITED STATES SYSTEMS, inc.
P.O. Box 5218 Kansas City, Kansas 66119 888-281-2454 (913) 281-1010

DESIGNED BY M.A.		MATERIAL C.S.	TITLE SITE LAYOUT DRAWING
DRAWN BY M.A.	DATE 08-22-05		COMPANY FLORIDA CRYSTALS CORPORATION SOUTH BAY, FL
CHECKED BY G.H.	DATE	SCALE NONE	
CONTRACT NO. 4500099994	PROJECT NO. J507-625	SIZE	DWG. NO. J62540R3 REV. 3

0637507/4.4/OC-Fl-C1b

ATTACHMENT OC-FI-C2

PROCESS FLOW DIAGRAM



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

Overall Sugar Mill - Facility Flow Diagram

Process Flow Legend
Solid/Liquid
Steam
Gas

Golder Associates

0637507/4.4/OC-FI-C2.vsd

ATTACHMENT OC-FI-CC3

IDENTIFICATION OF APPLICABLE REQUIREMENTS FOR THE TRANSHIPMENT FACILITY

ATTACHMENT OC-FI-CC3

SUGAR TRANS-SHIPMENT FACILITY RULE APPLICABILITY FOR OKEELANTA CORPORATION

APPLIC STAT	RULE DESCRIP	RULE NUMBER	RULE TITLE
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(2)b	
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(7)(a)1	
APPLICABLE	62-297	62-297.310(7)(a)3	
APPLICABLE	62-297	62-297.310(7)(a)4.a	
APPLICABLE	62-297	62-297.310(7)(a)9	
APPLICABLE	62-297	62-297.310(7)(c)	
APPLICABLE	62-297	62-297.310(8)	Test reports.
APPLICABLE	62-297	62-297.401	Compliance Test Methods.
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(9)	EPA Test Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources - 40 CFR 60, Appendix A
APPLICABLE	62-297	62-297.620	Exceptions and Approval of Alternate Procedures and Requirements.
APPLICABLE	62-296	62-296.320	General Pollutant Emission Limiting Standards
APPLICABLE	62-296	62-296.320(4)(a)	General Particulate Emission Limiting Standards - Process weight table

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.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

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

Emissions Unit Description and Status

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

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

3. Emissions Unit Identification Number: **018, 019, 020, 026, 027, 028, 045, 046, 047**

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: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
    This emission unit consists of Multiple Emission Points: The Vacuum System Baghouse (EU 018), the Packaging Lines Baghouse (EU 019), the Grinder Baghouse (EU 020), the three Sugar Silo Baghouses (EU 026, 027, and 028), the Powdered Sugar Dryer/Cooler Baghouse (EU 045), the Powdered Sugar Hopper Baghouse (EU 046), the new Packaging Lines Baghouse (EU 047), and two new emission points consisting of the railcar unloading receivers Nos. 1 and 2 baghouses.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

1 baghouse (Vacuum System)

2 baghouses (Packaging Lines)

1 baghouse (Grinder & Hopper)

3 baghouses (One for each of 3 Storage Silos)

1 baghouse (Powdered Sugar dryer/cooler)

Cyclonic Separator (Inlet side of vacuum pump of Vacuum System)

1 baghouse (Powdered Sugar Hopper)

1 baghouse (Railcar Unloading Receiver No. 1)

1 baghouse (Railcar Unloading Receiver No. 2)

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

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

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

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

Emission Point Description and Type

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

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

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

Segment Description and Rate: Segment _____ of _____

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

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	018		EL

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

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

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

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **2.8** lb/hour **12.28** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference: **See Table A-1.**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **See Table A-1 for calculations.**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

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: **12.28 TPY**	4. Equivalent Allowable Emissions: **2.8** lb/hour **12.28** tons/year
5. Method of Compliance: **EPA Method 9**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on requested allowable emissions.**	

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: **VE05**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Existing permit condition. Rule 62-297.620(4), F.A.C.**	

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

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

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor _____ of _____

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

Continuous Monitoring System: Continuous Monitor _____ of _____

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

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

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

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

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

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

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

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: _____
   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: _____ ☒ Not Applicable

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

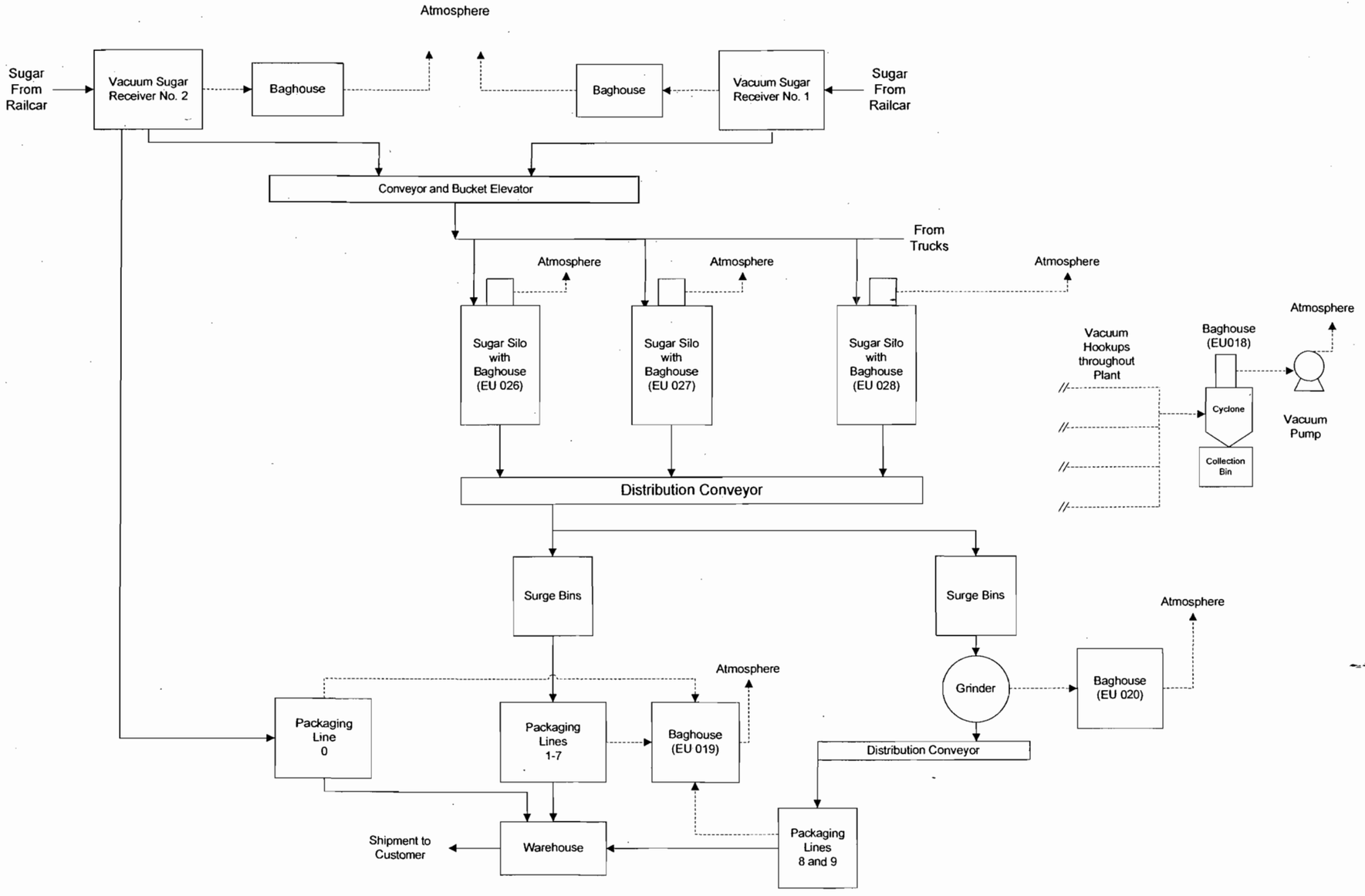
1. Identification of Applicable Requirements
   ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: _____ ☐ Not Applicable
4. Alternative Modes of Operation (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

Trans-Shipment facility permit No. 0990005-008-AC presented in Attachment B.

ATTACHMENT OC-EU1-I1

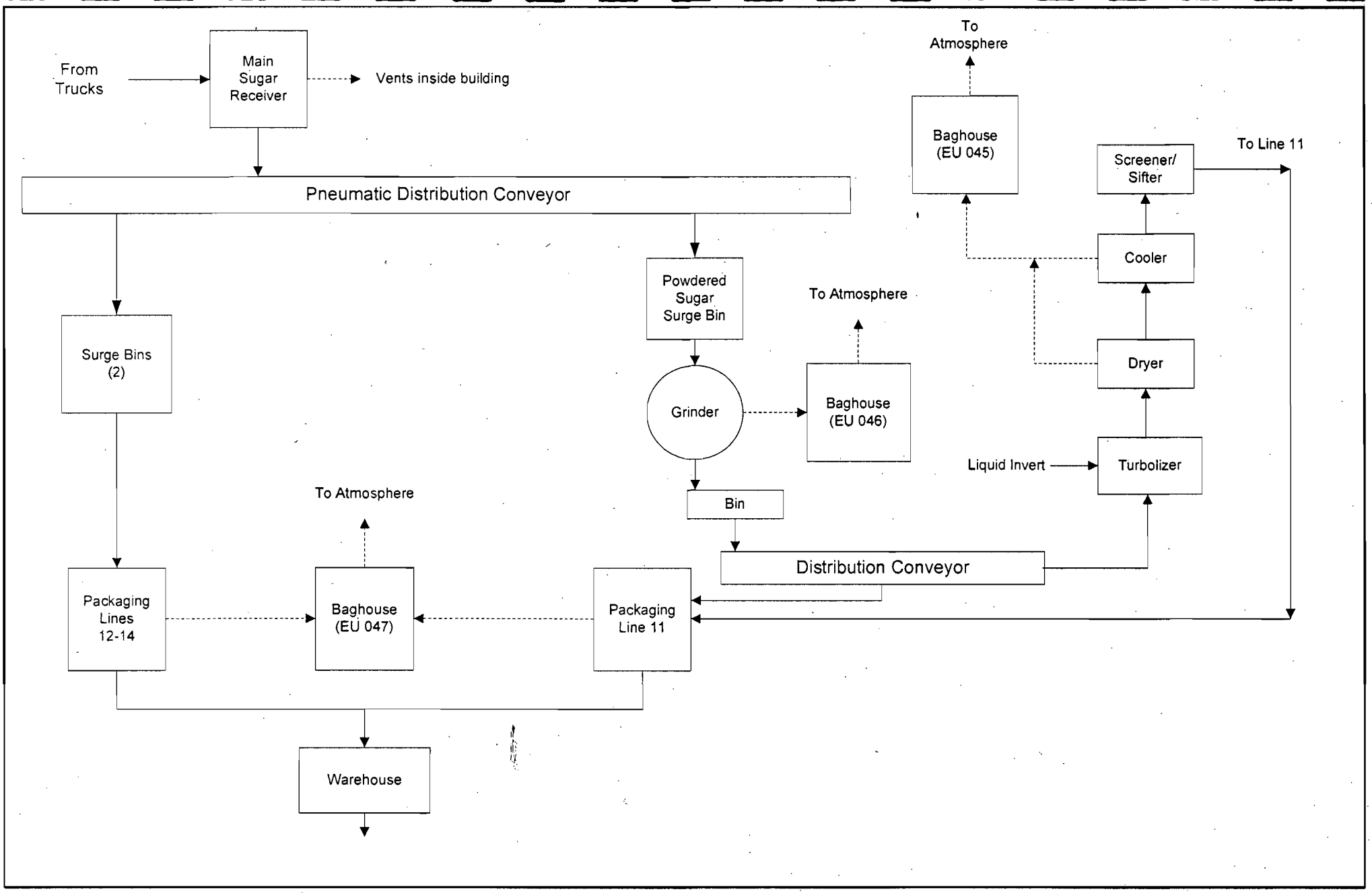
PROCESS FLOW DIAGRAMS



Attachment OC-EU1-I1a. Process Flow Diagram
Trans-Shipment Facility - Phase 1 and Increased Capacity
Okeelanta Corporation Refinery
South Bay, Florida

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

Golder Associates



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

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

Golder Associates

0637507/4.4/OC-EU1-I1b

ATTACHMENT OC-EU1-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT OC-EU1-13a

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

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.024

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3b

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

Packaging Lines 0-9		
Manufacturer and Model No.	MAC Environmental Model 55AVSC64 Style III	
Outlet Gas Temp (°F)		75
Outlet Gas Flow Rate (acfm)		10,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		9,869
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Polyester Pleated
Total Area of Filter Media (sq. ft)		3,520
Air to Cloth Ratio		2.84
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.857

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3c

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

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

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

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

ATTACHMENT OC-EU1-I3d

CONTROL EQUIPMENT PARAMETERS FOR THE SUGAR STORAGE SILOS BAGHOUSES (EU 026, 027, AND 028) AT THE TRANS-SHIPMENT FACILITY

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.0857

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3e

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

Powdered Sugar Dryer/Cooler		
Manufacturer and Model No.	Reimelt Corp. Model SL3-18	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		9,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		8,640
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Duratex II (pleated cartridges)
Total Area of Filter Media (sq. ft)		4,824
Air to Cloth Ratio		1.87
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.771

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

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

ATTACHMENT OC-EU1-I3f

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

Powdered Sugar Hopper Baghouse		
Manufacturer and Model No.	Reimelt Corp. Model 24TB-FRIP-32:S6	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		1,800
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		1,728
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Spun Bond Polyester (pleated elements)
Total Area of Filter Media (sq. ft)		325
Air to Cloth Ratio		5.54
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.154

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

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

ATTACHMENT OC-EU1-I3g

CONTROL EQUIPMENT PARAMETERS FOR THE PACKAGING LINES 11-14 BAGHOUSE (EU 047) AT THE TRANS-SHIPMENT FACILITY

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.514

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

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

ATTACHMENT OC-EU1-I3h

CONTROL EQUIPMENT PARAMETERS FOR THE VACUUM RECEIVER NOS. 1 AND 2 BAGHOUSES AT THE TRANS-SHIPMENT FACILITY

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.105

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

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

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

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MESSAGE TRANSMITTAL

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

Dear Matthew,

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

media: polyester

weight: 16 oz./sq yd

construction: scrim supported felt

mullen burst strength: 375 psi

thermal stability: 2% maximum at 275 degrees F for 2 hours

operating temp.: 240 degrees F

finish: heat set and calendered

permeability: 17-40cfm/sq ft @ 0.5" w.c.

Sincerely,

Greg Hawkins
Sales Manager

cc: Mark Aron -- United States Systems

ATTACHMENT A

1.0 INTRODUCTION

Okeelanta Corporation is proposing to modify the existing Packaging and Distribution Facility (also known as the Trans-Shipment Facility) at the Okeelanta sugar complex located near South Bay, Florida. The facility location is shown in Figure A-1 Area Map. The proposed modification will increase the amount of refined sugar packaged at the Trans-Shipment Facility from 865 to 1,300 tons per day (TPD). The construction of two new sugar receivers and one new sugar packaging line will be required to accomplish the increase. Sugar dust from each receiver will be controlled by an integral baghouse.

2.0 FACILITY DESCRIPTION

2.1 Existing Facility

The Trans-Shipment Facility is located approximately 2,500 feet south of the Okeelanta sugar mill and refinery. A detailed facility plot plan showing the Trans-Shipment Facility is presented in Attachment OC-FI-C1. Granulated, refined sugar is transported by trucks from the refinery to the Trans-Shipment Facility, where the sugar is packaged according to customer's requirements. The packaged sugar is then shipped by rail or truck to market.

The initial Trans-Shipment Facility construction in 1996 consisted of four primary areas; truck unloading, packaging, warehouse, and office/administration areas. The packaging area consisted of nine packaging lines (1 through 9). The initial building area occupied approximately 143,000 square feet of space. An expansion of the facility in 2000 added approximately 39,000 square feet of packaging and raw material storage area, a new pneumatic main sugar receiver (storage bin), and four new packaging lines (11 through 14).

At the refinery, extra-fine granulated (EFG) sugar is loaded into 80,000 pound gross weight trucks and is transported from the refinery to the Trans-Shipment Facility. Currently, the trucks are unloaded at two locations – the bulk truck unloading system at the north end of Trans-Shipment Facility and a receiving dock at the east side of the facility. The bulk truck unloading system at the north end of the facility consists of two stations, each capable of unloading 87,500 pounds per hour (lb/hr) of refined sugar. The receiving dock at the east side of the facility is a pneumatic unloading station with a capacity of 30,000 lb/hr of refined sugar.

When receiving product at the bulk truck unloading station, a hydraulically operated boot mechanism locks pneumatically against the truck's hopper. The EFG sugar is fed from the truck into a screw

conveyor, to a bucket elevator, and then into one of the three storage silos. The design capacity for the conveyors feeding the silos is 205,000 lb/hr.

From the silos, the sugar is transported by screw conveyor into surge bins located above packaging lines 1 through 9. The EFG sugar is metered from the surge bins into the nine packaging lines, where various size packages and containers are filled with the sugar for wholesale and retail distribution. A portion of the EFG sugar is conveyed to the grinder, where starch is added to produce powdered sugar at a design capacity of 8,000 lb/hr. Brown sugar is also produced at the Trans-Shipment Facility by mixing either light or dark molasses with the EFG sugar. Brown sugar can be produced at a design rate of 8,000 lb/hr.

The pneumatic unloading system at the east side of the facility unloads sugar into the main sugar receiver for packaging lines 11 through 14. From the main sugar receiver, the sugar is transported by pneumatic distribution conveyor into surge bins above packaging lines 12, 13, and 14. The EFG sugar is metered from the surge bins into the three packaging lines, where various size packages and containers are filled with the sugar for wholesale and retail distribution. A portion of the EFG sugar from the main sugar receiver is conveyed to the powdered sugar surge bin above the grinder. The grinder produces powdered sugar, which is conveyed to packaging line 11 for packaging.

After being packaged, the filled containers are palletized and wrapped in a plastic stretch wrap in the warehouse area. Shipping can be by rail or truck. See Attachment OC-EU1-11, Trans-Shipment Facility Flow Diagram, for details.

The office and administration area has offices, lockers, conference rooms, and employee break rooms.

2.2 Facility Modification

Okeelanta is proposing to add two new sugar receivers to unload bulk sugar from railcars, and a new packaging line designated line 0, at the Trans-Shipment Facility. This expansion will increase the nominal packaging rate from 865 TPD to 1,300 TPD.

The new sugar receivers will be located immediately west of the three existing silos on the north side of the facility. A plot plan showing the locations of the new receivers is presented in Attachment OC-FI-C1. Refined sugar from the refinery will be pneumatically unloaded from railcars into the two new sugar receivers. Sugar from the receivers will be conveyed to the silos via conveyors and bucket

elevators. The west receiver will also transfer sugar directly to the new packaging line 0. Dust from each of the receivers will be controlled by a United States Systems baghouse. Packaging line 0 will be used to fill totes north of line 1 in the existing packaging room. Sugar dust from the filling station will be controlled by suction ventilation ductwork added to the existing baghouse controlling emissions from packaging lines 1 through 9.

3.0 EMISSION ESTIMATES

The emissions from the Trans-Shipment Facility consist of particulate matter (PM) in the form of sugar dust, all of which is assumed to be particulate matter of less than 10 microns (PM_{10}). Currently, emissions at the Trans-Shipment Facility are controlled by nine baghouses. Two integral baghouses will be used to control emissions from the two new sugar receivers. Sugar dust from the new packaging line 0 will be controlled by the existing baghouse for packaging lines 1 through 9 (emissions unit 019).

Based on the baghouse manufacturer's data, the maximum particulate emissions from the Trans-Shipment Facility after the expansion is completed will be 12.28 tons per year (TPY), an increase of less than 1 TPY from the current emission limit of 11.35 TPY. See Table A-1, Summary of Particulate Emissions, for the Trans-Shipment Facility for emission calculations. Stack data are presented in Table A-2. See Attachment OC-EU1-I3 for information on the future emissions control equipment to be used at the Trans-Shipment Facility.

TABLE A-1
SUMMARY OF PARTICULATE EMISSIONS FOR THE TRANS-SHIPMENT FACILITY

Emission Segment Source	Point ID	Baghouse Guaranteed Manufacturer's Emission Rate	Baghouse Gas Flow Rate	Hourly Emissions (lb/hr)	Annual Emissions [a] (TPY)
Vacuum System 1	018	0.01 gr/scf	280 scfm	0.024	0.105
Packaging Lines 0-9	019	0.01 gr/acf	10,000 acfm	0.857	3.754
Grinder	020	0.0005 gr/scf	2,961 scfm	0.013	0.060
Silo No. 1	026	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 2	027	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 3	028	0.02 gr/scf	500 scfm	0.0857	0.375
Powdered Sugar Dryer/Cooler	045	0.01 gr/acf	9,000 acfm	0.771	3.379
Powdered Sugar Hopper	046	0.01 gr/acf	1,800 acfm	0.154	0.676
Packaging Lines 11-14	047	0.01 gr/acf	6,000 acfm	0.514	2.253
Railcar Unloading Receiver #1	--	0.02 gr/scf	615 scfm [b]	0.105	0.462
Railcar Unloading Receiver #2	--	0.02 gr/scf	615 scfm [b]	0.105	0.462
		Total Particulate Emissions All So		2.802 lb/hr	12.276 TPY

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

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

TABLE A-2
STACK PARAMETER SUMMARY TABLE FOR THE TRANS-SHIPMENT FACILITY

Emission Source	Control Device	Point ID	Discharge Type	Stack Height (ft)	Exit Diameter (ft)	Exit Temperature (° F)	Actual Volumetric Flow Rate (acfm)	Percent Water Vapor (%) [a]	Maximum Standard Flow Rate (scfm)
Vacuum System	Baghouse	018	Horizontal	8	0.33	75	284	0.025	280
Packaging Lines 0-9	Baghouse	019	Vertical	27	1.5	75	10,000	0.025	9,869
Grinder	Baghouse	020	Horizontal	39	1.0 [b]	75	3,000	0.025	2,961
Silo No. 1	Baghouse	026	Horizontal	65	0.5	90	521	0.025	500
Silo No. 2	Baghouse	027	Horizontal	65	0.5	90	521	0.025	500
Silo No. 3	Baghouse	028	Horizontal	65	0.5	90	521	0.025	500
Powdered Sugar Dryer/Cooler	Baghouse	045	Vertical	48	2.0	90	9,000	0.025	8,640
Powdered Sugar Hopper	Baghouse	046	Horizontal	48	0.75	90	1,800	0.025	1,728
Packaging Lines 11-14	Baghouse	047	Vertical	48	1.75	90	6,000	0.025	5,760
Railcar Unloading Receiver #1	Baghouse	--	Horizontal	5.0	0.50	90	641	0.025	615
Railcar Unloading Receiver #2	Baghouse	--	Horizontal	5.0	0.50	90	641	0.025	615

Footnotes:

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

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

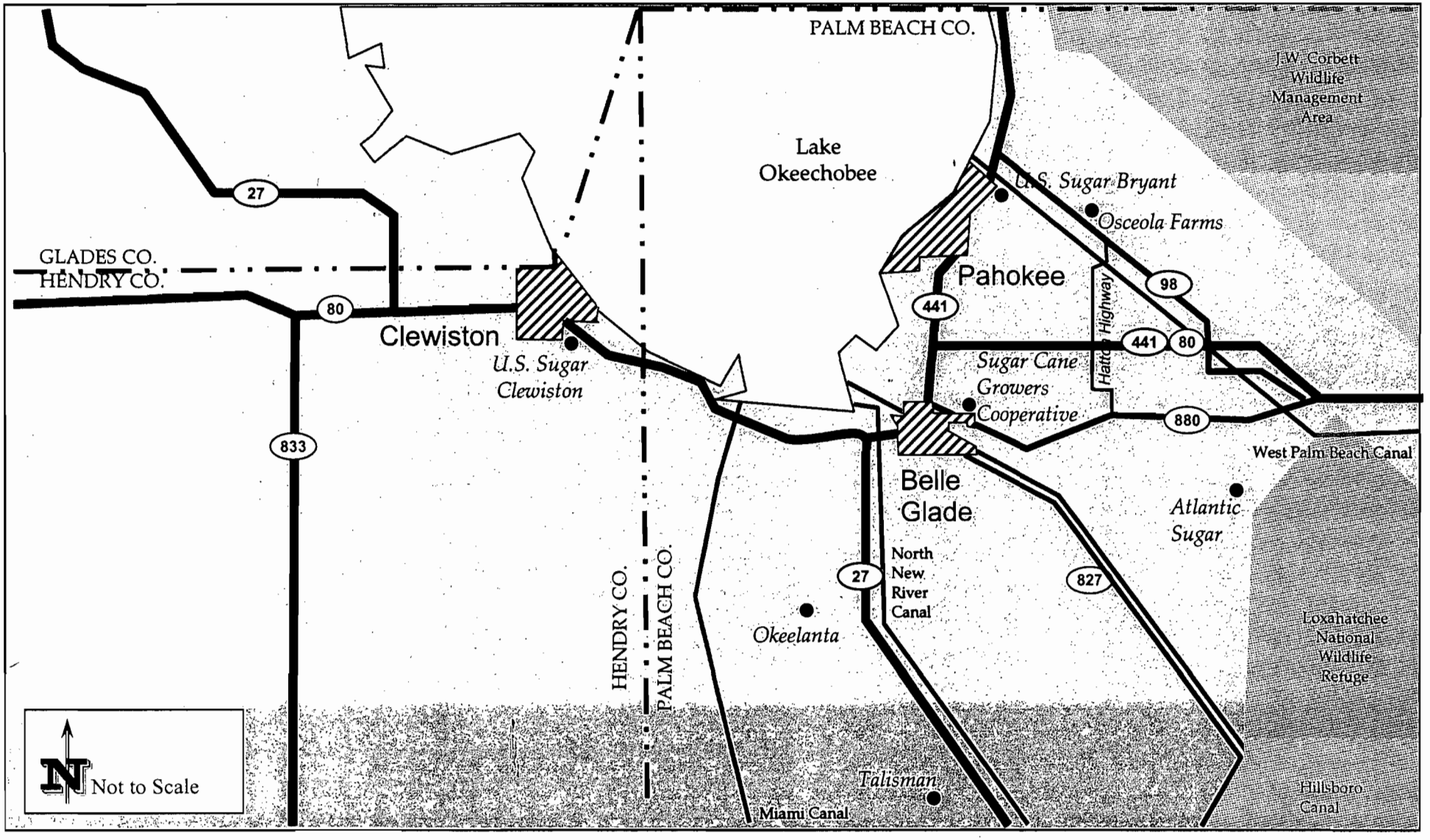


Figure A-1
Location of Florida Sugar Mills

Source: Golder Associates Inc., 2006

0637507/4.4/Figure A-1.doc

Golder Associates

ATTACHMENT B

TRANS-SHIPMENT FACILITY PERMIT NO. 0990005-008-AC

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

NOTICE OF PERMIT ISSUANCE

May 10, 2001

CERTIFIED MAIL 7000 0600 0024 1469 9439
RETURN RECEIPT REQUESTED

In the Matter of an Application
for Permit by:

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

Re: Palm Beach County - AP
Okeelanta Corporation
Transhipment Facility
DEP File No. 0990005-008-AC
South Florida EMA

Enclosed is Permit Number 0990005-008-AC to install a new baghouse on the main sugar receiver, a new sugar grinder with baghouse and new packaging lines with baghouse. These changes will be made a the transhipment facility located about 0.5 mil south of the sugar refinery, west of U.S. Highway 27, south of South Bay Florida. This permit is issued under section(s) 403.087, of the Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell

Richard W. Cantrell
Director of
District Management
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901-3881
(941) 332-6975

"More Protection, Less Process"

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on May 10, 2001 to the listed persons.

Clerk Stamp

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

Lucie Wolfe 5/10/01
(Clerk) (Date)

RWC/DMK/jw

Enclosures

Copies furnished to:

Matthew Capone, Okeelanta Corporation
David A. Buff, P.E., Golder Associates, Inc.
Palm Beach County Health Department
Jeff Koerner, P.E., DEP, Tallahassee

1005 ▶ 1 YAM

Department of
Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

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

I.D. No.: 0990005
Permit/Certification
Number: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006
County: Palm Beach
Latitude: 26° 34' 16" N
Longitude: 80° 44' 45" W
Section/Town/Range: 16/45S/36E
Project: New Sugar Grinder and Packaging Lines

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

Install a new baghouse on the main sugar receiver, a new sugar grinder with baghouse and new packaging lines with baghouse. These changes will be made at the transhipment facility located about 0.5 mile south of the sugar refinery, west of U.S. Highway 27, south of South Bay, Florida.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 0990005
Permit/Cert. No.: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006

SPECIFIC CONDITIONS:

1. The hours of operation of this facility are not restricted.

2. This facility shall be operated in such a fashion so as to preclude objectionable odors. [Rule 62-296.320(2), F.A.C.]

3. Copies of all applications, reports, tests, and notifications shall also be submitted to the Air Pollution Control Section of the Palm Beach County Public Health Unit located at 901 Evernia Street (Post Office Box 29), West Palm Beach, Florida 33402-0029.

4. All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions may include, but not be limited to, the following:

A. Paving and maintenance of roads, parking areas, and yards.
B. Application of water when necessary to control emissions.
C. Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent reentrainment, and from buildings or work areas to prevent particulate.
D. Enclosure or covering of conveyor systems.
E. Posting of vehicle (or truck) speed limits.

[Rule 62-296.320(3), F.A.C.]

5. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Conditions of Compliance:

6. The applicant shall retain a registered professional engineer for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. [Rule 62-4.050(3), F.A.C.]

7. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction.

8. Each of the emission units has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse. Therefore the Department waives any particulate matter compliance test requirements for such emissions unit specified in any otherwise applicable rule, and specify an alternative standard of 5% opacity.

SPECIFIC CONDITIONS:

If the Department has reason to believe that the particulate weight emission standard applicable to such an emissions unit is not being met, it shall require that compliance be demonstrated by the test method specified in the applicable rule.
[Rule 62-297.620(4), F.A.C.]

9. Okeelanta Corporation, the Permittee, has requested lower emissions limits than what is allowed in the Process Weight Tables. Based on baghouse manufacturer's guarantees, these emissions would be the basis for the Title V fees and are shown in the attached Table A-1.

10. The nominal sugar packaging rate will be 865 tons/day.

Required Testing:

11. Visible emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA Method Nine as published in 40 CFR-60 Appendix A, or State approved equivalent method. Such test shall be conducted within 30 days of initial operation. The Department shall be notified at least 15 days prior to testing to allow witnessing.
[Rule 62-297.310, F.A.C.]

12. Testing of emissions should be conducted with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so subsequent source operation is limited to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for purposes of additional compliance testing to regain rated capacity in the permit with prior notification to the Department's South District.

13. Notification of the Department prior to any required testing shall include as a minimum: the date and time of the test, the exact location of the test, and the name and telephone number of the contact person on site.
[Rule 62-297.310, F.A.C.]

Reports and Recordkeeping:

14. An annual operation report shall be submitted by March 1st each year.
[Rule 62-4.070(3), and Rule 62-210.370(2), F.A.C.]

General Conditions:

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

PERMITTEE:
Okeelanta Corporation

I.D. No.: 0990005
Permit/Cert. No.: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006

SPECIFIC CONDITIONS:

General Conditions:

NOTE: In the event of an emergency the permittee shall contact the Department by calling (850) 413-9911. During normal business hours, the permittee shall call (941) 332-6975.

Issued this 10th day of May, 2001.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell

Richard W. Cantrell
Director of
District Management

RWC/DMK/jw

9 Pages Attached

PERMITTEE:
Okeelanta Corporation

I.D. No.: 0990005
Permit/Cert. No.: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006

GENERAL CONDITIONS:

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

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

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

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

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

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

GENERAL CONDITIONS:

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

a. Have access to and copy any records that must be kept under the conditions of the permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

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

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

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

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

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

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

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

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.

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-30.300, F.A.C. as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

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

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

(c) Records of monitoring information shall include:

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

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

Table A-1. Summary of Particulate Emissions for the Transhipment Facility, Florida Crystals Food Corporation

Emission Segment Source	Point ID	Baghouse Guaranteed Manufacturer's Emission Rate	Baghouse Gas Flow Rate	Hourly Emissions (lb/hr)	Annual Emissions[a] (TPY)
Existing Sources					
Vacuum System 1 Baghouse	018	0.01 gr/scf	280 scfm	0.024	0.105
Packaging Lines Baghouse	019	0.01 gr/acf	10,000 acfm	0.857	3.754
Grinder Baghouse	020	0.0005 gr/scf	2,960 scfm	0.013	0.060
Silo No. 1 Baghouse	026	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 2 Baghouse	027	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 3 Baghouse	028	0.02 gr/scf	500 scfm	0.0857	0.375
			Subtotal Existing Sources	1.151 lb/hr	5.044 TPY
New Sources					
Main Sugar Receiver Baghouse		0.01 gr/acf	9,000 acfm	0.771	3.379
Powdered Sugar Hopper Baghouse		0.01 gr/acf	1,800 acfm	0.154	0.676
Packaging Lines Baghouse		0.01 gr/acf	6,000 acfm	0.514	2.253
			Subtotal New Sources	1.440 lb/hr	6.308 TPY
			Total Particulate Emissions All Sources	2.591 lb/hr	11.352 TPY

Note: Compliance with the PM Emission rates will be demonstrated through a visible emissions test using EPA Method 9.
[a] Based on current construction permit for existing sources and 8,760 hr/yr operation for new sources.

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 4, 2006

SUBJECT: Air Permit No. 0990005-019-AC
Okeelanta Corporation
Sugar Transshipment Facility - Expansion Project

The Final Permit for this project is attached for your approval and signature. The permit authorizes the construction of: two new sugar receivers (with baghouses) to pneumatically unload sugar from railcars; and a new sugar packaging line (Line "0"), which will share an existing baghouse system. The sugar packaging capacity of the transshipment facility will increase from 865 tons per day to 1300 tons per day. The new equipment will be installed at the existing sugar transshipment facility (SIC No. 2062), which is located approximately one-half mile south of the Okeelanta sugar refinery. The existing facility is located in Palm Beach County at 21250 U.S. Highway 27 South in South Bay, Florida. The project results in a minor source air construction permit and is not 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.

Day #90 is June 11, 2006. 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
South Bay, Florida 33493

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

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

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

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

Executed in Tallahassee, Florida.

Trina 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 4/11/06 to the persons listed:

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

Clerk Stamp

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

Barbara J. Friday (Clerk) 4/11/06 (Date)

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

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

PROJECT

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

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

NOTICE AND PUBLICATION

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

COMMENTS

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

1. New Railcar Sugar Unloading Receivers: In the descriptions throughout the permit for this equipment, replace "separate baghouses" with "integral baghouses" or "built-in baghouses". Also, identify each railcar sugar unloading receiver as a separate Emissions Unit. *Response*: The intent was merely to recognize that there will be two baghouses. The permit was clarified to read, "Each railcar sugar unloading receiver (EU-031, EU-032) shall be controlled by a baghouse."

2. Sugar Silo EU Numbers: To clarify the record keeping and reporting requirements, revise the three Emissions Unit numbers for these silos (EU-026, EU-027, and EU-028) to a common Emissions Unit number. *Response*: The permit was revised to identify the three silos as a single Emissions Unit (030) with three separate Emissions Points (S1101, S1102, and S1103).

CONCLUSION

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

Department of Environmental Protection

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
South Bay, Florida 33493

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

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

PROJECT AND LOCATION

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

STATEMENT OF BASIS

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

CONTENTS

Michael G. Cooke

Michael G. Cooke, Director
Division of Air Resource Management

4/11/06
(Effective Date)

FACILITY AND PROJECT DESCRIPTION

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

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

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

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

The transshipment facility emits particulate matter due to the handling and storage of sugar. The transshipment facility was constructed in 1996 with nine sugar packaging lines (1-9) and consisted of four primary areas: truck unloading; packaging; warehouse; and office/administration areas. An expansion project in 2000 added: four new packaging lines (11-14); a pneumatic main sugar receiver storage bin; and additional packaging/storage areas. This project will add packaging line "0" and two railcar unloading receivers. The transshipment facility has been permitted such that total potential emissions of all included emissions units are below the PSD significant emission rate of 15 tons per year of PM_{10}. After this expansion project, the total potential emissions from the transshipment facility will remain below the PSD significant emission rate of 15 tons per year of PM_{10}.

REGULATORY CLASSIFICATION

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

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

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

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

RELEVANT DOCUMENTS

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's South District Office (Post Office Box 2549, Fort Myers, Florida, 33902-2549) and the Air Pollution Control Section of the Palm Beach County Health Department (Post Office Box 29, West Palm Beach, Florida, 33402-0029).

3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); and Appendix B (General Conditions).

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

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

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

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

A. Transshipment Facility

This section of the permit addresses the following emissions unit.

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

EQUIPMENT

1. Existing Equipment: The transshipment facility consists of the following existing equipment: central vacuum system No. 1 (EU-018); sugar packaging line Nos. 1-9 (EU-019); sugar grinder (EU-020); sugar silos Nos. 1 - 3 (EU-030); powdered sugar dryer/cooler (EU-045); powdered sugar hopper (EU-046); and sugar packaging lines 11-14 (EU-047). Each existing units shall be controlled by a baghouse system. This air construction permit supersedes all previous air construction permits for the transshipment facility. [Rule 62-4.070(3), F.A.C.]

2. New Sugar Packaging Line: The permittee is authorized to the install a new packaging line "0". The new packaging line will be added to the group of existing packaging lines 1-9 (EU-019) and shall be controlled by the existing common baghouse. [Design; Application No. 0990005-019-AC]

3. New Railcar Sugar Unloading Receivers: The permittee is authorized to the install two new railcar sugar unloading receivers (Nos. 1 and 2). Each railcar sugar unloading receiver (EU-031, EU-032) shall be controlled by a baghouse. [Design; Application No. 0990005-019-AC]

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

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

a. New and replacement bags shall meet these specifications based on vendor information. No particulate matter emissions tests are required.

b. These rates represent the maximum expected emissions based on the baghouse design specification, the maximum

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

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

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

PERFORMANCE RESTRICTIONS

6. Permitted Capacity: The maximum sugar packaging rate is 1300 tons per day. [Rule 62-210.200(PTE), F.A.C.; [Design; Application No. 0990005-019-AC]

7. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rule 62-4.070(3), F.A.C; 62-210.200(PTE), F.A.C.]

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

9. Fugitive Dust Emissions: This permit requires the use of fans, filters, pneumatic unloading/loading, ductwork, storage silos and other similar equipment to contain, capture, and/or control particulate matter related to the storage and handling of sugar at the transshipment facility. The permittee shall also take the following reasonable precautions to prevent fugitive particulate matter emissions from any activity, including: vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling.

   a. Enclose or cover conveyor systems.

   b. Confine abrasive blasting where possible.

   c. As necessary, landscape and/or plant vegetation.

   d. As necessary, pave and maintain high-traffic roads, parking areas and yards.

   e. As necessary, remove particulate matter from roads, work areas, buildings, and other paved areas under the control of the permittee to prevent fugitive dust emissions.

   f. As necessary, apply water or other dust suppressants to control emissions from unpaved roads, yards, and other activities as road grading, land clearing, and the demolition of buildings.

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

10. Objectionable Odor Prohibited: The transshipment facility shall not discharge air pollutants which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(187), F.A.C.]

EMISSIONS STANDARDS

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

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

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

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

PERFORMANCE TESTING

15. Initial Compliance Tests: For this expansion project, each baghouse exhaust points for EU-019, EU-031, and EU-032 shall be tested to demonstrate initial compliance with the specified opacity standard. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rule 62-297.310(7)(a)1, F.A.C.]

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

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

18. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required test. [Rule 62-297.310(7)(a)9, F.A.C.]

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

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

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

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

RECORDS AND REPORTS

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

    1. The type, location, and designation of the emissions unit tested.
    2. The facility at which the emissions unit is located.
    3. The owner or operator of the emissions unit.
    4. The normal type and amount of materials processed, and the types and amounts of material processed during each test.

5. The means, raw data and computations used to determine the amount of materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. The date, starting time and duration of the test.
8. The test procedure used.
9. The names of individuals who furnished the process variable data, conducted the test, and prepared the report.
10. The applicable standard for the emissions unit and the test result in the same form and unit of measure.
11. A certification that, to the knowledge of the owner or his authorized agent, all data submitted is true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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

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

25. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

26. Operational Data: The permittee shall maintain adequate records of the sugar packaging rate to demonstrate compliance with the conditions of this permit. [Rule 62-4.070(3), F.A.C.]

CONTENTS

SECTION 4. APPENDIX A
CITATION FORMATS

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

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

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

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

New Permit Numbers

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

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

PSD Permit Numbers

Example: Permit No. PSD-FL-317

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

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

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

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

Code of Federal Regulations (CFR)

Example: [40 CRF 60.7]

Means: Title 40, Part 60, Section 7

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 (Not Applicable);
    b. Determination of Prevention of Significant Deterioration (Not Applicable); and
    c. Compliance with New Source Performance Standards (Not Applicable).

14. The permittee shall comply with the following:

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

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

    c. Records of monitoring information shall include:

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

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

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
Howard Dill ☐ Agent ☐ Addressee

B. Received by (Printed Name) Howard Dill Jr. C. Date of Delivery 4-13-06

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 0796

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

7000 1670 0013 3110 0796

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

Mr. Ricardo Lima, Vice President & General Mgr.

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 and 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

OKEELANTA CORPORATION

ONE NORTH CLEMATIS STREET, SUITE 200
WEST PALM BEACH, FLORIDA 33401

William F. Tarr
Telephone: 561-366-5157
Telecopier: 561-651-1280

Mailing Address:
P.O. Box 3435
West Palm Beach, Florida 33402

March 28, 2006

VIA FEDERAL EXPRESS

Trina Vielhauer, Chief
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
MS# 5505
Tallahassee, Florida 32399-2400

Re: Okeelanta Corporation
Notice of Intent to Issue Permit
Proof of Publication

Dear Ms. Vielhauer:

Enclosed is the original Proof of Publication from The Palm Beach Post dated March 17, 2006, for No. 5453426 Public Notice of Intent to Issue Air Permits.

If you have any questions, please give me a call. With kind regards, I remain,

Yours very truly,

William F. Tarr

/jcd
Enclosure
Copy to: Ricardo Lima
David Buff

Copy w/encl. to Matt Capone

March 15, 2006

Trina Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS # 5505
Tallahassee, Florida 32399-2400

RE: Comments Concerning Draft Air Permit No. 0990005-019-AC
Okeelanta Corporation Railcar Unloading Expansion Project

Dear Ms. Vielhauer:

Okeelanta Corporation received Draft Air Permit No. 0990005-019-AC on March 1, 2006. Please incorporate the following comments into the final permit.

Draft Permit Cover Page (page 1 of 7)

PROJECT AND LOCATION
The description of the two new sugar receivers should be changed from "separate" baghouses to "integral" or "built-in" baghouses. Describing the baghouses as separate is not consistent with the system description provided in Attachment A to the Application For Air Permit submitted by Okeelanta Corporation.

Draft Permit Section 1 (Page 2 of 7)

FACILITY AND PROJECT DESCRIPTION
This section provides a table listing each emission unit ID and corresponding emission unit description for the transshipment facility. Consistent with prior requests Okeelanta has made to revise the Title V operating permit, existing emission units 026, 027, and 028 should be combined into a single emissions unit (026) with three controlled exhaust points. The reason Okeelanta has made this request is because Sugar Silo's No. 1, No. 2, and No. 3 are components of a single operational system. Sugar received into the silos and drawn from the silos automatically switches from one silo to the next depending on silo levels, unloading rate and production demands. The administrative change of combining the three emission units into one will ensure that the permits and daily production throughput recordkeeping required for the annual operating report are consistent with the installed system.

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

Conversely, Okeelanta requests that the two new railcar unloading receivers be listed as separate emission units. In this case, Receiver No. 1 and No. 2 will be independently receiving sugar and feeding the product into separate systems that are downstream emissions units (the sugar silos or packaging lines 0 through 9). Because each receiver will be feeding separate systems, the daily production throughput recordkeeping required by the operating permit for the annual operating report will need to be tracked separately.

With the revisions requested, the FACILITY AND PROJECT DESCRIPTION table on page 2 of 7 would include the following unit ID's and descriptions:

ID	Emission Unit Description	ID	Emission Unit Description
018	Central vacuum system No. 1	045	Powdered sugar dryer/cooler
019	Sugar packaging lines (0-9)	046	Powdered sugar hopper
020	Sugar grinder	047	Sugar packaging lines (11-14)
026	Sugar silos No. 1, No. 2, & No. 3	049	Railcar sugar unloading receiver No. 1
----		050	Railcar sugar unloading receiver No. 2

Draft Permit Section 3 (Page 4 of 7)

EMISSION UNITS
For the reasons described above, Okeelanta requests that Sugar Silos No. 1, No. 2, and No. 3 be combined into a single emissions unit and that the two new railcar unloading receivers be listed as individual emissions units. With these requested revisions, the emissions units table on page 4 of 7 would be revised as illustrated above.

EQUIPMENT
1. Existing Equipment: Add sugar silo numbers 2 & 3 to the description of emission unit 026 and delete emission units 027 & 028.
3. New Railcar Sugar Unloading Receivers: In reference to the description of the baghouses for these units, delete the word "separate" and replace it with "built-in" or "integral".
4. Baghouse Design Specifications: Add sugar silo numbers 2 & 3 to the description of emission unit 026 and delete emission units 027 & 028. Add specification note c. With these requested revisions, the baghouse design specifications table on page 4 of 7 would be revised as follows.

ID	Emission Unit Description	Baghouse Specification [a] (grains/scf)	Exhaust Rate scfm	Maximum Emissions [b]	
				lb/hour	tons/year
018	Central vacuum system No. 1	0.01	280	0.024	0.11
019	Sugar packaging lines (0-9)	0.01	9869	0.86	3.75
020	Sugar grinder	0.0005	2961	0.013	0.06
026	Sugar silo's No. 1, No. 2, & No. 3	0.02	1500[c]	0.258[c]	1.14[c]
045	Powdered sugar dryer/cooler	0.01	8640	0.77	3.38
046	Powdered sugar hopper	0.01	1728	0.15	0.68
047	Sugar packaging lines (11-14)	0.01	5760	0.51	2.25
049	Railcar unloading receiver No. 1	0.02	615	0.11	0.46
050	Railcar unloading receiver No. 2	0.02	615	0.11	0.46
				Total	12.29

a. New and replacement bags shall meet these specifications based on vendor information. No particulate matter emissions tests are required.

b. These rates represent the maximum expected emissions based on the baghouse design specification, the maximum exhaust flow rates, and 8760 hours of operation per year. These rates are not enforceable emissions standards.

c. Combined rates for silo No.'s 1, 2, & 3.

If the Department has any questions concerning the above requests and comments, please call Matthew Capone at (561) 993-1658.

Sincerely,

Ricardo A. Lima
Vice President & General Manager
Okeelanta Corporation

c: J. Koerner, Florida DEP
A. Satyal, Palm Beach County
D. Buff, Golder Associates
J. Sommers, Florida Crystals
M. Capone, Okeelanta Corp.

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,

Jeffery J. Koerner

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

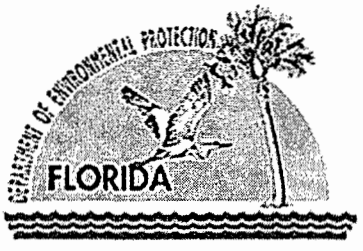
APPLICANT

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/PM10), 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 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.

TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

PROJECT

Draft Air Construction Permit No. 0990005-019-AC
Okeelanta Corporation - Sugar Transshipment Facility
Railcar Unloading Expansion Project

COUNTY

Palm Beach County, Florida

APPLICANT

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

ARMS Facility ID No. 0990005-019-AC

PERMITTING AUTHORITY

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

February 23, 2006

{Filename: TEPD}

1. GENERAL PROJECT INFORMATION

Facility Description and Location

The facility consists of two adjacent plants. New Hope Power Partnership (ARMS ID No. 0990332) operates a nominal 140 MW cogeneration plant that provides process steam for the sugar mill/refinery and generates electricity for sale to the power grid (SIC No. 4911). Okeelanta Corporation (ARMS ID No. 0990005) operates a sugar mill (SIC No. 2061), sugar refinery (SIC No. 2062), and a sugar packaging and transshipment facility. The cogeneration plant, sugar mill, sugar refinery and transshipment facility are all considered a single facility for purposes of the PSD and Title V regulatory programs. The transshipment facility is located approximately one-half mile south of the sugar refinery. The UTM coordinates are Zone 17, 524.90 km East, and 2940.10 km North. The map coordinates are latitude 26° 35' 00" N and longitude 80° 45' 00" W. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

Regulatory Categories

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

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

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

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

Project Description

Extra-fine granulated sugar (EFG) from the Okeelanta refinery is currently delivered to the transshipment facility at one of two locations. At the east truck receiving dock, trucks are pneumatically unloaded into a main sugar receiver, which pneumatically transfers sugar into surge bins above packaging lines (11-14). At the north side of the facility, trucks are unloaded at a bulk receiving station by locking a boot mechanism against the truck's hopper and sugar is transferred from truck by screw conveyor to a bucket elevator feeding one of three storage silos.

The project proposes to add a north railcar receiving station just west of the sugar silos. Railcars will be pneumatically unloaded into two new sugar receivers for transfer by screw conveyor to a bucket elevator feeding one of three storage silos. The west receiver will also transfer sugar directly to a surge bin for a new packaging line "0", which will be used to fill totes north of packaging line "1" in the existing packaging room.

At the three storage silos, sugar is transferred by screw conveyor into surge bins located above packaging lines (1-9). Sugar is metered from the surge bins into the packaging lines for processing into a variety of packages and containers for wholesale and retail distribution. A small portion of sugar can be conveyed to the grinder and mixed with starch to produce powdered sugar. In addition, brown sugar may be produced by mixing light or dark molasses with the extra fine granulated sugar.

Processing Schedule

01/30/06 Received the application for a minor source air pollution construction permit; application complete.

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: 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); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures).

Federal Regulations

There are no applicable federal regulations for the transshipment facility.

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 existing plants are considered an existing PSD-major facility. The transshipment facility emits particulate matter due to the handling and storage of sugar. Steam provides any necessary heating requirements and no fuel is combusted at the transshipment facility. The transshipment facility was constructed in 1996 with nine sugar packaging lines (1-9) and consisted of four primary areas: truck unloading; packaging; warehouse; and office/administration areas. An expansion project in 2000 added: four new packaging lines (11-14); a pneumatic main sugar receiver storage bin; and additional packaging/storage areas. This project will add packaging line "0" and two railcar unloading receivers. The transshipment facility has been permitted such that total potential emissions of all included emissions units are below the PSD significant emission rate of 15 tons per year of PM_{10}. After this expansion project, the total potential emissions from the transshipment facility will remain below the PSD significant emission rate of 15 tons per year of PM_{10}. Therefore, this project is not subject to PSD preconstruction review.

3. EMISSIONS STANDARDS

This permit will authorize the construction of: two new sugar receivers with separate baghouses to pneumatically unload sugar from railcars; and a new sugar packaging line (Line "0"), which will share an existing baghouse system. The sugar packaging capacity of the transshipment facility will increase from 865 tons per day to 1300 tons per day. The two new sugar receivers will be added as new Emissions Unit xxx and the new packaging line "0" will be grouped with the existing packaging lines 1-9 under existing Emissions Unit 019. The draft permit will include the following primary conditions.

1. Permitted Capacity: The maximum sugar packaging rate is 1300 tons per day. [Rule 62-210.200(PTE), F.A.C.; [Design; Application No. 0990005-019-AC]

2. Existing Equipment: The transshipment facility consists of the following existing equipment: central vacuum system No. 1 (EU-018); sugar packaging line Nos. 1-9 (EU-019); sugar grinder (EU-020); sugar silo No. 1 (EU-026); sugar silo No. 2(EU-027); sugar silo No. 3(EU-028); powdered sugar dryer/cooler (EU-045); powdered sugar hopper (EU-046); and sugar packaging lines 11-14 (EU-047). Each existing unit shall be controlled by a baghouse system. This air construction permit supersedes all previous air construction permits for the transshipment facility. [Rule 62-4.070(3), F.A.C.]

3. New Sugar Packaging Line: The permittee is authorized to the install a new packaging line "0". The new packaging line will be added to the group of existing packaging lines 1-9 (EU-019) and shall be controlled by the existing common baghouse. [Design; Application No. 0990005-019-AC]

4. New Railcar Sugar Unloading Receivers: The permittee is authorized to the install two new railcar sugar unloading receivers (Nos. 1 and 2). The new equipment (EU-xxx) shall be controlled by two separate baghouse systems. [Design; Application No. 0990005-019-AC]

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

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

a. New and replacement bags shall meet these specifications based on vendor information. No particulate matter emissions tests are required.

b. These rates represent the maximum expected emissions based on the baghouse design specification, the maximum exhaust flow rates, and 8760 hours of operation per year. These rates are not enforceable emissions standards.

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

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

7. 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.]

Compliance with the opacity standard shall be demonstrated for each baghouse by conducting initial and annual visible emissions tests in accordance with EPA Method 9.

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. 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
South Bay, Florida 33493

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

Air Permit No. 0990005-019-AC
Okeelanta Corporation
Sugar Transshipment Facility
Expansion Project
Permit Expires: {2Years}

PROJECT AND LOCATION

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

STATEMENT OF BASIS

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

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(DRAFT)

Michael G. Cooke, Director
Division of Air Resource Management

(Effective Date)

FACILITY AND PROJECT DESCRIPTION

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

ID	Emission Unit Description	ID	Emission Unit Description
018	Central vacuum system No. 1	028	Sugar silo No. 3
019	Sugar packaging lines (0-9)	045	Powdered sugar dryer/cooler
020	Sugar grinder	046	Powdered sugar hopper
026	Sugar silo No. 1	047	Sugar packaging lines (11-14)
027	Sugar silo No. 2	xxx	Railcar sugar unloading receiver Nos. 1 and 2

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

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

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

REGULATORY CLASSIFICATION

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

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

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

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

RELEVANT DOCUMENTS

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's South District Office (Post Office Box 2549, Fort Myers, Florida, 33902-2549) and the Air Pollution Control Section of the Palm Beach County Health Department (Post Office Box 29, West Palm Beach, Florida, 33402-0029).

3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); and Appendix B (General Conditions).

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

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

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

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

A. Transshipment Facility

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description	ID	Emission Unit Description
018	Central vacuum system No. 1	028	Sugar silo No. 3
019	Sugar packaging line Nos. 0-9 (New Line "0")	045	Powdered sugar dryer/cooler
020	Sugar grinder	046	Powdered sugar hopper
026	Sugar silo No. 1	047	Sugar packaging lines (11-14)
027	Sugar silo No. 2	xxx	Railcar sugar unloading receiver Nos. 1 and 2 (New)

EQUIPMENT

1. Existing Equipment: The transshipment facility consists of the following existing equipment: central vacuum system No. 1 (EU-018); sugar packaging line Nos. 1-9 (EU-019); sugar grinder (EU-020); sugar silo No. 1 (EU-026); sugar silo No. 2(EU-027); sugar silo No. 3(EU-028); powdered sugar dryer/cooler (EU-045); powdered sugar hopper (EU-046); and sugar packaging lines 11-14 (EU-047). Each existing unit shall be controlled by a baghouse system. This air construction permit supersedes all previous air construction permits for the transshipment facility. [Rule 62-4.070(3), F.A.C.]

2. New Sugar Packaging Line: The permittee is authorized to the install a new packaging line "0". The new packaging line will be added to the group of existing packaging lines 1-9 (EU-019) and shall be controlled by the existing common baghouse. [Design; Application No. 0990005-019-AC]

3. New Railcar Sugar Unloading Receivers: The permittee is authorized to the install two new railcar sugar unloading receivers (Nos. 1 and 2). The new equipment (EU-xxx) shall be controlled by two separate baghouse systems. [Design; Application No. 0990005-019-AC]

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

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

a. New and replacement bags shall meet these specifications based on vendor information. No particulate matter emissions tests are required.

b. These rates represent the maximum expected emissions based on the baghouse design specification, the maximum exhaust flow rates, and 8760 hours of operation per year. These rates are not enforceable emissions standards.

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

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

PERFORMANCE RESTRICTIONS

6. Permitted Capacity: The maximum sugar packaging rate is 1300 tons per day. [Rule 62-210.200(PTE), F.A.C.; [Design; Application No. 0990005-019-AC]

7. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rule 62-4.070(3), F.A.C; 62-210.200(PTE), F.A.C.]

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

9. Fugitive Dust Emissions: This permit requires the use of fans, filters, pneumatic unloading/loading, ductwork, storage silos and other similar equipment to contain, capture, and/or control particulate matter related to the storage and handling of sugar at the transshipment facility. The permittee shall also take the following reasonable precautions to prevent fugitive particulate matter emissions from any activity, including: vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling.

   a. Enclose or cover conveyor systems.

   b. Confine abrasive blasting where possible.

   c. As necessary, landscape and/or plant vegetation.

   d. As necessary, pave and maintain high-traffic roads, parking areas and yards.

   e. As necessary, remove particulate matter from roads, work areas, buildings, and other paved areas under the control of the permittee to prevent fugitive dust emissions.

   f. As necessary, apply water or other dust suppressants to control emissions from unpaved roads, yards, and other activities as road grading, land clearing, and the demolition of buildings.

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

10. Objectionable Odor Prohibited: The transshipment facility shall not discharge air pollutants which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(203), F.A.C.]

EMISSIONS STANDARDS

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

12. Excess Emissions - Allowed: Excess emissions resulting from malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions

shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

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

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

PERFORMANCE TESTING

15. Initial Compliance Tests: For this expansion project, each baghouse exhaust point for EU-019 and EU-xxx shall be tested to demonstrate initial compliance with the specified opacity standard. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rule 62-297.310(7)(a)1, F.A.C.]

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

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

18. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required test. [Rule 62-297.310(7)(a)9, F.A.C.]

19. Test Method: All tests shall be conducted in accordance with EPA Method 9, which is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. Tests shall also comply with the applicable requirements of Rule 62-297.310, F.A.C. See Appendix C in Section 4 of this permit. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

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

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

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

RECORDS AND REPORTS

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

    1. The type, location, and designation of the emissions unit tested.
    2. The facility at which the emissions unit is located.

3. The owner or operator of the emissions unit.
4. The normal type and amount of materials processed, and the types and amounts of material processed during each test.
5. The means, raw data and computations used to determine the amount of materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. The date, starting time and duration of the test.
8. The test procedure used.
9. The names of individuals who furnished the process variable data, conducted the test, and prepared the report.
10. The applicable standard for the emissions unit and the test result in the same form and unit of measure.
11. A certification that, to the knowledge of the owner or his authorized agent, all data submitted is true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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

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

25. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

26. Operational Data: The permittee shall maintain adequate records of the sugar packaging rate to demonstrate compliance with the conditions of this permit. [Rule 62-4.070(3), F.A.C.]

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SECTION 4. APPENDIX A
CITATION FORMATS

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

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

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

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

New Permit Numbers

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

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

PSD Permit Numbers

Example: Permit No. PSD-FL-317

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

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

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

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

Code of Federal Regulations (CFR)

Example: [40 CRF 60.7]

Means: Title 40, Part 60, Section 7

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 (Not Applicable);
    b. Determination of Prevention of Significant Deterioration (Not Applicable); and
    c. Compliance with New Source Performance Standards (Not Applicable).

14. The permittee shall comply with the following:

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

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

    c. Records of monitoring information shall include:

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

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

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Air Permit No. 0990005-019-AC
Okeelanta Sugar Mill and Refinery
Sugar Transshipment Facility
Expansion Project

PROJECT DESCRIPTION

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

The transshipment facility emits particulate matter due to the handling and storage of sugar. The transshipment facility was constructed in 1996 with nine sugar packaging lines (1-9) and consisted of four primary areas: truck unloading; packaging; warehouse; and office/administration areas. An expansion project in 2000 added: four new packaging lines (11-14); a pneumatic main sugar receiver storage bin; and additional packaging/storage areas. This project will add packaging line "0" and two railcar unloading receivers. The transshipment facility has been permitted such that total potential emissions of all included emissions units are below the PSD significant emission rate of 15 tons per year of PM10. After this expansion project, the total potential emissions from the transshipment facility will remain below the PSD significant emission rate of 15 tons per year of PM10 at approximately 12 tons per year. Therefore, this project is not 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)

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

CC: Korner

Golder Associates Inc.

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

Golder Associates

January 19, 2006

0637507

RECEIVED
JAN 30 2006
BUREAU OF AIR REGULATION

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

Attention: Mr. Ron Blackburn, Air Programs Manager

RE: OKEELANTA CORPORATION/NEW HOPE POWER PARTNERSHIP
AIR CONSTRUCTION PERMIT APPLICATION
TRANS-SHIPMENT FACILITY EXPANSION

Dear Mr. Blackburn:

Please find enclosed four (4) copies of the Air Construction Permit Application for the expansion of the trans-shipment facility at the Okeelanta Corporation's sugar refinery. 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/all

Enclosures

cc: Matt Capone
J. Morner, PBCo.

Y:\Projects\2006\0637507 Okeelanta Tranship\4.1\L011906.doc

APPLICATION FOR
AIR CONSTRUCTION PERMIT
TRANS-SHIPMENT FACILITY EXPANSION

OKEELANTA CORPORATION
SOUTH BAY, FLORIDA

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

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

January 2006

0637507

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

APPLICATION FOR AIR PERMIT – LONG FORM

Department of Environmental Protection

Division of Air Resource Management

RECEIVED
JAN 30 2006
BUREAU OF AIR REGULATION

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 & New Hope Power Partnership Facilities**
3. Facility Identification Number: **0990005 and 0990332**
4. Facility Location...:
   Street Address or Other Locator: **21250 U.S. Highway 27 South**
   City: **South Bay** County: **Palm Beach** Zip Code: **33493**
5. Relocatable Facility? ☐ Yes ☒ No
6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Matt Capone, Director of Environmental Programs**
2. Application Contact Mailing Address...
   Organization/Firm: **Okeelanta Corporation**
   Street Address: **21250 U.S. Highway 27**
   City: **South Bay** State: **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:	1-30-06
2. Project Number(s):	0990005-019-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 construct two sugar receivers to pneumatically unload sugar from railcars and increase sugar packaging capacity of the Trans-Shipment facility from 865 tons per day to 1,300 tons per day.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
018-020, 026-028, 045-047	Okeelanta Sugar Trans-Shipment Facility	ACIF	

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 South**
   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 Date

APPLICATION INFORMATION

Application Responsible Official Certification

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

1. Application Responsible Official Name:
   Ricardo A. Lima, Vice President and General Manager
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
   - ☐ 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.
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**
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.

   R A Lima — Signature

   1-14-06 — 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.

_____ _____

Signature Date

(seal)

* Attach any exception to certification statement.

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

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

1/19/06
Date

(seal)

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

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

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

Facility Contact

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

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: **April, 2005**

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: ☒ Attached, Document ID: **Attachment A** ☐ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: ☒ Attached, Document ID: **Attachment A**
3. Rule Applicability Analysis: ☒ Attached, Document ID: **OC-FI-CC3**
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: **Attachment A** ☐ 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

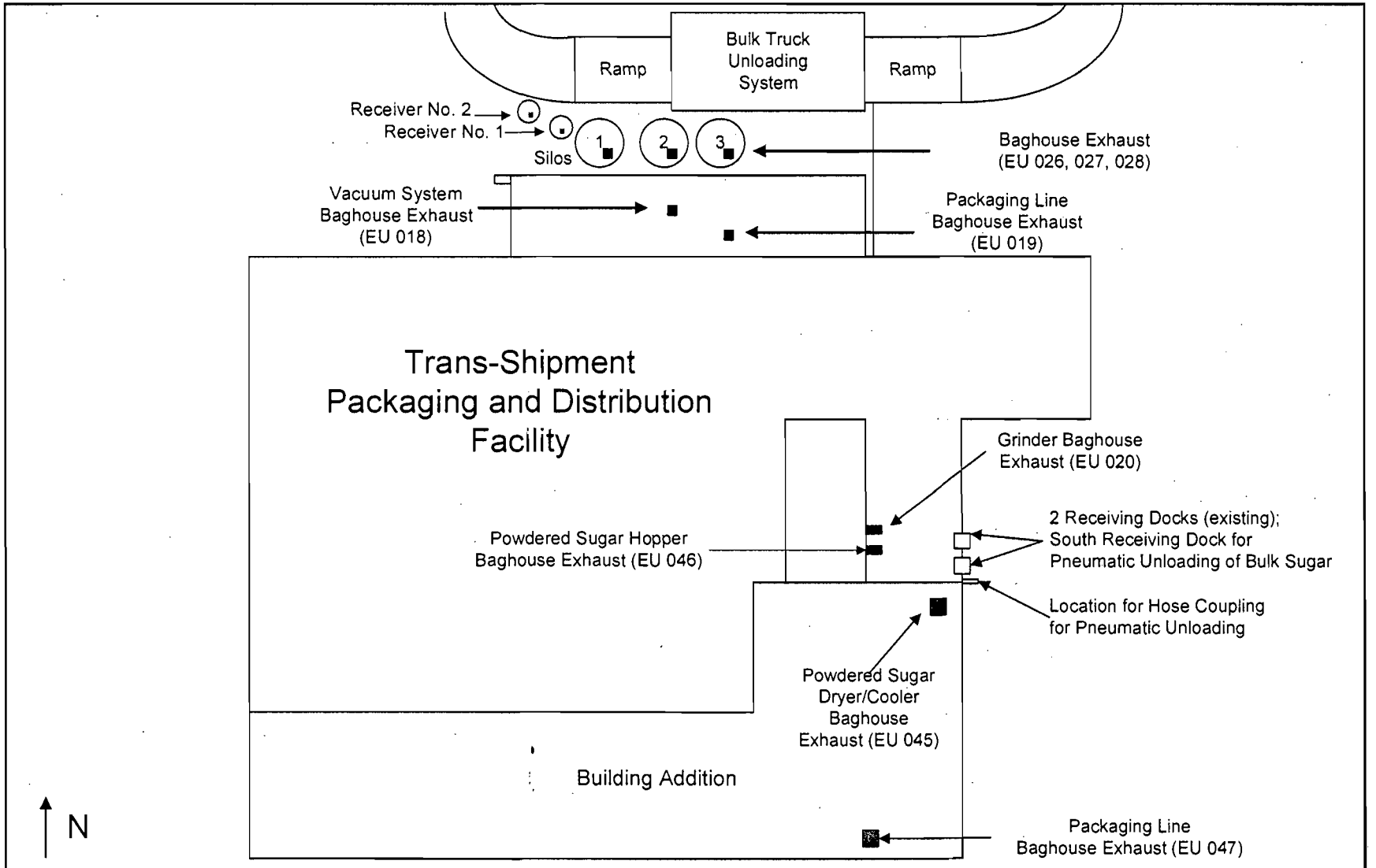
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:_____ ☐ Not Applicable

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

Additional Requirements Comment

ATTACHMENT OC-FI-C1

FACILITY PLOT PLAN



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

Attachment OC-FI-C1a
Trans-Shipment Packaging and Distribution Facility Plot Plan
Okeelanta Corporation

0637507/4.4/OC-FI-C1a.vsd

Golder Associates

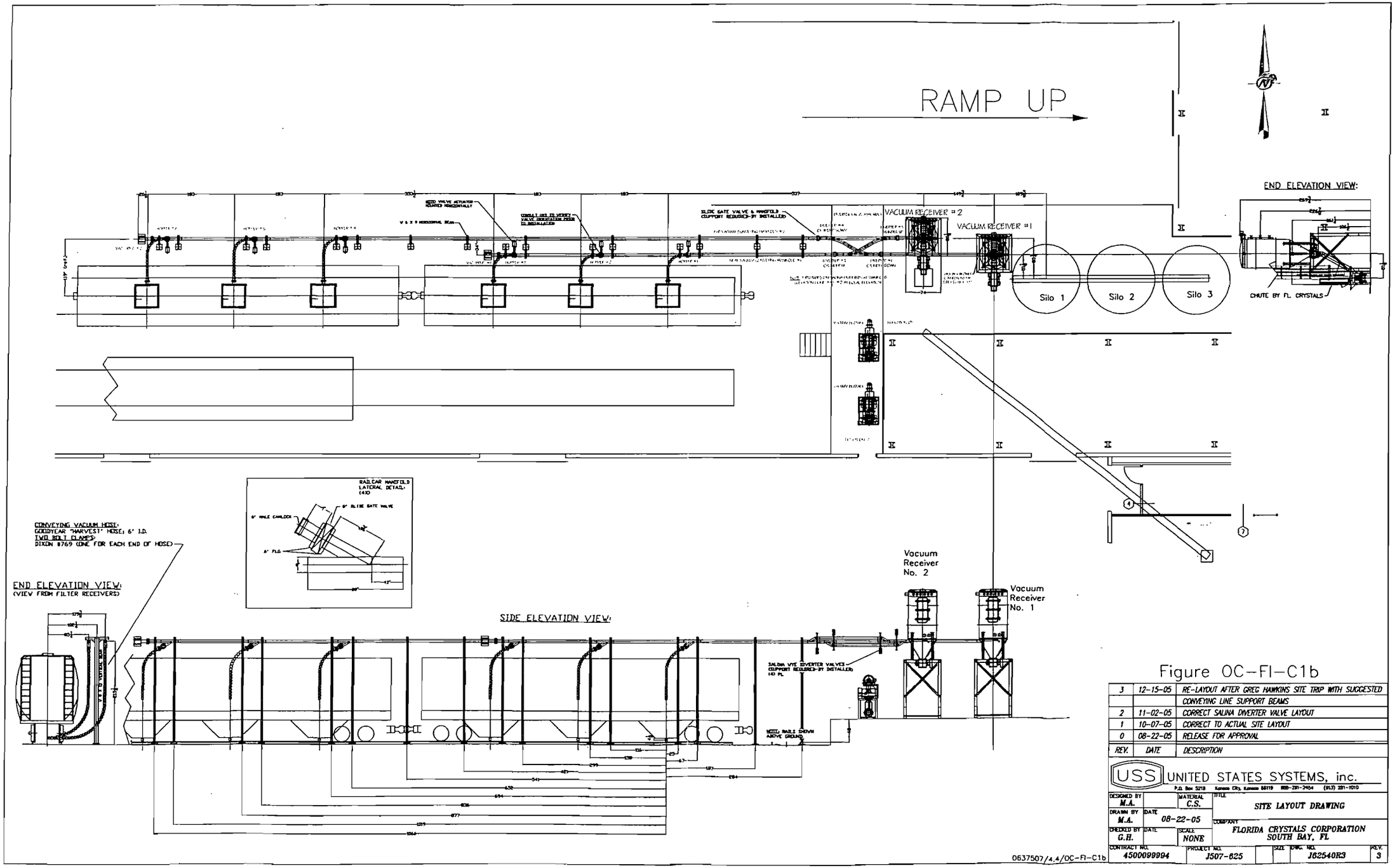


Figure OC-FI-C1b

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

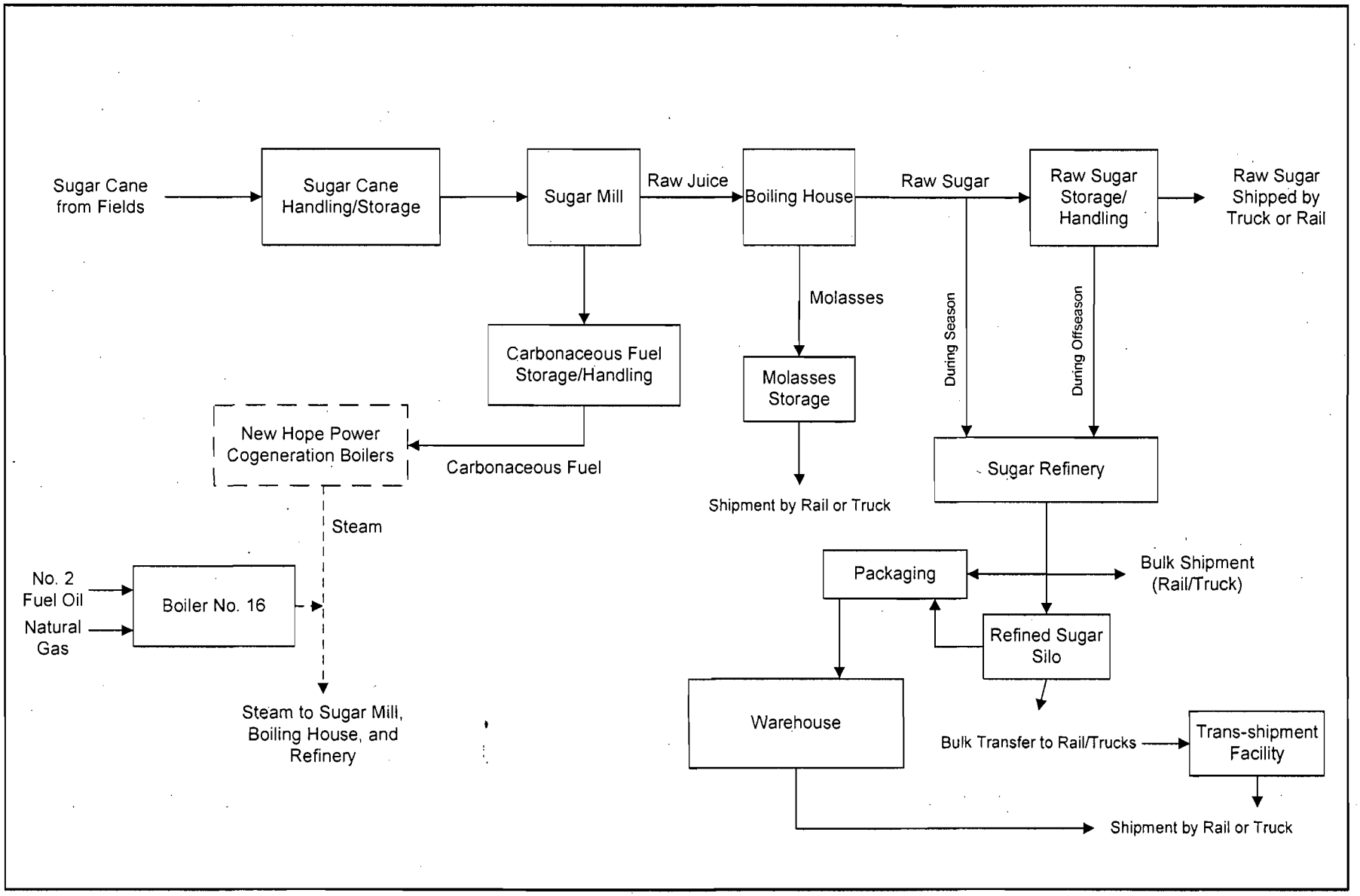
USS UNITED STATES SYSTEMS, inc.
P.O. Box 5218 Kansas City, Kansas 66119 800-231-2464 (913) 231-1010

DESIGNED BY: M.A.	MATERIAL: C.S.	TITLE: SITE LAYOUT DRAWING	
DRAWN BY: M.A.	DATE: 08-22-05	COMPANY: FLORIDA CRYSTALS CORPORATION SOUTH BAY, FL	
CHECKED BY: G.H.	DATE:	SCALE: NONE	
CONTRACT NO.: 4500099994	PROJECT NO.: J507-625	SIZE:	DWG. NO.: J62540R3 REV.: 3

0637507/4.4/OC-FI-C1b

ATTACHMENT OC-FI-C2

PROCESS FLOW DIAGRAM



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

Overall Sugar Mill - Facility Flow Diagram

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

Golder Associates

0637507/4.4/OC-FI-C2.vsd

ATTACHMENT OC-FI-CC3

IDENTIFICATION OF APPLICABLE REQUIREMENTS FOR THE TRANSHIPMENT FACILITY

ATTACHMENT OC-FI-CC3

SUGAR TRANS-SHIPMENT FACILITY RULE APPLICABILITY FOR OKEELANTA CORPORATION

APPLIC STAT	RULE DESCRIP	RULE NUMBER	RULE TITLE
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(2)b	
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(7)(a)1	
APPLICABLE	62-297	62-297.310(7)(a)3	
APPLICABLE	62-297	62-297.310(7)(a)4.a	
APPLICABLE	62-297	62-297.310(7)(a)9	
APPLICABLE	62-297	62-297.310(7)(c)	
APPLICABLE	62-297	62-297.310(8)	Test reports.
APPLICABLE	62-297	62-297.401	Compliance Test Methods.
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(9)	EPA Test Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources - 40 CFR 60, Appendix A
APPLICABLE	62-297	62-297.620	Exceptions and Approval of Alternate Procedures and Requirements.
APPLICABLE	62-296	62-296.320	General Pollutant Emission Limiting Standards
APPLICABLE	62-296	62-296.320(4)(a)	General Particulate Emission Limiting Standards - Process weight table

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.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

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

Emissions Unit Description and Status

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

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

3. Emissions Unit Identification Number: **018, 019, 020, 026, 027, 028, 045, 046, 047**

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: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
    This emission unit consists of Multiple Emission Points: The Vacuum System Baghouse (EU 018), the Packaging Lines Baghouse (EU 019), the Grinder Baghouse (EU 020), the three Sugar Silo Baghouses (EU 026, 027, and 028), the Powdered Sugar Dryer/Cooler Baghouse (EU 045), the Powdered Sugar Hopper Baghouse (EU 046), the new Packaging Lines Baghouse (EU 047), and two new emission points consisting of the railcar unloading receivers Nos. 1 and 2 baghouses.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

1 baghouse (Vacuum System)

2 baghouses (Packaging Lines)

1 baghouse (Grinder & Hopper)

3 baghouses (One for each of 3 Storage Silos)

1 baghouse (Powdered Sugar dryer/cooler)

Cyclonic Separator (Inlet side of vacuum pump of Vacuum System)

1 baghouse (Powdered Sugar Hopper)

1 baghouse (Railcar Unloading Receiver No. 1)

1 baghouse (Railcar Unloading Receiver No. 2)

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

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

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

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

Emission Point Description and Type

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

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

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

Segment Description and Rate: Segment _____ of _____

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

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	018		EL

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

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

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

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **2.8** lb/hour **12.28** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference: **See Table A-1.**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **See Table A-1 for calculations.**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

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: **12.28 TPY**	4. Equivalent Allowable Emissions: **2.8** lb/hour **12.28** tons/year
5. Method of Compliance: **EPA Method 9**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on requested allowable emissions.**	

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: **VE05**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **5 %** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Existing permit condition. Rule 62-297.620(4), F.A.C.**	

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

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

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor _____ of _____

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

Continuous Monitoring System: Continuous Monitor _____ of _____

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

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

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

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

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

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

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

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: _____
   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: _____ ☒ Not Applicable

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

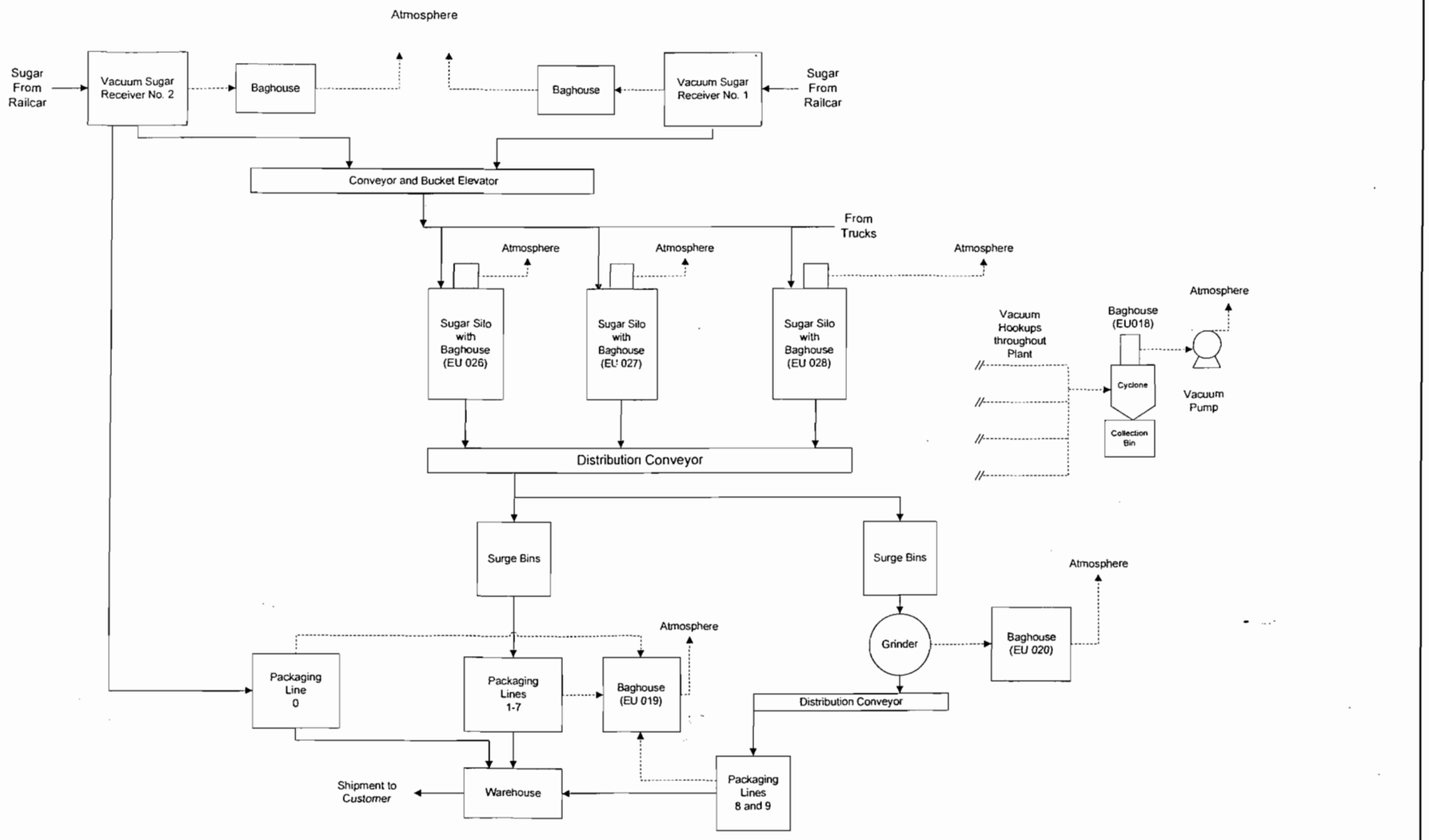
1. Identification of Applicable Requirements
   ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: _____ ☐ Not Applicable
4. Alternative Modes of Operation (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

Trans-Shipment facility permit No. 0990005-008-AC presented in Attachment B.

ATTACHMENT OC-EU1-I1

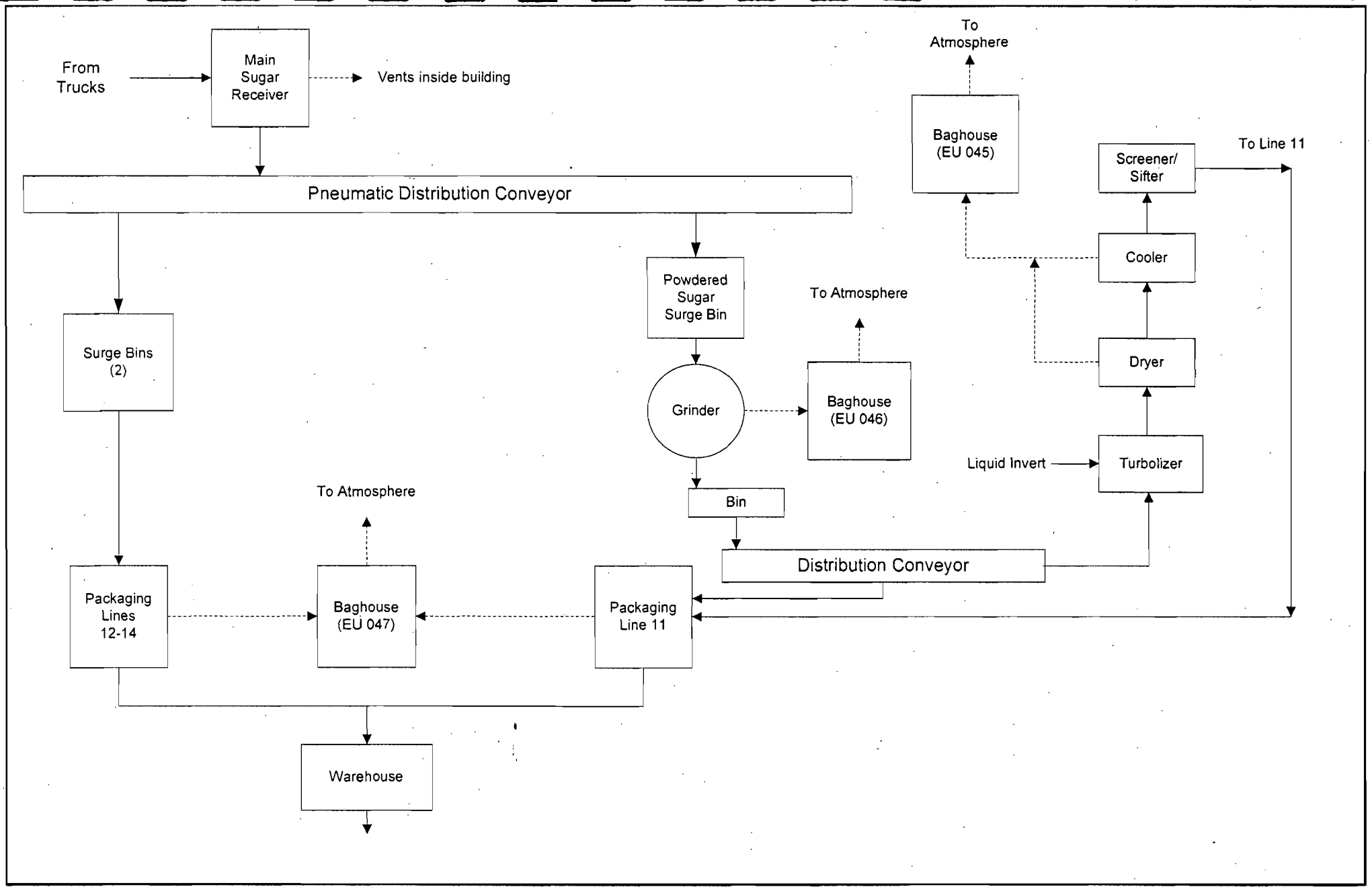
PROCESS FLOW DIAGRAMS



Attachment OC-EU1-I1a. Process Flow Diagram
Trans-Shipment Facility - Phase 1 and Increased Capacity
Okeelanta Corporation Refinery
South Bay, Florida

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

Golder Associates



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

Process Flow Legend
Solid/Liquid
Gas

0637507/4.4/OC-EU1-I1b

Golder Associates

ATTACHMENT OC-EU1-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT OC-EU1-I3a

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

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.024

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3b

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

Packaging Lines 0-9		
Manufacturer and Model No.	MAC Environmental Model 55AVSC64 Style III	
Outlet Gas Temp (°F)		75
Outlet Gas Flow Rate (acfm)		10,000
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		9,869
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Polyester Pleated
Total Area of Filter Media (sq. ft)		3,520
Air to Cloth Ratio		2.84
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.857

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3c

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

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.013

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

Sample calculations:

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

ATTACHMENT OC-EU1-I3d

CONTROL EQUIPMENT PARAMETERS FOR THE SUGAR STORAGE SILOS BAGHOUSES (EU 026, 027, AND 028) AT THE TRANS-SHIPMENT FACILITY

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.0857

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

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

ATTACHMENT OC-EU1-13e

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

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.771

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

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

ATTACHMENT OC-EU1-I3f

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

Powdered Sugar Hopper Baghouse		
Manufacturer and Model No.	Reimelt Corp. Model 24TB-FRIP-32:S6	
Outlet Gas Temp (°F)		90
Outlet Gas Flow Rate (acfm)		1,800
Exhaust Gas Moisture Content (%)		0.025
Outlet Gas Flow Rate (scfm)		1,728
Cleaning Method		Pulse Jet cleaning (Timer Actuated)
Bag Material		Spun Bond Polyester (pleated elements)
Total Area of Filter Media (sq. ft)		325
Air to Cloth Ratio		5.54
Manufacturer's Guaranteed Outlet Loading (grains/acf)		0.01
Pollutants		Outlet Loading
Particulate Matter (lb/hr)		0.154

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

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

ATTACHMENT OC-EU1-I3g

CONTROL EQUIPMENT PARAMETERS FOR THE PACKAGING LINES 11-14 BAGHOUSE (EU 047) AT THE TRANS-SHIPMENT FACILITY

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.514

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

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

ATTACHMENT OC-EU1-I3h

CONTROL EQUIPMENT PARAMETERS FOR THE VACUUM RECEIVER NOS. 1 AND 2 BAGHOUSES AT THE TRANS-SHIPMENT FACILITY

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

Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.105

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

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

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

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MESSAGE TRANSMITTAL

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

Dear Matthew,

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

media: polyester

weight: 16 oz./sq yd

construction: scrim supported felt

mullen burst strength: 375 psi

thermal stability: 2% maximum at 275 degrees F for 2 hours

operating temp.: 240 degrees F

finish: heat set and calendered

permeability: 17-40cfm/sq ft @ 0.5" w.c.

Sincerely,

Greg Hawkins
Sales Manager

cc: Mark Aron -- United States Systems

ATTACHMENT A

1.0 INTRODUCTION

Okeelanta Corporation is proposing to modify the existing Packaging and Distribution Facility (also known as the Trans-Shipment Facility) at the Okeelanta sugar complex located near South Bay, Florida. The facility location is shown in Figure A-1 Area Map. The proposed modification will increase the amount of refined sugar packaged at the Trans-Shipment Facility from 865 to 1,300 tons per day (TPD). The construction of two new sugar receivers and one new sugar packaging line will be required to accomplish the increase. Sugar dust from each receiver will be controlled by an integral baghouse.

2.0 FACILITY DESCRIPTION

2.1 Existing Facility

The Trans-Shipment Facility is located approximately 2,500 feet south of the Okeelanta sugar mill and refinery. A detailed facility plot plan showing the Trans-Shipment Facility is presented in Attachment OC-FI-C1. Granulated, refined sugar is transported by trucks from the refinery to the Trans-Shipment Facility, where the sugar is packaged according to customer's requirements. The packaged sugar is then shipped by rail or truck to market.

The initial Trans-Shipment Facility construction in 1996 consisted of four primary areas; truck unloading, packaging, warehouse, and office/administration areas. The packaging area consisted of nine packaging lines (1 through 9). The initial building area occupied approximately 143,000 square feet of space. An expansion of the facility in 2000 added approximately 39,000 square feet of packaging and raw material storage area, a new pneumatic main sugar receiver (storage bin), and four new packaging lines (11 through 14).

At the refinery, extra-fine granulated (EFG) sugar is loaded into 80,000 pound gross weight trucks and is transported from the refinery to the Trans-Shipment Facility. Currently, the trucks are unloaded at two locations – the bulk truck unloading system at the north end of Trans-Shipment Facility and a receiving dock at the east side of the facility. The bulk truck unloading system at the north end of the facility consists of two stations, each capable of unloading 87,500 pounds per hour (lb/hr) of refined sugar. The receiving dock at the east side of the facility is a pneumatic unloading station with a capacity of 30,000 lb/hr of refined sugar.

When receiving product at the bulk truck unloading station, a hydraulically operated boot mechanism locks pneumatically against the truck's hopper. The EFG sugar is fed from the truck into a screw

conveyor, to a bucket elevator, and then into one of the three storage silos. The design capacity for the conveyors feeding the silos is 205,000 lb/hr.

From the silos, the sugar is transported by screw conveyor into surge bins located above packaging lines 1 through 9. The EFG sugar is metered from the surge bins into the nine packaging lines, where various size packages and containers are filled with the sugar for wholesale and retail distribution. A portion of the EFG sugar is conveyed to the grinder, where starch is added to produce powdered sugar at a design capacity of 8,000 lb/hr. Brown sugar is also produced at the Trans-Shipment Facility by mixing either light or dark molasses with the EFG sugar. Brown sugar can be produced at a design rate of 8,000 lb/hr.

The pneumatic unloading system at the east side of the facility unloads sugar into the main sugar receiver for packaging lines 11 through 14. From the main sugar receiver, the sugar is transported by pneumatic distribution conveyor into surge bins above packaging lines 12, 13, and 14. The EFG sugar is metered from the surge bins into the three packaging lines, where various size packages and containers are filled with the sugar for wholesale and retail distribution. A portion of the EFG sugar from the main sugar receiver is conveyed to the powdered sugar surge bin above the grinder. The grinder produces powdered sugar, which is conveyed to packaging line 11 for packaging.

After being packaged, the filled containers are palletized and wrapped in a plastic stretch wrap in the warehouse area. Shipping can be by rail or truck. See Attachment OC-EU1-I1, Trans-Shipment Facility Flow Diagram, for details.

The office and administration area has offices, lockers, conference rooms, and employee break rooms.

2.2 Facility Modification

Okeelanta is proposing to add two new sugar receivers to unload bulk sugar from railcars, and a new packaging line designated line 0, at the Trans-Shipment Facility. This expansion will increase the nominal packaging rate from 865 TPD to 1,300 TPD.

The new sugar receivers will be located immediately west of the three existing silos on the north side of the facility. A plot plan showing the locations of the new receivers is presented in Attachment OC-FI-C1. Refined sugar from the refinery will be pneumatically unloaded from railcars into the two new sugar receivers. Sugar from the receivers will be conveyed to the silos via conveyors and bucket

elevators. The west receiver will also transfer sugar directly to the new packaging line 0. Dust from each of the receivers will be controlled by a United States Systems baghouse. Packaging line 0 will be used to fill totes north of line 1 in the existing packaging room. Sugar dust from the filling station will be controlled by suction ventilation ductwork added to the existing baghouse controlling emissions from packaging lines 1 through 9.

3.0 EMISSION ESTIMATES

The emissions from the Trans-Shipment Facility consist of particulate matter (PM) in the form of sugar dust, all of which is assumed to be particulate matter of less than 10 microns (PM_{10}). Currently, emissions at the Trans-Shipment Facility are controlled by nine baghouses. Two integral baghouses will be used to control emissions from the two new sugar receivers. Sugar dust from the new packaging line 0 will be controlled by the existing baghouse for packaging lines 1 through 9 (emissions unit 019).

Based on the baghouse manufacturer's data, the maximum particulate emissions from the Trans-Shipment Facility after the expansion is completed will be 12.28 tons per year (TPY), an increase of less than 1 TPY from the current emission limit of 11.35 TPY. See Table A-1, Summary of Particulate Emissions, for the Trans-Shipment Facility for emission calculations. Stack data are presented in Table A-2. See Attachment OC-EU1-I3 for information on the future emissions control equipment to be used at the Trans-Shipment Facility.

TABLE A-1
SUMMARY OF PARTICULATE EMISSIONS FOR THE TRANS-SHIPMENT FACILITY

Emission Segment Source	Point ID	Baghouse Guaranteed Manufacturer's Emission Rate	Baghouse Gas Flow Rate	Hourly Emissions (lb/hr)	Annual Emissions [a] (TPY)
Vacuum System 1	018	0.01 gr/scf	280 scfm	0.024	0.105
Packaging Lines 0-9	019	0.01 gr/acf	10,000 acfm	0.857	3.754
Grinder	020	0.0005 gr/scf	2,961 scfm	0.013	0.060
Silo No. 1	026	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 2	027	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 3	028	0.02 gr/scf	500 scfm	0.0857	0.375
Powdered Sugar Dryer/Cooler	045	0.01 gr/acf	9,000 acfm	0.771	3.379
Powdered Sugar Hopper	046	0.01 gr/acf	1,800 acfm	0.154	0.676
Packaging Lines 11-14	047	0.01 gr/acf	6,000 acfm	0.514	2.253
Railcar Unloading Receiver #1	--	0.02 gr/scf	615 scfm [b]	0.105	0.462
Railcar Unloading Receiver #2	--	0.02 gr/scf	615 scfm [b]	0.105	0.462
		Total Particulate Emissions All So		2.802 lb/hr	12.276 TPY

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

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

TABLE A-2
STACK PARAMETER SUMMARY TABLE FOR THE TRANS-SHIPMENT FACILITY

Emission Source	Control Device	Point ID	Discharge Type	Stack Height (ft)	Exit Diameter (ft)	Exit Temperature (° F)	Actual Volumetric Flow Rate (acfm)	Percent Water Vapor (%) [a]	Maximum Standard Flow Rate (scfm)
Vacuum System	Baghouse	018	Horizontal	8	0.33	75	284	0.025	280
Packaging Lines 0-9	Baghouse	019	Vertical	27	1.5	75	10,000	0.025	9,869
Grinder	Baghouse	020	Horizontal	39	1.0 [b]	75	3,000	0.025	2,961
Silo No. 1	Baghouse	026	Horizontal	65	0.5	90	521	0.025	500
Silo No. 2	Baghouse	027	Horizontal	65	0.5	90	521	0.025	500
Silo No. 3	Baghouse	028	Horizontal	65	0.5	90	521	0.025	500
Powdered Sugar Dryer/Cooler	Baghouse	045	Vertical	48	2.0	90	9,000	0.025	8,640
Powdered Sugar Hopper	Baghouse	046	Horizontal	48	0.75	90	1,800	0.025	1,728
Packaging Lines 11-14	Baghouse	047	Vertical	48	1.75	90	6,000	0.025	5,760
Railcar Unloading Receiver #1	Baghouse	--	Horizontal	5.0	0.50	90	641	0.025	615
Railcar Unloading Receiver #2	Baghouse	--	Horizontal	5.0	0.50	90	641	0.025	615

Footnotes:

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

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

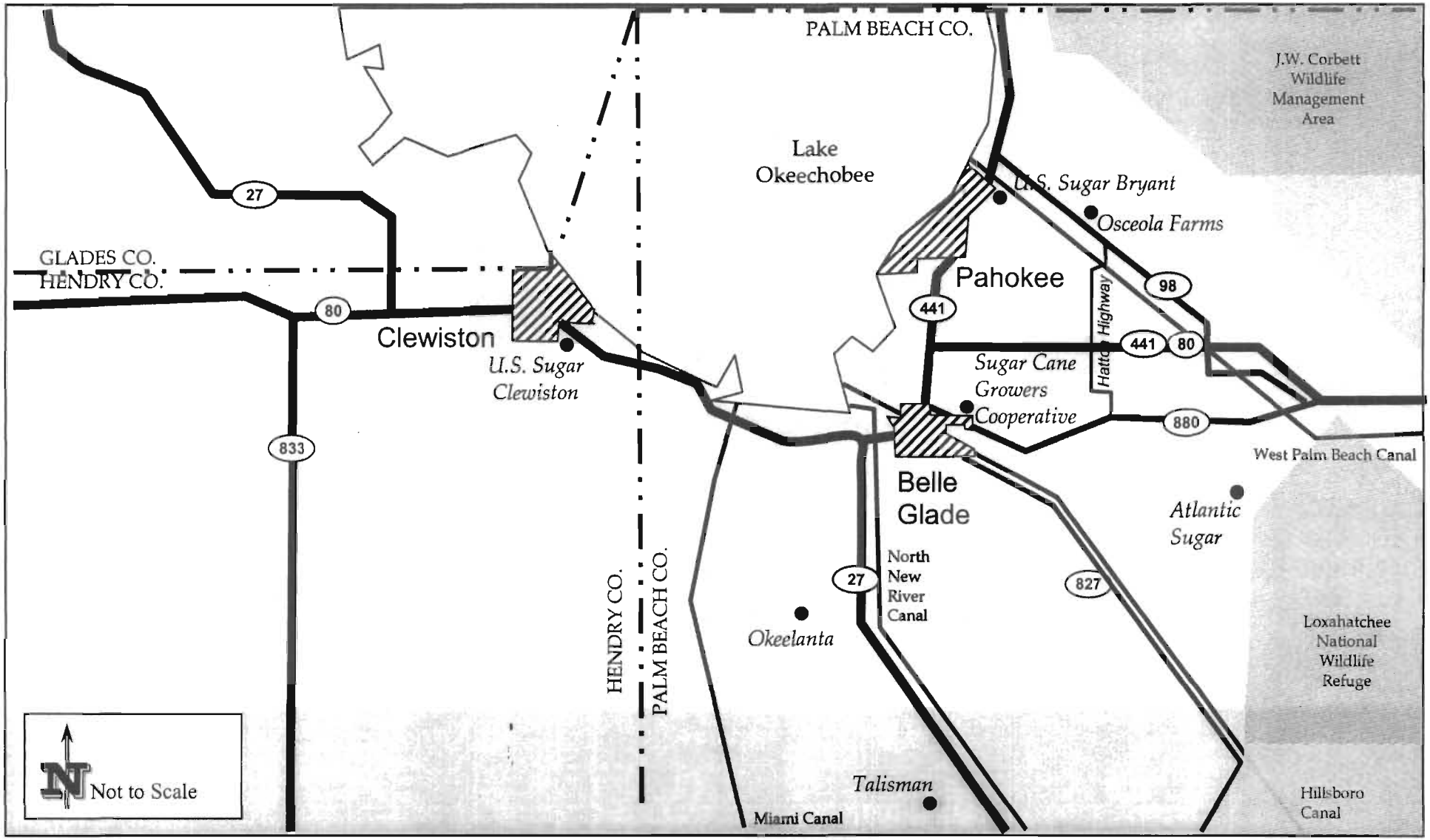


Figure A-1
Location of Florida Sugar Mills

Source: Golder Associates Inc., 2006

0637507/4.4/Figure A-1.doc

Golder Associates

ATTACHMENT B

TRANS-SHIPMENT FACILITY PERMIT NO. 0990005-008-AC

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

NOTICE OF PERMIT ISSUANCE

May 10, 2001

CERTIFIED MAIL 7000 0600 0024 1469 9439
RETURN RECEIPT REQUESTED

In the Matter of an Application
for Permit by:

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

Re: Palm Beach County - AP
Okeelanta Corporation
Transhipment Facility
DEP File No. 0990005-008-AC
South Florida EMA

Enclosed is Permit Number 0990005-008-AC to install a new baghouse on the main sugar receiver, a new sugar grinder with baghouse and new packaging lines with baghouse. These changes will be made a the transhipment facility located about 0.5 mil south of the sugar refinery, west of U.S. Highway 27, south of South Bay Florida. This permit is issued under section(s) 403.087, of the Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell
Director of
District Management
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901-3881
(941) 332-6975

"More Protection, Less Process"

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on May 10, 2001 to the listed persons.

Clerk Stamp

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

Lucie Kaefe 5/10/01
(Clerk) (Date)

RWC/DMK/jw

Enclosures

Copies furnished to:

Matthew Capone, Okeelanta Corporation
David A. Buff, P.E., Golder Associates, Inc.
Palm Beach County Health Department
Jeff Koerner, P.E., DEP, Tallahassee

1005 A 1 YAM

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

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

I.D. No.: 0990005
Permit/Certification
Number: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006
County: Palm Beach
Latitude: 26° 34' 16" N
Longitude: 80° 44' 45" W
Section/Town/Range: 16/45S/36E
Project: New Sugar Grinder and Packaging Lines

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

Install a new baghouse on the main sugar receiver, a new sugar grinder with baghouse and new packaging lines with baghouse. These changes will be made at the transhipment facility located about 0.5 mile south of the sugar refinery, west of U.S. Highway 27, south of South Bay, Florida.

PERMITTEE:
Okeelanta Corporation

I.D. No.: 0990005
Permit/Cert. No.: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006

SPECIFIC CONDITIONS:

1. The hours of operation of this facility are not restricted.

2. This facility shall be operated in such a fashion so as to preclude objectionable odors. [Rule 62-296.320(2), F.A.C.]

3. Copies of all applications, reports, tests, and notifications shall also be submitted to the Air Pollution Control Section of the Palm Beach County Public Health Unit located at 901 Evernia Street (Post Office Box 29), West Palm Beach, Florida 33402-0029.

4. All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions may include, but not be limited to, the following:

A. Paving and maintenance of roads, parking areas, and yards.
B. Application of water when necessary to control emissions.
C. Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent reentrainment, and from buildings or work areas to prevent particulate.
D. Enclosure or covering of conveyor systems.
E. Posting of vehicle (or truck) speed limits.

[Rule 62-296.320(3), F.A.C.]

5. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Conditions of Compliance:

6. The applicant shall retain a registered professional engineer for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents.
[Rule 62-4.050(3), F.A.C.]

7. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction.

8. Each of the emission units has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse. Therefore the Department waives any particulate matter compliance test requirements for such emissions unit specified in any otherwise applicable rule, and specify an alternative standard of 5% opacity.

SPECIFIC CONDITIONS:

If the Department has reason to believe that the particulate weight emission standard applicable to such an emissions unit is not being met, it shall require that compliance be demonstrated by the test method specified in the applicable rule.
[Rule 62-297.620(4), F.A.C.]

9. Okeelanta Corporation, the Permittee, has requested lower emissions limits than what is allowed in the Process Weight Tables. Based on baghouse manufacturer's guarantees, these emissions would be the basis for the Title V fees and are shown in the attached Table A-1.

10. The nominal sugar packaging rate will be 865 tons/day.

Required Testing:

11. Visible emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA Method Nine as published in 40 CFR-60 Appendix A, or State approved equivalent method. Such test shall be conducted within 30 days of initial operation. The Department shall be notified at least 15 days prior to testing to allow witnessing.
[Rule 62-297.310, F.A.C.]

12. Testing of emissions should be conducted with the source operating within 10% of its rated capacity. Testing may be conducted at less than 90% of rated capacity; however, if so subsequent source operation is limited to 110% of the test load. Once the unit is so limited, then operation at higher capacities is allowed for purposes of additional compliance testing to regain rated capacity in the permit with prior notification to the Department's South District.

13. Notification of the Department prior to any required testing shall include as a minimum: the date and time of the test, the exact location of the test, and the name and telephone number of the contact person on site.
[Rule 62-297.310, F.A.C.]

Reports and Recordkeeping:

14. An annual operation report shall be submitted by March 1st each year.
[Rule 62-4.070(3), and Rule 62-210.370(2), F.A.C.]

General Conditions:

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

PERMITTEE:
Okeelanta Corporation

I.D. No.: 0990005
Permit/Cert. No.: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006

SPECIFIC CONDITIONS:

General Conditions:

NOTE: In the event of an emergency the permittee shall contact the Department by calling (850) 413-9911. During normal business hours, the permittee shall call **(941) 332-6975.**

Issued this 10th day of May, 2001.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell

Richard W. Cantrell
Director of
District Management

RWC/DMK/jw

9 Pages Attached

PERMITTEE:
Okeelanta Corporation

I.D. No.: 0990005
Permit/Cert. No.: 0990005-008-AC
Date of Issue: May 10, 2001
Expiration Date: May 10, 2006

GENERAL CONDITIONS:

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

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

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

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

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

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

GENERAL CONDITIONS:

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

a. Have access to and copy any records that must be kept under the conditions of the permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

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

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

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

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

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

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

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

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.

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-30.300, F.A.C. as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

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

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

(c) Records of monitoring information shall include:

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

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

Table A-1. Summary of Particulate Emissions for the Transhipment Facility, Florida Crystals Food Corporation

Emission Segment Source	Point ID	Baghouse Guaranteed Manufacturer's Emission Rate	Baghouse Gas Flow Rate	Hourly Emissions (lb/hr)	Annual Emissions[a] (TPY)
Existing Sources					
Vacuum System 1 Baghouse	018	0.01 gr/scf	280 scfm	0.024	0.105
Packaging Lines Baghouse	019	0.01 gr/acf	10,000 acfm	0.857	3.754
Grinder Baghouse	020	0.0005 gr/scf	2,960 scfm	0.013	0.060
Silo No. 1 Baghouse	026	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 2 Baghouse	027	0.02 gr/scf	500 scfm	0.0857	0.375
Silo No. 3 Baghouse	028	0.02 gr/scf	500 scfm	0.0857	0.375
			Subtotal Existing Sources	1.151 lb/hr	5.044 TPY
New Sources					
Main Sugar Receiver Baghouse		0.01 gr/acf	9,000 acfm	0.771	3.379
Powdered Sugar Hopper Baghouse		0.01 gr/acf	1,800 acfm	0.154	0.676
Packaging Lines Baghouse		0.01 gr/acf	6,000 acfm	0.514	2.253
			Subtotal New Sources	1.440 lb/hr	6.308 TPY
			Total Particulate Emissions All Sources	2.591 lb/hr	11.352 TPY

Note: Compliance with the PM Emission rates will be demonstrated through a visible emissions test using EPA Method 9.
[a] Based on current construction permit for existing sources and 8,760 hr/yr operation for new sources.

Best Available Copy

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.

Kristi Morrow

Sworn to and subscribed before 17th day of March, A.D. 2006

Karen M. McLinton

Personally known XX or Produced Identification_____
Type of Identification Produced_____

Karen M. McLinton
Commission # DD359566
Expires: NOV 15, 2008
Bonded Thru
Atlantic Bonding Co., Inc.

RECEIVED
MAR 29 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; 27250 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

RAMP UP

VACUUM RECEIVER #2

VACUUM RECEIVER #1

Silo 1

Silo 2

Silo 3

END ELEVATION VIEW:

CHUTE BY FL CRYSTALS

HOPPER #6

HOPPER #5

HOPPER #4

HOPPER #3

HOPPER #2

HOPPER #1

VAC. BLOCK #2

VAC. BLOCK #1

MOTOR VALVE ACTUATOR MOUNTED HORIZONTALLY

W 6 X 9 HORIZONTAL BEAM

CONSULT LINE TO VERIFY VALVE OPERATION PRIOR TO INSTALLATION

SLIDE GATE VALVE & MANIFOLD SUPPORT REQUIRED BY INSTALLER

DIVERTER #4 CYLINDER DOWN

DIVERTER #3 CYLINDER UP

DIVERTER #2 CYLINDER UP

DIVERTER #1 CYLINDER DOWN

NEW VACUUM CONVEYING MANIFOLD #2

NEW VACUUM CONVEYING MANIFOLD #1

VACUUM BLOWER

VACUUM BLOWER

RAILCAR MANIFOLD LATERAL DETAIL (4)O

6" MALE CAMLOCK

6" SLIDE GATE VALVE

6" FLG.

CONVEYING VACUUM HOSE:
GOODYEAR "HARVEST" HOSE; 6" I.D.
TWO BOLT CLAMPS:
DIXON #769 (ONE FOR EACH END OF HOSE)

END ELEVATION VIEW:
(VIEW FROM FILTER RECEIVERS)

SIDE ELEVATION VIEW:

Vacuum Receiver No. 2

Vacuum Receiver No. 1

SALINA WYE DIVERTER VALVES (SUPPORT REQUIRED BY INSTALLER) (4) PL

NOTE: RAILS SHOWN ABOVE GROUND

115
128
67
187
284
399
423
541
652
694
836
877
1219
1060

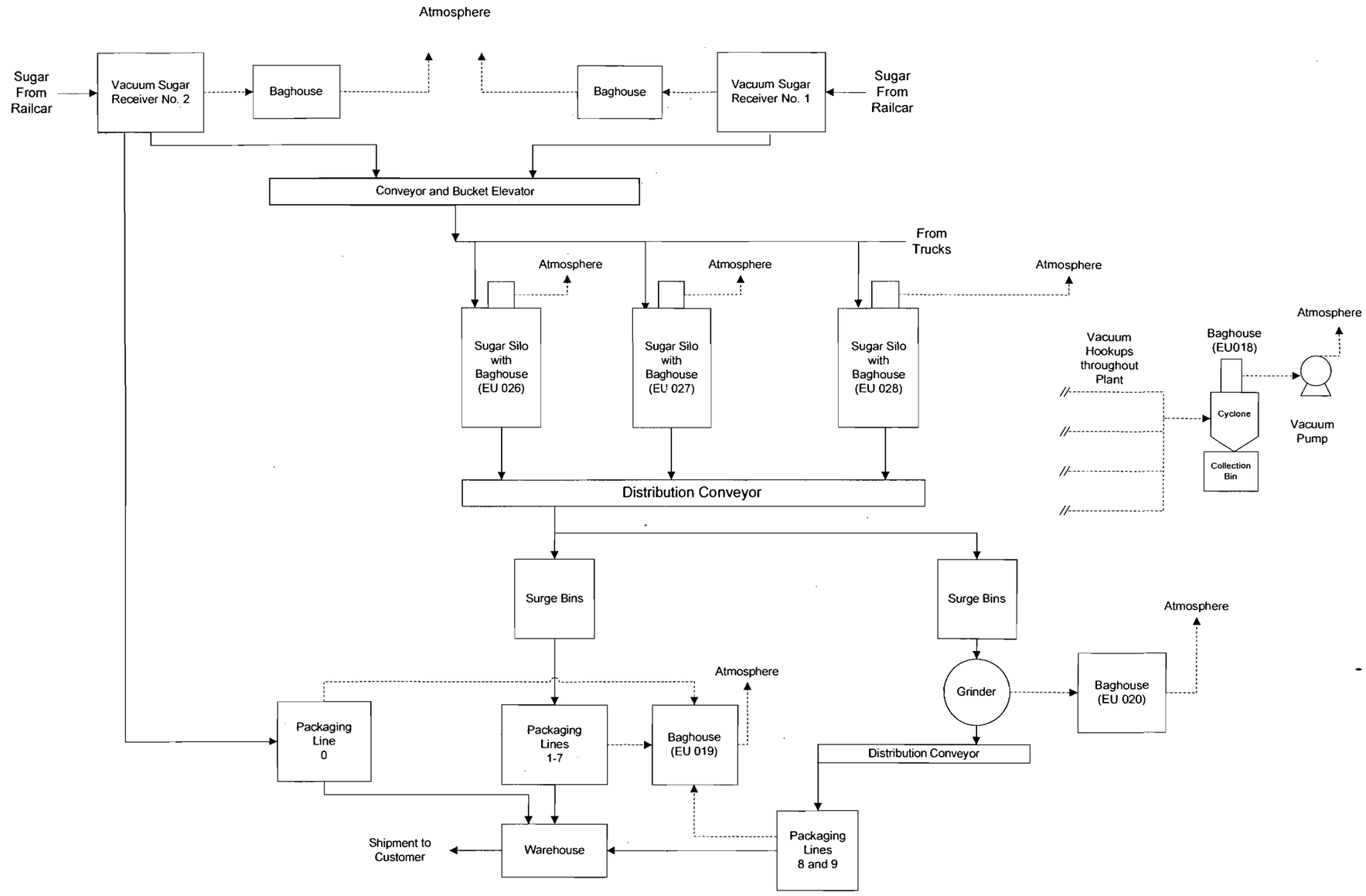
Figure OC-FI-C1b

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

USS UNITED STATES SYSTEMS, inc.
P.O. Box 5218 Kansas City, Kansas 66119 888-281-2454 (913) 281-1010

DESIGNED BY M.A.		MATERIAL C.S.	TITLE: SITE LAYOUT DRAWING
DRAWN BY M.A.	DATE 08-22-05		COMPANY: FLORIDA CRYSTALS CORPORATION SOUTH BAY, FL
CHECKED BY G.H.	DATE	SCALE NONE	
CONTRACT NO. 4500099994	PROJECT NO. J507-825	SIZE	DWG. NO. J62540R3 REV. 3

0637507/4.4/OC-FI-C1b



Attachment OC-EU1-I1a. Process Flow Diagram
Trans-Shipment Facility - Phase 1 and Increased Capacity
Okeelanta Corporation Refinery
South Bay, Florida

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

Golder Associates