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BUREAU OF AIR REGULATION

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

Prepared For:

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

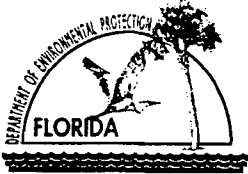
Prepared By:

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

**January 2001
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2 Copies – Okeelanta Corporation
2 Copies - Golder Associates Inc.**



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

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

Application Contact

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

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	01/22/01
2. Permit Number:	099 0005 - 007 - AC (Patty → JFK)
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

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

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

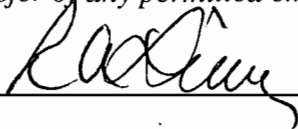
Reason for revision: _____

Air Construction Permit Application

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

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

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Ricardo A. Lima, Vice President - General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Okeelanta Corporation Street Address: 21250 U.S. Highway 27 City: South Bay State: FL Zip Code: 33493
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (561) 996 - 9072 Fax: (561) 992 - 7326
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> Signature  Date <u>1/18/01</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

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

4. Professional Engineer Statement:

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

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

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

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

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

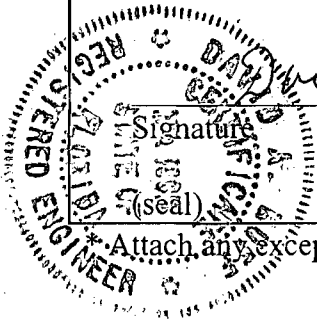
If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such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

David A. Buff

Signature

01/19/01

Date



Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

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

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

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

Application Comment

[Empty box for Application Comment]

Facility Regulatory Classifications

Check all that apply:

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

List of Applicable Regulations

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

Title V Core List

Effective:03/25/97

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

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

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

Federal: (description)

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

State: (description)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Title V Core List

Effective:03/25/97

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

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

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

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

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

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

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

B. FACILITY POLLUTANTS

List of Pollutants Emitted

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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

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

ATTACHMENT OC-AI-AD

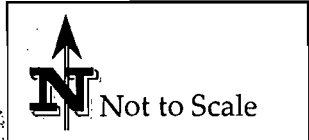
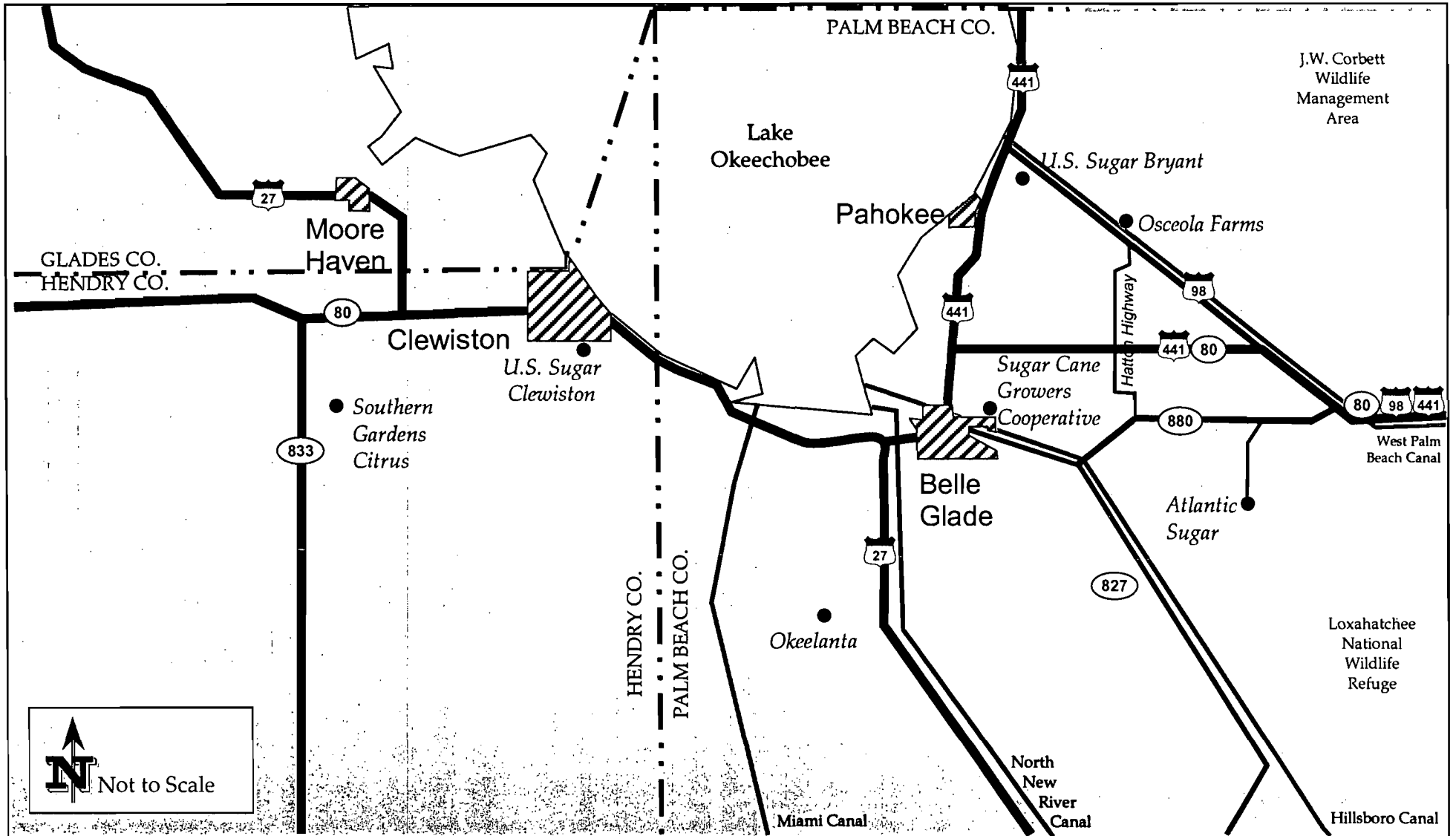
FACILITY POLLUTANTS COMMENT

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

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

ATTACHMENT OC-FI-C1

AREA MAP SHOWING FACILITY LOCATION



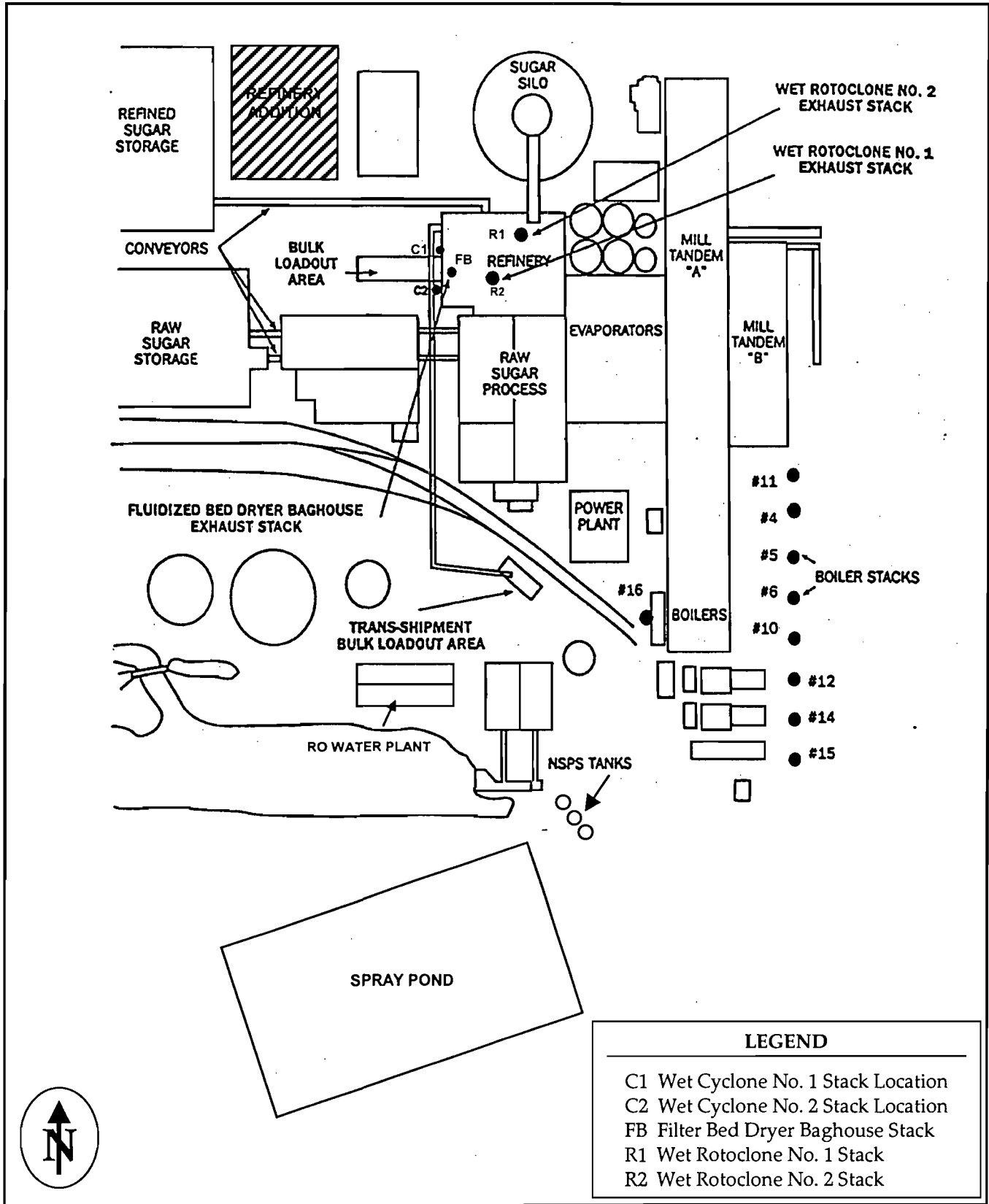
Attachment OC-FI-C1
 Location of Okeelanta Corporation

Source: Golder Associates Inc., 2000



ATTACHMENT OC-FI-C2

FACILITY PLOT PLAN



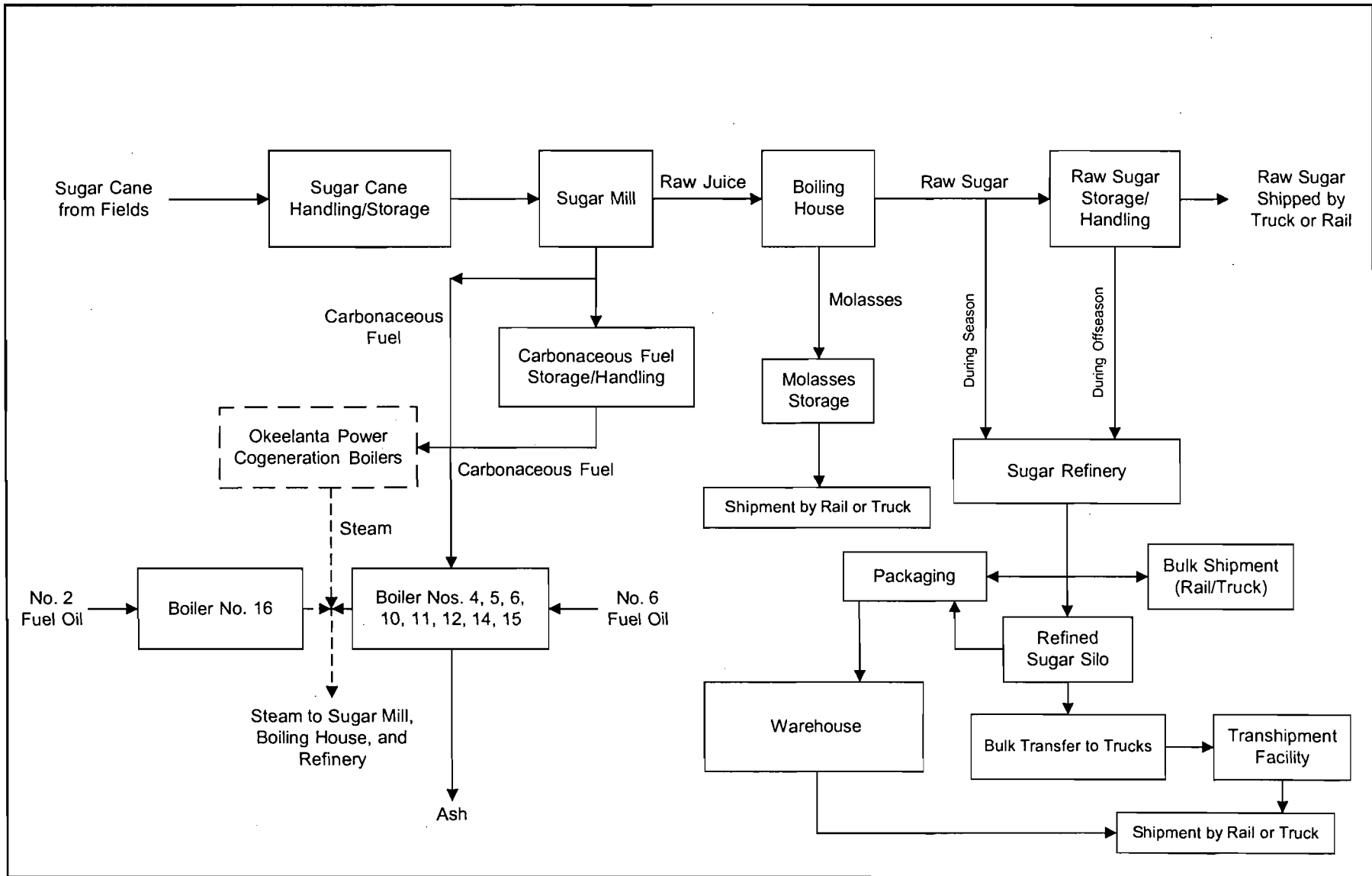
Attachment OC-FI-C2
 Facility Plot Plan of Okeelanta Sugar Mill and Refinery

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

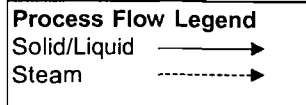


ATTACHMENT OC-FI-C3

PROCESS FLOW DIAGRAM



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



Overall Sugar Mill - Facility Flow Diagram

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

Date: 01/19/01



III. EMISSIONS UNIT INFORMATION

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

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Mill Boiler No. 16			
4. Emissions Unit Identification Number:			
ID: 014		<input type="checkbox"/> No ID	<input type="checkbox"/> ID Unknown
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 20	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Package Boiler equipped with Coen's Lo-NO_x burners fired with No. 2 distillate fuel oil. This unit is designed for 40% flue gas recirculation.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Coen's Lo-NO_x Burners

2. Control Device or Method Code(s): **024**

Emissions Unit Details

1. Package Unit:

Manufacturer: **Babcock and Wilcox**

Model Number: **FM 120-97**

2. Generator Nameplate Rating:

MW

3. Incinerator Information:

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

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

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

List of Applicable Regulations

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

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

Emission Point Description and Type

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

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

Segment Description and Rate: Segment 1 of 1

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

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions 1 of 1

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions 1 of 1

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions 1 of 1

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions 1 of 1

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions 1 of 1

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions 1 of 1

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions _____ of _____

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

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

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

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

Continuous Monitoring System: Continuous Monitor 1 of 5

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

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

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

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

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

Continuous Monitoring System: Continuous Monitor 2 of 5

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

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

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

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

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

Continuous Monitoring System: Continuous Monitor 3 of 5

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

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

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

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

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

Continuous Monitoring System: Continuous Monitor 4 of 5

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

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

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

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

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

Continuous Monitoring System: Continuous Monitor 5 of 5

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

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

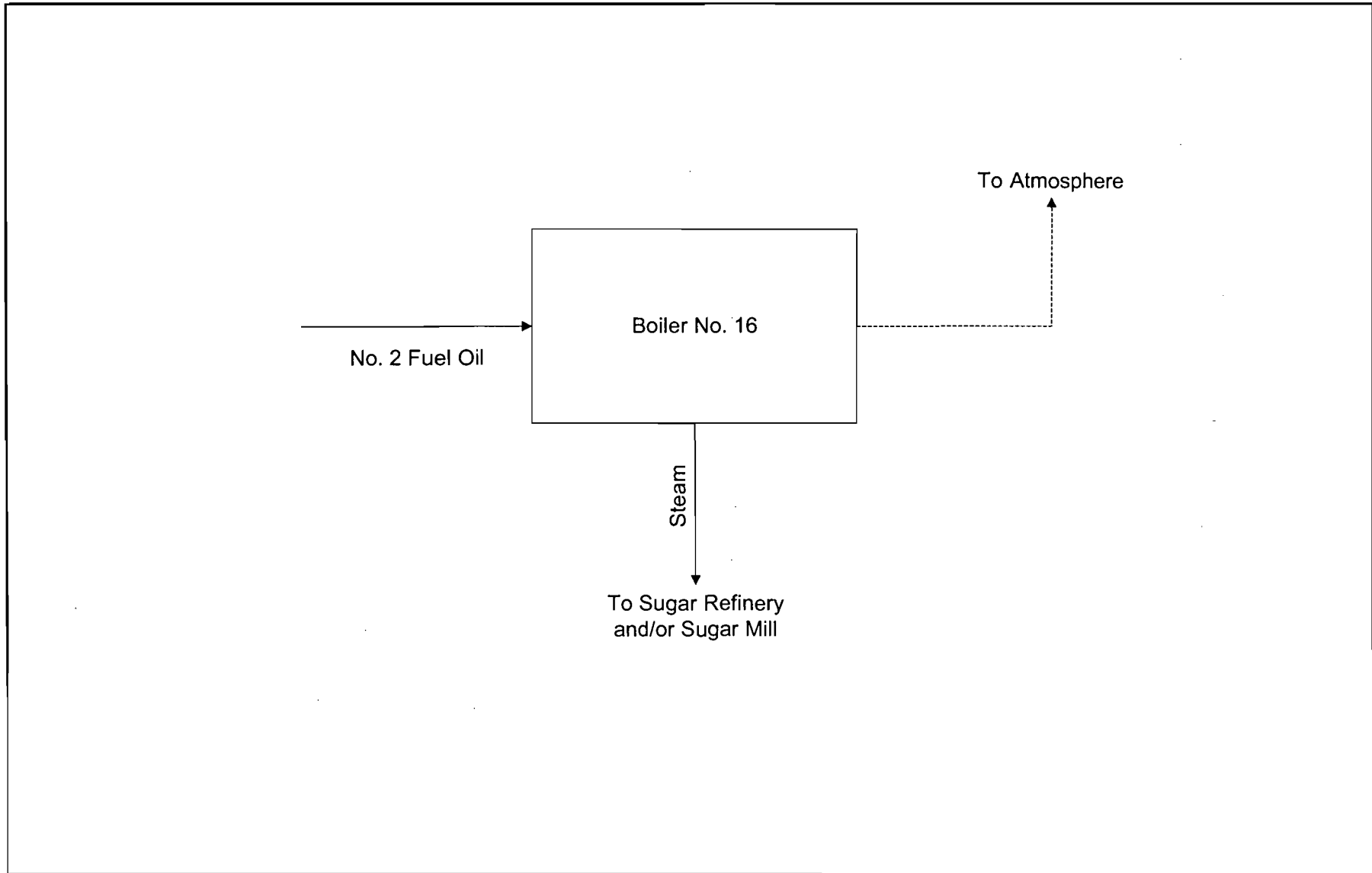
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>OC-EU1-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/>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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

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

ATTACHMENT OC-EU1-J1

PROCESS FLOW DIAGRAM



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

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

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



ATTACHMENT OC-EU1-J13

IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS

AIR OPERATING PERMIT



Department of Environmental Protection

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

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

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

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

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

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

Pertinent Documents

Dated

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

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

PERMITTEE:
Okeelanta Corporation

I.D. No.: 52FTM50000514
Permit/Cert. No.: A050-257065
Date of Issue: November 29, 1994
Expiration Date: November 29, 1999

GENERAL CONDITIONS:

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

PERMITTEE:
Okeelanta Corporation

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

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
Okeelanta Corporation

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

GENERAL CONDITIONS:

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

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

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

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

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

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

(c) Records of monitoring information shall include:

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

PERMITTEE:
Okeelanta Corporation

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

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

FACILITY OPERATIONS:

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

CONDITIONS OF COMPLIANCE:

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

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

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

PERMITTEE:
Okeelanta Corporation

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

SPECIFIC CONDITIONS:

CONDITIONS OF COMPLIANCE:

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

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

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

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

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

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

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

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

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

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

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

PERMITTEE:
Okeelanta Corporation

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

SPECIFIC CONDITIONS:

CONDITIONS OF COMPLIANCE:

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

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

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

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

REQUIRED TESTING:

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

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

REPORTS AND RECORDKEEPING:

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

PERMITTEE:
Okeelanta Corporation

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

SPECIFIC CONDITIONS:

REPORTS AND RECORDKEEPING:


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

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

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

Issued this 29th day of November, 1993.

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL PROTECTION



Peter J. Ware
Director of
District Management

PJW/AEL/jw

11 Pages Attached

AIR CONSTRUCTION PERMIT



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawton Chiles, Governor
Virginia B. Wetherell, Secretary

February 18, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Carreno:

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

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

FROM

Specific Condition No. 5:

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

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

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

Specific Condition No. 10:

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

TO:

Specific Condition No. 5:

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

Pollutant	lbs/MMBtu	Emissions		Compliance Test Method
		lbs/hr	TPY**	EPA Test Methods (July 1, 1990)
PM	0.054	11.0	23.1	5
PM10	0.027	5.5	11.6	201 or 201A
SO2	0.51	105.5	132.9	Certified Fuel Analysis
NOX	0.18*	36.9	77.5	7, 7A, 7E
CO	0.20	41.0	86.1	10
VOC	0.09	18.5	38.7	25
VE	20% opacity (6-minute average) except 27% (max.) for 1 6-minute period/hr.			9

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

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

Specific Condition No. 10:

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

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

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

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/plm

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

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

Boiler # 16

PERMIT # 16

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC 50-191876
Palm Beach County

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

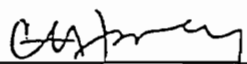
Expires 3/1/23

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

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

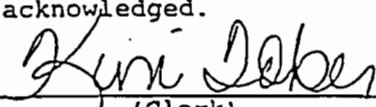

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

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

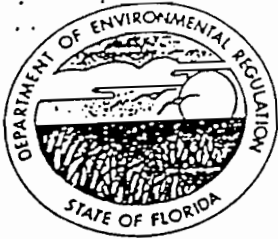
Clerk Stamp

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


(Clerk)

7-30-91
(Date)

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



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2000

Lawton Chiles, Governor

Carol M. Browner, Secy

PERMITTEE:

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

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

Expiration Date: March 1, 1993
County: Palm Beach
Latitude/Longitude: 26°35'00" N
80°45'00" W

Project: Oil Fired Steam Boiler
No. 16

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

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

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

Attachments are listed below:

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

PERMITTEE:
Okeelanta Corporation

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

GENERAL CONDITIONS:

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

PERMITTEE:
Okeelanta Corporation

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

GENERAL CONDITIONS:

compliance with the conditions of the permit and when required by Department rules.

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

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

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

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

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

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

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

PERMITTEE:
Okeelanta Corporation

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

GENERAL CONDITIONS:

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 the Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

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

14. The permittee shall comply with the following:

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

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

PERMITTEE:
Okeelanta Corporation

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

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

Construction Details

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

PERMITTEE:
Okeelanta Corporation

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

SPECIFIC CONDITIONS:

Emission Restrictions

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

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

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

Compliance Requirements

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

Federal Requirements

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

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

PERMITTEE:
Okeelanta Corporation

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

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

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

Operation Requirements

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

PERMITTEE:
Okeelanta Corporation

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

SPECIFIC CONDITIONS:

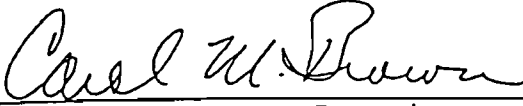
9. Maximum heat input to the boiler shall not exceed 1,463 gallons per hour of No. 2 distillate fuel oil (205 MMBtu/hr).
10. The boiler shall not operate for more than 175 days (4,200 hours) during any 12 month period. The boiler shall only operate during the off-season months (March through October).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

Administrative Requirements

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

Issued this 29th day
of July, 1991.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Carol M. Browner, Secretary

BEST AVAILABLE COPY

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

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

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

BACT Determination Request by the Applicant:

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

Date of Receipt of a BACT Application:

January 29, 1991

BACT Determined by DER:

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

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

BACT Determination Rationale:

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

ATTACHMENT A

SUPPLEMENTAL INFORMATION FOR TEMPORARY PERMIT

1.0 INTRODUCTION

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

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

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

2.0 PROJECT DESCRIPTION

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

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

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

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

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

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

3.0 REGULATORY REQUIREMENTS

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

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

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

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

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

References:

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

Footnotes:

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

Table 2. Compliance Testing Results for Okeelanta Boiler 16

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

Golder Associates Inc.

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Gainesville, FL 32653-1500
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TRANSMITTAL LETTER

To:

Jeff Koerner, FDEP
New Source Review Section

RECEIVED

JAN 22 2001

Date: January 19, 2001

Project No.: 0137514-0100

BUREAU OF AIR REGULATION

Sent by: **ARZ/JKW**

- Mail
- Air Freight
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- UPS
- Federal Express - for Monday 1/22/2001 delivery
- E-mail of PDF file

Per: **David A. Buff**

Quantity	Item	Description
4	Temporary Permit	Mill Boiler No. 16

Remarks:

2 copies sent to:

Matthew Capone, Okeelanta Corp.
South Bay, FL

1 copy sent to:

Darrell Graziani, P.E. - Palm Beach County Health Department
West Palm Beach, FL
(561) 355-3136