DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

TO: (NAME, OFFICE, LOCATION)	
1. Clair Fancy - BAQM	Initial / Date
2. Tallahassee	Initial / Date
3. Willard 2/10	Initial / Date
4.	Initial / Date

REMARKS:

RECEIVED
FEB 6 1989
DER - BAQM

1-17-89

Willard
Do [illegible] want
to keep this [illegible]
your office or
should [illegible] keep it
[illegible] with
w/the (active) permits?
inactive ? Patty

INFORMATION
- Review & Return
- Review & File
- Initial & Forward

DISPOSITION
- Review & Respond
- Prepare Response
- For My Signature
- For Your Signature
- Let's Discuss
- Set Up Meeting
- Investigate & Report
- Initial & Forward
- Distribute
- Concurrence
- For Processing
- Initial & Return

FROM:
David Knowles
Fort Myers

DATE
2-3-89

PHONE
721-7900

Florida Department of Environmental Regulation

South District • 2269 Bay Street • Fort Myers, Florida 33901-2896 • 813-332-2667

Bob Martinez, Governor | Dale Twachtmann, Secretary | John Shearer, Assistant Secretary
Philip Edwards, Deputy Assistant Secretary

February 3, 1989

Mr. P. A. Carreno
Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

Re: Palm Beach County - AP
Okeelanta Corporation
Boilers 4 and 5
A050-92636 and A050-115245

Dear Mr. Carreno:

We have received your letter of January 4, 1989 requesting amendments to the permits for boilers 4 and 5 and the letter from Clair Fancy dated November 18, 1988, with his analysis of the proposed changes.

You are hereby authorized to change tubes, headers, drums, etc. as required to increase steam pressure and temperature to 350 PSIG and 650° F, in boilers 4 and 5. The design steam capacity of boiler No. 4 is changed to 90,000 lbs/hr and the design steam capacity of boiler No. 5 is changed to 116,800 lbs/hr.

All other permit conditions remain unchanged.

Sincerely,

Philip R. Edwards
Deputy Assistant Secretary

PRE/DMK/jsw

cc: Clair Fancy
A. J. Satyal

OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

TELEPHONE: (407) 996-9072 TELEX: 803444

January 4, 1988

Florida Department of
Environmental Regulations
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attn: Mr. Claire Fancy P. E.
Deputy Chief
Bureau of Air Quality Management

Subject: Boiler No. 4 Permit No. AO-50-92636
Boiler No. 5 Permit No. AO-50-11545

Dear Mr. Fancy,

This is in reference to your letter dated November 18, 1988, that we received on December 2, 1988 concerning the increase in steam pressure and temperature for the above mentioned boilers.

After further consideration on this matter, we have agreed with the conclusion that you have expressed in the above mentioned letter.

We are proceeding to provide Mr. David Knowles at the Department's South Florida District office with the heat balance calculations that shows the quantity of higher heat content steam that can be produced by the boilers in question at their current allowable heat input.

Thank you for your attention in this matter.

Sincerely,

P.A. Carreno
Director of Mill &
Refinery Operations

PAC:slg

xc: Mr. Willard Hanks
Mr. David Knowles, S.F. District
Mr. Arthur Kirstein, III

OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

TELEPHONE: (407) 996-9072 TELEX: 803444

January 4, 1988

Florida Department of
Environmental Regulations
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
JAN 06 1989
DER - BAQM

Attn: Mr. Claire Fancy P. E.
Deputy Chief
Bureau of Air Quality Management

Subject: Boiler No. 4 Permit No. AO-50-92636
Boiler No. 5 Permit No. AO-50-11545

Dear Mr. Fancy,

This is in reference to your letter dated November 18, 1988, that we received on December 2, 1988 concerning the increase in steam pressure and temperature for the above mentioned boilers.

After further consideration on this matter, we have agreed with the conclusion that you have expressed in the above mentioned letter.

We are proceeding to provide Mr. David Knowles at the Department's South Florida District office with the heat balance calculations that shows the quantity of higher heat content steam that can be produced by the boilers in question at their current allowable heat input.

Thank you for your attention in this matter.

Sincerely,

P.A. Carreno
Director of Mill &
Refinery Operations

PAC:slg

xc: Mr. Willard Hanks
Mr. David Knowles, S.F. District
Mr. Arthur Kirstein, III

OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

TELEPHONE: (407) 996-9072

TELEX: 803444

January 4, 1988

Department of Environmental
of Regulation
2269 Bay Street
Ft. Myers, FL 33901

Attention: Mr. Phill Edwards

Subject: Upgrading Boilers:
Number 4 Permit AO-50-92636
Number 5 Permit AO-50-11545

Dear Mr. Edwards:

As you know we have been in contact with Mr. Claire Fancy from Tallahassee concerning our intentions to increase the steam pressure and temperature of the boilers mentioned above, from 250 psig operating pressure and 550°F up to 350 psig and 650°F. This is to proceed with an energy saving program that we have in progress.

In a letter dated November 18, 1988, Mr. Fancy is informing us of his departments conclusions on this matter; it is that the actual emissions are a direct function of the heat input to the boilers. Therefore, the construction and operation permits for these two boilers can be amended to authorize the production of steam with a higher temperature and pressure provided the heat input to each boiler does not exceed the quantity allowed by the latest construction permit for each boiler. Please see the copy of the letter attached.

After further consideration in this matter we have agreed with this conclusions and with this purpose we mailed a letter to Mr. Fancy dated January 4, 1989. A copy is also enclosed with this letter.

To proceed with this amendment we are providing you with the heat balance calculations showing that in order to account for the higher heat content, the quantity of steam to be produced by Boiler Number 4 has to be reduced from 94,000 lbs/hr down to 90,000 lbs/hr; and for Boiler Number 5 it has to be reduced from 122,000 lbs/hr down to 116,800 lbs/hr.

We have to start these modifications to the boilers by the end of this crop on March 15, 1989, in order to have it ready for the next crop.

Your prompt attention to this matter is appreciated.

Sincerely yours,

P. A. Carreno
Director of Mill &
Refinery Operations

PAC: slg

xc: Mr. Claire Fancy, DER Tallahassee, W/Attachments
Mr. David Knowls, DER Ft. Myers W/Attachments
Mr. Arthur Kirstein, III
Mr. Frank Fernandez
Mr. Roger King

Okeelanta Corporation
Heat Balance Calculations
Boilers Number 4 and 5

Boiler Number 4

1. (a) Required heat input to feed water for a current steam rating of 94,000 lbs/hr at 250 psig and 550°F equals:

1061.5 BTU/lb

(b) Feed water heat input = 94,000 X 1061.5 equals: 99.78×10^6

At 55% efficiency the actual heat input equals: $(99.78 \times 10^6) \div 0.55$ equals 181.42×10^6 BTU/hr

(c) Permitted particulate emission equals 0.3 lb/BTU X 10^6 /hr equals 181.42 X 0.3 equals 54.43 lbs/hr.

$$\frac{54.43 \times 24 \text{ hr/day} \times 140 \text{ day/yr}}{2000} = 91.44 \text{ tons/yr}$$

2. (a) After boiler has been up rated to produce steam at 350 psig and 650°F, particulate emissions must not exceed 91.44 tons/yr or 54.43 lbs/hr. Accordingly, heat input to boilers must not exceed 181.42 X 10^6 BTU/hr and heat input to feed water must not exceed 99.78 X 10^6 BTU/hr.

(b) Required heat input to feed water for proposed conditions of 350 psig and 650°F equals 1,109 BTU/lb.

(c) Therefore, the new firing rate of boiler will be $\frac{99.78 \times 10^6}{1109}$ equals 90,000 lbs/hr

Boiler Number 5

Same reasoning as for Boiler Number 4

1. (a) As per boiler Number 4 equals 1061.5 BTU/lb

(b) 122,000 X 1061.5 equals 129.50×10^6
$(129.50 \times 10^6) \div 0.55$ equals 235.45×10^6 BTU/hr

(c) 235.45 X 0.3 equals 70.64 lbs/hr
$$\frac{70.64 \times 24 \text{ hrs} \times 140 \text{ days}}{2000} = 118.68 \text{ Tons/yr}$$

2. (a) New firing rate for boiler
$$\frac{129.50 \times 10^6}{1109} = 116{,}800 \text{ lbs/hr}$$

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

November 18, 1988

Mr. P. A. Carreno
Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

Dear Mr. Carreno:

Re: Increase Steam Pressure and Temperature for Boilers Numbers 4 and 5

We have reviewed your correspondence showing the affect the increase in steam pressure and temperature for boilers Nos. 4 and 5 will have on the emissions from the sugar mill. It is our conclusion that the actual emissions are a direct function of the heat input to the boilers. Therefore, the construction and operation permits for these two boilers can be amended to authorize the production of steam with a higher temperature and pressure provided the heat input to each boiler does not exceed the quantity allowed by the latest construction permit for each boiler. It will be necessary to reduce the allowable steam production rate of these boilers to account for the higher heat content of the steam. If you wish to proceed with this amendment, please provide Mr. David Knowles at the Department's South Florida District office with heat balance calculations that show the quantity of higher heat content steam that can be produced by boilers Nos. 4 and 5 at their current allowable heat input. You will be limited to this new rate by permit condition.

If you have any questions on this matter, please call Willard Hanks at (904)488-1344 or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/WH/s

cc: D. Knowles, SF District

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

November 18, 1988

Mr. P. A. Carreno
Okeelanta Corporation
Post Office Box 86
South Bay, Florida 33493

Dear Mr. Carreno:

Re: Increase Steam Pressure and Temperature for Boilers Numbers 4 and 5

We have reviewed your correspondence showing the affect the increase in steam pressure and temperature for boilers Nos. 4 and 5 will have on the emissions from the sugar mill. It is our conclusion that the actual emissions are a direct function of the heat input to the boilers. Therefore, the construction and operation permits for these two boilers can be amended to authorize the production of steam with a higher temperature and pressure provided the heat input to each boiler does not exceed the quantity allowed by the latest construction permit for each boiler. It will be necessary to reduce the allowable steam production rate of these boilers to account for the higher heat content of the steam. If you wish to proceed with this amendment, please provide Mr. David Knowles at the Department's South Florida District office with heat balance calculations that show the quantity of higher heat content steam that can be produced by boilers Nos. 4 and 5 at their current allowable heat input. You will be limited to this new rate by permit condition.

If you have any questions on this matter, please call Willard Hanks at (904)488-1344 or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/WH/s

cc: D. Knowles, SF District

OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

TELEPHONE: (407) 996-6072

10/31
Hillard,
Are you handling this? Do we need to track it? Anybody else need copies?
Patty

October 24, 1988

Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
OCT 27 1988
DER - BAQM

Attn: Mr. Claire Fancy P.E.
Deputy Chief
Bureau of Air Quality Management

Subject: Boiler No. 4 Permit No. A0-50-92636
Boiler No. 5 Permit No. A50-115245

Dear Mr. Fancy,

This is in response to your letter of August 25, 1988 concerning our request to increase the steam pressure and temperature for the two boilers mentioned above.

The changes to be made to each boiler is much less than half the cost of a new equivalent boiler as follows:

Boiler No. 4

Drums, headers and tubes	$ 503,452.00
Safety valves	5,576.00
Saddle for upper drums and supports	1,075.00
Blow-off valves	11,438.00
Steam separators & internal piping for drums	13,478.00
Water columns	6,036.00
Miscellaneous valves	2,858.63
Miscellaneous gauges & thermometer	719.00
Brickwork	33,175.00
Sub Total	$ 577,807.63
6% Sales Tax	34,668.00
5% Contingencies	28,890.37
	$ 641,366.47

Boiler No. 5

Drums, headers and tubes	$ 556,930.00
Safety valves	6,093.00
Saddles for upper drums & supports	1,075.00
Blow-off valves	11,438.00
Steam separators and interval piping for drums	13,478.00
Water Column	6,036.00
Miscellaneous valves	2,858.63
Miscellaneous gauges and thermometers	719.00
Brickwork	33,175.00
Sub Total	$ 631,802.63
6% Sales Tax	37,908.16
5% Contingencies	31,590.13
	$ 701,300.92

For back up to these figures please see attached copies of our P.O. Number FM-10026 to Alpha Boilers, Inc. and a quote from the same company for the brickwork to be preformed.

The cost of a new equivalent boiler as per Alpha Boilers, Proposal Number 88100-M dated September 13, 1988 is for $2,375,000.00. Foundation, as well as scrubber and air pollution equipment are not included. See attached copy of their proposal.

We will continue to comply with all current permit restrictions other than steam temperature and pressure. There will be no increase in heat input and actual emissions.

The steam flow will not be increased in any of the boilers; on the contrary, since the objective of these changes are to save energy and fuel, the overall heat input and emissions will be less for these and all other boilers. Please note references to the attached schedule A.

Schedule B is a back up of the calculations for the results shown in schedule A.

An analysis of the emissions is shown on schedule C also attached. For comparison purposes, calculations are based on permitting conditions and last years particulate emissions tests.

Please let us know if you need any additional information. Your prompt attention to this matter will be appreciated since we have started these new modifications by this coming month of March 1989 to have the boilers ready for the following crop.

Sincerely yours,

P. A. Carreno
Mill & Refinery Operations

PAC: slg

xc: A. Kirstein, III
F. Fernandez
R. King
G. Rodriguez
D. Knowles W/Attachment
DER S.F. District
Ft. Myers, FL

ALPHA BOILERS, INC.

2655 Le Jeune Road, Suite 800 · Coral Gables, Florida 33134 · USA
tel. 305-442-2233 · telex: 6811276 PBNC · fax: 305-445-9125

September 6,1988

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

Att: Mr. Pablo Carreño

As we have previously discussed there will necessarily be some refractory and insulation work to do on Boilers #4 & #5 and you have suggested that we handle this as a subcontract with a reliable mason contractor who is familiar with Okeelanta and these boilers. The baffles in particular must be installed as the new pressure parts are erected.

Accordingly we sent the attached inquiry to Reintjes (formerly Alert Division) and Plibrico and have received their proposals, on the basis of which we can quote you a price of $ 66,350.00 for material and labor for the work which is described therein and which we know must be done (baffles, furnace roofs and boiler roofs). The prices quoted were very close so you can select which of these contractors you prefer.

For the furnace repair work, the scope of which cannot be ascertained until the old boilers are removed, the hourly labor prices are also very similar and the schedules of the two bidders are attached. If you wish to handle this work as a subcontract under our supervision we must add a mark-up of 10% to the charges of the mason contractor on this part of the work.

Yours very truly,
ALPHA BOILERS, INC.

Miguel Andux
Exec. Vice-President

MA/mo
Enclosure

Letter addressed to Plibrico and Reintjes

Gentlemen:

ALPHA BOILERS, INC. has a contract to furnish and erect new pressure parts (drums, headers and tubes) on Boilers No. 4 and No. 5 at Okeelanta Corp. during the 1989 dead season.

In making this change the old pressure parts will be removed through the roof but the existing boiler steel structure and settings will be left intact to the extent possible.

We enclose two (2) prints of our drawings 88100, sheets PPA-1, Rev.0(boiler #4) & PPA-2, Rev.0(boiler #5), showing the new arrangement from which it is obvious that the baffles between tubes 11-D and 12D, between 13D and 14D and above tubes 20-D and 21-D will be lost when the old boilers are removed. (Please note that the boiler bank baffles are materially different in No. 4 and No. 5, although the tube banks have the same configuration). The tile and insulation roof over the furnace and the red brick covering over tubes 17-D and 19-D between the steam drums will also be lost. New #12 ga. steel plate sheathing over tubes 17-D and 19-D will be supplied and erected by ALPHA.

We would like to have you give us a firm price for material and for labor to replace the specific areas listed above and as depicted on our drawings. Since the side walls will remain in place it will be necessary to cut a hole in one side wall through which to pass the titles which make up the rear boiler bank baffle, then the baffle must be installed before the superheater tubes are put in place. The front baffle (between tubes 13-D and 14-D) cannot be installed this way so this erection work must be done as the tubes are rolled. The castable baffle over tube 21-D must be installed from below at this time while the brick and castable baffle over tube 20-D may be installed from above using the existing access door. Presumably you will have a mason available as this work proceeds as you will other repair work to do. (See below.)

The balance of the settings comprise Bigelow-Liptak suspended walls which have been in service for many years without any significant repairs in the areas shaded by the tubes. Some damage may occur in these zones during erection of the pressure parts and other areas where long term deterioration may have taken place may appear after the old tubes are removed. Clearly there is no means of ascertaining in advance how much repair work may be required, so this part of the contract must be cost-plus. Any such repair work must necessarily be done from outside the boiler as there will not be time to do so before erection of the new pressure parts.

The parts not shaded by the tubes (the furnaces) require more or less regular maintenance and of course there is no means to ascertain in advance what must be done next year, so this part must also be cost-plus.

In summary, we would like your lump sum quotation (for material and for labor) for the work which is definitely outlined above and your cost-plus terms and conditions

for the work for which the scope cannot be definitely established in advance. Please furnish us with a list of the insurance coverage you will provide. Okeelanta wants us to sublet the refractory work to a reliable contractor so that there is single responsibility for this job, which must without fail be completed in advance of the 1989 crop which will start in October of that year. Your work will probably be ready to start around the middle of May 1989.

Please note that insulation of the exposed new drums ends, headers and supply tubes will be carried out by others.

Please let us have your proposal by August , 1988.

Thank you for your kind cooperation in this matter. We remain,

Very sincerely yours,
ALPHA BOILERS, INC.

Miguel Andux
Exec. Vice-President

MA/mo
Enclosure

Reintjes

COST PLUS PROPOSAL

CLASSIFICATION	STRAIGHT TIME	OVER TIME	DOUBLE TIME
SUPERINTENDENT	$ 22.00	$ 31.90	$ 41.80
MASON FOREMAN	20.81	30.45	39.70
MASON	19.62	29.00	37.80
MASON-1	17.04	24.95	33.40
LABOR FOREMAN	12.20	17.85	23.30
LABOR	11.59	16.96	22.10

Overtime rates all crafts - time and one half except for Sunday and holidays.

Per diem $40.00 per day including lodging.

Mason-1 is training journeyman mason.

Shop costs @ $50.00 per day.

PLIBRICO SALES & SERVICE COMPANY

LABOR RATES

EFFECTIVE JUNE 1, 1988 THRU 12/31/88

Foreman	$28.80
Time & ½	41.07
Double Time	53.31
Mechanic	25.99
Time & ½	36.84
Double Time	47.67
Apprentice 1st Class	23.82
Time & ½	33.60
Double Time	43.35
Apprentice 2nd Class	21.66
Time & ½	30.32
Double Time	38.99
LABORERS:	
Local 517	$17.48
Time & ½	24.55
Double Time	31.60
Local 517	17.05
Time & ½	24.17
Double Time	31.29
Local 478	15.56
Time & ½	22.40
Double Time	29.25
Non-Union	13.32
Time & ½	19.37
Double Time	25.41
Truck Drivers	15.74
Time & ½	22.99

ALPHA BOILERS, INC.

2655 Le Jeune Road, Suite 800 · Coral Gables, Florida 33134 · USA
tel. 305-442-2233 · telex: 6811276 PBNC · fax: 305-445-9125

September 1[illegible]1988

OKEELANTA CORPORATION
P.O. Box 86
South Bay, FL.
33493

Att: Pablo Carreno

Re: Proposal 88100-M

Dear Sir:

In accordance with your request, we are pleased to offer one complete new stoker fired boiler installation as follows.

ONE ALPHA STEAM GENERATING UNIT CONSISTING OF:

Item I - One ALPHA Boiler,110,000 lbs. per hour, 475 p.s.i.g. design pressure, 650 F total steam temperature.

Item II - One Burner Assembly.

Item III - One Detroit Rotograte Stoker and Sluice Assembly.

Item IV - One Setting and Insulation Assembly.

Item V - One Forced Draft Fan Assembly.

Item VI - One Induced Draft Fan Assembly.

Item VII - Dust Collector.

Item VIII - Ductwork and Stack.

Item IX - Piping and Wiring.

Item X - One Set of Instruments and Controls and Motor Control Center.

Item XI - Erection.

Dismantling of existing equipment and foundation as well as scrubber and air pollution equipment not included.

The price of this equipment F.O.B. Okeelanta Factory will be .....$ 2,375,000.00

Shipment could be started eight months after your approval of our engineering drawings and completed 12 months thereafter.

We thank you for the opportunity of quoting.

Very truly yours,
ALPHA BOILERS, INC.

Miguel Andux
Exec. Vice-President

MA/mo

REQUISITIONER	DELIVER TO	APPROVED BY	APPROVED BY	APPROVED BY	REQUISITION DATE
A.Padron	Okeelanta Corp.				6/6/88

ACCOUNT NUMBER	EST. VALUE	DATE REQUIRED	SUGGESTED SUPPLIER	ADDRESS	REQUISITION NUMBER

OKEELANTA CORPORATION

SOUTH BAY, FLORIDA 33493

FM - 10026
PURCHASE ORDER NO.
This P.O. No. must appear on all invoices, packages and shipping papers.

FLA. STATE SALES TAX_____ YES _____ NO EXEMPTION NUMBER

INVOICE AND SHIP TO:

☐ OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY ON U.S. 27
P.O. BOX 86
SOUTH BAY, FLA. 33493 • TEL.: (305) 996-9072

ACKNOWLEDGMENTS AND INQUIRIES TO:

☐ AMERICA'S EXPORT CORP. (OKEELANTA)
2600 S.W. 3RD AVE., (CORAL WAY)
TERREMARK BLDG., SUITE 300
MIAMI, FL 33129 • TEL. (305) 856-7192

DATE	SHIP VIA	TERMS:	DELIVERY PROMISED	F.O.B. ☐ DELIVERY POINT ☐ SHIPPING POINT

ITEM	STOCK NO.	ACCT. NO.	QUANTITY AND UNIT	DESCRIPTION	UNIT PRICE	EXTENDED PRICE
				Continued -Item III		
			2 Ea.	check screw, gauge cock and siphon. Super-		
				heater thermometer with stainless steel		
				wall. Price $719.00 Per set EACH	719.00	1538.00
				All components, drums, tubes, etc. shall be at		
				the job site by ~~March 12, 1988~~ SEE CONTRACT		
				Dismantling and erection of all pressure		
	23 week from			parts shall be completed by ~~August 12th 1989~~ SEE CONTRACT		
	STARTING DATE			Alpha Boilers Inc. shall submit a C.P.M.		
				schedule on fabrication and erection of Boiler		
				components TO MEET THE August 12, 1989 completion date		
				All pressure parts shall be in compliance		
				with the A.S.M.E. Code.		
				ALPHA BOILERS INC shall submit the proper		
				S and A stamps upon request.		
				Any substitutions of sub-contractors are		
				to be approved by Okeelanta Corporation.		

REQUISITIONER'S INSTRUCTIONS

1. Fill in requested info only.
2. Items listed must be available from same supplier.
3. Use typewriter or ball point pen.
4. Incomplete or illegible requisitions will be returned.

VENDOR INSTRUCTIONS

1. Submit all invoices in duplicate.
2. No C.O.D. shipments will be accepted.

PURCHASING

AUTHORIZED SIGNATURE
~~ROBERTO SUERO~~

THIS FORM IS A REQUISITION ONLY UNTIL COMPLETED AND SIGNED BY THE PURCHASING DEPT.

REQUISITIONER	DELIVER TO	APPROVED BY	APPROVED BY	APPROVED BY	REQUISITION DATE
A. Padron	Okeelanta Corp.				6/6/88

ACCOUNT NUMBER	EST. VALUE	DATE REQUIRED	SUGGESTED SUPPLIER	ADDRESS
3515 516	$1,143,260.26		Alpha Boilers, Inc.	

REQUISITION NUMBER

OKEELANTA CORPORATION

SOUTH BAY, FLORIDA 33493

FM - 10026
PURCHASE ORDER NO.

This P.O. No. must appear on all invoices, packages and shipping papers.

FLA. STATE SALES TAX_____ YES _____ NO EXEMPTION NUMBER

Alpha Boilers Inc.
2655 LeJeune Rd. Suite 800
Coral Gables, FL 33134
Attn: Mr. Miguel Andux
442-2233
445-9125

INVOICE AND SHIP TO:
[X] OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY ON U.S. 27
P.O. BOX 86
SOUTH BAY, FLA. 33493 • TEL.: (305) 996-9072

ACKNOWLEDGMENTS AND INQUIRIES TO:
[X] AMERICA'S EXPORT CORP. (OKEELANTA)
626 NORTH DIXIE HWY.
WEST PALM BEACH, FL. 33401
TEL.: (305) 659-6449

$75,000.00 with Purchase order, balance against

DATE	SHIP VIA	TERMS: deliveries of equipment and progress reports of erection. All invoices to be net cash	DELIVERY PROMISED	F.O.B. Okeelanta
	Motor Freight			[X] DELIVERY POINT [ ] SHIPPING POINT

ITEM	STOCK NO.	ACCT. NO.	QUANTITY AND UNIT	DESCRIPTION	UNIT PRICE	EXTENDED PRICE
				To Furnish all the materials, equipment		
				and erection to convert Boilers #4 & #5		
				To 450 Psig Design pressure (350 Psig operating pressure) and 650°F steam temperature:		
				as described in ALPHA Proposal No. 88100		
				dated Feb. 26, 1988 Addendum I and II 25,		
				1988 Alternate I and II and Addendum II		
				May 3, 1988		
1						
				(Item 1) Per Feb. 26, 1988 Proposal		
				Boiler #4 Drums, headers and tubes		
				i.d. / shellplate thickness / approx. dimension tang-tangent / approx. weight		
				Uptake Drum 36" 1 1/16" 31'-0" 5 Lb		
				Middle Drum 42" 1¼" 33'-0" 20,129 Lb		
				Downcomer Drum 36" 1 1/16" 31'-0" 13,755 Lb		
				Lower Drum 36" 1 1/16" 28'-0" 13,267 LB		
				Water Wall Header 10" .593" Various 3252 Lbs		
				Superheater Headers 12" .688" 32'-0" 5670 Lbs		
				(1) Superheater Sub. Pipe 10" .365" 11'-0" 446 Lbs		
				(1) Set boiler and supply tubes (54 wide)		
				3½" x .135" and 4" x .165" SA-178-A		

REQUISITIONER'S INSTRUCTIONS

1. Fill in requested info only.
2. Items listed must be available from same supplier.
3. Use typewriter or ball point pen.
4. Incomplete or illegible requisitions will be returned.

VENDOR INSTRUCTIONS

1. Submit all invoices in duplicate.
2. No C.O.D. shipments will be accepted.

RCD JUN 10 1988

AUTHORIZED SIGNATURE

THIS FORM IS A REQUISITION ONLY UNTIL COMPLETED AND SIGNED BY THE PURCHASING DEPT.

PURCHASING

REQUISITIONER	DELIVER TO	APPROVED BY	APPROVED BY	APPROVED BY	REQUISITION DATE
A.PAdron	Okeelanta Corp.				6/6/88

ACCOUNT NUMBER	EST. VALUE	DATE REQUIRED	SUGGESTED SUPPLIER	ADDRESS	REQUISITION NUMBER

OKEELANTA CORPORATION

SOUTH BAY, FLORIDA 33493

FM - 10026
PURCHASE ORDER NO.
This P.O. No. must appear on all invoices, packages and shipping papers.

FLA. STATE SALES TAX_____ YES _____ NO EXEMPTION NUMBER

INVOICE AND SHIP TO:

☐ OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY ON U.S. 27
P.O. BOX 86
SOUTH BAY, FLA. 33493 • TEL.: (305) 996-9072

ACKNOWLEDGMENTS AND INQUIRIES TO:

☐ AMERICA'S EXPORT CORP. (OKEELANTA)
2600 S.W. 3RD AVE., (CORAL WAY)
TERREMARK BLDG., SUITE 300
MIAMI, FL 33129 • TEL. (305) 856-7192

DATE	SHIP VIA	TERMS:	DELIVERY PROMISED	F.O.B. ☐ DELIVERY POINT ☐ SHIPPING POINT

ITEM	STOCK NO.	ACCT NO.	QUANTITY AND UNIT	DESCRIPTION	UNIT PRICE	EXTENDED PRICE
				Continued. Boiler #4 Drums, headers & tubes		
				(1) Set superheater tubes 593 wide) 1 3/4"		
				x .135" SA-178-A		
				53 sets superheater tube ties stainless steel		
				Erection of the foregoing components including		
				erection of new or existing boiler trim (safety		
				valves, water column, blow-off valves, etc.).		
				The use of acme shall be provided by Okeelanta		
				for the heavy lifts. Price $503,452.00		
				Price includes; drum, headers and tubes @ $412,552.00 & erection $90900.00		
				Boiler #5 Drums, header and tubes		

	size	shellplate thickness	approx. dimension tang-tangent	approx. weight
Uptake Drum	36"	1 1/16"	34'-0"	14,981 Lbs.
Middle Drum	42"	1¼"	36'-0"	21,811 Lbs
Downtake Drum	36"	1 1/16"	34'-0"	14,981 Lbs
Lower Drum	36"	1 1/8"	31'-0"	14,565 Lbs
Water Wall Headers	10"	.593"	Various	3455 Lbs
Superheater Headers	12"	.687"	35'-0"	6202 Lbs
(1) Superheater S.Pipe	3½"	.365"	11'-0"	446 Lbs

				(1) Set boiler and supply tubes (60 wide)		
				3¼" x .135" and 4" x .109" SA-178-A		

REQUISITIONER'S INSTRUCTIONS

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3. Use typewriter or ball point pen.
4. Incomplete or illegible requisitions will be returned.

VENDOR INSTRUCTIONS

1. Submit all invoices in duplicate.
2. No C.O.D. shipments will be accepted.

REC'D JUN 10 1988

PURCHASING

AUTHORIZED SIGNATURE

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REQUISITIONER	DELIVER TO	APPROVED BY	APPROVED BY	APPROVED BY	REQUISITION DATE
A.Padron	Okeelanta Corp.				6/6/88

ACCOUNT NUMBER	EST. VALUE	DATE REQUIRED	SUGGESTED SUPPLIER	ADDRESS

REQUISITION NUMBER

OKEELANTA CORPORATION

SOUTH BAY, FLORIDA 33493

FM - 10026
PURCHASE ORDER NO.
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FLA. STATE SALES TAX_____ YES _____ NO EXEMPTION NUMBER

INVOICE AND SHIP TO:

☐ OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY ON U.S. 27
P.O. BOX 86
SOUTH BAY, FLA. 33493 • TEL.: (305) 996-9072

ACKNOWLEDGMENTS AND INQUIRIES TO:

☐ AMERICA'S EXPORT CORP. (OKEELANTA)
2600 S.W. 3RD AVE., (CORAL WAY)
TERREMARK BLDG., SUITE 300
MIAMI, FL 33129 • TEL. (305) 856-7192

DATE	SHIP VIA	TERMS:	DELIVERY PROMISED	F.O.B.
				☐ DELIVERY POINT ☐ SHIPPING POINT

ITEM	STOCK NO.	ACCT. NO.	QUANTITY AND UNIT	DESCRIPTION	UNIT PRICE	EXTENDED PRICE
				Continued Boiler #5 Drums, headers & Tubes		
				(1) Set super heater tubes (59 wide) 1 3/4"		
				x .135" SA-178-A		
				59 sets superheater tube ties stainless		
				steel. Erection of the foregoing components		
				including erection of new or existing boiler		
				trim (safetyvalves, water column, blow-off		
				valves, etc.). The use of a crane shall be		
				provided by Okeelanta for the heavy lifts.		
				Price $556,930.00 Price includes; drum, headers, & Tubes		
				(Item II) Per Feb 26, 1988 Proposal @ $460,130.00 & erection @ $96,800.00		
				Boiler #4 Safety Valves		
				1-2" Consolidated 1811 KC-6~~00~~		
				2-2½" Consolidated 1811 LA-600#		
				3 - Gags		
				Price $5,576.00 LOT		$5576.00
				Boiler #5 Safety Valves		
				1-2½" Consolidated 1811 LC		
				2-2½" Consolidated 1811 LA		
				3-Gags		
				Price 6,093.00 LOT		6093.00

REQUISITIONER'S INSTRUCTIONS

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VENDOR INSTRUCTIONS

1. Submit all invoices in duplicate.
2. No C.O.D. shipments will be accepted.

RECD JUN 10 1988

PURCHASING

AUTHORIZED SIGNATURE

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REQUISITIONER	DELIVER TO	APPROVED BY	APPROVED BY	APPROVED BY	REQUISITION DATE
A.Padron	Okeelanta Corp.				6/6/88

ACCOUNT NUMBER	EST. VALUE	DATE REQUIRED	SUGGESTED SUPPLIER	ADDRESS	REQUISITION NUMBER

OKEELANTA CORPORATION

SOUTH BAY, FLORIDA 33493

FM - 10026
PURCHASE ORDER NO.
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FLA. STATE SALES TAX_____ YES _____ NO EXEMPTION NUMBER

INVOICE AND SHIP TO:

☐ OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY ON U.S. 27
P.O. BOX 86
SOUTH BAY, FLA. 33493 • TEL.: (305) 996-9072

ACKNOWLEDGMENTS AND INQUIRIES TO:

☐ AMERICA'S EXPORT CORP. (OKEELANTA)
2600 S.W. 3RD AVE., (CORAL WAY)
TERREMARK BLDG.; SUITE 300
MIAMI, FL 33129 • TEL. (305) 856-7192

DATE	SHIP VIA	TERMS:	DELIVERY PROMISED	F.O.B.
				☐ DELIVERY POINT ☐ SHIPPING POINT

ITEM	STOCK NO.	ACCT. NO.	QUANTITY AND UNIT	DESCRIPTION	UNIT PRICE	EXTENDED PRICE
				(Item III)) Per Feb. 26, 1988 Proposal		
				Boiler #4		
				3 sets saddles for upper drums and structural		
				suppoers for pendant superheater (type A036		
				steel) Price $1,075.00 LOT		$1075.00
				Boiler #5		
				3 sets saddles for upper drums and structural		
				supports for pendant superheater (type A-36 Steel)		
				Price $1,075.00 LOT		1075.00
				Addendum I - Per April 25, 1988 Proposal		
				Addendum I--Blow-off Valves		
				2 sets Demister type double screens with blow-		
				off valves and 8 sets 2½" straightway and		
				angle header blow-off valves, suitable for		
				450 psig design pressure, Edwards or equal.		
				Price $22,876.00 LOT		22876.00
				Alternate II--Steam Separators and Internal		
				Piping for Steam Drums.		
				2 sets Demister type double screens with		
				enclosure, baffles and feedwater, continuous		
				blowdown and chemical piping. Price $26,956.00 LOT		26956.00

REQUISITIONER'S INSTRUCTIONS

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VENDOR INSTRUCTIONS

1. Submit all invoices in duplicate.
2. No C.O.D. shipments will be accepted.

RECD JUN 10 1988

L. I. Padron
AUTHORIZED SIGNATURE

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REQUISITIONER	DELIVER TO	APPROVED BY	APPROVED BY	APPROVED BY	REQUISITION DATE
A.Padron	Okeelanta Corp.				6/6/88
ACCOUNT NUMBER	EST. VALUE	DATE REQUIRED	SUGGESTED SUPPLIER	ADDRESS	REQUISITION NUMBER

OKEELANTA CORPORATION

SOUTH BAY, FLORIDA 33493

FM - 10026
PURCHASE ORDER NO.
This P.O. No. must appear on all invoices, packages and shipping papers.

FLA. STATE SALES TAX_____ YES _____ NO EXEMPTION NUMBER

INVOICE AND SHIP TO:

☐ OKEELANTA CORPORATION
6 MILES SOUTH OF SOUTH BAY ON U.S. 27
P.O. BOX 86
SOUTH BAY, FLA. 33493 • TEL.: (305) 996-9072

ACKNOWLEDGMENTS AND INQUIRIES TO:

☐ AMERICA'S EXPORT CORP. (OKEELANTA)
2600 S.W. 3RD AVE., (CORAL WAY)
TERREMARK BLDG., SUITE 300
MIAMI, FL 33129 • TEL. (305) 856-7192

DATE	SHIP VIA	TERMS	DELIVERY PROMISED	F.O.B. ☐ DELIVERY POINT ☐ SHIPPING POINT

ITEM	STOCK NO.	ACCT. NO.	QUANTITY AND UNIT	DESCRIPTION	UNIT PRICE	EXTENDED PRICE
				Addendum II -Per May 3, 1988 Proposal		
				Item I		
			2 ea	Water Column for 450 psig design pressure		
				with whistle type alarm (similiar to presen		
				waser column) and 2 water gauges, complete		
				with drain valves Price $6,036.00 EACH		XXXXXXXX
						12072.00
				Item II		
			2 sets	Miscellaneous valves suitable for 450 psig		
				design pressure as follows:		
				1/4" Hancock 5500-S Steam gaggeshut-off valve	$ 44.30	$88.60
				1" Hancock 5500-S sample valve	63.37	126.74
				1" Hancock 5500-S drum vent valve	63.37	126.74
				1" Hancock 5500-S Superheater vent valve	63.37	126.74
				1" Hancock 5500-S Superheater drain valve	63.37	126.74
				1" Hancock 5505-S continuous blowdown valve	555.02	1110.04
				5/16 otifice		
				3" Hancock Feedwater swing check	2005.83	4011.66
			2 sets	Item III	Total..	$5717.26
				Weksler steam pressure gauge o/600 psig with		

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VENDOR INSTRUCTIONS

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2. No C.O.D. shipments will be accepted.

RECD JUN 10 1988

AUTHORIZED SIGNATURE

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SCHEDULE A

OKEELANTA CORPORATION.
Change to boilers 4 and 5

Reduction of steam usage under proposed conditions

UNDER PRESENT CONDITIONS (250psig/550 deg. Far/25 psig)				TANDEM B	UNDER PROPOSED CONDITIONS (350psig/650 deg. Far/25 psig)			
STEAM CONSUMPTION (lbs/hr)	ESTIMATED LOAD (hp)	PLWR (#/hp-hr)	FLWR (#/hp-hr)	TURBINE No	FLWR (#/hp-hr)	PLWR (#/hp-hr)	ESTIMATED LOAD (hp)	STEAM CONSUMPTION (lbs/hr)
14,472	480	30.15	26.80	KN 1	21.00	23.63	480	11,340
14,472	480	30.15	26.80	KN 2	21.00	23.63	480	11,340
20,231	671	30.15	26.80	M1	21.00	23.63	671	15,852
20,231	671	30.15	26.80	M2	21.00	23.63	671	15,852
20,231	671	30.15	26.80	M3	21.00	23.63	671	15,852
20,231	671	30.15	26.80	M4	21.00	23.63	671	15,852
22,646	671	33.75	30.00	M5	21.00	23.63	671	15,852
22,646	671	33.75	30.00	M6	21.00	23.63	671	15,852
155,159				TOTAL				117,794

Savings in steam usage under proposed conditions 24.08%

NOTES:

PLWR -------- Partial load water rate

FLWR -------- Full load water rate

PLWR = FLWR X 1.125

LOAD CALCULATIONS.

Knives 417 tons of cane per hour x 11.5 % fiber x 10 hp/ton fiber per hour = 480 hp/unit

Mills 417 tons of cane per hour x 11.5 % fiber x 14 hp/ton fiber per hour = 671 hp/unit

SCHEDULE B

OKEELANTA CORPORATION
CHANGES TO BOILERS 4 AND 5

CALCULATIONS

ACTUAL EMISSIONS
Pressure 250 psig. temp. 550 deg. Farh.

	BOILER 4	BOILER 5		
ACTUAL EMISSIONS (LBS/HR)	38.69	52.56	(1)	Obtained from 1987-88 test

PROPOSED EMISSION CALCULATIONS
Pressure 350 psig. temp. 650 deg Farh.

	BOILER 4	BOILER 5		
ENTHALPY OF STEAM PROPOSED COND. (BTU/LBS)	1,337.50	1,337.50	(2)	
ENTHALPY OF STEAM ACTUAL COND. (BTU/LBS)	1,290.00	1,290.00	(3)	
ENTHALPY RISE (BTU/LBS)	47.50	47.50	(4)	(2)-(3)
STEAM GENERATION (LBS/HR)	94,000	122,000	(5)	
EQUIVALENT EFFIC. 55% (LBS/HR)	170,909	221,818	(6)	(5)/0.55
INPUT REQUIERED (BTU E6/HR)	8.12	10.54	(7)	(6) x (4) /1,000,000
EMISSION (LBS/BTU E6)*	.196	.201	(8)	Obtained from 1987-88 test
INCREMENTAL EMISSION (LBS/HR)	1.59	2.12	(9)	(7) x (8)
PROPOSED EMISSION (LBS/HR)	40.28	54.68	(10)	(1) + (9)
EQUIVALENT IN TONS/YEAR	67.67	91.86		

SCHEDULE C

OKEELANTA CORPORATION
CHANGES TO BOILERS 4 AND 5

PARTICLE EMISSION ANALYSIS (TONS/YEAR)

BOILER No	permitted TPY (1)	Actual TPY (2)	Proposed TPY (3)	Proposed TPY with boiler changes (4)
4	91.43	65.00	67.67	64.83
5	118.66	88.30	91.86	88.01
6	121.58	60.51	60.51	60.51
10	84.67	72.07	72.07	69.05
11	84.67	53.21	53.21	50.97
12	101.62	101.61	101.61	97.35
14	101.62	87.26	87.26	83.60
15	84.67	65.17	65.17	61.73
	788.93	593.13	599.36	576.06

(1) Maximum allowed emissions (tons/year) based on current permits.

(2) Theoretical emissions for last year, based on actual emission rate and maximun allowable time of operation.

(3) Same as collumn (2) with boilers 4 and 5 corrected for emissions based on new temperature and pressure.

(4) Same as collumn (3) with high pressure boilers corrected for savings in steam demand.

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

August 25, 1988

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

Dear Mr. Carreno:

We have reviewed your request to increase the steam pressure and temperature of the boilers at your sugar mill. To operate at the new steam conditions will require your existing permits be amended or new permits to construct be obtained. More information will be needed to determine how to handle the proposed change in steam conditions.

If the change can be made to each boiler for less than half the cost of a new equivalent boiler, all current permit restrictions (other than steam temperature and pressure) will continue to be complied with, and there will be no increase in heat input and actual emissions of any regulated and unregulated pollutant, then the existing permit for the boiler can be amended to authorize operation at the new steam conditions. The Department will require cost data for the change along with a heat and material balance that shows the actual emissions do not increase for any pollutant. The amendment of the permit may establish new allowable emission standards for the boiler equal to the actual emissions from them and require pre and post construction tests to confirm the actual emissions are not increased.

If the cost of tubes, headers, and drum exceed 50 percent of the cost of a new equivalent boiler or the emissions of any pollutant from the boiler increases, the change will require a new permit to construct. The regulations that the boiler modification would be subject to are determined by the magnitude of the increase in emissions.

Also, any federal permit issued by EPA for these boilers would have to be amended prior to operating at the new steam conditions. Their policy for amending permits and requiring new permits to construct are similar to the guidelines described in this letter.

If you have any questions on this matter, please call Willard Hanks at (904)488-1344 or write to me at the Department's Tallahassee address.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/plm

cc: David Knowles, SF Dist.

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) Kellar & Hanks, BAQM Tallahassee	Initial	
	Date	
2.	Initial	
	Date	
3.	Initial	
	Date	
4.	Initial	
	Date	

REMARKS:

RECEIVED

NOV 4 1988

DER - BAQM

INFORMATION

- [ ] Review & Return
- [ ] Review & File
- [ ] Initial & Forward
- [ ]

DISPOSITION

- [ ] Review & Respond
- [ ] Prepare Response
- [ ] For My Signature
- [ ] For Your Signature
- [ ] Let's Discuss
- [ ] Set Up Meeting
- [ ] Investigate & Report
- [ ] Initial & Forward
- [ ] Distribute
- [ ] Concurrence
- [ ] For Processing
- [ ] Initial & Return

FROM: David Knowles
Fort Meyers

DATE 11/2/88

PHONE 721-7900

2180 WEST FIRST STREET
SUITE 401
FORT MYERS, FLORIDA 33901

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

PHILIP R. EDWARDS
DISTRICT MANAGER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA DISTRICT

August 13, 1980

Mr. Arthur Kirstein, III
Executive Vice President
Gulf + Western Food Products Co.
P.O. Box 86
South Bay, FL 33493

CERTIFIED MAIL NO. P09 5346991
RETURN RECEIPT REQUESTED

Re: Palm Beach Co. - AP
Gulf + Western
Boilers #4, #5, #11

Dear Mr, Kirstein:

A review has been conducted of the stack tests performed on the above referenced boilers. Inasmuch as the steam production during the test was less than ninety percent (90%) of the boiler design capacity, the permits issued are being amended to include a steam production limitation.

In reviewing the files for boilers #4 and #5, it was noted that the permit numbers were issued incorrectly. Accordingly, the numbers will be changed to reflect the construction, rather than operation, status of these permits.

Boiler #4 (AC50-6585) is amended as follows:

1) Permit number is changed from AO50-6585 to AC50-6585.

2) Specific Condition #11 - this boiler shall not be operated at steam production rates exceeding 80,400 lbs./hr. on an hourly average.

Boiler #5 (AC50-6595) is amended as follows:

1) Permit number is changed from AO50-6595 to AC50-6595.

2) Specific Condition #11 - this boiler shall not be operated at steam production rates exceeding 101,600 lbs./hr. on an hourly average.

Boiler #11 (AO50-6617) is amended as follows:

> Specific Condition No. 7 - this boiler shall not be operated at steam production rates exceeding 109,500 lbs./hr. on an hourly average.

All other conditions of these permits remain as issued.

Should you object to this permit, including any and all of the conditions contained therein, you may file an appropriate petition for administrative hearing. This petition must be filed within fourteen (14) days of the receipt of this letter. Further, the petition must conform to the requirements of Section 28-5.201, Florida Administrative Code, (attached). The petition must be filed with the Office of General Counsel, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

If no petition is filed within the prescribed time, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this matter.

Your cooperation in this matter will be appreciated.

Sincerely,

Philip R. Edwards

Philip R. Edwards
District Manager

PRE/TWD/lc

cc: Palm Beach County Health Dept.

Attachment

2180 WEST FIRST STREET
SUITE 401
FORT MYERS, FLORIDA 33901

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

PHILIP R. EDWARDS
DISTRICT MANAGER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA DISTRICT

May 13, 1980

Mr. Arthur Kirstein, III
Executive Vice-President
Gulf & Western Food Products Co.
P. O. Box 86
South Bay, Fl 33493

RE: Palm Beach Co. - AP
Gulf & Western
Boilers #4 & #5

Dear Mr. Kirstein:

Enclosed is Permit Numbers # AO50-6585 and # AO50-6595, dated May 12, 1980 to construct the subject pollution source, issued pursuant to Section 403, Florida Statutes.

Should you object to this permit, including any and all of the conditions contained therein, you may file an appropriate petition for administrative hearing. This petition must be filed within fourteen (14) days of the receipt of this letter. Further, the petition must conform to the requirements of Section 28-5.15, Florida Administrative Code, (see reverse side of this letter). The petition must be filed with the Office of General Counsel, Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301.

If no petition is filed within the prescribed time, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this matter.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement action for violation of the conditions and requirements thereof.

Sincerely,

Philip R. Edwards
District Manager

PRE/TWD/lp

Enclosure

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

(1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.

(2) All petitions filed under these rules should contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name and address of the petitioner or petitioners;

(c) All disputed issues of material fact. If there are none, the petition must so indicate;

(d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;

(e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;

(f) A demand for the relief to which the petitioner deems himself entitled; and

(g) Such other information which the petitioner contends is material.

cc: DER Tallahassee
Angel Tellechea, P.E.
Palm Beach Co. Health Dept.

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AO50-6585

GULF & WESTERN FOOD PRODUCTS CO.
Boiler #4

DATE OF ISSUANCE

May 12, 1980

DATE OF EXPIRATION

December 31, 1980

PHILIP R. EDWARDS
District Manager

DER FORM PERM 11-42

2180 WEST FIRST STREET
SUITE 401
FORT MYERS, FLORIDA 33901

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

PHILIP R. EDWARDS
DISTRICT MANAGER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA DISTRICT

APPLICANT:

Arthur Kirstein III
Executive Vice-President
Gulf & Western Food Products Co.
P. O. Box 86
South Bay, Fl 33493

PERMIT/CERTIFICATION NO. AO50-6585

COUNTY: Palm Beach

PROJECT: Boiler #4

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

Replacement of existing control system on Boiler #4 with one (1) Ducon Multivane Scrubber Model II, Size 180.

Subject to the following thirteen (13) General and ten (10) Specific Conditions.

PERMIT NO.: AO50-6585
APPLICANT: Arthur Kirstein, III

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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

3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, 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.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.

13. This permit also constitutes:

[ ] Determination of Best Available Control Technology (BACT)
[ ] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AO50-6585
APPLICANT: Arthur Kirstein, III

SPECIFIC CONDITIONS:

1. Construction of this installation shall be completed by October 31, 1980. Application for Permit to Operate to be submitted by December 1, 1980.

2. This construction permit expires on December 31, 1980 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Environmental Regulation Board.

3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.

4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Dept. of Environmental Regulation for consideration toward the issuance of an operation permit.

5. This boiler shall be tested for particulate matter within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DER SOUTH FLORIDA DISTRICT OFFICE, 2180 West First Street, Suite 401, Fort Myers, Florida 33901.

6. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying ou of an adequate sampling program - see attached guidelines.

7. All fugitive dust generated at this site shall be adequately controlled.

8. The control system shall be equipped with instrumentation to monitor total pressure drop and inlet water pressure.

9. Drawings, plans, documents or specifications submitted by the permittee, not attached hereto, but retained on file at the South Florida District Office, are made a part hereof.

10. Emissions from this facility shall not exceed the following limitations:

    (a) Particulate Matter - 0.30 pounds per million BTU's of carbonaceous fuel heat input plus 0.10 pounds per million BTU's of fossil fuel heat input.
    (b) Opacity - 30 percent except that up to 40 percent is permissible for not more than two minutes in any one hour.

Expiration Date: December 31, 1980

Issued this 12th day of May, 19 80.

_____ Pages Attached.

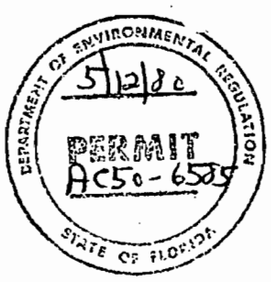
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Signature

PHILIP R. EDWARDS
District Manager

DER FORM 17-1.122(63) 4/4 (1/80)

BEST AVAILABLE COPY



(16)

#4

BOILER NO. 4

RECEIVED
MAR 12 1980
DER SO FLA DISTRICT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

PAID JAN 18 19
6585

APPLICATION TO OPERATE/CONSTRUCT
AIR POLLUTION SOURCES

SOURCE TYPE: _____ ( ) New[1] (x) Existing[1]

APPLICATION TYPE: ( ) Construction ( ) Operation ( ) Modification

COMPANY NAME: G+W Food Products Co, Okeelanta Sugar Division COUNTY: Palm Beach

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) _____

SOURCE LOCATION: Street 4 miles West of U.S. 27 & 8 miles S.W. of South Bay City South Bay, Florida

UTM: East 17-524.9 Km. E North 2939.5 KM N.

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

APPLICANT NAME AND TITLE Arthur Kirstein, III, Executive Vice-President

APPLICANT ADDRESS P.O. Box 86, South Bay, Florida 33493

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Gulf + Western Food Products Company
I certify that the statements made in this application for a Modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

Signed: K M. Kirstein III

Arthur Kirstein, III-Executive Vice-Presider
Name and Title (Please Type)

*Attach letter of authorization Date: 3-7-80 Telephone No. (305)996-9072

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: _____

Angel Tellechea
Name (Please Type)

(Affix Seal)

Gulf + Western Technology Corporation
Company Name (Please Type)

P.O. Box 86, South Bay, Florida 33493
Mailing Address (Please Type)

Florida Registration No. 12343 Date: 3-7-80 Telephone No. (305)996-9072

[1] See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The proposed project consists of replacing two existing Joy Impinger Scrubbers Model 56-D by one Ducon Multivane Model 11 Size 180 made out of 7 gauge 316 L.SS. The project will result in full compliance. This is going to be the same modificati that we made in Boiler #6 and that has improved the performance of such source.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction May 1980 Completion of Construction October 1980

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

1.- Structural steel, duct work and concrete foundation $40,000.00

2.- Ducon Multivane Scrubber, including chimney, test, platforms, piping installation $210,000.00

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Boiler #	Permit #	Issuance	Expiration
4	A050-5885	September 11,1979	September 11,1984

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? ___Yes X No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr - ; if power plant, hrs/yr 3600 ; if seasonal, describe:

G. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? _____

   a. If yes, has "offset" been applied? _____
   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirements apply to this source? If yes, see Sections VI & VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? _____

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants Type	% Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
N/A	N/A	N/A	N/A	N/A

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 45,854 lb/hr of bagasse

2. Product Weight (lbs/hr): 94,000 lbs/hr of steam @250 psig at 550° FTT

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission[1] Maximum lbs/hr	Emission[1] Actual T/yr	Allowed Emission[2] Rate per Ch. 17-2, F.A.C.	Allowable[3] Emission lbs/hr	Potential[4] Emission lbs/hr	Potential[4] Emission T/yr	Relate to Flow Diagram
Particulate	49.5	89.1	0.3# MBTU/HR	51.91	369.0	664.2	
Sulphur Dioxide	28.89	52.0			28.89	52.0	
Sulphur Trioxide	0.368	0.66			0.368	0.66	
Carbon Mono oxide	46.32	83.88			46.32	83.38	
Hydro Carbon's CH4	45.95	82.71			45.95	82.71	
Nitrogen Oxide No2	38.74	69.73			38.74	69.73	

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles[5] Size Collected (in microns)	Basis for Efficiency (Sec.V,It5)
Ducon Multivane				
Scrubber Model II				
Size 180	Particulate	86.59%	0.3-10.0 & greater	

[1]See Section V, Item 2.
[2]Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E.(1), F.A.C. -- 0.1 pounds per million BTU heat input)
[3]Calculated from operating rate and applicable standard
[4]Emission, if source operated without control (See Section V, Item 3)
[5]If Applicable

** Contaminants emitted based on burning 92 gallons of oil and 22.93 tons of bagasse per hour.

E. Fuels

Type (Be Specific)	Consumption* avg/hr	max./hr	Maximum Heat Input (MMBTU/hr)
54.9% Moisture Bagasse	22,927	45,854	168.42×10^6
2% Bunker C #6	1.093	2.186	13.76×10^6

*Units Natural Gas,MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis: Fuel Oil Bagasse analysis: See Test Report Attached

Percent Sulfur: 2.0 Percent Ash: _____

Density: 8.1 lbs/gal Typical Percent Nitrogen: .5

Heat Capacity: 18,500 BTU/lb 149,850 BTU/gal

Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum N/A

G. Indicate liquid or solid wastes generated and method of disposal.

All liquid or solid wastes generated are contained in controlled ponds.**

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 62.5 ft. Stack Diameter: 7'-6" ft.

Gas Flow Rate: 79,607 ACFM Gas Exit Temperature: 152 ^{o}F.

Water Vapor Content: 23 % Velocity: 33.33 FPS

** Blow down water from the boiler will be discharged containing:

P. Alkalinity	PPM	as C_a CO_3	= 200-600
Hydrate Alkalinity	PPM	as C_a CO_3	= 20-600
Chloride	PPM	as Cl	= 0-150
Phosphate	PPM	as PO_4	= 30-150
Sulphate	PPM	as SO_3	= 30-50
Total disolved solids	PPM		= 1850-2500

The blow down water from the boiler will be discharged into the main mill waste ditch. This waster is to flood the cane fields and it is impounded and controlled within the farms private land.

Approximately 400 GPM of Slurry from the Scrubber will be discharged into the mail mill waste ditch and used to flood the cane fields, and it will be impounded and controlled within the farms private land.

3160 WEST FIRST STREET
SUITE 401
FORT MYERS, FLORIDA 33901

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

PHILIP R. EDWARDS
DISTRICT MANAGER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA DISTRICT

APPLICANT:

Arthur Kirstein, III
Executive Vice-President
Gulf & Western Food Products Co.
P. O. Box 86
South Bay, Fl 33493

PERMIT/CERTIFICATION NO. AO50-6595

COUNTY: Palm Beach

PROJECT: Boiler #5

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

Replacement of existing control system on Boiler #5 with one (1) Ducon Multivane Scrubber Model II, Size 180.

Subject to the following thirteen (13) General and ten (10) Specific Condition

PERMIT NO.: AO50-6595
APPLICANT: Arthur Kirstein, III

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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

3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, 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.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.

13. This permit also constitutes:

[ ] Determination of Best Available Control Technology (BACT)
[ ] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AO50-6595
APPLICANT: Arthur Kirstein, III

SPECIFIC CONDITIONS:

1. Construction of this installation shall be completed by October 31, 1980. Application for Permit to Operate to be submitted by December 1, 1980.

2. This construction permit expires on December 31, 1980 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Environmental Regulation Board.

3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.

4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Dept. of Environmental Regulation for consideration toward the issuance of an operation permit.

5. This boiler shall be tested for particulate matter within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DER SOUTH FLORIDA DISTRICT OFFICE, 2180 West First Street, Suite 401, Fort Myers, Florida 33901.

6. Satisfactory ladders, platforms and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying of an adequate sampling program - see attached guidelines.

7. All fugitive dust generated at this site shall be adequately controlled.

8. The control system shall be equipped with instrumentation to monitor total pressure drop and inlet water pressure.

9. Drawings, plans, documents or specifications submitted by the permittee, not attached hereto, but retained on file at the South Florida District Office, are made a part hereof.

10. Emissions from this facility shall not exceed the following limitations:

    (a) Particulate Matter - 0.30 pounds per million BTU's of carbonaceous fuel heat input plus 0.10 pounds per million BTU's of fossil fuel heat input.
    (b) Opacity - 30 percent except that up to 40 percent is permissible for not more than two minutes in any one hour.

Expiration Date: December 31, 1980

Issued this 12th day of May, 19 80.

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Signature
PHILIP R. EDWARDS
District Manager

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AO50-6595

GULF & WESTERN FOOD PRODUCTS CO.
Boiler #5

DATE OF ISSUANCE

May 12, 1980

DATE OF EXPIRATION

December 31, 1980

PHILIP R. EDWARDS
District Manager

DER FORM PERM 11-42

(1)

(16)

DEPARTMENT OF ENVIRONMENTAL REGULATION 5/12/80 PERMIT AC50-6595 STATE OF FLORIDA

BOILER NO. 5

RECEIVED
MAR 12 1980
DER SO FLA. DISTRICT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

PAID JAN 18 1980

6595

APPLICATION TO OPERATE/CONSTRUCT
AIR POLLUTION SOURCES

SOURCE TYPE: _____ ( ) New[1] (X) Existing[1]

APPLICATION TYPE: ( ) Construction ( ) Operation (X) Modification

COMPANY NAME: Gulf + Western Food Products Co. Okeelanta Sugar Division COUNTY: Palm Beach

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) _____

SOURCE LOCATION: Street 4 miles West of U.S. 27 & 8 miles S. of South Bay City South Bay, Florida

UTM: East 17-524-9 Km. E North 2939.5 Km N

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

APPLICANT NAME AND TITLE Arthur Kirstein, III Executive Vice President

APPLICANT ADDRESS P.O. Box 86, South Bay, Florida 33493

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Gulf + Western Food Products Co.
I certify that the statements made in this application for a Modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

Signed: A. Kirstein III

Arthur Kirstein, III Executive Vice-President
Name and Title (Please Type)

*Attach letter of authorization Date: 3-7-80 Telephone No. (305)996-9072

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: _____

Angel Fellechea
Name (Please Type)

(Affix Seal)

Gulf + Western Technology Corporation
Company Name (Please Type)

P.O. Box 86, South Bay, Florida 33493
Mailing Address (Please Type)

Florida Registration No. 12343 Date: 3-7-80 Telephone No. (305)996-9072

[1] See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

(2)

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The proposed project consists of replacing two existing Joy Impinger Scrubbers Model 56-D by one Ducon Multivane Model II, Size 180 made out of 7 gauge 316 L.SS

The project will result in full compliance. This is going to be the same modificati we made in Boiler #6 and that has improved the performance of such source.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction May 1980 Completion of Construction October 1980

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Structural Steel duct work and concrete foundation	$ 40,000.00
Ducon Multivane Scrubber including chimney, test, platforms, piping and installation	210,000.00

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Boiler #	Permit #	Insurance Date	Expiration Date
5	A050-5886	9-11-79	9-11-84

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? ___Yes _x_ No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr - ; if power plant, hrs/yr 3,600 ; if seasonal, describe:

G. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? ___
   a. If yes, has "offset" been applied? ___
   b. If yes, has "Lowest Achievable Emission Rate" been applied? ___
   c. If yes, list non-attainment pollutants. ___
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. ___
3. Does the State "Prevention of Significant Deterioriation" (PSD) requirements apply to this source? If yes, see Sections VI & VII. ___
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? ___
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? ___

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants Type	% Wt	Utilization Rate - lbs/hr	Relate to Flow Diagram
N/A	N/A	N/A	N/A	N/A

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): Bagasse 59.28]

2. Product Weight (lbs/hr): 122,000 of steam @ 250 psig @550° FTT

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission[1] Maximum lbs/hr	Actual T/yr	Allowed Emission[2] Rate per Ch. 17-2, F.A.C.	Allowable[3] Emission lbs/hr	Potential[4] Emission lbs/hr	T/yr	Relate to Flow Diagram
Particulate	67	112	0.3 #MBTU/Hr	67.19	566	1019	
Sulfur Dioxide	39.25	70.65			39.25	70.65	
Sulfur Trioxide	0.5	0.9			0.5	0.9	
Carbon Monoxide	59.91	107.83			59.91	107.83	
Hydrocarbons CH4	59.41	106.93			59.41	106.93	
Nitrogen Oxides NO2	50.82	91.48			50.82	91.48	

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns)[5]	Basis for Efficienc (Sec.V,It
Ducon Multivane				
Scrubber Model II				
Size 180	Particulate	88.16%	0.3-10.0 & Greater	See Derivatio

[1]See Section V, Item 2.
[2]Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E.(1), F.A.C. -- 0.1 pounds per million BTU heat input)
[3]Calculated from operating rate and applicable standard
[4]Emission, if source operated without control (See Section V, Item 3)
[5]If Applicable

** Contaminants emitted based on burning 2.976 barrel of oil and 29.64 tons of bagasse per hour.

E. Fuels

Type (Be Specific)	Consumption* avg/hr	max./hr	Maximum Heat Input (MMBTU/hr)
Moisture Bagasse	47,358	59.281	
2% Bunker C #6	1.5	2.97	

*Units Natural Gas,MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis: Fuel Oil Bagasse: See Test Report attached.

Percent Sulfur: 2% Percent Ash: _____

Density: 8.1 lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: 18,500 BTU/lb 149,850 BTU/gal

Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum N/A

G. Indicate liquid or solid wastes generated and method of disposal.

All liquid or solid wastes generated are contained in controlled ponds.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 62.5 ft. Stack Diameter: 7'.6" ft.

Gas Flow Rate: 109,100 ACFM Gas Exit Temperature: 152 °F.

Water Vapor Content: 23 % Velocity: 36.67 FPS

Blow down water from the boiler will be discharge containing:

P. Alkalinity	PPM as C CO_3	= 200-600
Hydrate Alkalinity	PPM as C_a CO_3	= 20-600
Chloride	PPM as Cl	= 0-150
Phosphate	PPM as PO_4	= 30-150
Sulphate	PPM as SO_3	= 30-50
Total disolved solids	PPM	= 1850-2500

The blow down water from the boiler will be discharged into the main mill waste ditch This water is used to flood the cane fields and it is impounded and controlled within the farms private land.

Approximately 400 GPM of Slurry from the Scrubber will be discharged into the main mill waste ditch and used to flood the cane fields, and it will be impounded and controlled within the farms private land.

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) ___

Approximate Number of Hours of Operation per day _____ days/week _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velosity _____ FPS

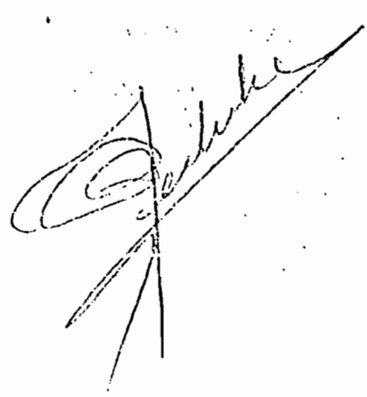
*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: ( ) Cyclone ( ) Wet Scrubber

( ) Afterburner ( ) Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):



SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight - show derivation.

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.,) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.).

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8½" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8½" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. An application fee of $20, unless exempted by Section 17-4.05(3), F.A.C. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

( ) Yes ( ) No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources? (If yes, attach copy)

( ) Yes ( ) No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

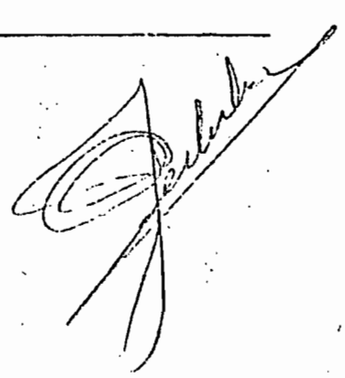
Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:
5. Useful Life:
6. Operating Costs:
7. Energy:
8. Maintenance Cost:
9. Emissions:

Contaminant	Rate or Concentration

*Explain method of determining D 3 above.



10. Stack Parameters

a. Height: ft. b. Diameter: ft.

c. Flow Rate: ACFM d. Temperature: °F

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if neceaasry).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency*: d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy*: h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency*: d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy**: h. Maintenance Costs:

i. Availability of construction materials and process chemicals.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

*Explain method of determining efficiency.
**Energy to be reported in units of electrical power - KWH design rate.

3.

a. Control Device:

b. Operating Principles:

c. Efficiency*:

d. Capital Cost:

e. Life:

f. Operating Cost:

g. Energy:

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space and operate within proposed levels:

4.

a. Control Device

b. Operating Principles:

c. Efficiency*:

d. Capital Cost:

e. Life:

f. Operating Cost:

g. Energy:

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency*:

3. Capital Cost:

4. Life:

5. Operating Cost:

6. Energy:

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a.

(1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.

*Explain method of determining efficiency above.

(7) Emissions:*

CONTAMINANT	RATE OR CONCENTRATION

(8) Process Rate:*

b.

(1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No:

(7) Emissions:*

CONTAMINANT	RATE OR CONCENTRATION

(8) Process Rate:*

10. Reason for selection and description of systems:

*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____no sites _____TSP ____( )SO_2* _____Wind spd/dir

Period of monitoring ____/__/____ to ____/__/____
month day year month day year

Other data recorded_____

Attach all data or statistical summaries to this application.

2. Instrumentation, Field and Laboratory

a) Was instrumentation EPA referenced or its equivalent?

___Yes ___No

b) Was instrumentation calibrated in accordance with Department procedures?

___Yes ___No ___Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____Year(s) of data from ____/__/____ to ____/__/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

_____

4. Stability wind rose (STAR) data obtained from (location)_____

_____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____grams/sec
SO_2	_____grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

*Specify bubbler (B) or continuous (C).

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

Gulf+Western
Food Products Company
A DIV. OF GULF+WESTERN INDUSTRIES, INC.

Okeelanta Sugar Division
P.O. Box 86
South Bay, Florida 33493
(305) 996-9072

March 7, 1980

Addendum to Permit Application to modify
Air Pollution Source Boiler #5 G+W Food
Products Company, Okeelanta Sugar Division.

AIR POLLUTION SOURCES AND CONTROL DEVICES

Show the Derivation of Process Weight

122.000 lbs/hr steam @ 250 psig and 550 FTT

Total heat in steam 122.000 x 1290.5 = 157.44×10^6 BTU/hr

Total heat in feed water = 122,000 x 224.6 BTU/lb = 27.4×10^6

$157.44 \times 10^6 - 27.4 \times 10^6 = 130.04 \times 10^6$

Losses due to chimney dry gasses	
Losses due to moisture form to burn hydrogen	
Losses due to moisture in air	
Losses due to associated water	
Losses due to incomplete carbon combustion	
Losses due to carbon in ashes	
Losses due to radiation	
	0.45

Heat value in one pound of
No. 6 Fuel Oil 18,500 BTU's

Heat value in one pound of average
Okeelanta bagasse 54.9% moisture 3,673 BTU's

Efficiency for boiler = 0.55

Total heat fuel input = $\frac{130.04 \times 10^6}{0.55} = 236.44 \times 10^6$

Total heat input less fuel oil heat input

$236.44 \times 10^6 - 18.7 \times 10^6 = 217.74 \times 10^6$

$217.74 \times .3 = 65.32$

$18.7 \times .1 = \frac{1.87}{67.19}$

$\frac{18.7 \times 10^6}{149.850 \times 42} = 2.97$ Barrels/hour - 125 gals.

CONTINUED.....

$$\frac{217.74 \times 10^6}{3673} = 59.281 = 29.64 \text{ Tons/hr.}$$

Estimated discharge of each contaminants in lbs/hr and tons/yr based on fuel burned/hr 125 lgs. per hour and 29.64 tons of bagasse/hour.

Particulate	563.2	1013.8	2.88	5.18	566.08	1019.0
Sulfur Dioxide	-	-	39.25	70.65	39.25	70.65
Sulfur Trioxide	-	-	0.5	0.9	0.5	0.9
Carbon Monoxide	59.28	106.7	0.625	1.13	59.91	107.83
Hydrocarbons as CH4	59.28	106.7	0.13	0.23	59.41	106.93
Nitrogen Oxides as NO2	35.57	64.03	15.25	27.45	50.82	91.48

BASIS FOR EFFICIENCY ON THE PROCESS

Estimated particulate emissions 566 lbs/hr coming out of Boiler #5

Ducon Scrubber Efficiency 88.16

$$566 - \left(\frac{88.16 \times 566}{100}\right) = 566 - 499 = 67$$

67 lbs./hr particulate going out to the atmosphere

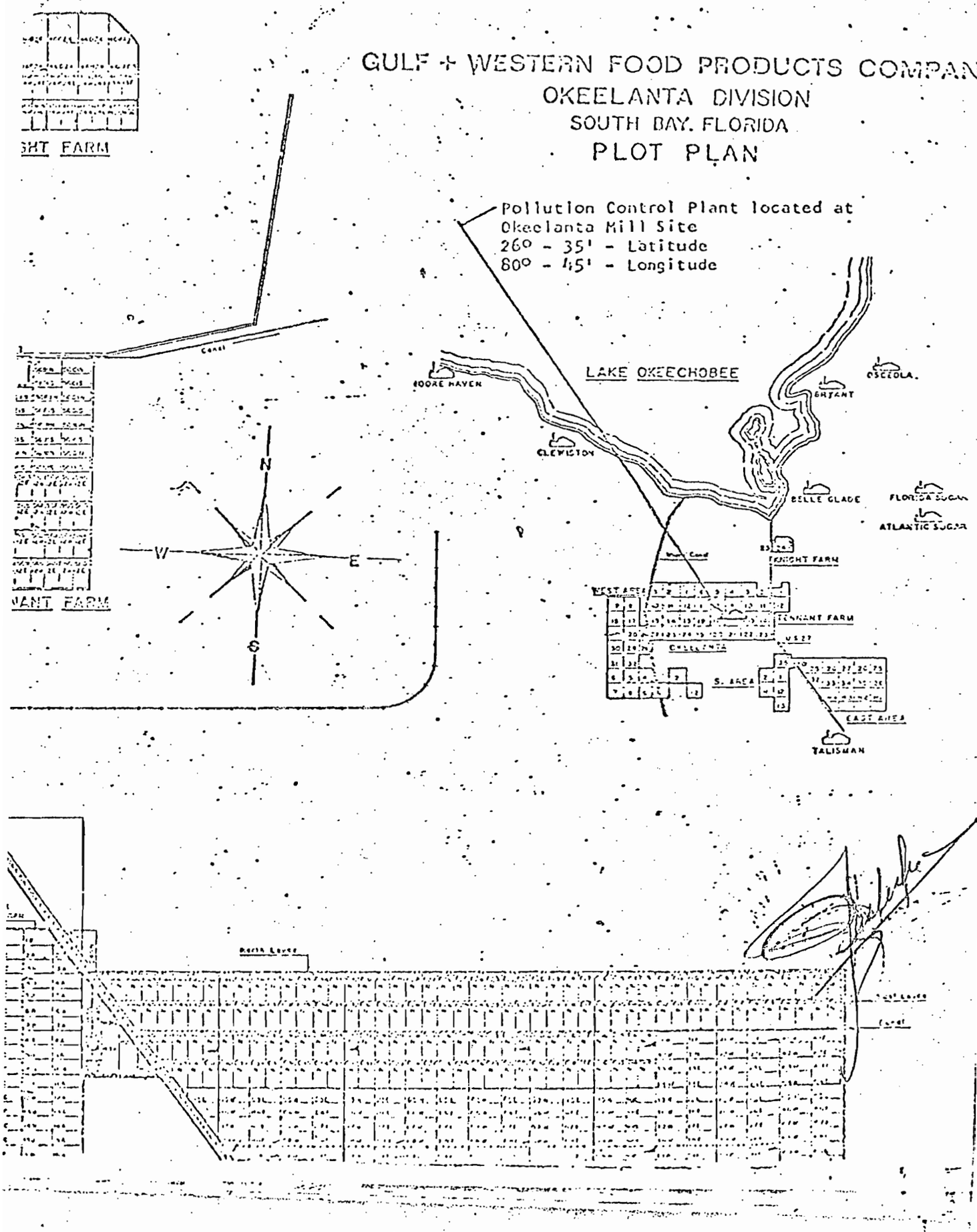
499 lbs/hr particulate going to slurry pond.

GULF + WESTERN FOOD PRODUCTS COMPAN

OKEELANTA DIVISION

SOUTH BAY, FLORIDA

PLOT PLAN

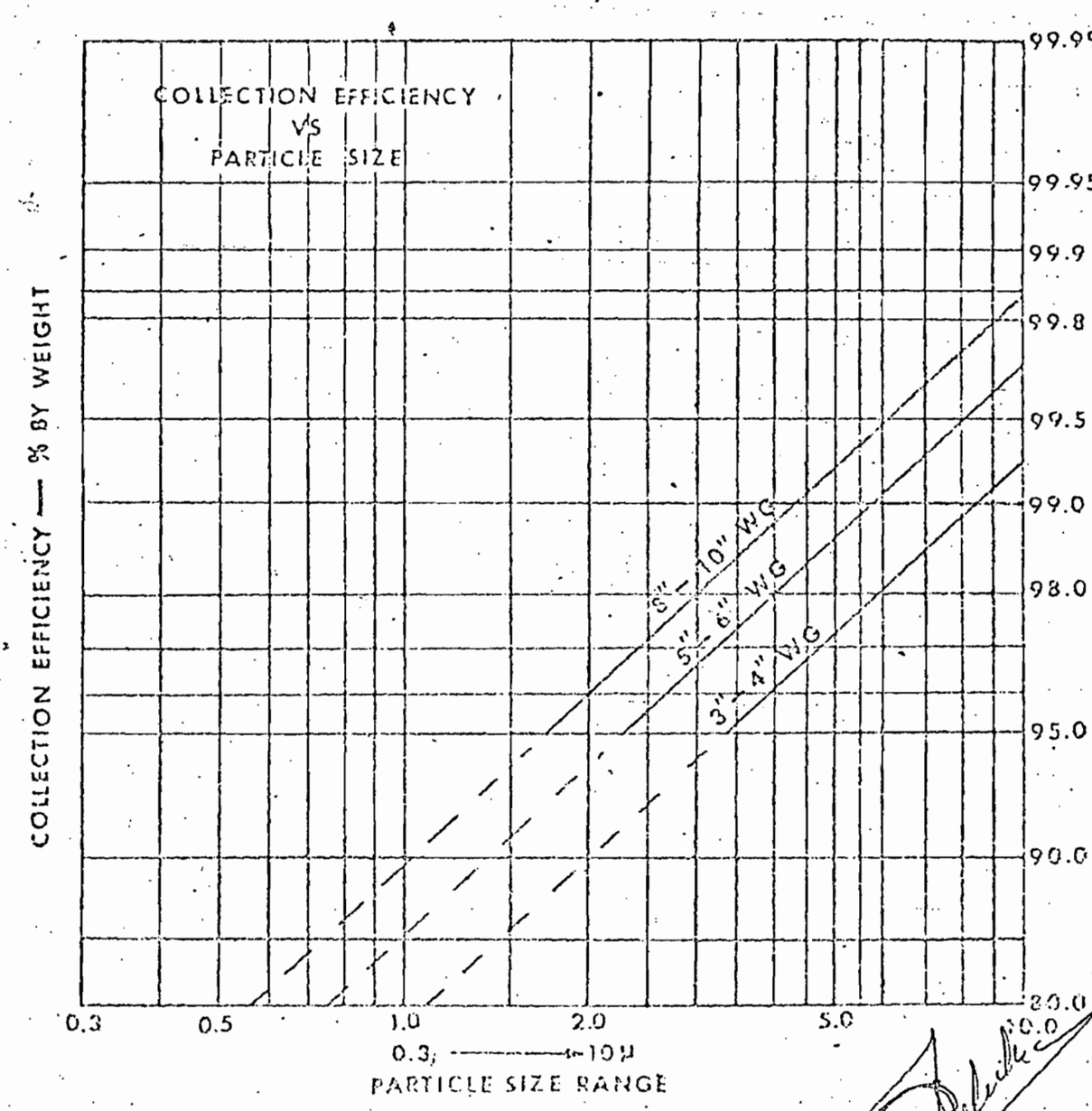


Boiler #

ESTIMATED COMPARATIVE

SCRUBBER PERFORMANCE CURVES

MULTIVANE, TYPE 'L'



NOTE: CURVES ARE FOR COMPARISON PURPOSES ONLY
NOT TO BE USED FOR OVERALL EFFICIENCY CALCULATIONS

DUCON

THE DUCON CO. INC. - 147 EAST SECOND ST., MINEOLA, L.I., N.Y.

DUCON

THE DUCON COMPANY, INC.
SUBSIDIARY OF UNITED STATES FILTER CORPORATION
147 EAST SECOND STREET · MINEOLA, NEW YORK 11501
TEL: 516 741-6100 · CABLE: DUCON MINEOLANY · TWX 510 222-9861

January 7, 1980

Gulf & Western Industries, Inc.
Okeelanta Sugar Division
P.O. Box 86
South Bay, Florida 33493

Attention: Mr. A. Tellechea

Subject: Ducon Multivane Scrubber
Performance Guarantee
Boilers No. 4 & 5

Gentlemen:

We make the following statement of performance in regard to the Ducon Multivane Scrubber Size 180 that is to be installed on Boilers No. 4 & 5.

Gulf & Western is to install the existing Multivanes on Boilers No. 4 & 5. The Ducon Company guarantees that the relocated Multivanes on Boilers No. 4 & 5, when operating at a pressure drop of 6.0" to 7.0" w.g. at normal boiler operating conditions, will result in a particulate stack emission not to exceed 0.3 lbs./million BTU input.

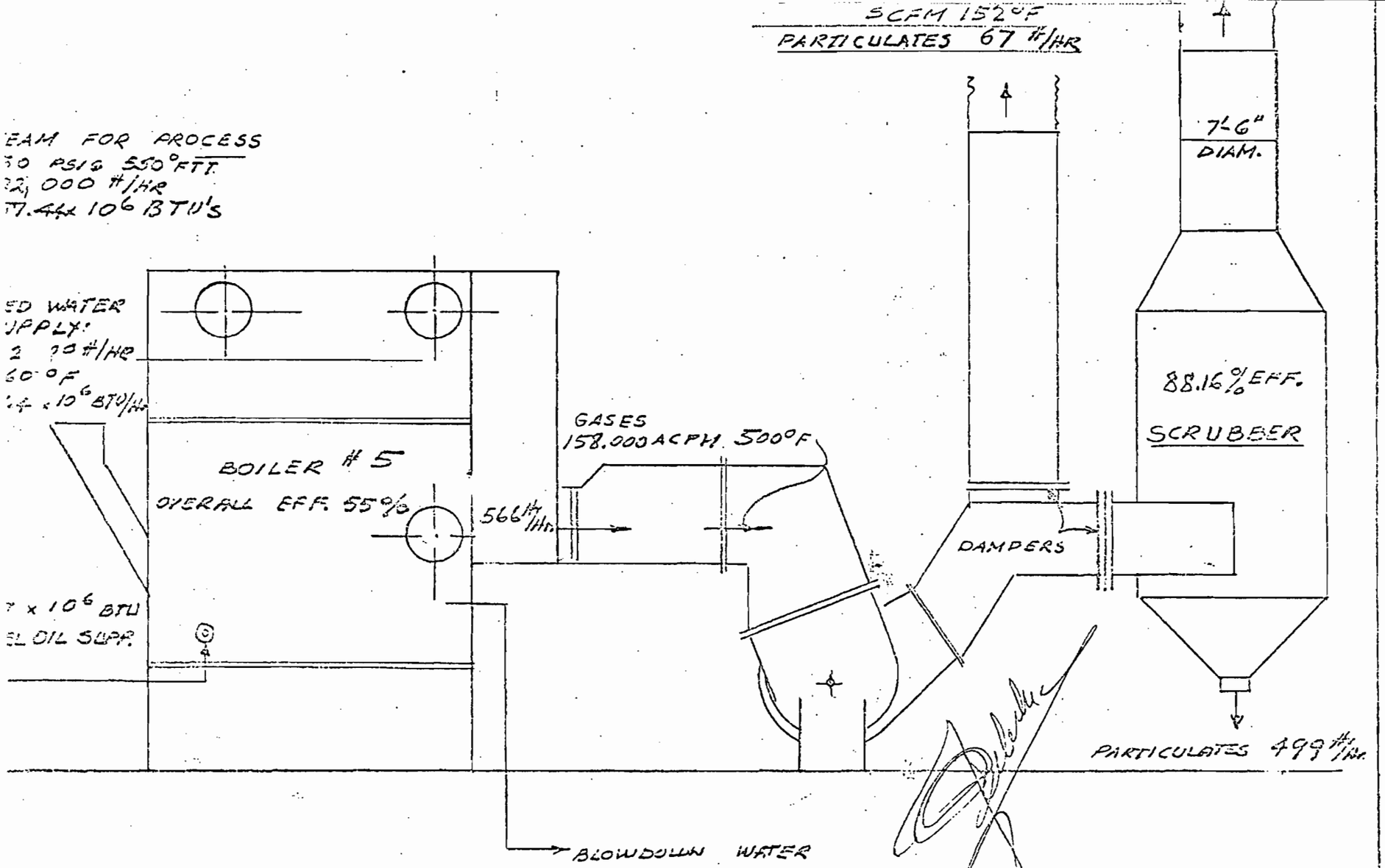
This guarantee is based upon the installation of the Multivane Scrubbers in accordance with our standard installation instructions and operated according to the Ducon operating instructions.

Very truly yours,
THE DUCON COMPANY, INC.

William J. Ruby

cg

cc: Technical Service File
C79-0200

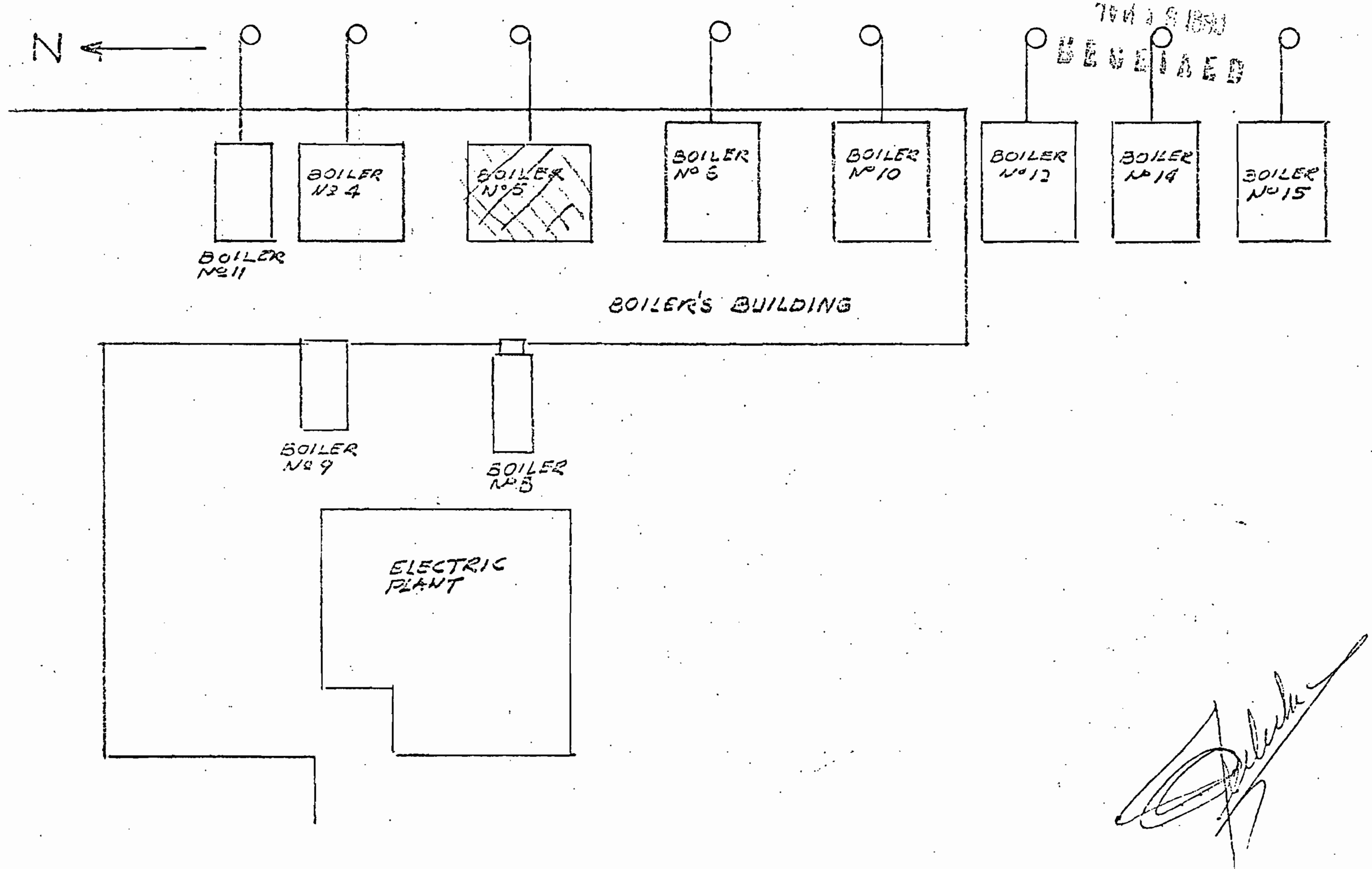


FLOW DIAGRAM
BOILER Nº 5

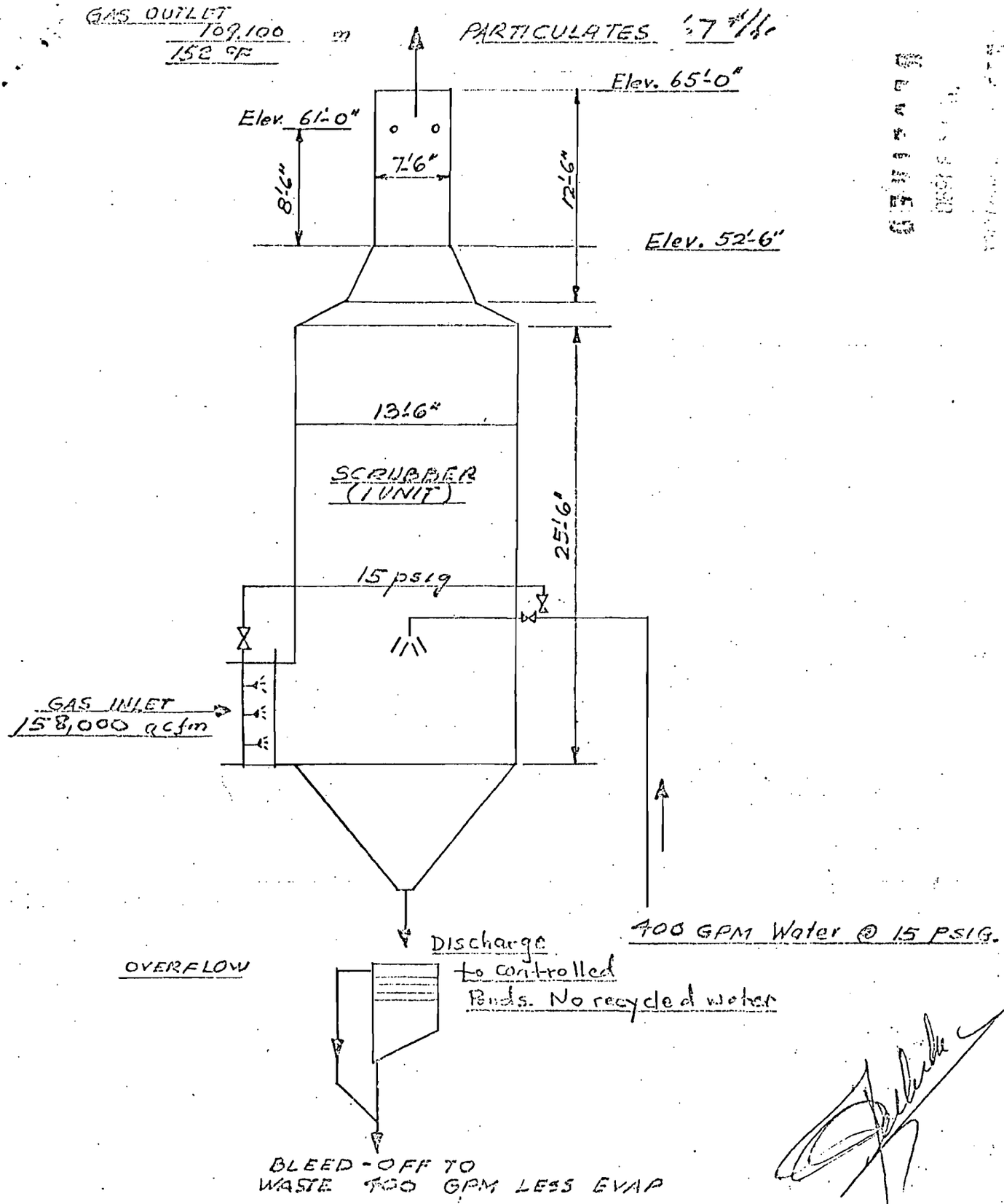
GULF + WESTERN FOOD PRODUCTS Co
OKEELANTA DIVISION

DATE:

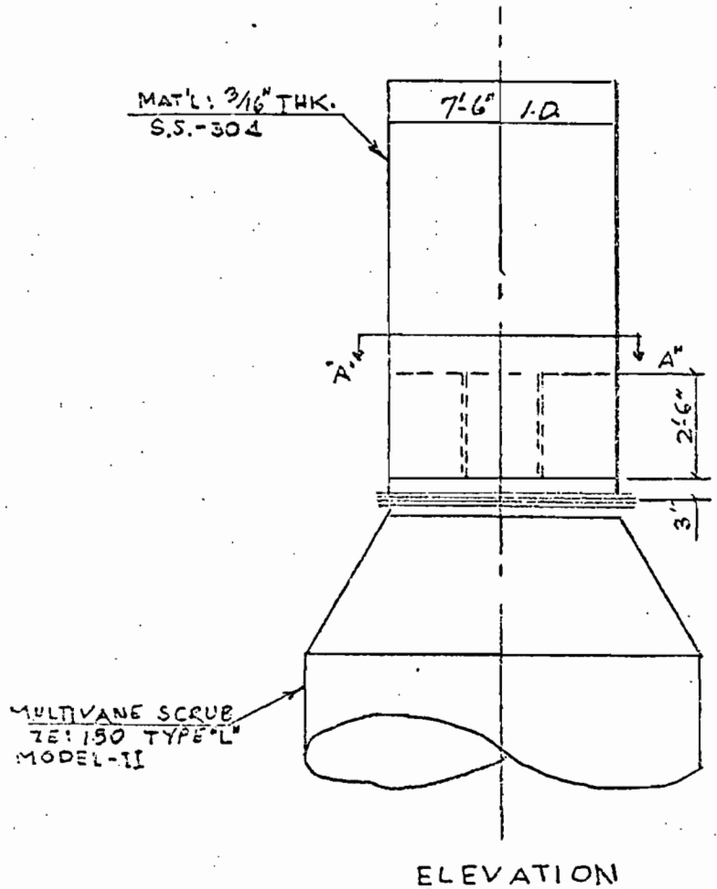
DWG Nº
5-1



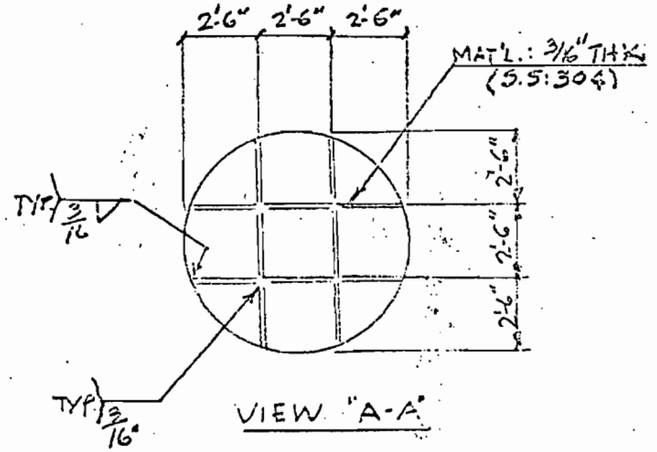
SCRUBBER AND BOILER #5 - SITE LOCATION	GULF+WESTERN FOOD PRODUCTS CO.
	OKEELANTA DIVISION
	DATE:
	DWG Nº 5-3



SCRUBBER WATER BALANCE FOR BOILER # 5 DUCONWET SCRUBBER	GULF+WESTERN FOOD PRODUCTS Co OKEELANTA DIVISION Date: Drwg No. 5-2

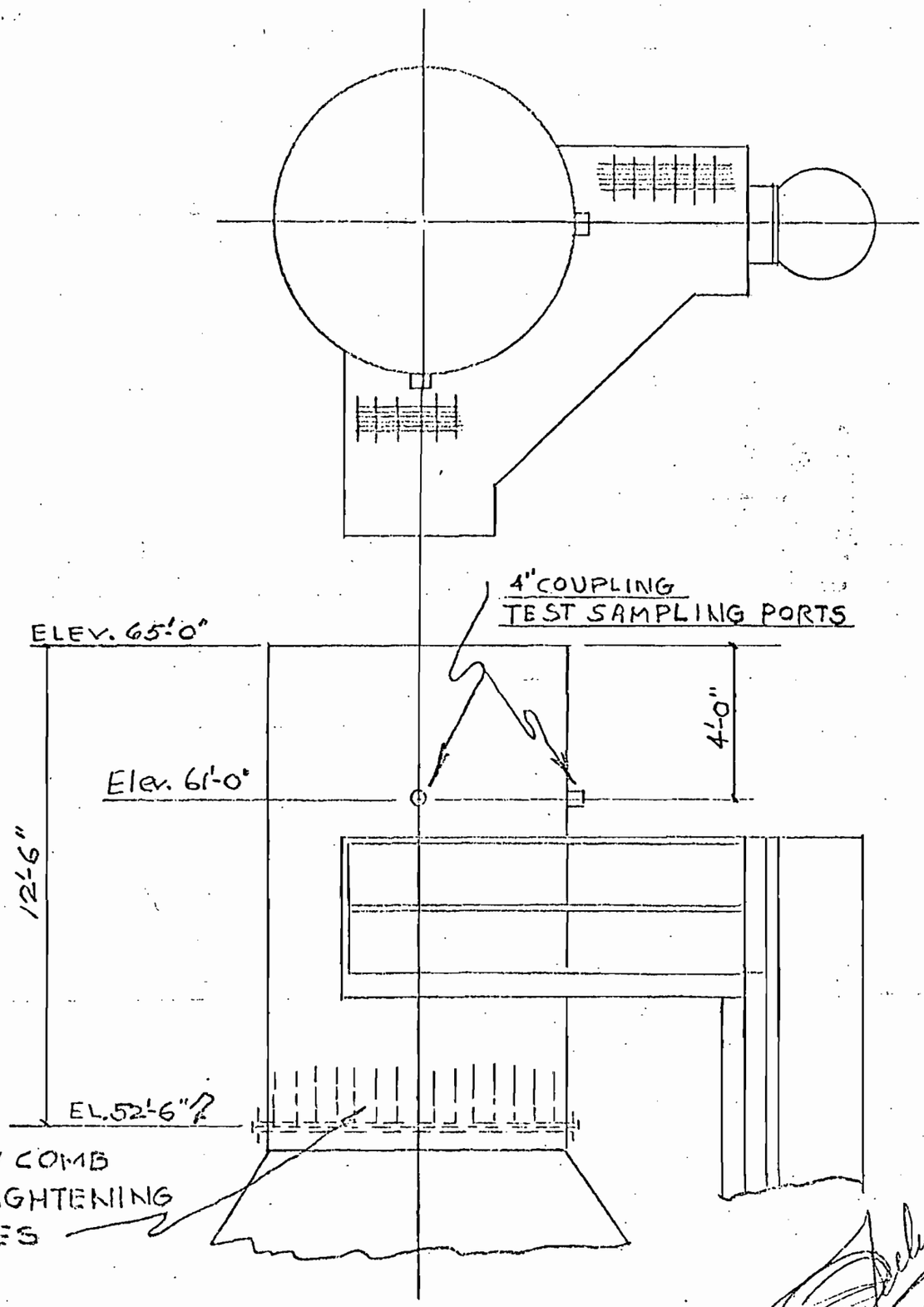


ELEVATION



VIEW "A-A"

Arrangement of Diverting Vane	Gulf + Western Food Products Co.
for Size 180 Multivane, Type II	Okeelanta Sugar Division
Scrubber. Boiler # 5	Date:
	Dwg. No. 5-4



Sampling Ports And Test Platform Boiler # 5	Gulf + Western Food Products Co. Okeelanta Sugar Division
	Date:
	Dwg. No. 5-5

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR GULF & WESTERN FOOD PRODUCTS CO.
OKEELANTA SUGAR DIVISION
POST OFFICE BOX 86
SOUTH BAY, FLORIDA 33493

PERMIT NO. AC50-2054A DATE 12-20-74

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES AND CHAPTER 17-4 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
MR. ARTHUR KIRSTEIN III, VICE PRESIDENT & GENERAL MANAGER

FOR THE CONSTRUCTION OF THE FOLLOWING:
SCRUBBER SYSTEM FOR BOILER #4, CONSISTING OF TWO JOY MODEL 56-D-SS IMPINGEMENT SCRUBBERS

LOCATED AT: 4 MILES WEST OF U.S. HWY. 27, 8 MILES SOUTH OF SOUTH BAY - LAT. 26° 35'00" LONG. 80° 45'00"

IN ACCORDANCE WITH THE APPLICATION DATED 11-20-74 AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN, ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL 11-30-75 AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

Philip R Edwards
PHILIP R. EDWARDS,
REGIONAL ADMINISTRATOR

PETER P. BALJET,
EXECUTIVE DIRECTOR

FORM 1-J

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC50-2054A Date: 12-20-74

(X) 1. Construction of this installation shall be completed by 8-15-75. Application for Permit to Operate to be submitted by 11-30-75.

(X) 2. This construction permit expires on 11-30-75 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.

(X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.

(X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.

(X) 5. This boiler shall be tested* for particulates within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC Southwest Florida Regional Office 2180 W. First St., Suite 401, Ft. Myers, Florida 33901

*FUEL ANALYSIS MAY BE SUBMITTED FOR REQUIRED SULFUR DIOXIDE EMISSION TEST.

( ) 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Florida Regional Office, .

(X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.

(X) 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.

(X) 9. All fugitive dust generated at this site shall be adequately controlled.

(OVER)

(10) Submit, within sixty (60) days upon receipt of this permit, the scrubbers design operating data as specified by the manufacturer, including pressure drop, water flow rates, etc.

(11) This boiler shall not be operated after July 1, 1975 without the control system indicated on this permit being installed and operational.

PERMITTED
BY
SOUTHWEST REGION
DEPT. OF POLLUTION CONTROL
PERMIT NO. AC 50-2054A
DATE 12/30/74

60th Day
FEB 17 1975
Boiler #4

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

RECEIVED
DEC 6 1974
SW REGION DPC

PAID DEC 6 1974

APPLICATION TO ~~OPERATE~~/CONSTRUCT POLLUTION SOURCES

SECTION I – GENERAL INFORMATION FOR ALL POLLUTION SOURCES

I TO BE FILLED IN BY APPLICANT

Source Type: Air Pollution
Type application: [ ] Operation [ ] Temporary Operation [X] Construction
Status Source: [ ] New [ ] Existing [ ] Modification

Source Name: Gulf + Western Food Products Co. Okeelanta Sugar Division County: Palm Beach

Source Location: Street 4 Miles West of U.S. Hwy. 27 8 Miles Southwest of South Bay City: South Bay
~~(Water Source Only)~~ Lat: 26 ° 35 ' 00 " Long: 45 ° 00 ' 00 "
(Air Source Only) UTM: East _____ North _____

Appl. Name and Title: Arthur Kirstein III, Vice-President & General Manager
Appl. Address: P.O. Box 86, South Bay, Florida 33493

II TO BE FILLED IN BY REGION (*BY BUREAU OF PERMITTING)

Control No: Region _____ County _____ Type _____ *Project _____

Type Permit	Date Rec'd	*Permit No.	*Issue Date	*Compl. Date	*Exp. Date

Source Description: _____
Control Equipment: _____

Water Permits

Receiving Body Code: _____ Surface Water Code: _____
Station No.: Influent: _____ Effluent: _____

Effluent:	Average	Design	% Reduction
Flow rate, MGD			
BOD, lbs/day			
Susp. Sol., lbs/day			
Other:			

Air Permits

Operating Time: [X] Continuous [ ] Intermittent
Fuel: Type Bagasse & #6 fuel oil M-BTU/hr. In Put 186.32 x 10^6
Incinerator: Capacity, tons/day _____ Type Waste _____
Mfg. & Model _____

Pollutant Emissions, lbs/day	Actual	Design	Allowable
Particulate			
Sulfur Oxides			
Other:			

Implementation: Estimated Appl. Filing Date November 1974
Estimated Start of Const. July 1975 Estimated Compliance Date October 1975

DESCRIPTION OF PROPOSED PROJECT

A. Describe the nature and extent of the proposed project. Refer to existing pollution control facilities, DPC permits, conditions, orders and notices, expected improvement in performance of the facilities and state whether the proposed project will result in full compliance of the source. Attach additional sheet if necessary.

The proposed project consists in the installation of two (2) Joy Impinger Scrubbers, model 56-D-SS to receive the flue gases from the existing #4 boiler and reduce the particulate emissions to meet the existing Florida Standards of 0.3# per million BTU Heat Input. This installation will be provided with the necessary dampers to by-pass the scrubbers in order to make emergency repairs or cleanings.

B. Schedule of Project Covered in this Application (Construction Permit Application Only).

Federally or State Financed Projects only:

Planning Complete N/A

Financing Program Complete

Indicate other local, state and/or federal agency approvals and dates

All projects:

Start of Construction July 1975

Completion of Construction October 1975

C. Costs of Construction (Show a breakdown of costs for individual components/units of the proposed project serving pollution control purpose only). Information on actual costs shall be furnished with the application for operation permit.

Two (2) Joy Turbulaire Scrubbers model 56-D-SS	35,000
Two (2) 20'-0" S.S. Stacks with honey comb straighteners & parts	24,000
New turbine & gear drive to increase capacity ID. Fan	15,000
Pumps, piping, instruments & installation	15,000
Duct work from I.D. to scrubbers, foundations & installations	20,000

NOTE: The Okeelanta Sugar Mill will resume operations for the 1975-76 Crop during the month of October.

D. Indicate any previous DPC permits, issuance dates, and expiration dates.

Boilers	Nos. 2 & 3	- Permit	No. AO-50-2054	Date	5-23-73	expires 7-1-75
"	No. 4	"	No. AO-50-2053	"	"	" "
"	No. 5	"	No. AO-50-2055	"	"	" "
"	No. 6	"	No. AO-50-2056	"	"	" "
"	No. 7	"	No. AO-50-2218	"	12-11-73	" 2-8-75
"	No. 8	"	No. AO-50-2219	"	"	" "
"	No. 9	"	No. AO-50-2220	"	"	" "

AIR POLLUTION SOURCES & CONTROL DEVICES

A. Identification of Air Contaminants

1) [X] Particulates
   a) [ ] Dust b) [X] Fly Ash c) [ ] Smoke d) [ ] Other (Identify)

2) [X] Sulfur Compounds
   a) [ ] SO_x as SO_2 b) [ ] Reduced Sulfur as H_2S c) [ ] Other (Identify)

3) [X] Nitrogen Compounds
   a) [ ] NO_x as NO_2 b) [ ] NH_3 c) [ ] Other (Identify)

4) [ ] Flourides 5) [ ] Acid Mist 6) [ ] Odor

7) [X] Hydrocarbons 8) [ ] Volatile Organic Compounds

9) [ ] Other (Specify): _____

B. Raw Materials and Chemicals Used (Be Specific)

Description	Utilization Tons/day, lbs./day, etc.	Approximate Contaminant Content		Relate to Flow Diagram
		Type	% Wt.	
N/A	N/A	N/A	N/A	N/A

C. Process Weight:

1) Total Process Weight Rate 43,416 lbs./hr. [See Sec. 17-2.04(2)]
2) Product Weight 92,000 lb./hr. expressed as Steam @ 250 psig @ 550° FTT.
3) Normal Operating Time 24 hrs/day, 7 days/week, if seasonal describe: 100% by month and 18-20 weeks per year

D. Airborne Contaminants Discharged:

Name of Contaminant	Actual Discharge	Discharge Criteria*	Allowable Discharge*	Relate Location to Flow Diagram
Particulate	52 lbs/hr	0.3#MBTU/hr	55.90	See Sketch
Sulfur Compounds	2656 "			"
Carbon Monoxides	.0033 "			"
Nitrogen Oxides	8.66 "			"
Hydrocarbons	0.266 "			"

* Refer to Chapter 17-2 Florida Administrative Code
(Discharge Criteria: Process Weight Rate, #/tonP_2O_5, #/M BTU/hr etc.)

E. Control Devices:

Name	Eff.	Conditions of Operation, Particle Size Range, etc.	Relate to Flow Diagram
2 Joy Impinger Scrubbers		Continuous	See Sketch
Model 56-D-SS-			
S. No. 0-74-438-04C y D			

F. Fuels:

Type (Be specific)	Daily Consumption	Heat Input BTU/hr.	Relate to Flow Diagram
56% Moisture Bagasse	1,042,000 lbs.	173.66×10^6	
#6 Fuel Oil w/2% Sulfur	16,200 "	12.66×10^6	

G. Describe briefly, without revealing trade secrets, the unit processes/operations generating the airborne emissions identified in this application:
The existing boiler #4 is supplied with hot condensate at 230°F., 56% moisture bagasse and Bunker C #6 with 2% sulfur are fired at the same time in the fuel cells and 92,000 lbs/hr of 250 psig. @ 550°F are generated.

H. Indicate liquid or solid wastes generated and method of disposal.
Blow down water will be discharged containing:

P. Alkalinity	PPM as C_a CO_3	=	200-600
Hydrate Alkalinity	PPM as C_a CO_3	=	20-600
Cloride	PPM as Cl	=	0-150
Phosphate	PPM as PO_4	=	30-150
Sulphate	PPM as SO_3	=	30-50
Total disolved solids	PPM	=	1850-2500

The blow down water from the boiler will be discharged into the main mill waste ditch. This water is used to flood the cane fields and it is impounded and controlled within the farms private land.

Approximately 100 GPM of Slurry from the Scrubbers will be discharged into the main mill waste ditch and used to flood the cane fields, and it will be impounded and controlled within the farms private land.

STATEMENTS BY APPLICANT AND ENGINEER

A. Applicant

Gulf + Western Food Products Co.

The undersigned owner or authorized representative of * Okeelanta Sugar Division is fully aware that the statements made in this application for a two scrubbers installation permit are true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provisions of Chapter 403 Florida Statutes and all the rules and regulations of the Department or revisions thereof. He also understands that a permit, if granted by the Department, will be non-transferable and he will promptly notify the Department upon sale or legal transfer of the permitted establishment.

A. Kirstein III

Signature of the Owner or Authorized Representative

Arthur Kirstein III, Vice-President & General Manager
Name and Title (Please Type)

Date: _____ Telephone No.: 996-9072

* Attach a letter of authorization

B. Professional Engineer Registered in Florida:

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the control and discharge of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution source(s) with appropriate control facilities, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and the rules and regulations of the Department. It is also agreed that the undersigned will furnish the applicant a set of instructions for the proper maintenance and operation of the installation covered in this application.

Signature _____

Name: Angel M. Tellechea
(please type)

Mailing Address: P.O. Box 837
Coconut Grove Station
Miami, Florida 33133

Telephone No.: 444-7879

Florida Registration Number 12343
(Please affix seal)

Date: Nov. 20, 1974

Gulf+Western
Food Products Company
A DIV. OF GULF+WESTERN INDUSTRIES, INC.

Okeelanta Sugar Division
P. O. Box 86
South Bay, Florida 33493
(305) 996-9072

December 4, 1974

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

PAID DEC - 6 1974

Department of Pollution Control
Southwest Regional Office
3201 Golf Course Blvd.
Punta Gorda, Florida

Gentlemen:

Please find enclosed our applications to construct pollution sources control devices for our existing Boiler #4 and Boiler #5.

Enclosed are our checks #218565 and #218564, each in the amount of $20.00 for the application fee.

Please note that Boilers #2 and #3 will not be operating after April, 1975.

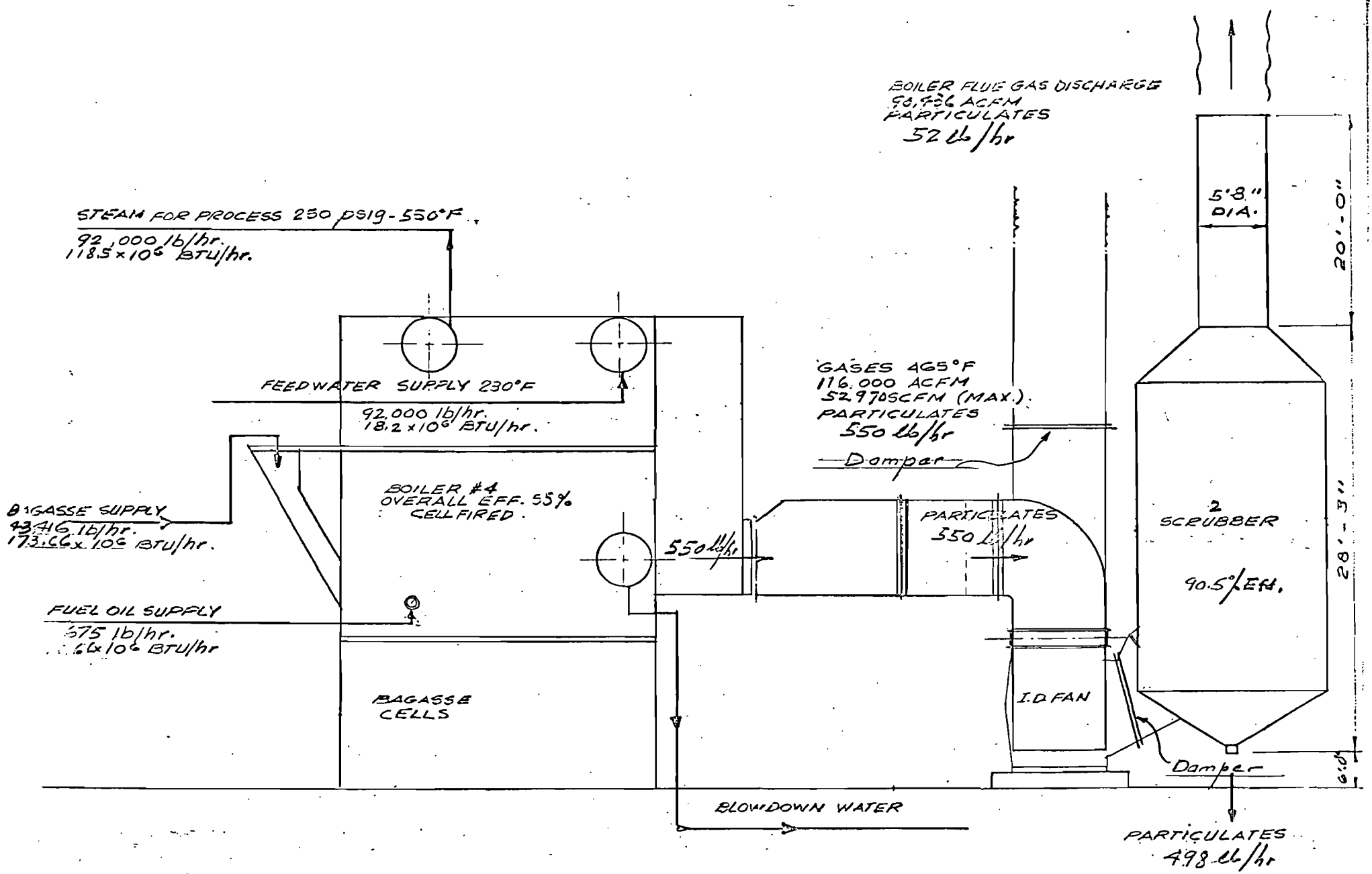
Sincerely yours,

A. Kirstein III

Arthur Kirstein III
Vice President & General Manager

AK/mm

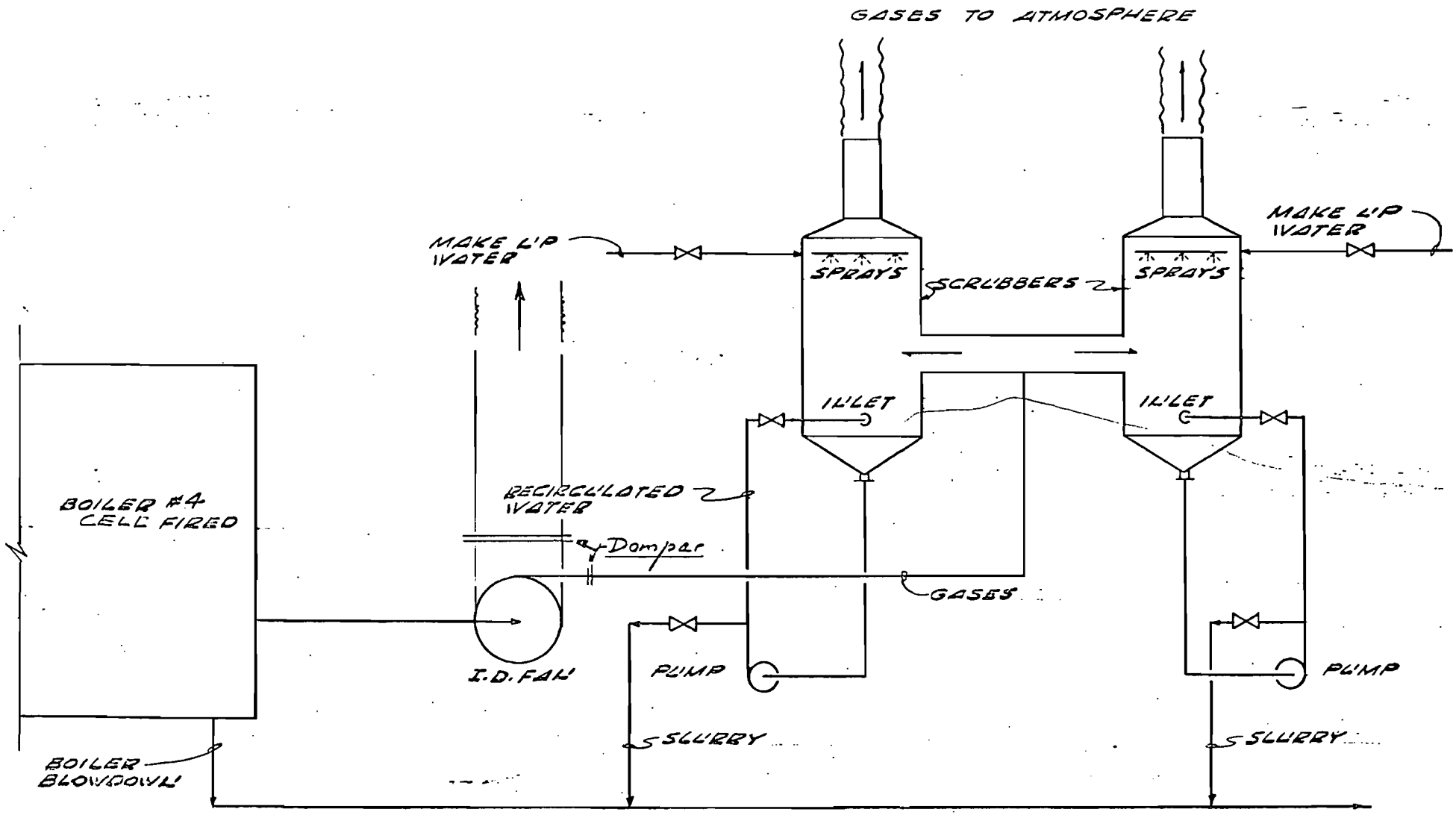
Encl.



FLOW DIAGRAM
BOILER #4

GULF+WESTERN FOOD PRODUCTS CO.
OKEELANTA DIVISION

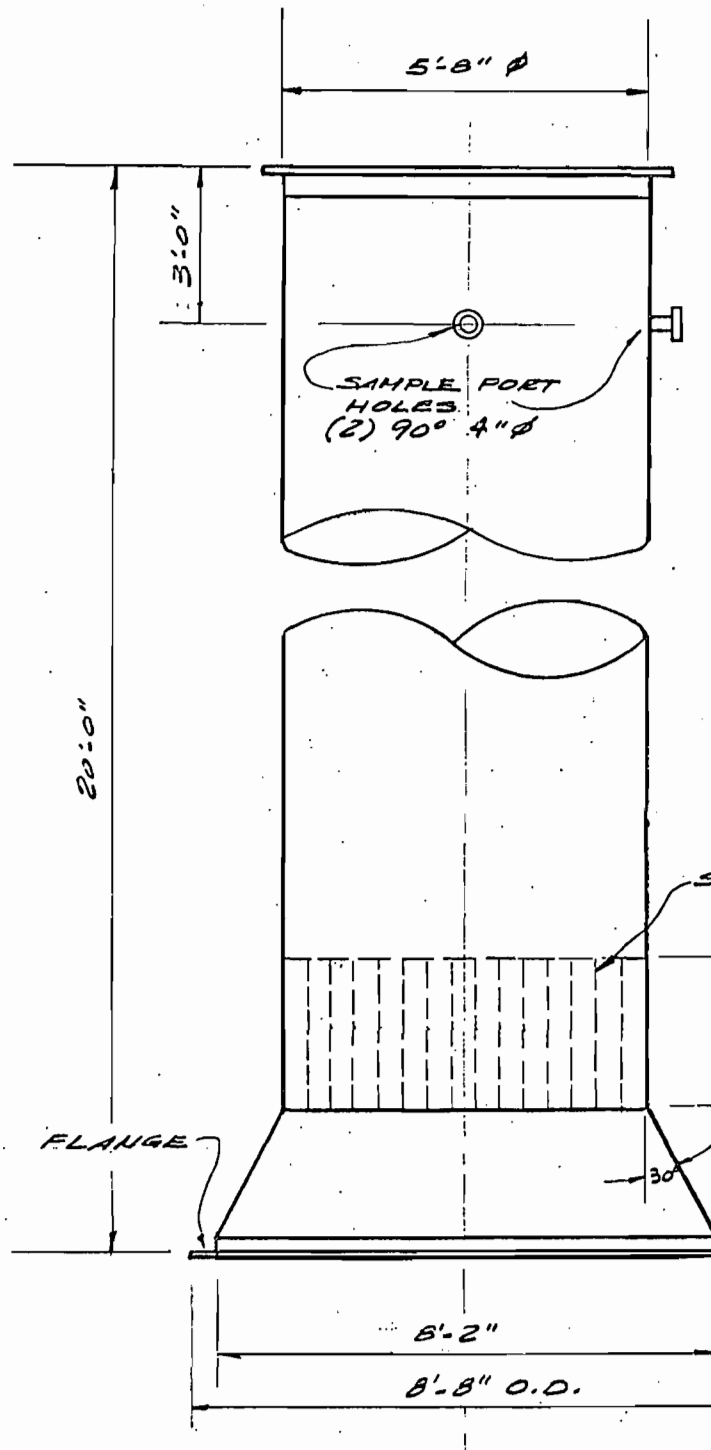
SCALE N.T.S.	DATE 11-20-74.
DRAWN BY [illegible]	DWG.
CHECKED BY	Nº 44-ED-28-B-4

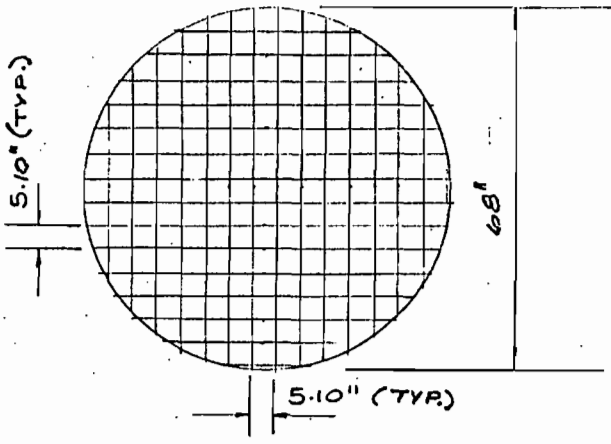


FLOW DIAGRAM POLLUTION CONTROL EQUIPMENT BOILER #4

GULF+WESTERN FOOD PRODUCTS CO.
OKEELANTA DIVISION

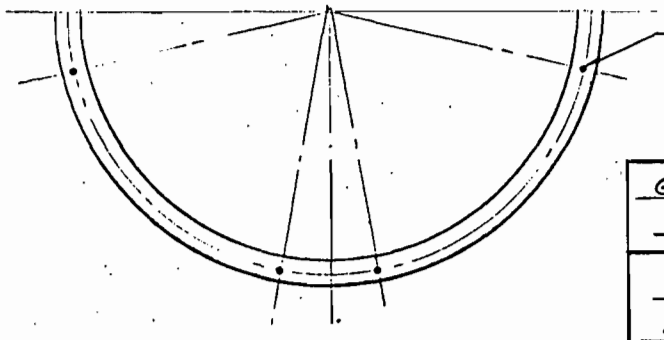
SCALE N.T.S.	DATE 11-20-74
DRAWN BY J.K.O.	DWG
CHECKED BY	Nº 44-ED-28-C





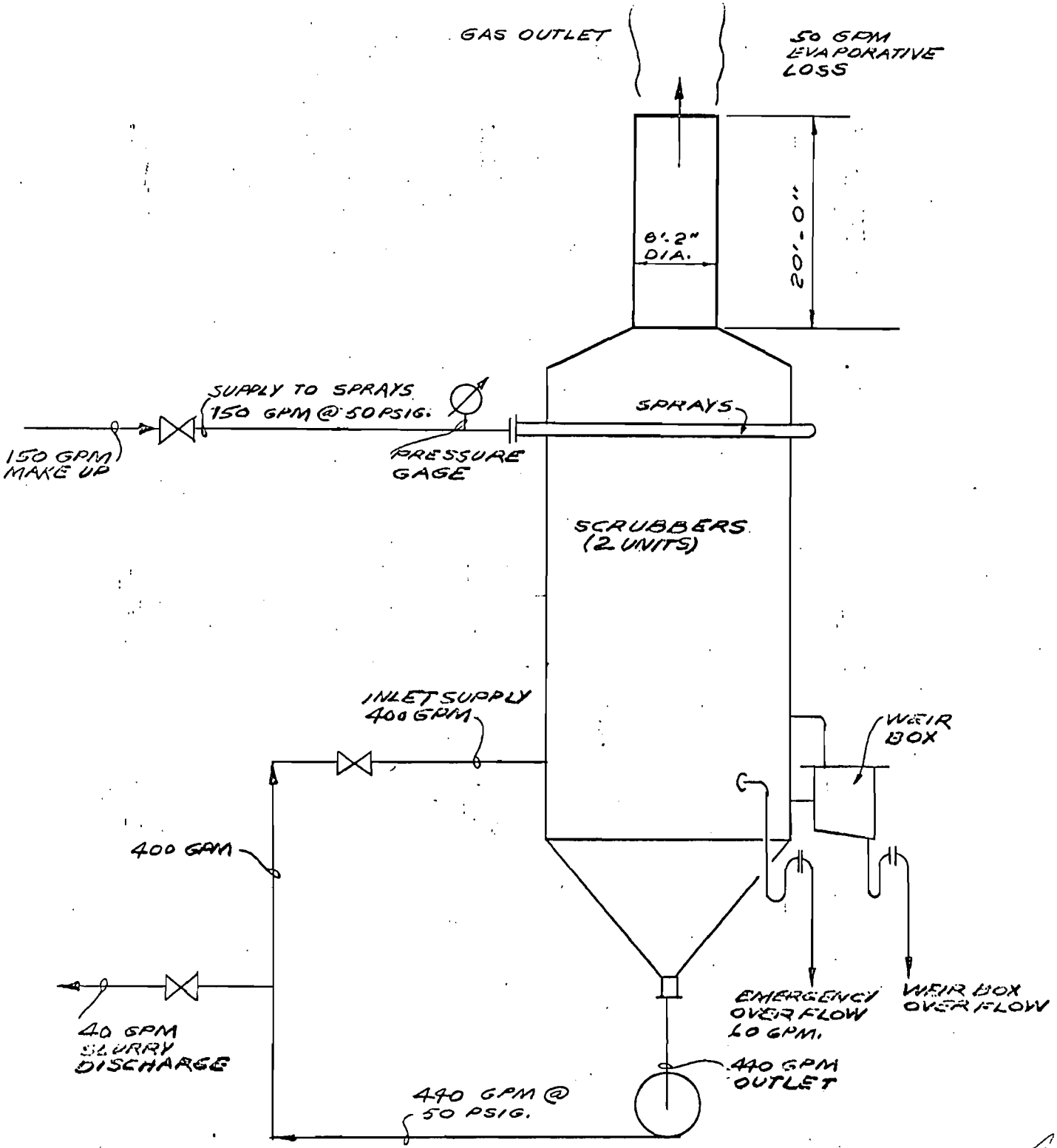
DETAIL "A"
HONEY COMB STRAIGHTENER TYPE

MATERIAL:
304 SS, 11 GAUGE



GULF + WESTERN FOOD PRODUCTS C
OKEELANTA SUGAR DIVISION

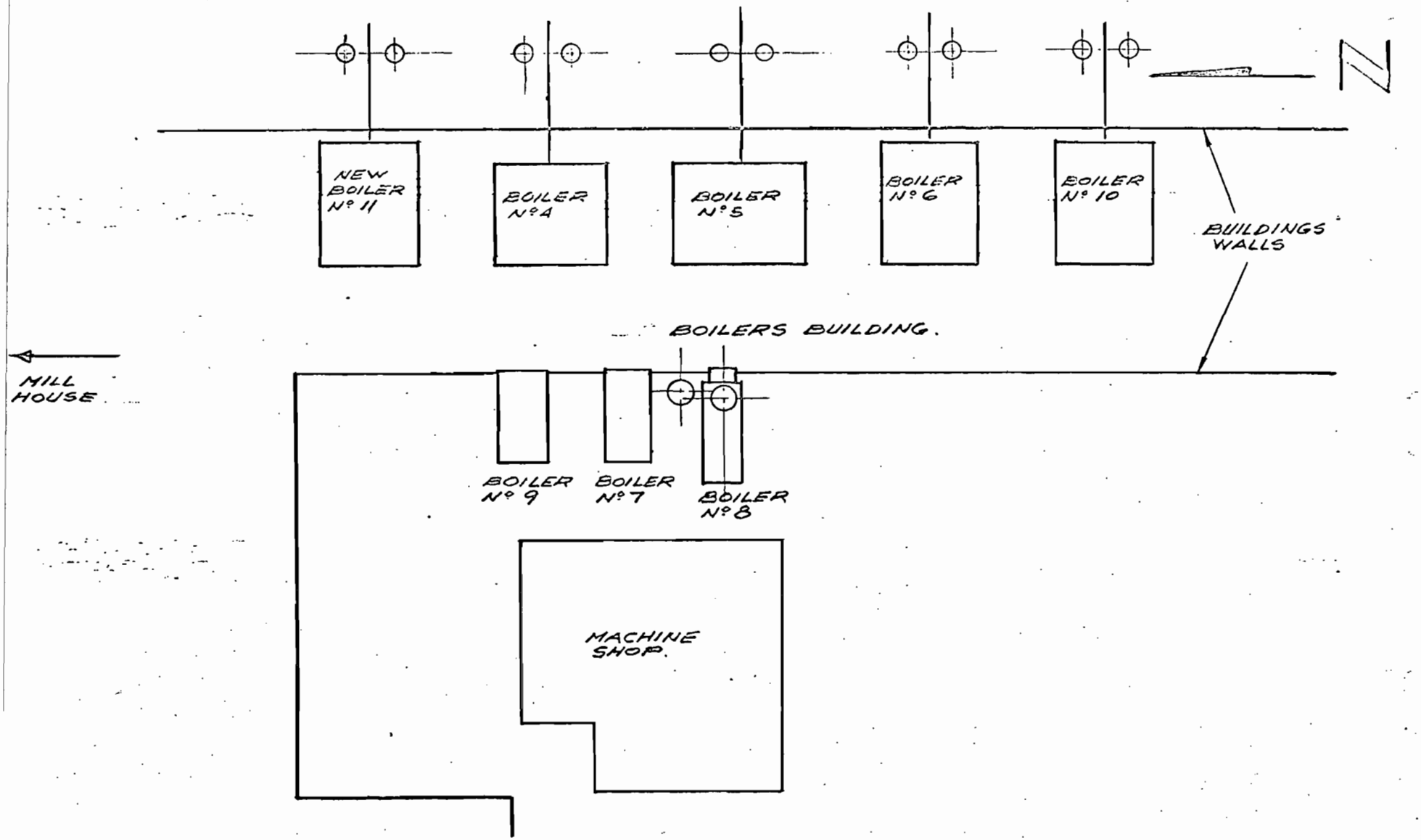
AIR STRAIGHTENER HONEY
COMB TYPE & EXHAUST DUC



SCRUBBERS WATER BALANCE
FOR BOILER Nº4

GULF+WESTERN FOOD PRODUCTS CO
OKEELANTA DIVISION

SCALE N.T.S.	DATE 11-20-77
DR. BY SARA	DWG. NO. 44-ED-22-D-4
CH. BY	



BOILER #4
SITE LOCATION

GULF+WESTERN FOOD PRODUCTS CO.

OKEELANTA DIVISION

SCALE 1" = 40'-0"	DATE 11-20-74
DR BY GUILLEN.	DWG. NO. 44-ED-28-A-4
CH BY	

GULF + WESTERN FOOD PRODUCTS COMPANY

OKEELANTA DIVISION

SOUTH BAY. FLORIDA

PLOT PLAN

Pollution Control Plant located at
Okeelanta Mill Site
26° - 35' - Latitude
80° - 45' - Longitude

KNIGHT FARM

TENNANT FARM

Canal

LAKE OKEECHOBEE

MOORE HAVEN

CLEWISTON

OSCEOLA

BRYANT

BELLE GLADE

FLORIDA SUGAR

ATLANTIC SUGAR

Miami Canal

KNIGHT FARM

WEST AREA

TENNANT FARM

U.S.27

OKEELANTA

S. AREA

EAST AREA

TALISMAN

ROWER
AND SUGAR

North Levee

East Levee

Canal

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR Gulf & Western Food Products, Co.
Okeelanta Sugar Division, P.O. Box 86
South Bay, Florida 33493

PERMIT NO. AC50-2055A DATE 12-23-74

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES AND CHAPTER 17-4 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
Mr. Arthur Kirstein III, Vice Pres. & General Manager

FOR THE CONSTRUCTION OF THE FOLLOWING:
Scrubber system for Boiler #5 consisting of tow Joy Model 56-D-SS Impingement scrubbers

LOCATED AT 4 miles West of U.S. Hwy. 27, 8 miles So. West of South Bay
Lat: 26° 35' 00'' - Long: 80° 45' 00''

IN ACCORDANCE WITH THE APPLICATION DATED 11-22-74 AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN, ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL 11-30-75 AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

P. R. Edwards
Regional Administrator

Peter P. Baljet
Executive Director

FORM 1-J

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC50-2055A Date: 12-23-74

(X) 1. Construction of this installation shall be completed by 8-15-74. Application for Permit to Operate to be submitted by 11-30-75.

(X) 2. This construction permit expires on 11-30-75 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.

(X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.

(X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.

(XX) 5. This boiler shall be tested* for Particulates within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC Southwest Region Florida Regional Office 2180 W. First St., Suite 401, Ft. Myers, Florida 33901

*FUEL ANALYSIS MAY BE SUBMITTED FOR REQUIRED SULFUR DIOXIDE EMISSION TEST.

( ) 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Florida Regional Office, .

(XX) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.

(X) 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.

(X) 9. All fugitive dust generated at this site shall be adequately controlled.

FS17

(X) 10. Submit, within (60) days upon receipt of this permit, the scrubbers design operating data as specified by the manufacturer including pressure drop, water flow rates, etc.

(X) 11. This boiler shall not be operated after July 1, 1975 without the control system indicated on this permit being installed and operational.

PERMITTED
BY
SOUTHWEST REGION
DEPT. OF POLLUTION CONTROL
PERMIT NO. AC 50-2655A
DATE 12/31/74

RECEIVED
NOV 16 1974
SW. REGION DPC

AP-52
BOILER #5

60th Day
FEB 17 1975

RECEIVED
DEC 6 1974
Division of Environmental Health
PALM BEACH COUNTY
HEALTH DEPT.

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

APPLICATION TO ~~OPERATE~~/CONSTRUCT POLLUTION SOURCES

SECTION I – GENERAL INFORMATION FOR ALL POLLUTION SOURCES
I TO BE FILLED IN BY APPLICANT

Source Type: Air Pollution
Type application: [ ] Operation [ ] Temporary Operation [X] Construction
Status Source: [ ] New [ ] Existing [ ] Modification

Source Name: Gulf + Western Food Products Co. Okeelanta Sugar Division County: Palm Beach

Source Location: Street: 4 Miles West of U.S. Hwy. 27, 8 Miles Southwest of South Bay City: South Bay
~~(Water Source Only)~~ Lat: 26 ° 35 ' 100 " Long: 45 ° 00 ' 00 "
(Air Source Only) UTM: East _____ North _____

Appl. Name and Title: Arthur Kirstein III, Vice-President & General Manager
Appl. Address: P.O. Box 86, South Bay, Florida 33493

II TO BE FILLED IN BY REGION (*BY BUREAU OF PERMITTING)

Control No: Region _____ County _____ Type _____ *Project _____

Type Permit	Date Rec'd	*Permit No.	*Issue Date	*Compl. Date	*Exp. Date

Source Description: _____
Control Equipment: _____

Water Permits

Receiving Body Code: _____ Surface Water Code: _____
Station No.: Influent: _____ Effluent: _____

Effluent:	Average	Design	% Reduction
Flow rate, MGD			
BOD, lbs/day			
Susp. Sol., lbs/day			
Other:			

Air Permits

Operating Time: [X] Continuous [ ] Intermittent
Fuel: Type Bagasse & #6 Fuel Oil M-BTU/hr. In Put 249.0 x 10^6
Incinerator: Capacity, tons/day _____ Type Waste _____
Mfg. & Model _____

Pollutant Emissions, lbs/day	Actual	Design	Allowable
Particulate			
Sulfur Oxides			
Other:			

Implementation: Estimated Appl. Filing Date November 1974
Estimated Start of Const. July 1975 Estimated Compliance Date October 1975

DESCRIPTION OF PROPOSED PROJECT

A. Describe the nature and extent of the proposed project. Refer to existing pollution control facilities, DPC permits, conditions, orders and notices, expected improvement in performance of the facilities and state whether the proposed project will result in full compliance of the source. Attach additional sheet if necessary.

The proposed project consists in the installation of two (2) Joy ~~Impinger Scrubbers, model 56-D-SS~~ to receive the flue gases from ~~the existing #5 boiler and reduce the particulate emissions to meet the existing Florida Standards of 0.3# per million BTU Heat~~ Input. This installation will be provided with the necessary dampers to by-pass the scrubbers in order to make emergency repairs or cleanings.

B. Schedule of Project Covered in this Application (Construction Permit Application Only).

Federally or State Financed Projects only:

Planning Complete N/A

Financing Program Complete

Indicate other local, state and/or federal agency approvals and dates

All projects:

Start of Construction July 1975

Completion of Construction October 1975

C. Costs of Construction (Show a breakdown of costs for individual components/units of the proposed project serving pollution control purpose only). Information on actual costs shall be furnished with the application for operation permit.

Two (2) Joy Turbulaire Scrubbers model 56-D-SS	35,000
Two (2) 20'-0" S.S. Stacks with honey comb straighteners & parts	24,000
New turbine & gear drive to increase capacity I.D. Fan	15,000
Pumps, piping, instruments & installation	15,000
Duct work from I.D. to Scrubbers, foundations & installations	20,000

NOTE: The Okeelanta Sugar Mill will resume operations for the 1975-76 Crop during the month of October.

D. Indicate any previous DPC permits, issuance dates, and expiration dates.

Boilers	Nos. 2 & 3	- Permit	No. AO-50-2054	Date	5-23-73	expires	7-1-75
"	No. 4	"	No. AO-50-2053	"	"	"	"
"	No. 5	"	No. AO-50-2055	"	"	"	"
"	No. 6	"	No. AO-50-2056	"	"	"	"
"	No. 7	"	No. AO-50-2218	"	12-11-73	"	2-8-75
"	No. 8	"	No. AO-50-2219	"	"	"	"
"	No. 9	"	No. AO-50-2220	"	"	"	"

AIR POLLUTION SOURCES & CONTROL DEVICES

A. Identification of Air Contaminants

1) [X] Particulates
   a) [ ] Dust b) [X] Fly Ash c) [ ] Smoke d) [ ] Other (Identify)

2) [X] Sulfur Compounds
   a) [ ] SO_x as SO_2 b) [ ] Reduced Sulfur as H_2S c) [ ] Other (Identify)

3) [X] Nitrogen Compounds
   a) [ ] NO_x as NO_2 b) [ ] NH_3 c) [ ] Other (Identify)

4) [ ] Flourides 5) [ ] Acid Mist 6) [ ] Odor

7) [X] Hydrocarbons 8) [ ] Volatile Organic Compounds

9) [ ] Other (Specify): _____

B. Raw Materials and Chemicals Used (Be Specific)

Description	Utilization Tons/day, lbs./day, etc.	Approximate Contaminant Content		Relate to Flow Diagram
		Type	% Wt.	
N/A	N/A	N/A	N/A	N/A

C. Process Weight:

1) Total Process Weight Rate 57,500 lbs./hr. [See Sec. 17-2.04(2)]
2) Product Weight 125,000 lb./hr. expressed as steam at 250 psig. & 550° FTT
3) Normal Operating Time 24 hrs/day, 7 days/week; if seasonal describe: 100% by month and 18-20 weeks per year.

D. Airborne Contaminants Discharged:

Name of Contaminant	Actual Discharge	Discharge Criteria*	Allowable Discharge*	Relate Location to Flow Diagram
Particulate	71 lbs/hr.	0.3#/MBTU/hr.	74.7 lbs/hr.	See sketch
Sulfur Compounds	39.85 "	–	–	"
Carbon Monoxides	0.005 "	–	–	"
Nitrogen Oxides	13.0 "	–	–	"
Hydro carbons	0.4 "		–	"

* Refer to Chapter 17-2 Florida Administrative Code
(Discharge Criteria: Process Weight Rate, #/tonP_2O_5, #/M BTU/hr etc.)

E. Control Devices:

Name 2 Joy Impinger Scrubbers Model 56-D-SS	Eff.	Conditions of Operation, Particle Size Range, etc.	Relate to Flow Diagram
S. No. 0-74-438-04A	.905	Continuos	
0-74-438-04B		10-420 microns	See sketch

F. Fuels:

Type (Be specific)	Daily Consumption	Heat Input BTU/hr.	Relate to Flow Diagram
56% Moisture Bagasse	1.380,000 lbs.	230.0×10^6	
#6 Fuel oil, 2% sulfur	24,300 lbs.	19.0×10^6	

G. Describe briefly, without revealing trade secrets, the unit processes/operations generating the airborne emissions identified in this application:

The existing #5 boiler is supplied with hot condensate water at 230°F, 56% moisture bagasse and #6 Bunker C fuel oil with 2% sulfur are fired at the same time to generate 125,000#/hr. steam at 250#/psig. and 550°F

H. Indicate liquid or solid wastes generated and method of disposal.

P. Alkalinity	PPM as C_a CO_3	=	200-600
Hydrate Alkalinity	PPM as C_a CO_3	=	20-600
Cloride	PPM as Cl	=	0-150
Phosphate	PPM as PO_4	=	30-150
Sulphate	PPM as SO_3	=	30-50
Total disolved solids	PPM	=	1850-2500

The blow down water from the boiler will be discharged into the main mill waste ditch. This water is used to flood the cane fields and it is impounded and controlled within the farms private land.

Approximately 134 GPM of Slurry from the Scrubbers will be discharged into the main mill waste ditch and used to flood the cane fields, and it will be impounded and controlled within the farms private land. See sketch #44-ED-27-A-5, #44-ED-27-B-5, #44-ED-27-C-5, & #44-ED-27-D-5.

STATEMENTS BY APPLICANT AND ENGINEER

A. Applicant

The undersigned owner or authorized representative of * Gulf + Western Food Products Co. Okeelanta Sugar Division is fully aware that the statements made in this application for a two scrubbers installation permit are true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provisions of Chapter 403 Florida Statutes and all the rules and regulations of the Department or revisions thereof. He also understands that a permit, if granted by the Department, will be non-transferable and he will promptly notify the Department upon sale or legal transfer of the permitted establishment.

A. Kirstein III

Signature of the Owner or Authorized Representative

Arthur Kirstein III, Vice-President & General Manager

Name and Title (Please Type)

Date: _____ Telephone No.: 996-9072

* Attach a letter of authorization

B. Professional Engineer Registered in Florida:

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the control and discharge of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution source(s) with appropriate control facilities, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and the rules and regulations of the Department. It is also agreed that the undersigned will furnish the applicant a set of instructions for the proper maintenance and operation of the installation covered in this application.

Signature _____

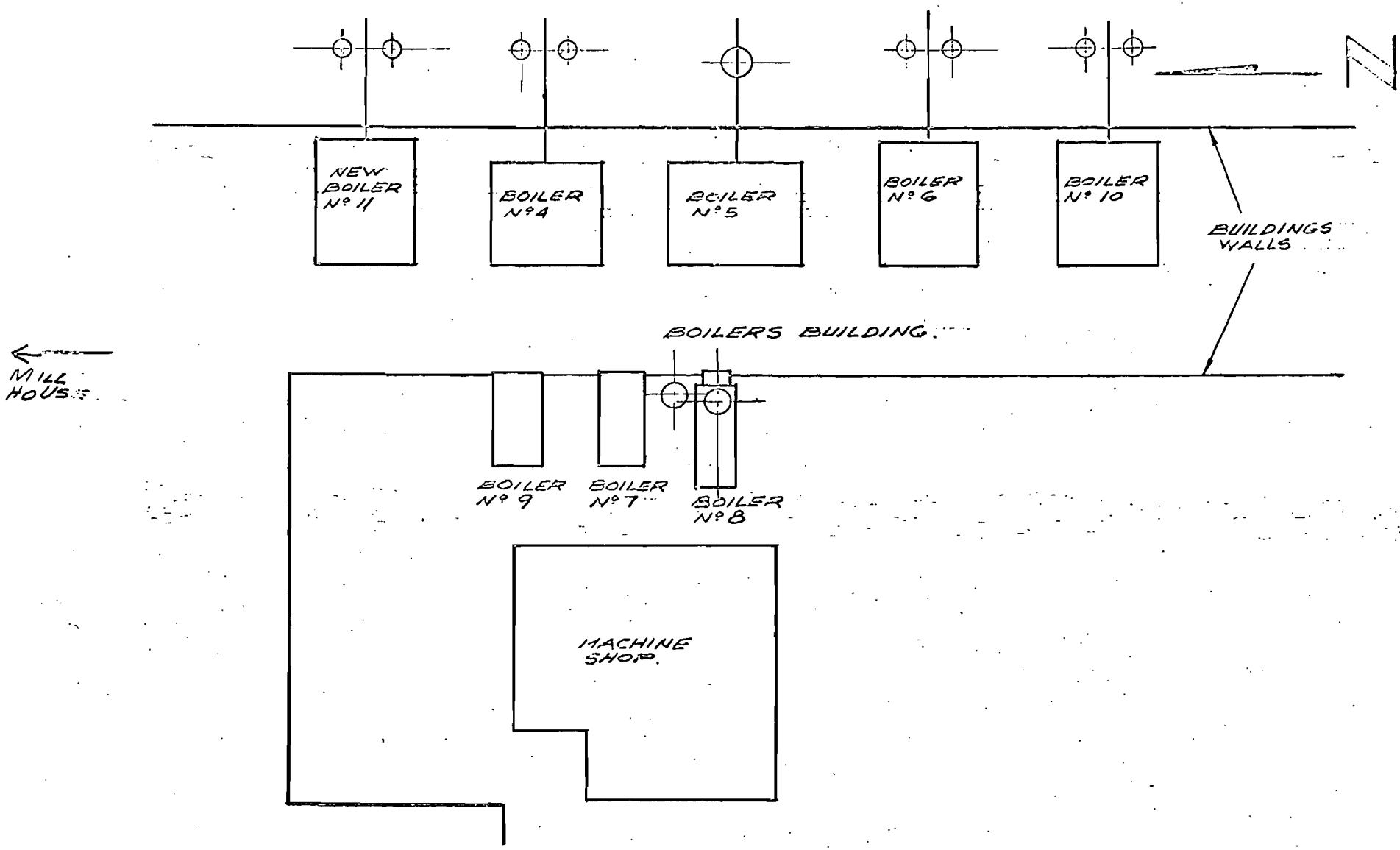
Name: Angel M. Tellechea
(please type)

Mailing Address: P.O. Box 837
Coconut Grove Station
Miami, Florida 33133

Telephone No.: 444-7879

Florida Registration Number 12343
(Please affix seal)

Date: November 22, 1974

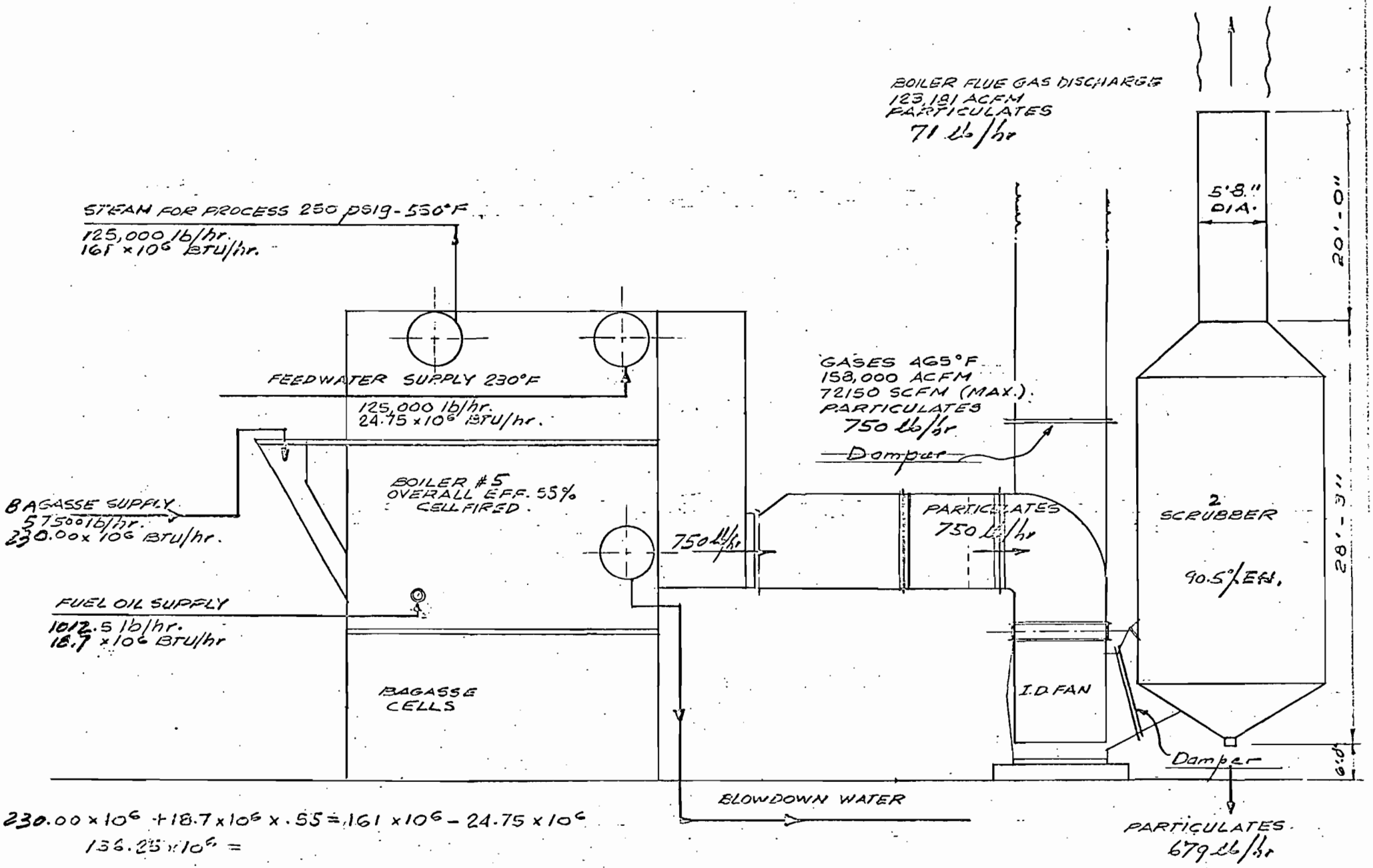


BOILER #5
SITE LOCATION

GULF+WESTERN FOOD PRODUCTS CO

OKEELANTA DIVISION

SCALE 1" = 40'-0"	DATE 11-20-74
DR BY GUILLEN	DWG. NO. 44-ED-27-A-3
CH BY	



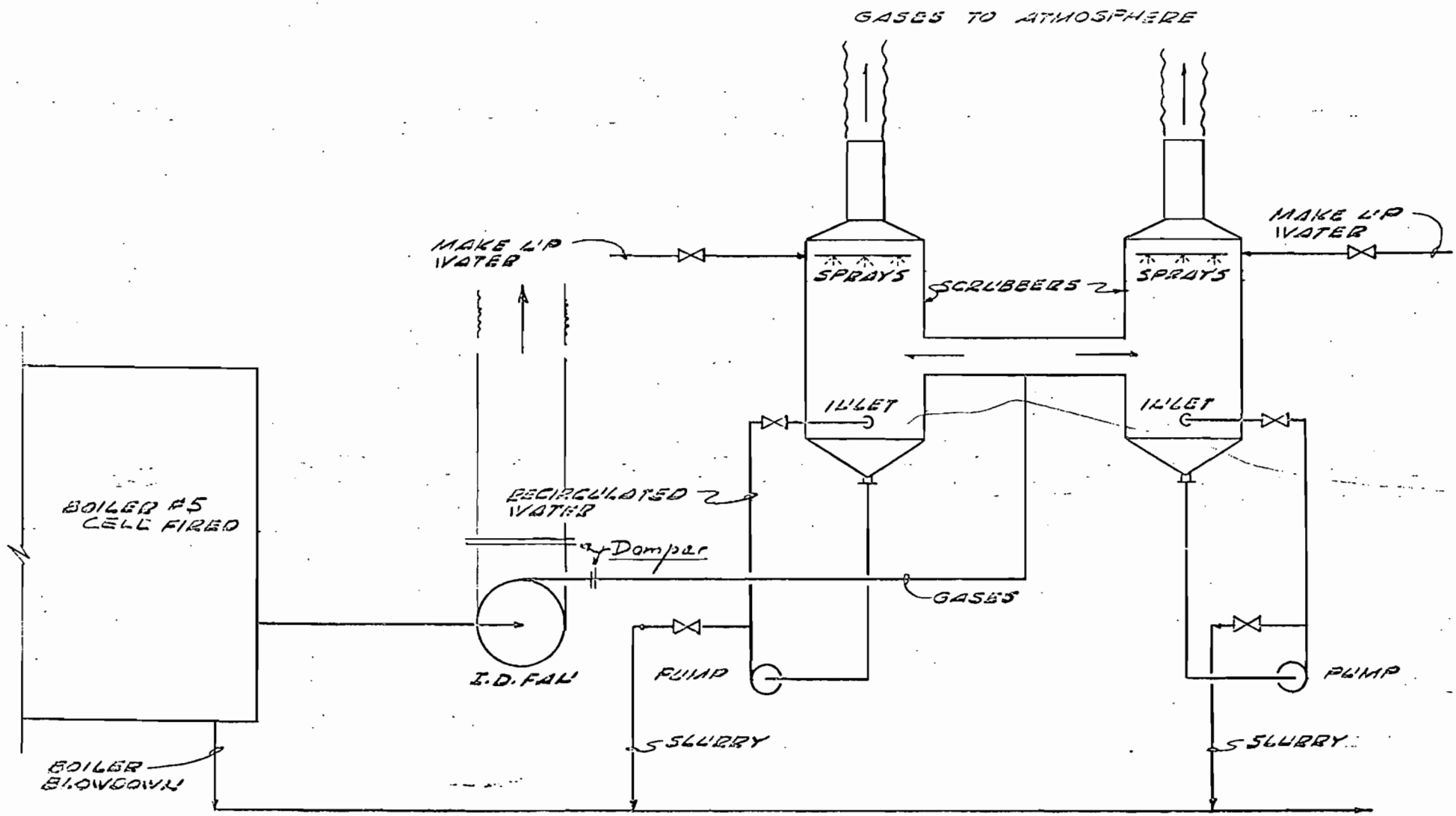
$230.00 \times 10^6 + 18.7 \times 10^6 \times .55 = 161 \times 10^6 - 24.75 \times 10^6$

$136.25 \times 10^6 =$

FLOW DIAGRAM
BOILER #5

GULF+WESTERN FOOD PRODUCTS CO.
OKEELANTA DIVISION

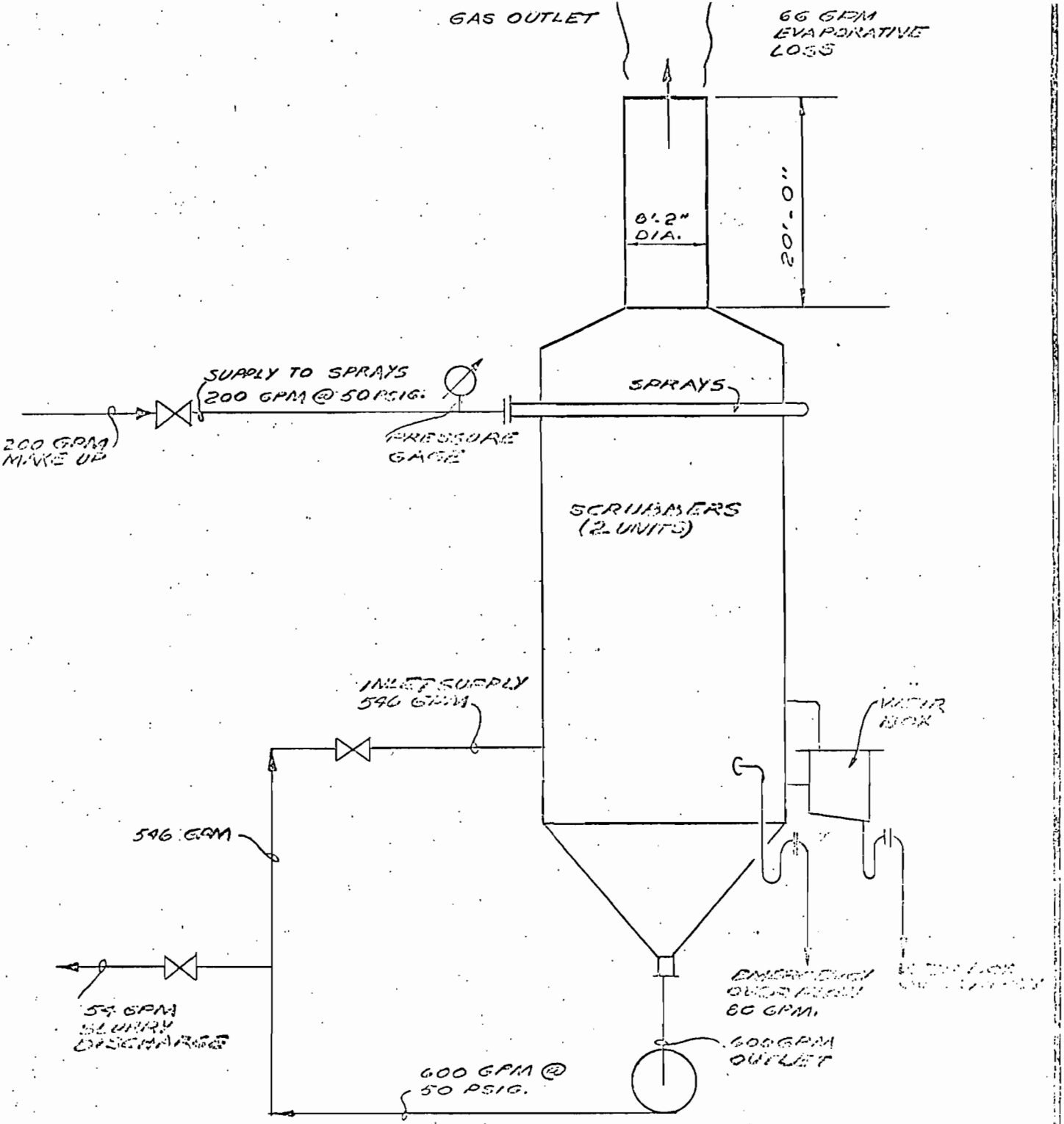
SCALE N.T.S.	DATE 11-20-74
DRAWN BY GUILLEN.	DWG.
CHECKED BY	Nº 44-ED-27-B-5



FLOW DIAGRAM
POLLUTION CONTROL
EQUIPMENT BOILER #5

GULF+WESTERN FOOD PRODUCTS CO.
OKEELANTA DIVISION

SCALE N.T.S.	DATE 11-20-74
DRAWN BY J.K.O.	DWG
CHECKED BY	Nº 44-ED-27-C



SCRUBBERS WATER BALANCE FOR BOILER Nº 5	GULF+WESTERN FOOD PRODUCTS CO
	OKEELANTA DIVISION
SCALE N.T.S.	DATE 11-20-7[illegible]
DR. BY SARA	DWG. NO. 44-FD-27 [illegible]
CH. BY	

GULF + WESTERN FOOD PRODUCTS COMPANY

OKEELANTA DIVISION

SOUTH BAY, FLORIDA

PLOT PLAN

Pollution Control Plant located at
Okeelanta Mill Site
26° - 35' - Latitude
80° - 45' - Longitude

KNIGHT FARM

TENNANT FARM

S.H.827

Canal

LAKE OKEECHOBEE

MOORE HAVEN

CLEWISTON

OSCEOLA

BRYANT

BELLE GLADE

FLORIDA SUGAR

ATLANTIC SUGAR

Miami Canal

KNIGHT FARM

WEST AREA

TENNANT FARM

U.S.27

OKEELANTA

S. AREA

EAST AREA

TALISMAN

N

S

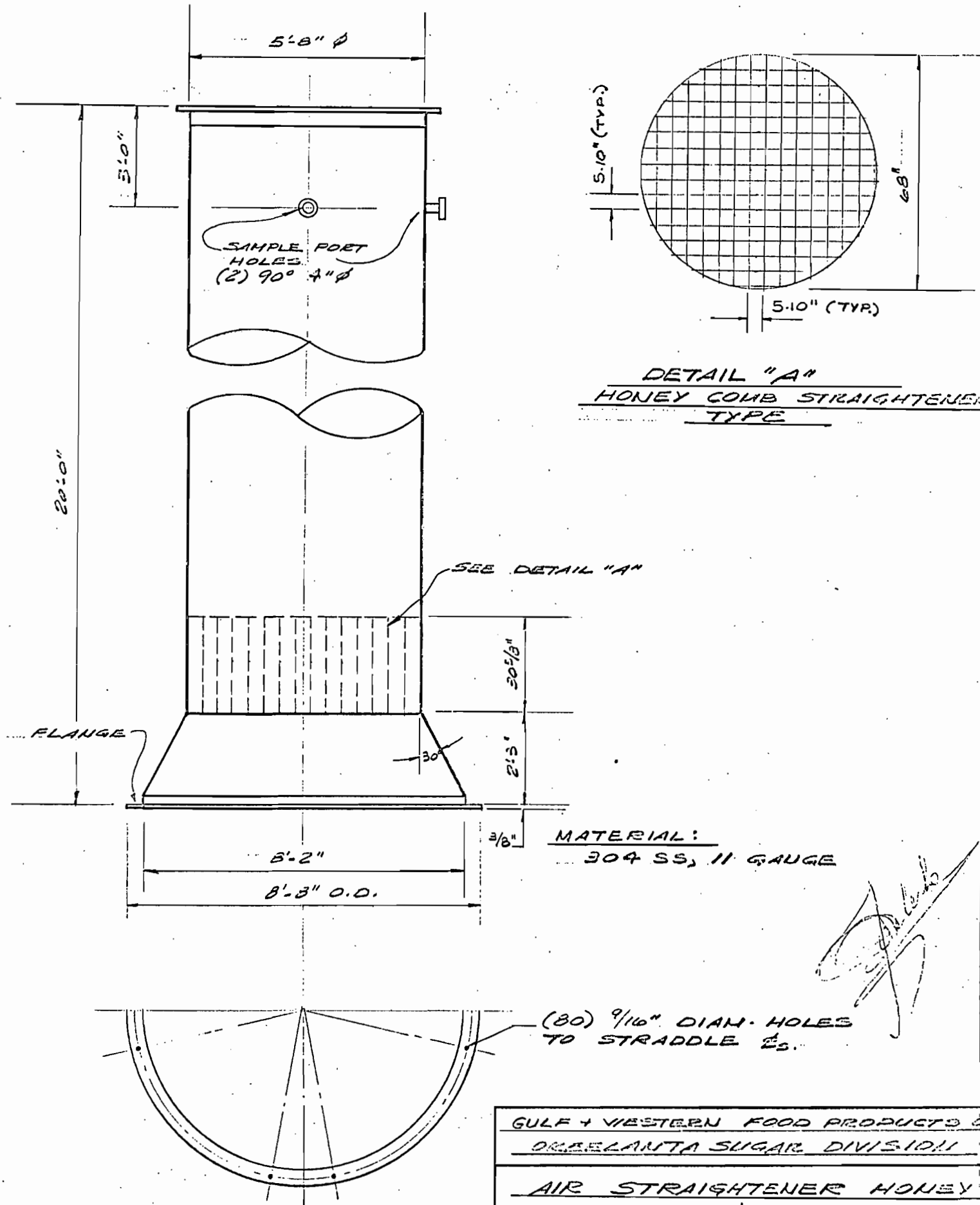
E

W

North Levee

East Levee

Canal



DETAIL "A"
HONEY COMB STRAIGHTENER TYPE

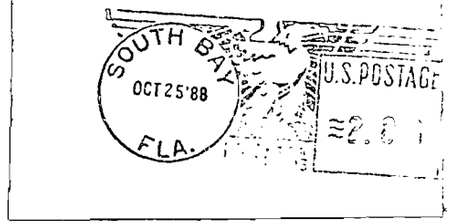
MATERIAL:
304 SS, 11 GAUGE

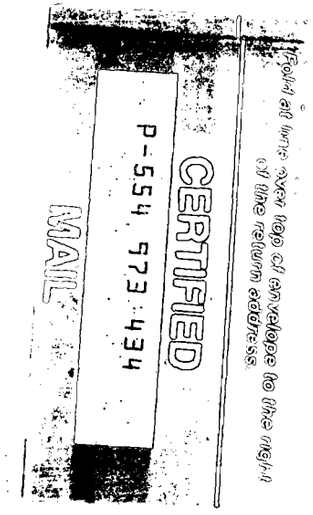
GULF + WESTERN FOOD PRODUCTS
OKEELANTA SUGAR DIVISION

AIR STRAIGHTENER HONEY COMB TYPE & EXHAUST DUC

SCALE: NO

DATE: 11-20-74





FROM P. A. CARRENO

Okeelanta Corporation

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

TO MR. CLAIRE FANCY
DEPT OF ENVIRONMENTAL REG.
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399-2400

RETURN POSTAGE GUARANTEED