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Department of Environmental Protection

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

Colleen M. Castille Secretary

June 24, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Request for Additional Information

Project Nos. 0990005-016-AC and 0990005-017-AV Title V Permit Renewal and Concurrent Air Construction Permit Revisions

Dear Mr. Williams:

On April 25, 2005, the Department received your application to renew the Title V air operation permit (and a concurrent air construction permit for minor revisions) for the Okeelanta Corporation's sugar mill and New Hope Power's cogeneration plant. The initial submittal did not include the required Compliance Assurance Monitoring (CAM) Plan. The CAM Plan was later submitted on May 23, 2005. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

- 1. <u>Attachment OC-FI-CV6</u>: This attachment requests several changes to permit conditions that were previously requested, but not granted. For each requested change, provide the current permit condition, the revised permit condition, and the underlying air construction permit or regulatory citation. The Department will consider your requests, but must determine the possible implications from making such changes (i.e., affects on a BACT determination, PSD avoidance, etc.). After this information is provided, I recommend a meeting to resolve the requested changes.
- 2. <u>Attachment OC-FI-CV3a Compliance Plan</u>: This attachment identifies potential compliance issues and a plan to regain compliance.
 - a. Boiler 16: What is the current operational status for this unit? Describe the operational scenarios during which this boiler is operated, the frequency, and duration. What is the current fuel sulfur content? Was an initial certification of the NOx CEMS ever performed and satisfactorily completed?
 - b. Central Vacuum System (EU-018): What are the problems with this equipment? Why isn't this equipment being used?

3. CAM Plan

- a. Cogeneration Boilers A, B, and C: The indicator for particulate matter is opacity and you have proposed 20% based on a 1-hour block average. Identify other critical parameters for the electrostatic precipitator that may also be included in the CAM plan to ensure continuous compliance with the particulate matter standard.
- b. Central Dust Collection System Nos. 1 and 2 (EU-021 and 022) and Cooler No. 2 (EU-024): Explain the problems with "fouling" of the instrument sample line for monitoring the pressure drop across the wet cyclone. What corrective actions could be taken to prevent fouling?

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to

"More Protection, Less Process"

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respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,

Jeffery F. Koerner Air Permitting North

cc: Mathew Capone, Okeelanta Corp.
David Buff, Golder Associates
Ron Blackburn, SD Office
James Stormer, SED Office
Kathleen Forney, EPA Region 4