



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

NOTICE OF ADMINISTRATIVE PERMIT CORRECTION

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

John J. Fanjul, V.P. and General Manager
Atlantic Sugar Association, Inc.
P.O. Box 1570
Belle Glade, FL 33430

Re: Atlantic Sugar Mill, Boiler No. 5
Air Permit No. PSD-FL-078A
Administrative Permit Correction

Dear Mr. Fanjul:

On July 2, 2001, the Department received a request from Golder Associates on your behalf for minor amendments to the above referenced final permit. The Department has reviewed this request and makes the following determinations:

- Final Permit, Page 5 of 15:** Atlantic Sugar requests that this condition specify a "24-hour average". According to the information provided, the "470 gph" criterion is the maximum fuel consumption by design. It is not a 24-hour average. However, it is noted that Condition 16.e does allow compliance to be demonstrated based on a 24-hour average. No change is required.
- Final Permit, Page 6 of 15:** Atlantic Sugar requests amending Condition No. 8 to be consistent with Condition No. 19, which allows a 90-day time frame for completing tests. The Department agrees that this was the intent and the testing deadline in Condition No. 8 is amended from December 15, 2001 to January 15, 2002 to be consistent with Condition No. 19.
- Appendix BD:** For PM₁₀ emissions in the summary table, the Department moved the numeric values under the "Emissions Standards" column to the "Emissions Factors" column. The PM₁₀ values under "Emissions Standards" were noted as "NA" for not applicable because there are no PM₁₀ limits in the permit. Also, the annual PM₁₀ emissions when firing bagasse were corrected from "65.0" to "60.7" tons per year.

The Department has determined that minor corrections to information contained in the final permit are required, pursuant to Rule 62-210.360, F.A.C. These corrections are related to minor errors and do not alter, modify or revise any permit requirement. Attached are amended pages 6 and BD-1 of the final permit. Please replace the pages in your final permit with these corrected versions. If you have any questions regarding this matter, please contact Jeff Koerner at 850/921-9536.

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

"More Protection, Less Process"

Printed on recycled paper.

Executed in Tallahassee, Florida.



C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administrative Permit Correction was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7/10/01 to the persons listed:

cc: Mr. John J. Fanjul, Atlantic Sugar Association*
Mr. David Buff, Golder Associates
Mr. Ron Blackburn, SD

Mr. James Stormer, PBCHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Enclosures

**AIR CONSTRUCTION PERMIT MODIFICATION
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

SUBSECTION A. EU 005 - MILL BOILER NO. 5

Scrubber Pressure Drop (Continued)

Steam Production Rate 1-Hour Average	Minimum Scrubber Pressure Drop
≤ 110,000 lb/hour	6 inches water column
>110,000 to 115,000 lb/hour	7 inches water column
>115,000 to 125,000 lb/hour	8 inches water column
>125,000 to 130,000 lb/hour	10 inches water column

- c. *Pressure gages* shall be installed to monitor the water supply pressure to the scrubber nozzles. Based on 1-hour averages, the upper ring of 14 spray nozzles shall be maintained above 35 psig and the lower ring of 24 spray nozzles shall be maintained above 60 psig. Spray nozzles shall be equipped with quick release connections and shall be inspected daily.
- d. A *flow meter* shall be installed to measure the water flow rate through the scrubber. The total flow rate shall be maintained above 550 gallons per minute, based on a 1-hour average. If the scrubber flow rate drops below 550 gallons per minute, an alarm shall warn the operator.
- e. The *scrubber water pH* shall be measured and recorded at least once per day. The pH shall be maintained between 6 and 8.5.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations and within the optimum operating ranges indicated above. Should any monitored parameter fall outside the specified operating range, the permittee shall investigate the cause and take corrective action to regain operation within the specified range. Excluding scrubber water pH, the permittee shall begin reading and recording all monitored parameters at 30-minute intervals until successive readings indicate the unit has regained operation within the specified optimum range. For scrubber water pH, the permittee shall begin measuring and recording the scrubber water pH at 8-hour intervals until successive readings indicate the unit has regained operation within the specified optimum range. Operation outside of the specified operating range for any monitored parameter is not a violation of this permit, in and of itself. However, continued operation outside of the specified operating range for any monitored parameter without corrective action may be considered circumvention of the air pollution control equipment. [Applicant Request; Rule 62-4.070(3); Rule 62-212.400 (BACT), F.A.C.]

- 8. Good Combustion Practices: The boiler operators shall use the "good combustion practices (GCPs)" defined in *Appendix GCP* to minimize emissions of CO, NO_x, PM/PM₁₀, and VOC from Boiler No. 5. As a critical part of the GCPs, the permittee shall install, calibrate, operate, and maintain process monitors to indicate the oxygen and carbon monoxide contents of the exhaust flue gas from the boiler before October 15, 2001. Readouts of these process monitors shall be provided in the boiler control room. It is noted that the monitored flue gas carbon monoxide content is for the purpose of determining efficient combustion and may not be representative of the actual CO emissions from the stack.

In addition to the initial CO and NO_x compliance testing required by this permit, the permittee shall conduct concurrent CO and NO_x testing in accordance with EPA Methods 10 and 7/7E for at least twelve (12) additional 1-hour runs. The additional tests shall be completed before January 15, 2002. Testing shall be conducted when the boiler is firing only bagasse and six (6) runs may occur with the boiler operating below 90% of permitted capacity. The permittee shall provide a 15-day advance notice of the proposed test schedule. During each run, the operators shall observe and record the CO and O₂ contents of

SECTION IV.

APPENDIX BD - SUMMARY OF EMISSIONS STANDARDS AND BACT DETERMINATIONS

The following tables summarize the final Best Available Control Technology determinations for this project and the corresponding emissions standards. [Rules 62-212.400(BACT) and 62-4.070(3), F.A.C.]

Emissions Unit No. 9 - Sugar Mill Boiler No. 5

Pollutant	Fuel	BACT Controls	Emission Standards	Emission Factors	Capacity Factor	Potential Emissions (TPY)	
CO	Carbonaceous Fuel	Good Combustion Practices	6.5 lb/mmBTU	NA	867,302 mmBTU/year ^c	2818.7	2818.7
	Fuel Oil	Good Combustion Practices	NA	0.033 lb/mmBTU ^a	NA	NA	
NOx	Carbonaceous Fuel	Good Combustion Practices	0.16 lb/mmBTU	NA	837,302 ^e mmBTU/year	67.0	71.7
	Fuel Oil	Good Combustion Practices	NA	0.31 lb/mmBTU ^a	30,000 ^d mmBTU/year	4.7	
PM	Carbonaceous Fuel	Wet Scrubber Good Combustion Practices	0.15 lb/mmBTU	NA	867,302 mmBTU/year ^c	65.0	65.0
	Fuel Oil	Wet Scrubber Good Combustion Practices	0.10 lb/mmBTU	NA	NA	NA	
PM10	Carbonaceous Fuel	Wet Scrubber Good Combustion Practices	NA	0.14 lb/mmBTU	867,302 mmBTU/year ^c	60.7	60.7
	Fuel Oil	Wet Scrubber Good Combustion Practices	NA	0.10 lb/mmBTU	NA	NA	
SO ₂ (Not BACT)	Carbonaceous Fuel	Low Sulfur W/Wet Scrubber	0.05 lb/mmBTU	NA	837,302 ^e mmBTU/year	20.9	37.1
	Fuel Oil	Restricted Sulfur and Firing	1.0% Sulfur by wt.	1.08 lb/mmBTU ^b	30,000 ^d mmBTU/year	16.2	
VOC	Carbonaceous Fuel	Good Combustion Practices	0.25 lb/mmBTU	NA	867,302 mmBTU/year ^c	108.4	108.4
	Fuel Oil	Good Combustion Practices	NA	0.0019 lb/mmBTU ^a	NA	NA	
Visible Emissions	Boiler No. 5 Stack All Fuels	Wet Scrubber Good Combustion Practices	≤ 20% opacity, except for up to 40% for 2 min.		NA	NA	NA
	Bagasse Conveyor	Reasonable Precautions	≤ 10% opacity, unless winds are > 18 mph		NA	NA	NA

Notes:

- | | |
|--|---|
| a. AP-42, Section 1.3, Fuel Oil Combustion | d. Based on 200,000 gallons/year of oil and fuel oil characteristics |
| b. Fuel oil characteristics: 1.0% S by wt., 8.1 lb fuel/gallon oil, 150,000 BTU/gallon oil | e. Difference between 867,302 mmBTU/year (total) and 30,000 mmBTU/year (oil) |
| c. Maximum steam production rate of 441,717,000 lb/year based on this heat input | f. Steam production limits and heat input equivalents are based on 7-month rolling total. |

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John J. Fanjul, V.P. & Gen. Mgr
 Atlantic Sugar Association, Inc
 PO Box 1570
 Belle Glade, FL 33430

2. Article Number (Copy from service label)

7000 0600 0026 4129 8320

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Salvadoro Rodriguez 7-12-01

C. Signature

X *Salvadoro Rodriguez* Agent Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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

7000 0600 0026 4129 8320

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

Postmark
Here

Recipient's Name (Please Print Clearly; to be completed by mailer)

John J. Fanjul

Street, Apt. No., or PO Box No.

PO Box 1570

City, State, ZIP+4

Belle Glade, FL 33430

PS Form 3800, February 2000

See Reverse for Instructions