

FAXDate 5/25/01Number of pages including cover sheet 2

TO: Jeffery F. Koerner
R.E.
Dept. of Env. Protection
Bureau of Air Regulation
New Source Review Section

Phone

Fax Phone 850 922-6979FROM: ATLANTIC SUGAR
ASSOCIATION, INC

Hector J. Cardentez

561-992-1506Phone 561-996-6541 - 206Fax Phone 561-996-8021

CC:

REMARKS: Urgent For your review Reply ASAP Please Comment

Enclosed is PROOF OF PUBLICATION from The Palm Beach
Post of February 16, 2001 about the Intent to
Issue Permit for ASA Boiler 5.

Regards.

THE PALM BEACH POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

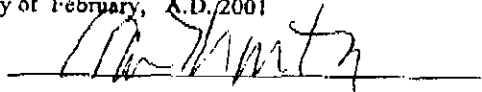
STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Linda M. Francis, who on oath says that she is **Classified Systems Manager**, of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, a Notice in the matter of Intent to Issue Permit in the --- Court, was published in said newspaper in the issues February 16, 2001.

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before this 16th day of February, A.D. 2001



Personally known XX or Produced Identification _____
Type of Identification Produced _____

 **KAREN M McLINTON**
MY COMMISSION # CC 979669
EXPIRES: Nov 15, 2004
1-800-3-NOTARY FL Notary Service & Training, Inc.

NO. 794051
PUBLIC NOTICE OF INTENT
TO ISSUE AIR CONSTRUCTION
PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT
OF ENVIRONMENTAL
& PROTECTION
Project No. 0000010-004 AC
Draft Permit No. PPD-PL-078A
Doter No. 6 Modification
Atlantic Sugar
Association, Inc.
Palm Beach County
The Department of Environ-
mental Protection (Depart-
ment) gives notice of its intent
to issue an air construction
permit to the Atlantic Sugar
Association, Inc. to expand
operation of existing Doter
No. 5. The Atlantic Sugar As-
sociation owns and operates
an existing sugar mill located
approximately 10 miles east
of Belle Glade on State Road
880 in Palm Beach County,
Florida. The applicant's Author-
ized Representative is John
J. Farah, Vice President and
General Manager of Atlantic
and when petitioner received
notice of the agency action or
proposed action; (g) A state-
ment of all disputed issues of
material fact if there are
disputes; (h) A concise state-
ment of the ultimate facts at
issue, including the specific
facts the petitioner contends
warrant reversal or modifica-
tion of the agency's proposed
action; (i) A statement of the
specific rules of evidence the
petitioner contends require re-
versal or modification of the
agency's proposed action;
and (j) A statement of the relief
sought by the petitioner,
stating precisely the action
petitioner wishes the agency
to take with respect to the
agency's proposed action.
A petition that does not dis-
cuss the material facts upon
which the Department's action
is based shall state that no
such facts are in dispute and
otherwise shall contain the
same information as set forth
above, as required by Rule 28-
106.301, F.A.C.
Because the administrative
hearing process is designed
to formulate final agency ac-
tion, the filing of a petition
means that the Department's
final action may be different
from the petition taken by it
in this notice. Persons whose
substantial interests will be af-
fected by any such final deci-
sion of the Department of the
application have the right to
petition to become a party to
the proceeding, in accordance
with the requirements set
forth above.
A complete project file is
available for public inspection
during normal business hours,
11:00 a.m. to 5:00 p.m., Mon-
day through Friday, except leg-
al holidays. If:
Department of Environmental
Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, FL 32301
Telephone: 900/488 0114
Department of Environmental
Protection
South Florida District Office
Suite 344,
2286 Victoria Avenue
Fort Myers, FL 33901-3381
Telephone: 813/932-0970
Palm Beach County
Health Department
Air Pollution Control Section
P.O. Box 89
(901 Evernia Street)
West Palm Beach, FL
33402-0089
Telephone: 561/868-3166
The complete project file in-
cludes the application, techni-
cal evaluation, draft permit
and the information submitted
by the responsible official, ex-
clusive of confidential records
under Section 409.111, F.S.
Interested persons may con-
tact Department's reviewing
engineer for this project, Jeff
Koerner, New Source Review
Section, at 111 South Magnolia
Drive, Suite 4, Tallahassee,
Florida 32301, or call
900/488 0114 for additional
information.
PUB: The Palm Beach Post
February 16, 2001

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-6600
Fax (352) 336-6603



April 23, 2001

RECEIVED

9937584

APR 23 2001

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Attention: Jeffery Koerner, P.E.

RE: ATLANTIC SUGAR MILL
PROJECT NO. 0990016-004-AC; PSD-FL-078A
INCREASED OPERATION OF BOILER NO. 5

Dear Mr. Koerner:

In follow up to our recent conversation, this letter presents additional information and comments regarding the Intent to Issue Air Construction Permit and Proposed Draft Permit for the Atlantic Sugar Association (ASA) Boiler No. 5 project. The Florida Department of Environmental Protection (FDEP) issued the draft permit on dated January 31, 2001. The comments and additional information are addressed below.

Technical Evaluation and Preliminary Determination

Page 4 of 17 – Table 3.2 states the requested increase in VOC emissions to be 116 TPY. This figure should be 72 TPY, based on the Department's VOC emission limit of 0.25 lb/MMBtu. Maximum annual VOC emissions from the modified Boiler No. 5 are 108.4 TPY at 0.25 lb/MMBtu. Baseline VOC emissions were 36.3 TPY. Therefore, $108.5 \text{ TPY} - 36.3 \text{ TPY} = 72.1 \text{ TPY}$ increase.

Draft Permit

Page 4 of 14 – The Department agreed that the appropriate fuel oil firing rate for the boiler is 470 gph, based on the original design of the boiler's oil burners. It was also agreed that this capacity would be specified on a 24-hour basis.

- 3.a. The Department will locate and provide to ASA the documentation for the basis for the 100,000 lb/hr steam limitation and 195.0 MMBtu/hr heat input limitation when firing any amount of wood chips. In the absence of any documentation, it is requested that this limitation be deleted.
- 3.c. The Department will add the word "design" prior to the word "parameters" in the second sentence, and prior to the word "steam" in the last sentence. In the last sentence, the wording will be changed to reflect "may require a PSD review".

Page 5 of 14

4. The phrase "consecutive 7 months" will be changed to "crop season".
- 4.b. As stated previously, the 168 gph will be revised to "470 gph", and a 24-hour averaging time will be specified.
- 7.a. This condition will be deleted.
- 7.b. ASA has a transparent plastic viewer on the Boiler No. 5 scrubber. It is not glass. Therefore, the request still remains to revise to "site glass or similar device".

Page 6 of 14

- 7.e. In the third sentence, "pressure differential" will be changed to "water flow rate".
8. The purpose of the correlation testing is to gather data and not to determine compliance with the emission limits. In order to allow optimum testing to be performed over a range of flue gas oxygen levels, the permit should state that an exceedance of an emissions limit during the correlation testing does not constitute a violation of this permit. It is also requested, for reasons previously presented, that the permit provide for the NO_x emissions limit to be revised upwards if supported by the correlation test data.

Page 7 of 14

11. The mass PM emissions due to fuel oil burning will be revised from 2.52 lb/hr to 7.05 lb/hr, based on a maximum heat input due to fuel oil of 70.5 MMBtu/hr and the limit of 0.1 lb/MMBtu.

Page 9 of 14

- 16.e. In keeping with the limitation on fuel oil consumption based on a 24-hr average basis, the reading of the fuel oil flow meter will be required once per day.

All "consecutive 7 months" will be changed to "crop season". The phrase "12 months" associated with oil firing will be changed to "crop season".

Page 10 of 14

17. The phrase "2000/2001" will be changed to "2001/2002".
18. It is requested that up to 90 days be allowed to perform the initial compliance testing. This will allow adequate time to complete installation of the process monitors and gain working knowledge of the monitors and systems.
19. NO_x emissions are below 100 TPY, and NO_x will be controlled through the application of GCP, as monitored by the CO and O₂ process monitors, It is therefore requested that the compliance test frequency for NO_x be reduced to initially and upon operating permit renewal.

Appendix FC

Will be revised to reflect 70.5 MMBtu/hr and 470 gph of fuel oil firing, and delete limitation on wood chip firing, if appropriate.


Appendix GCP

Page GCP-2 – Change the second Item 4 to Item “6”.

Thank you for consideration of these comments in issuing the final permit. Please call or e-mail me if you have any additional questions concerning this information.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff P.E., Q.E.P.
Principal Engineer
Florida P.E. #19011
SEAL

DB/arz

Enclosures

cc: Hector Cardentey
John A. Fanjul
Peter Cunningham
Darrel Graziani

P:\Projects\1999\9937584a Atlantic Sugar\02\1.042301.doc

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-6600
Fax (352) 336-6603



March 21, 2001

9937584

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

RECEIVED

MAR 23 2001

Attention: Jeffery Koerner, P.E.

BUREAU OF AIR REGULATION

RE: ATLANTIC SUGAR MILL
PROJECT NO. 0990016-004-AC; PSD-FL-078A
INCREASED OPERATION OF BOILER NO. 5

Dear Mr. Koerner:

On January 31, 2001 the Florida Department of Environmental Protection (FDEP) issued an Intent to Issue Air Construction Permit and Proposed Draft Permit for the Atlantic Sugar Association (ASA) Boiler No. 5 project. The draft permit has been reviewed, and several comments and concerns have been identified. The comments are addressed below, in the same order as they appear in the draft permit.

Technical Evaluation and Preliminary Determination

Page 4 of 17 – Table 3.2 states the requested increase in VOC emissions to be 116 TPY, but should read “181 TPY”.

Page 9 of 17 – second paragraph, seventh line: change “Clewiston” to “Atlantic Sugar Association”.

- Discussion regarding NO_x emission limit: ASA disagrees that the BACT standard for CO provides an adequate margin of safety to minimize NO_x emissions to achieve the current NO_x standard of 0.16 lb/MMBtu. Although the BACT standard for CO is 6.5 lb/MMBtu, the process CO and O₂ monitors and testing program will be used to establish operational ranges which effectively limit CO emissions to well below 6.5 lb/MMBtu. Good combustion practices will stress limiting CO and VOC emissions. This will necessarily require that higher NO_x emissions be maintained. Considering that recent NO_x emissions during single yearly compliance tests have ranged up to 83% of the 0.16 lb/MMBtu NO_x standard, and that historical data has shown levels as high as 0.31 lb/MMBtu (with concurrent lower CO emissions), the FDEP's proposed standard is likely to be violated. Further, there is no justification for limiting Boiler No. 5 to such low NO_x emissions. Maximum annual NO_x emissions due to firing bagasse, based on ASA's proposed limit of 0.25 lb/MMBtu, are only 99 TPY. ASA urges the FDEP to set a BACT limit no lower than 0.20 lb/MMBtu, consistent with another recent BACT determination for a bagasse boiler in Florida.

Page 13 of 17 – in Table 5.7 there is a footnote (“**”) indicated, but the footnote itself is missing.

Draft Permit

Page 2 of 14 – Regulatory Classification: as stated in the TE&PD, the facility is “believed to be” a major source of HAPs.

Page 3 of 14 – 1. Permitting Authorities: has the mailing address for BAR changed?

Page 4 of 14 – Emissions Unit Description: FDPE has restricted the fuel oil burning capability of the boiler to 168 gallons per hour, although ASA requested 470 gph. ASA explained in the application that the 470 gph was the original capacity of the fuel oil burners installed on Boiler No. 5, and that the 168-gph limitation was only imposed because of stack testing conditions. FDEP does not offer any explanation of this discrepancy from the applicant’s request. ASA believes that there is no reason to limit the hourly fuel oil firing capability of the boiler to less than 470 gph. Dispersion modeling to support the application was performed at the higher fuel usage rate.

3.a. The basis for the 100,000 lb/hr steam limitation and 195.0 MMBtu/hr heat input limitation when firing any amount of wood chips is unknown. FDEP does not discuss the rationale or basis for this limitation. It is not reflected in any previous construction or operating permit for this boiler. Therefore, please provide justification for this limit, or delete the second sentence of this condition in its entirety.

3.c., paragraph following – delete all but the first sentence of this paragraph. Other FDEP rules cover physical changes, changes in operation, and modifications. Also, it is premature to state that any changes to the design conditions shall require a PSD review. In addition, add the statement that “actual operation may vary from the design parameters, without prior approval” to clarify the condition.

Page 5 of 14 – 4. Please change all phrases “consecutive 7 months” to “crop season”. Since the crop season is already limited by permit condition to October through April, there is no reason to have a consecutive 7-month reporting period. This unnecessarily increases recordkeeping requirements.

4.b. As discussed previously, revise the 168 gph to “470 gph”. Also, specify a 24-hour averaging time, consistent with the Title V permit.

7.a. Delete this condition related to a weir box. It is not necessary with the Boiler No. 5 scrubber system, and has not been a previous requirement (not in the Title V permit).

7.b. Change “site glass” to “sight glass or similar device”.

Page 6 of 14

7.c. There appears a footnote (“+”) attached to some of the steam rates. Please delete these.

7.e. In the third sentence, change “pressure differential” to “water flow rate”.

8. In this condition, provide for the NO_x emissions limit to be revised upwards if supported by the test data.

Page 7 of 14

10. As discussed previously, allow the NO_x emissions limit to be revised if warranted by the test data.

11. Revise the mass PM emissions due to fuel oil burning from 2.52 lb/hr to 7.05 lb/hr, based on a maximum heat input due to fuel oil of 70.5 MMBtu/hr, as requested in the application.

Page 9 of 14

16.e. In keeping with the request that fuel oil consumption be regulated on a 24-hr average basis, revise to require reading of the fuel oil flow meter once per day.

17. Change all "consecutive 7 months" to "crop season". Change "12 months" associated with oil firing to "crop season".

Page 10 of 14

18. Change "2000/2001" to "2001/2002".

Appendix FC

Revise to reflect 70.5 MMBtu/hr and 470 gph of fuel oil firing.

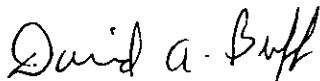
Appendix GCP

Page GCP-2 – Change the second Item 4 to Item "6".

Thank you for consideration of these comments in issuing the final permit. Please call or e-mail me if you have any additional questions concerning this information.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P.E. #19011
SEAL

DB/jkw

Enclosures

cc: Hector Cardentey
John A. Fanjul
Jeffery Koerner
Peter Cunningham
Stan Krivo, EPA Region IV
National Park Service
Darrel Graziani
C. Haladay

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