

BEST AVAILABLE COPY

Atlantic Sugar Association

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July 17, 1981

Mr. Cleve Holliday, Meteorologist
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Holliday

Re: Air Construction Permit
Application AC-50-42389

The purpose of this letter is to respond to your letter dated July 13, 1981. The numbering of our answers coincides with the numbering of your questions.

1. Our Cane fields on the East are adjacent to the Loxahatchee National Wildlife Refuge. The fields are separated from the Refuge by a canal that is 40' wide. The refuge extends for 10-12 miles to the East. This is a natural barrier which prevents the general public from reaching the outskirts of our property. On the West, we have cane fields that extend for 5 to 6 miles. The cane fields are typically, 40 acres surrounded by canals. The width of the canals varies from 20 to 40 feet. For someone to travel a mile through cane fields, they would have to cross 8 cane fields and approximately 16 canals.

The nearest public highway to our mill is 4 miles to the North. A person would have to travel through 4 miles of cane fields in order to reach our mill. Our cane fields do not provide an open area between the mill and the public highway since the cane is not harvested all at once.

During the harvesting of the cane fields, our private roads are heavily travelled by our farm equipment and trailers. Each section being harvested is supervised by personnel in pickup trucks equipped with mobile two-way radios. They are instructed to report any

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occurrences which are out of the ordinary, including intruders. A person walking in an open field would be easily detected.

2. As we indicated in our letter of May 15, 1981, to Mr. Steve Smallwood, the proposed scrubber is a scaled-up unit from an impingement type scrubber, modified to improve its performance. The major modifications are stated in the May 15 letter. We have contracted a local shop to fabricate the scrubber in accordance with the drawings and specifications supplied by IPS engineers. We feel it would be very difficult to obtain a guarantee from a scrubber manufacturer or a supplier on equipment which we have fabricated and which we have modified. However, since this equipment is used widely by most mills with good results, we feel that its performance can be predicted within the range of past performance tests.
Another obstacle that would make a performance guarantee difficult is the variability in the efficiency of the scrubber. Variations in the quality of bagasse and in the operation of the boiler makes impossible the determination of a grain loading and the particle size distribution. Without these two factors a performance would be difficult to ascertain. The only factor that we can measure is the emission from the stack. The past performance of this equipment, which is well documented, is the basis for our requested emission limit 0.20 lbs. per MMBTU. A lower BACT standard has no basis and would be impossible to attain.

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If any further information is needed, please do not hesitate to call us.

Sincerely yours,

H. J. Valella
Executive Vice President &
General Manager

HJV:mc

cc: Mr. David Knowles, South Florida Dist.
Mr. Michael Martin, Palm Beach Co. Health Dept.
Mr. Angel Tellechea, Gulf + Western