Modules: AD004 and AB209

Jon H

Project 0990019-014-AV

REPORT

REQUEST FOR EXTENSION OF BOILER MACT COMPLIANCE DATE

Osceola Farms Company

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Title V Revision Application Form (6 pages)

1.0 INTRODUCTION

The Osceola Farms Company (Osceola) operates a sugar mill located near Pahokee in western Palm Beach County, Florida. The Sugar Mill operated through June 2013 under Title V Operating Permit No. 0990019-011-AV, issued on March 22, 2010. The Title V permit was renewed on June 28, 2013 (Permit No. 0990019-012-AV). The facility is classified as a major source of hazardous air pollutants (HAPs). The mill has five steam boilers (Boilers 2, 3, 4, 5, and 6) that operate to generate steam and electricity for the mill. These boilers are fired by bagasse, which is a fibrous biomass material and a byproduct of the sugarcane processing operations. In addition, No. 6 fuel oil is used as a backup or supplemental fuel.

On December 21, 2012, the U.S. Environmental Protection Agency (EPA) finalized and signed revisions to the Maximum Achievable Control Technology Standards for Industrial Boilers located at major sources of HAPs ("Boiler MACT"). The final rule was published in the Federal Register on January 31, 2013, which was also the effective date of the rule.

The Osceola boilers are regulated as industrial boilers under the Boiler MACT rule [Title 40, Code of Federal Regulations, Part 63, Subpart DDDDD (40 CFR 63 Subpart DDDDD)] and therefore will be subject to the newly promulgated MACT standards. The compliance date under the rule is January 31, 2016.

In order to comply with the Boiler MACT standards, control systems will need to be installed on each of the five boilers at the Osceola sugar mill. Pursuant to provisions in 40 CFR 63 Subpart A – General Provisions, an owner/operator who is unable to comply with a relevant standard established under Section 112(d) of the Clean Air Act (CAA) by the compliance date may request the Administrator or a State (if delegated) to grant an extension of up to 1 additional year to comply with the standard, if such additional period is necessary for the installation of controls. In fact, in issuing the final Industrial Boiler MACT rule, EPA has recognized the need that certain sources will have in requesting and being granted a 1-year extension.

Due to the magnitude of work that would need to be performed and the amount of time required for the installation of controls on all five boilers at the mill, as well as to manage the economic impact of these changes, Osceola is requesting that the Florida Department of Environmental Protection (FDEP) grant a one (1) year extension of the compliance date until January 31, 2017.

The requirements for a request for extension of the compliance date are summarized in Section 2.0. The justification for the extension request is presented in Section 3.0, including the type of boilers operating at the mill, the control systems that would need to be installed, and a compliance schedule summarizing all the tasks to be performed in order to comply with the MACT standards.

2.0 REQUIREMENTS FOR AN EXTENSION AND EXTENSION REQUESTS

Pursuant to 40 CFR 63.6(i)(4)(i)(A), the owner or operator of an affected source who is unable to comply with the relevant standards may request an extension of up to 1 additional year to comply with the standard. The owner/operator must submit a Title V revision application to incorporate the conditions of the extension of compliance. The request must be submitted in writing to the appropriate compliance authority no later than 120 days prior to the source's compliance date (which is January 31, 2016).

A request for compliance extension under this provision must include the following information per 40 CFR 63.6 (i)(6)(i):

> *(A) A description of the controls to be installed to comply with the standard;*
>
> *(B) A compliance schedule, including the date by which each step toward compliance will be reached. At a minimum, the list of dates shall include:*
>
> *(1) The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated; and*
>
> *(2) The date by which final compliance is to be achieved.*
>
> *(3) The date by which on-site construction, installation of emission control equipment, or a process change is to be completed; and*
>
> *(4) The date by which final compliance is to be achieved;*

The MACT rules for an extension of the compliance date also include requirements for the Administrator in issuing or denying the request, notification requirements, and contents of the extension approval. The justification for the extension request and schedule for compliance is presented in Section 3.0.

3.0 REQUEST FOR AN EXTENSION

3.1 Description of Existing Osceola Boilers

The Osceola boilers supply the sugar mill with process steam during the sugarcane grinding season, approximately October through March. The maximum steam rate and maximum heat input rate for each boiler are shown below:

Unit	Maximum Steam Rate (lb/hr)	Maximum Heat Input Rate (MMBtu/hr)
Boiler No. 2	140,000 (24-hr)	280
Boiler No. 3	150,000 (24-hr)	292
Boiler No. 4	140,000 (24-hr)	280
Boiler No. 5	165,000 (24-hr)	330
Boiler No. 6	195,000 (1-hr)	379

Note: lb/hr = pounds per hour.
MMBtu/hr = million British thermal units per hour.

The five steam boilers operated by Osceola are primarily fired with bagasse, which is a fibrous biomass byproduct of the sugarcane processing operation. Small amounts of No. 6 fuel oil are also fired at times for startup, shutdown and malfunction, and for supplemental fuel. All the boilers are permitted to operate 3,840 hours per year and 160 days during the crop season. The crop season can extend from October 1 through April 30.

The existing air emissions controls consist of wet impingement scrubbers serving all five boilers. Boiler Nos. 2, 4, and 5 each have two scrubbers, which operate in parallel (i.e., the boiler exhaust flow splits). Boiler Nos. 2 and 5 each have two stacks (one on each scrubber), while Boiler No. 4 utilizes a single stack (both scrubbers exhaust to a common stack). Boiler Nos. 3 and 6 each have one wet scrubber and one stack. Good combustion practices are used on all boilers to limit CO and organic HAP emissions.

3.2 Applicability of MACT Regulations to Osceola Boilers

The five steam boilers operated by Osceola are primarily fired with bagasse, the fibrous biomass byproduct of the sugarcane processing operation. Therefore, the boilers will be subject to MACT standards for boilers designed to burn solid fuels. The solid fuel category also includes a subcategory for boilers that burns at least 10 percent biomass or bio-based solids, as defined by §63.7575, on an annual heat input basis in combination with solid fossil fuels, liquid fuels, or gaseous fuels. Since the Osceola

boilers burn 95-percent or greater biomass on an annual heat input basis, they are subject to the biomass/bio-based solid fuel subcategory.

The U.S. EPA also established a separate subcategory to address bagasse-fired boilers, which is the hybrid suspension grate (HSG) boiler subcategory. Based on the definition of hybrid suspension grate boilers in §63.7575, it was determined that each of the five boilers at Osceola would fall under the HSG subcategory.

The solid fuel subcategory contains emission limits for hydrogen chloride (HCl) and for mercury (Hg). In addition, the HSG subcategory contains emission limits for particulate matter (PM) or total selected metals (TSM), and for carbon monoxide (CO). The emission limits applicable to the Osceola boilers are shown in Table 3-1.

3.3 Description of Controls to Comply with the Standards

Osceola has conducted a preliminary evaluation of emissions from the boilers in relation to the Boiler MACT emission limits. Based on the historical test data available for PM, TSM, HCl, and Hg, it is determined that no additional controls will be required on the boilers to meet the MACT standards for each of these pollutants. However, based on CO test data from the boilers, none of the boilers will be able to comply with the CO limit of 2,800 ppmvd @ 3% O_2.

In order to meet the MACT standards for CO, it is expected that advanced overfire air (OFA) systems will need to be installed on each of the boilers. An advanced OFA system injects combustion air into the furnace at a controlled temperature to provide a more complete combustion process. The system provides more uniform mixing of volatiles and unburned particles rising from the grate or released in suspension by the combustion process. OFA systems provide increased residence time in the furnace to allow greater carbon burnout, thereby lowering CO emissions. OFA systems on biomass-fired boilers have exhibited significant improvements in boiler efficiencies and reduction in CO emissions.

The additional air pollution control equipment or significant modifications which are anticipated to be required for each boiler are described below.

- Boiler Nos. 2, 3, and 6 - Modern OFA systems are needed to reduce CO emissions to meet the MACT emission limits for CO. Previous investigations and discussions with vendors have indicated that such improvements would bring the CO emissions from these boilers to below the MACT emission limit. No other changes to these boilers are anticipated to be required. New OFA systems for each boiler would have to be permitted, engineered, procured, and installed prior to the compliance date.

- Boiler Nos. 4 and 5 – Based on their historical CO emissions, these boilers, which do not currently employ grates, would need to be converted to inclined pinhole grate boilers. Osceola will convert them to inclined pinhole grate boilers by installing grates and other associated equipment in the boilers. In addition, the overfire air systems on the boilers would also need to be improved in order to insure compliance with the CO limit (similar to Boiler Nos. 2, 3 and 6 discussed above). No other changes to these boilers are anticipated to be required. New inclined pinhole grates and OFA systems for each boiler would have to be permitted, engineered, procured, and installed prior to the compliance date.

In addition, pursuant to 40 CFR 63.7500, the boilers must comply with startup work practices which require the use of one or a combination of the following clean fuels: natural gas, synthetic natural gas, propane, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, and liquefied petroleum gas.

The current startup procedure of the boilers at Osceola does not include the use of any of the above-mentioned fuels, except that No. 2 fuel oil is used to for initial ignition of the fuel bed. Each of the five boilers has only fuel oil burners equipped to burn No. 6 fuel oil. Therefore, each of the boilers will likely have to be equipped with new burners that will allow the use of distillate oil (No. 2 fuel oil) during startup.

The existing air pollution controls for MACT-regulated pollutants are summarized in Table 3-2, as well as the additional controls anticipated to be required to meet the Boiler MACT limits.

3.4 Need for Extension of Compliance Date

In the preamble to the final Industrial Boiler MACT rule, EPA acknowledges that certain source may in fact need a 1-year extension of the compliance date:

> *"Commenters have argued that the 3-year compliance deadline the EPA is establishing for existing sources to meet the standards does not provide them with sufficient time to meet the standards in view of the large number of sources that will be competing for the needed resources and materials from engineering consultants, permitting authorities, equipment vendors, construction contractors, financial institutions, and other critical suppliers....At the same time, the CAA allows Title V permitting authorities to grant sources, on a case-by-case basis, extensions to the compliance time of up to one year if such time is needed for installation of controls.... We believe that should the range of circumstances that commenters have cited as impeding sources' ability to install controls within three years materialize, then it is reasonable for permitting authorities to take those*

circumstances into consideration when evaluating a source's request for a 1-year extension, and where such applications prove to be well-founded, it is also reasonable for permitting authorities to make the 1-year extension available to applicants. In making a determination as to whether an extension is appropriate, we believe it is also reasonable for permitting authorities to consider the large number of pollution control retrofit projects being undertaken for purposes of complying either with the standards in this rule or with those of other rules such as MATS for the power sector that may be competing for similar resources."

Therefore, EPA not only allows extensions to be granted by the Title V permitting authorities, but also recognizes that extensions are appropriate in this case.

As determined in the previous section, Osceola will have to install advanced OFA systems on all boilers, and convert Boiler Nos. 4 and 5 to inclined pinhole grate boilers, in order to comply with the CO limits specified in the Boiler MACT rule. The entire basis of achieving compliance with the MACT CO limit is dependent on proper installation and operation of the control systems. Also, each of the boilers will likely have to be equipped with No. 2 fuel oil burners.

Osceola is requesting an extension of the MACT compliance date by 1 year, until January 31, 2017, to complete the installation of controls, based on the following:

- The Osceola mill boilers operate on a seasonal basis (during the sugarcane crop season), generally from October through March. In order to achieve the necessary steam production to process the sugarcane crop, all the boilers need to operate during the crop season. Therefore, the installation of controls and modifications can take place only during the off-crop season, which is from April through September. Any testing of the boilers and fine tuning of operation have to occur during the crop season, while the boilers are operating. There are only two off-seasons remaining prior to the compliance date of January 31, 2016 [i.e., the 2014 off-season and the 2015 off-season, which last from April through September each year (approximately)]. Therefore, it would be very difficult to complete the air permitting, engineering design, procurement, installation, and testing of all upgrades and control systems on all five boilers during just two off-seasons.
- A large amount of capital will be required to meet Boiler MACT compliance due to the large number of boilers requiring modifications, and due to the nature of the modifications themselves. Actual projected costs are not yet available since neither air permitting nor engineering has yet been completed on the boilers. However, to avoid a severe economic impact to the facility, these costs need to be spread over a period of time longer than 2 years.
- The primary steps prior to the installation of controls on all boilers are air permitting, engineering design for all the boilers (as each boiler is differently designed), arrangement of capital that would need to be expended, procurement of the necessary equipment, and installation and testing. In order to manage the demands of engineering, procurement and capital in the most effective way, the work needs to be spread out over time. It is also recognized that the availability of engineering design firms and construction firms to provide the services and equipment may be limited due to many industrial boiler

owner/operators competing for these services. Thousands of boilers across the country will be affected by the Boiler MACT rule, and all have the same compliance date of January 2016. Approving a 1-year extension of the compliance date would allow a full three off-seasons to complete all work and allow testing of the remaining boilers during the 2016-2017 crop season.

- Due to the large amount of capital expenditure involved in the installation of controls, and also to prove the adequacy of the equipment to meet the Boiler MACT rule, Osceola desires to proceed with retrofitting of Boiler Nos. 3 and 5 during the 2014 off-season and Boiler Nos. 2 and 4 during the 2015 off season. Boiler No. 4 and 5 will require the greatest modifications and capital. Therefore, spreading these two boilers over two consecutive off-seasons will reduce the burden on Osceola. Performance testing of the first two boilers, along with quality assurance and quality control per the manufacturer and equipment standards, could then be performed on during the 2014-2015 crop season. Installation and operating experience on these boilers could then be applied to the remaining three boilers, with boiler retrofits completed on Boiler Nos. 2 and 4 during the next 2015 off-season, and on Boiler No. 6 during the 2016 off-season. Acceptance and performance testing could then be completed on this last boiler by January 31, 2017.

3.5 Compliance Schedule

A tentative schedule has been developed based on a compliance date of January 31, 2017. A detailed Gantt chart is provided in Figure 3-1, illustrating the previous tasks associated with each of the five boilers. The main tasks necessary to complete the boiler modifications are described in the following subsections.

3.5.1 Air Construction Permitting

An air construction permit will be required from FDEP authorizing the installation of the OFA upgrades and the distillate oil burners in the existing five boilers, and installation of inclined pinhole grates on two boilers. Based on preliminary review, it is possible that prevention of significant deterioration (PSD) new source review (NSR) will not be triggered due to these upgrades on all the boilers. The pollutant likely requiring PSD review will be nitrogen oxides (NO_x). If the upgrades result in triggering PSD review, the air permit application would also include a Best Available Control Technology (BACT) analysis, air dispersion modeling, and an air quality analysis. It is anticipated that Osceola will submit the application to FDEP during the summer of 2013. Osceola anticipates that a final permit would be obtained by December 31, 2013.

3.5.2 Engineering Design

As discussed in Section 3.3, in order to efficiently manage the demands of engineering, procurement and capital, Osceola would initially begin with engineering design for two boilers (Boiler Nos. 3 and 5). The engineering design would include preliminary evaluation of the current design, and development and finalization of the modifications/conversions to the existing design. Osceola would begin the evaluations prior to the 2013-2014 crop season (no later than August 31, 2013) and is expecting to proceed with the modifications as soon as the final air construction permit is issued. Osceola anticipates that the engineering design would be completed by January 31, 2014, for Boiler Nos. 3 and 5.

Osceola would begin the engineering design for Boilers Nos. 2 and 4 prior to the 2014-2015 crop season (no later than August 15, 2014) and for Boiler No. 6 prior to the 2015-2016 crop season (no later than August 15, 2015). The engineering design would be completed for Boiler Nos. 2 and 4 by January 31, 2015, and for Boiler No. 6 by January 31, 2016, respectively.

3.5.3 Procurement of Control Equipment

Procurement of equipment cannot begin until final engineering is complete. Once the final engineering design document is complete, requests for bids from vendors can be sent out. After bids are received, they must be evaluated, funding approved, and a vendor selected. Once the vendor is finalized, Osceola would order the equipment. This complete process is expected to require from 9 to 12 months for each boiler.

3.5.4 Installation of Control Equipment

In order to achieve the steam production requirements and not hinder the boiler operations, all the installations would be carried out during the off-crop season (i.e., when the boilers are not in operation). For Boiler Nos. 3 and 5, installation would begin approximately May 1, 2014, and finish by September 30, 2014 (before the beginning of crop season 2014-2015). Similarly, the installation of control equipment for Boiler Nos. 2 and 4 would be completed by September 30, 2015, and for Boiler No. 6 by September 30, 2016.

3.5.5 Acceptance Testing and Operation

Once the installation of controls is completed for each boiler, acceptance testing along with quality assurance and quality control per the manufacturer and equipment standards would be conducted in the crop season following the installation. For example, installation of Boiler Nos. 3 and 5 would be completed by September 30, 2014, and Osceola would then begin acceptance testing starting October 1, 2014 through March 31, 2015 (during 2014-2015 crop season). Based on the results of the testing, any subsequent adjustments that may need to be made would occur during the crop season that the testing is performed. Acceptance testing and adjustments for the remaining boilers would be conducted in the crop-season following completion of installation of each boiler, i.e., during the 2015-2016 crop season for Boiler Nos. 2 and 4, and during the 2016-2017 crop season for Boiler No. 6.

3.5.6 Performance Testing

Based on a compliance date of January 31, 2017, the MACT performance testing on all the boilers would be conducted during the 2016-2017 crop season; although some boilers could be tested during an earlier crop season as they complete acceptance testing. Under the Boiler MACT rule, all compliance testing must be conducted within 180 days of the compliance date. Thus, all testing would need to be completed by the end of the 2016-2017 crop season (approximately March 2017) in order to meet this 180-day deadline.

3.6 Title V Permit Revision

Based on the rule requirements, the conditions of an approved compliance extension must be incorporated into the facility's Title V permit. Therefore, a Title V permit revision application is being submitted with this request for extension document.

TABLES

Table 3-2: Summary of Air Pollution Control Devices To Meet Boiler MACT, Osceola Farms

Pollutant Controlled	Boiler	Air Emission Controls	
		Existing Controls	**Potential Additional Controls**
PM/TSM	2	Wet Impingement Scrubber	None
	3	Wet Impingement Scrubber	None
	4	Wet Impingement Scrubber	None
	5	Wet Impingement Scrubber	None
	6	Wet Impingement Scrubber	None
CO	2	Good Combustion Practices	Improved Overfire Air System
	3	Good Combustion Practices	Improved Overfire Air System
	4	Good Combustion Practices	Convert to Traveling Grate with improved overfire air system
	5	Good Combustion Practices	Convert to Traveling Grate with improved overfire air system
	6	Good Combustion Practices	Improved Overfire Air System
Hg, HCl	2	Wet Impingement Scrubber	None
	3	Wet Impingement Scrubber	None
	4	Wet Impingement Scrubber	None
	5	Wet Impingement Scrubber	None
	6	Wet Impingement Scrubber	None
HAPS	2	Wet Impingement Scrubber	Use of Clean Fuels During Startup
	3	Wet Impingement Scrubber	Use of Clean Fuels During Startup
	4	Wet Impingement Scrubber	Use of Clean Fuels During Startup
	5	Wet Impingement Scrubber	Use of Clean Fuels During Startup
	6	Wet Impingement Scrubber	Use of Clean Fuels During Startup

Table 3-1. Final Boiler MACT Limits Applicable to Osceola Boilers

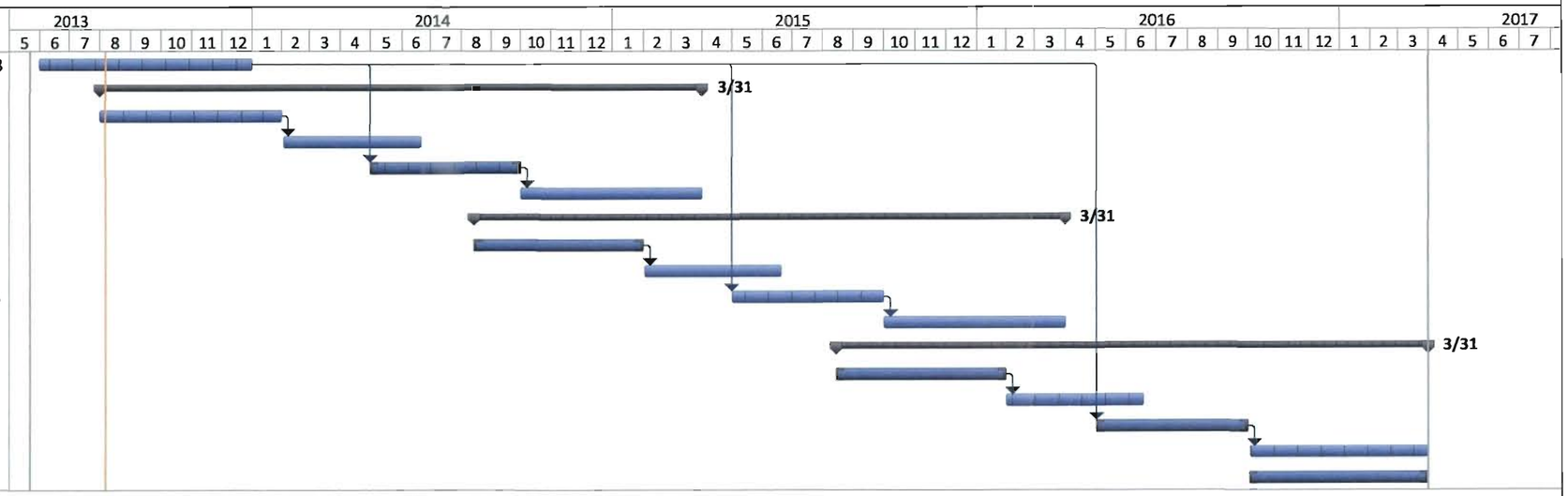
Pollutant	Boiler Subcategory	EPA Final MACT (December 2012)	
Hydrogen chloride	All	0.022	lb/MMBtu heat input
Mercury	All	5.7E-06	lb/MMBtu heat input
Particulate matter (filterable)	Hybrid Suspension Grate	0.44	lb/MMBtu heat input
or			
Total Selected Metals[a]	Hybrid Suspension Grate	4.5E-04	lb/MMBtu heat input
Carbon monoxide	Hybrid Suspension Grate	2,800	ppmvd @ 3% O_2, 3-run average
Dioxins/furans (toxic equivalency basis)	All	Work Practice Standard:	Annual boiler tuneup; one-time energy assessment

[a] Includes arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium.

FIGURE

Figure 1: Osceola Farms Company - Boiler MACT Upgrade Project Schedule

ID	Task Name	Duration	Start	Finish
1	Air Construction Permitting (All boilers)	153 days	Fri 5/31/13	Tue 12/31/13
2	**Boiler Nos. 3 and 5**	**434 days**	**Thu 8/1/13**	**Tue 3/31/15**
3	Engineering Design	132 days	Thu 8/1/13	Fri 1/31/14
4	Procurement of Control Equipment	100 days	Mon 2/3/14	Fri 6/20/14
5	Installation of Control Equipment	109 days	Thu 5/1/14	Tue 9/30/14
6	Acceptance, Operation and Testing	130 days	Wed 10/1/14	Tue 3/31/15
7	**Boiler Nos. 2 and 4**	**425 days**	**Fri 8/15/14**	**Thu 3/31/16**
8	Engineering Design	122 days	Fri 8/15/14	Sat 1/31/15
9	Procurement of Control Equipment	100 days	Mon 2/2/15	Fri 6/19/15
10	Installation of Control Equipment	109 days	Fri 5/1/15	Wed 9/30/15
11	Acceptance, Operation and Testing	131 days	Thu 10/1/15	Thu 3/31/16
12	**Boiler No. 6**	**425 days**	**Sat 8/15/15**	**Fri 3/31/17**
13	Engineering Design	122 days	Sat 8/15/15	Sun 1/31/16
14	Procurement of Control Equipment	100 days	Mon 2/1/16	Fri 6/17/16
15	Installation of Control Equipment	110 days	Mon 5/2/16	Fri 9/30/16
16	Acceptance, Operation and Testing	130 days	Mon 10/3/16	Fri 3/31/17
17	**Boiler MACT Performance Testing**	130 days	**Mon 10/3/16**	**Fri 3/31/17**



ATTACHMENT

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

RECEIVED
AUG 22 2013
DIVISION OF AIR RESOURCE MANAGEMENT

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **Osceola Farms Company**	
2. Site Name: **Osceola Farms Company**	
3. Facility Identification Number: **0990019**	
4. Facility Location... Street Address or Other Locator: **U.S. 98, East of Pahokee** City: **Pahokee** County: **Palm Beach** Zip Code: **33476**	
5. Relocatable Facility? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Matthew Capone, Director of Environmental Compliance**
2. Application Contact Mailing Address... Organization/Firm: **Osceola Farms Company** Street Address: **1 N. Clematis St.** City: **West Palm Beach** State: **FL** Zip Code: **33401**
3. Application Contact Telephone Numbers... Telephone: **(561) 366-5000** ext. Fax: **(561) 992-7326**
4. Application Contact E-mail Address: **Matthew_Capone@floridacrystals.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 8-22-13	3. PSD Number (if applicable):
2. Project Number(s): 0990019-014-AV	4. Siting Number (if applicable):

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

☐ Air construction permit.

☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).

☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

☐ Initial Title V air operation permit.

☒ Title V air operation permit revision.

☐ Title V air operation permit renewal.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

☐ Air construction permit and Title V permit revision, incorporating the proposed project.

☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

The purpose of this application is to request that the Florida Department of Environmental Protection (FDEP) incorporate in Permit No. 0990019-012-AV a grant of a one (1) year extension of the Boiler MACT compliance date until January 31, 2017. Osceola Farms Company will need the additional time to upgrade the existing five boilers in order to comply with the regulation.

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
002	Boiler No. 2	AC1A	
003	Boiler No. 3	AC1A	
004	Boiler No. 4	AC1A	
005	Boiler No. 5	AC1A	
006	Boiler No. 6	AC1A	

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: ( ) ext. Fax: ( )
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement: *I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.* _____ _____ Signature Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
   Jose Gonzalez, Vice President of Industrial Operations

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):
   - ☒ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
   - ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
   - ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
   - ☐ The designated representative at an Acid Rain source or CAIR source.

3. Application Responsible Official Mailing Address...
   Organization/Firm: **Osceola Farms Company**
   Street Address: **32298 State Road 700**
   City: **Pahokee** State: **FL** Zip Code: **33476**

4. Application Responsible Official Telephone Numbers...
   Telephone: **(561) 924-7156** ext. Fax: **(561) 924-3246**

5. Application Responsible Official E-mail Address: **Jose_Gonzalez@floridacrystals.com**

6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Signature

8-14-13
Date

Professional Engineer Certification

1. Professional Engineer Name: **David A. Buff**
   Registration Number: **19011**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Golder Associates Inc.****
   Street Address: **6026 NW 1st Place**
   City: **Gainesville** State: **FL** Zip Code: **32607**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext. **21145** Fax: **(352) 336-6603**
4. Professional Engineer E-mail Address: **dbuff@golder.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☒, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

David A. Buff
Signature

8/19/13
Date

(seal)

*Attach any exception to certification statement.
**Board of Professional Engineers Certificate of Authorization #00001670.

At Golder Associates we strive to be the most respected global group of companies specializing in ground engineering and environmental services. Employee owned since our formation in 1960, we have created a unique culture with pride in ownership, resulting in long-term organizational stability. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees now operating from offices located throughout Africa, Asia, Australasia, Europe, North America and South America.

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