



Florida Department of Environmental Protection

South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary - Designee

January 17, 2007

CERTIFIED MAIL 7005 1160 0000 2711 4829
RETURN RECEIPT REQUESTED

Mr. Carlos Rionda
Vice President/General Manager
Osceola Farms Company
Post Office Box 679
Pahokee, Florida 33476

Re: Request for Additional Information Regarding Title V Permit Application
File Nos. 0990019-008-AV and 0990019-009-AV
Osceola Farms Company, Palm Beach County

Dear Mr. Rionda:

Thank you for the additional information for your Title V Revision application File No.: 0990019-009-AV. As indicated in the Department's December 15, 2006 letter, your Title V Revision application (DEP File No.: 0990019-009-AV) is considered a major change to Osceola Farms Company Title V Renewal Air Operation Application (DEP File No.: 0990019-008-AV). The Department will be processing DEP File No. 0990019-009-AV as part of the Osceola Farms Company Title V Renewal application.

The application(s) is incomplete. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

- (a) Fuel analysis was only submitted and presented for bagasse. The health-based compliance demonstration of 40 CFR 63 Subpart DDDDD did not appear to evaluate the following other fuels requested in Osceola Farms Company's Title V Renewal application (DEP File No. 0990019-008-AV): lumber, oily rags, oil-soaked peat moss, oil-soaked paper towels, oil-soaked bagasse, and oil-soaked wood chips. There did not appear be fuel analysis for No. 6 fuel or wood chips or combination of fuels as allowed by permit. The application (DEP File No. 0990019-009-AV) indicated that fuel analysis for Mn content of No. 6 fuel oil was not conducted. Fuel analysis for the health-based compliance demonstration should be site specific. Please provide site specific fuel analysis for all fuel types allowed by permit (or requested to be permitted as submitted in the Title V Renewal application, DEP File No. 0990019-008-AV) and to demonstrate worst-case scenario. [40 CFR 63 Subpart DDDDD, Appendix A.8(a)(3)]

Osceola Farms Company
DEP File Nos. 0990019-008-AV and 0990019-009-AV
January 17, 2007

- (b) The application did not appear to describe worst-case operating conditions in the performance test report for the process and control systems and explain why the conditions are worst case. The facility must test under worst-case operating conditions as defined in 40 CFR 63 Appendix A. [40 CFR 63 Subpart DDDDD, Appendix A.(4)(b)(2)]
- (c) Please provide justification for using the 90th percentile value from the fuel analysis data instead of the actual worst case as required by 40 CFR 63 Subpart DDDDD. [62-213.420(1)(b)3., F.A.C., 62-4.070(1), F.A.C.]
- (d) The data in Table 2-2 for Boiler 5 east stack and Boiler 5 west stack does not appear to be consistent with the stack emission compliance testing for these two stacks submitted to the Department on 1/10/06. Please verify the modeling parameters used for Boiler 5 east stack and Boiler 5 west stack. If necessary, please resubmit the modeling with the correct stack parameters for Boiler No. 5 east stack and Boiler No. 5 west stack. [62-213.420(1)(b)3., F.A.C., 62-4.070(1), F.A.C.]
- (e) Figure 2-1 and Figure 2-2 do not appear to depict nearby residences as indicated in the application. However, Figure 4-3 does appear to indicate a single residence. Please verify that the figures depict all places people congregate including residences, daycares, and churches as required by the 40 CFR 63 Subpart DDDDD, Appendix A.5(d)(2) and 8(a)(2)(iii). If necessary, please resubmit a figure with all required structures identified. [40 CFR 63 Subpart DDDDD, Appendix A.5(d)(2) and 8(a)(2)(iii)]
- (f) The proposed permit limits in Table 5.1 do not define all parameters that affect the source. Please provide all parameters to include, but not limited to, fuel type, fuel mix (annual average), emission rate, type of control devices, process parameters, and non-process parameter for incorporation in to the Title V permit. [40 CFR 63 Subpart DDDDD, Appendix A.8(a)(6) and 8(c)(d)]
- (g) Appendix A. Fuel Analyses was submitted with a page that appeared to be copied folded and therefore cannot be reviewed by the Department. Please resubmit this document so that all the information contained in the document can be reviewed by the Department. The document appears to be named 0637530/HBCA/4.4/Osceola Stack Params Blr MACT SRM_rev1.xls. [62-213.420(1)(b)3., F.A.C., 62-4.070(1), F.A.C.]
- (h) Please submit RfC values as required by 40 CFR 63 Subpart DDDDD, Appendix A.8.(a)(4).

Professional Engineer (P.E.) Certification Statement: 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. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

Osceola Farms Company
DEP File Nos. 0990019-008-AV and 0990019-009-AV
January 17, 2007

If you should have any questions, please call me at 239-332-6975, extension 109.

Sincerely,



Susan R. Machinski
Engineering Specialist IV

SRM/jw

copy to:

David Buff, P.E., Golder & Associates
Mr. James Stormer, Palm Beach County Health Department (Internet E-mail)
Cindy Phillips, Tallahassee, FDEP (Internet E-mail)
Cleve Holladay, Tallahassee, FDEP (Internet E-mail)