



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 18, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jose F. Alvarez, V.P. of Planning and Plant Operations
Sugar Cane Growers Cooperative of Florida, Inc.
P.O. Box 666
Belle Glade, FL 33430-0666

Re: Draft Air Permit No. 0990026-006-AC
Sugar Mill Operations
Project to Replace Grates for Boiler 1 and 2

Dear Mr. Alvarez:

Enclosed is one copy of the draft permit to replace the existing traveling grates with water-cooled pinhole grates for Boilers 1 and 2 at the existing sugar mill located near Belle Glade in Palm Beach County, Florida. The Department's "Technical Evaluation and Preliminary Determination", "Intent to Issue Permit", and the "Public Notice of Intent to Issue Permit" are also included.

The "Public Notice of Intent to Issue Permit" must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, Administrator of the New Source Review Section, at the above letterhead address. If you have any other questions, please contact Jeff Koerner at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

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:

Mr. Jose F. Alvarez
 V.P. of Planning & Plant Operations
 Sugar Cane Growers Cooperative of Florida, Inc.
 Post Office Box 666
 Belle Glade, FL 33430-0666

COMPLETE THIS SECTION ON DELIVERY

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

Evelyn B. Taylor 4/21/03

C. Signature

x Evelyn B. Taylor 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

7001 0320 0001 3692 6457

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)

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

Sent to **Jose F. Alvarez**

Street, Apt. No.,
or P.O. Box No. **PO Box 666**

City, State, ZIP+4
Belle Glade, FL 33430-0666

PS Form 3800, January 2001 See Reverse for Instructions

In the Matter of an
Application for Air Permit by:

Sugar Cane Growers Cooperative of Florida, Inc.
P.O. Box 666
Belle Glade, FL 33430-0666

Draft Air Permit No. 0990026-006-AC
Glades Sugar House, Boilers 1 and 2
Grate Replacement Project
Palm Beach County, Florida

Authorized Representative:

Mr. Jose F. Alvarez, V.P. of Planning and Plant Operations

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of Draft Permit attached) for the proposed project as detailed in the application and the enclosed Technical Evaluation and Preliminary Determination, for the reasons stated below. The applicant, Sugar Cane Growers Cooperative of Florida, Inc., applied on January 21, 2003 to the Department for a permit to replace the existing traveling grates with water-cooled pinhole grates for Boilers 1 and 2 at the existing sugar mill located near Belle Glade in Palm Beach County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform proposed work. The Department intends to issue this air construction permit based on the belief that the applicant has provided reasonable assurances to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) and (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S.

however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) 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 dispute 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 action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

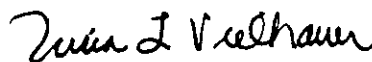
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Mediation is not available in this proceeding. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit package (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/18/03 to the persons listed:

- cc: Mr. Jose Alvarez, Sugar Cane Growers Cooperative of Florida, Inc.*
Ms. Kathy Lockhart, Sugar Cane Growers Cooperative of Florida, Inc.
Mr. David Buff, Golder Associates Inc.
Mr. James Stormer, PBCHD
Mr. Ron Blackburn, SD Office
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Victoria Debsan April 18, 2003
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Permit No. 0990026-006-AC

Sugar Cane Growers Cooperative of Florida, Inc.

Glades Sugar House

Boilers 1 and 2 – Grate Replacement Project

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to the Sugar Cane Growers Cooperative of Florida, Inc. to replace the existing traveling grates with water-cooled pinhole grates for Boilers 1 and 2. The existing sugar mill is located in Belle Glade at 1500 West Sugar House Road in Palm Beach County, Florida. The applicant's authorized representative is Mr. Jose F. Alvarez, the V.P. of Planning and Plant Operations. The applicant's mailing address is Sugar Cane Growers Cooperative of Florida, Inc., P.O. Box 666, Belle Glade, FL 33430-0666.

The applicant proposes to perform the following work: replacement of the existing fuel grates, addition of a new combustion air fan, modification of the combustion air distribution to provide more over-fire air, and the repair of concrete supports and refractory near the grates. The project should not increase hourly or annual emissions of air pollutants, but should result in more efficient combustion with the firing of less bagasse to produce the same amount of steam. The project is a cost effective alternative to continued routine repair of the traveling grates. The draft permit contains conditions to verify that the project will not increase pollutant emission rates or result in increased boiler capacities. As a routine replacement, the project is not subject to PSD preconstruction review.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) 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 dispute 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 action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on 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, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
(111 S. Magnolia Drive, Suite 4)
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400
Telephone: 850/488-0114

Dept. of Environmental Protection
South District Office
Air Resources Section
2295 Victoria Avenue, Suite 364
Fort Myers, FL 33901-3381
Telephone: 239/332-6975

Palm Beach County Health Department
Environmental Health and Engineering
Air Pollution Control Section
P.O. Box 29 (901 Evernia Street)
West Palm Beach, FL 33402-0029
Telephone: (561) 355-3136

The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project for additional information at the address and phone numbers listed above.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Draft Air Construction Permit No. 0990026-006-AC
Sugar Cane Growers Cooperative of Florida, Inc.
Mill Boilers 1 and 2 - Grate Replacements

COUNTY

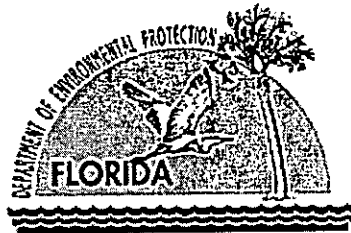
Palm Beach County

APPLICANT

Sugar Cane Growers Cooperative of Florida, Inc.
Glades Sugar House
ARMS Facility ID No. 0990026

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section



April 18, 2003

{Filename: 0990026-006-AC TEPD.doc}

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

Sugar Cane Growers Cooperative of Florida, Inc.
P.O. Box 666
Belle Glade, FL 33430-0666

Authorized Representative: Mr. Jose F. Alvarez, V.P. of Planning and Plant Operations

Processing Schedule

01/21/03 Received the application for a minor source air pollution construction permit.
01/30/03 Department requested additional information.
03/26/03 Department received additional information; application complete.

Facility Description and Location

Sugar Cane Growers Cooperative of Florida, Inc. operates an existing sugar mill located in Belle Glade on West Sugar House Road in Palm Beach County, Florida. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS). The mill extracts juice from sugarcane grown in nearby fields to produce raw sugar. The remaining fibrous plant material is called "bagasse" and is burned as fuel in six boilers to provide steam and heating requirements for the cane milling process. Sugarcane is harvested and milled between October and April of each year. The sugar mill boilers remain idle during the five month off-season. The Standard Industrial Code for sugarcane processing is SIC No. 2061.

Regulatory Classifications

Title III: The existing facility is identified as a potential major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

Project Description

Boilers 1 and 2 are identical traveling grate boilers manufactured by Riley and installed at the mill in 1963. Bagasse is burned on top of the grate with forced air provided to support combustion. A large percentage of the forced air is supplied under the grate to prevent heat damage. Accumulation of bagasse on top of the grates can prevent air flow and result in damage to that portion of the grate. The grates are inspected during the off-season each year and repaired as necessary. Maintenance and repair costs of the existing traveling grates have averaged approximately \$50,000 per boiler per year over the last five years. A recent inspection of Boilers 1 and 2 identified damage to the existing traveling grates as well as concrete supports and refractory near the grates. The repair costs are estimated at approximately \$175,000 per boiler.

As an alternative to repair, the applicant proposes to replace the existing traveling grates with water-cooled pinhole grates. Cooling for this type of grate is provided by natural water circulation in the boiler, which means that less under-fire air is necessary and more over-fire air can be used to promote a better mixing zone above the furnace. A water-cooled grate also allows higher forced draft air temperatures than the existing traveling grates (> 400° F). In combination, these features can result in better overall combustion of the bagasse on the grate. To take full advantage of the grate replacement, the applicant also proposes to install a new forced air fan for each boiler to improve the under-fire/over-fire air distribution system.

The applicant describes the scope of the project in the following terms:

Nature: The boilers are two of six steam boilers at the mill and are moderate in size. The boilers are relatively important to the facility. Boiler availability will not be affected because mill operation is seasonal and grates are

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

typically repaired during each off-season. The water-cooled pinhole grate and the new air distribution fan will be new parts. The grates are not a major component of the boiler in terms of cost (<1.5% of the total cost of a new boiler). The applicant considers the replacement to be routine because the existing grates are relatively small in size and are removed, repaired, and re-assembled each year.

Extent: The entire emissions unit (boiler) is not being replaced; only a component of the unit (grate) is being replaced, which is small in terms of overall boiler replacement cost. The replacement can be performed in a short amount of time during the normal off-season. Grate repair during the off-season is a common industry practice for bagasse-fired boilers. Aside from the grate, the only additional equipment will be a new air distribution fan, which is not essential to the replacement. All other parts will be replacement parts.

Purpose: The purpose is not to extend the useful life of the emissions unit. As previously mentioned, grate repair during the off-season is a common industry practice for bagasse-fired boilers. The new grates will serve the same function as the existing grates and will not enhance operation. However, it is expected that less bagasse will be fired to produce a similar amount of steam. The steam needs of the sugar mill remain constant regardless of improvements to boiler efficiency. The mill has an economic incentive to operate the boiler less. The project will not increase steam production capacity, operating rate, or utilization. This facility did retire two oil-fired boilers (~150 MMBtu/hour) in 1983 and 1984.

Frequency: As previously mentioned, grate repair occurs each year during the off-season and is a common industry practice for bagasse-fired boilers.

Cost: The applicant estimates that the costs associated with the grate replacement for each boiler are: \$115,000 for the new water-cooled pinhole grate; \$28,000 for the new forced draft fan; and \$57,000 for the concrete repair and brick refractory work. The total estimated costs for the proposed changes are approximately \$200,000 per boiler compared to \$175,000 per boiler to repair the existing traveling grates. Only the cost of the new fan will be capitalized, which is only 14% of the total project expenses. The other costs will be paid from the current operating budget. In contrast, the cost of a new boiler is estimated at \$6 - \$8 million per boiler. The entire project represents only about 3% of the total replacement cost.

In 2000/2001, the Department approved a similar project to replace the existing dumping grate on Boiler 3 with a water-cooled pinhole grate. After completing the project, stack test results indicated that this similar project did not result in any short-term emission increases of nitrogen oxides, particulate matter, or volatile organic compounds. The amount of sugarcane processed at the mill depends on the amount harvested from the existing fields. There is no predicted expansion in the available land for growing sugarcane or in the annual sugarcane crop. Therefore, the applicant believes that the proposed project will:

- Result in more efficient combustion and the firing of less bagasse to produce the same amount of steam;
- Potentially result in lower short-term emission rates of CO, NO_x, PM and VOC (SO₂ will remain constant);
- Allow more rapid completion of the milling season;
- NOT increase the capacity of the boilers or affect the furnace volume or flue gas temperature;
- NOT result in increased hours of operation or boiler utilization; and
- NOT cause increased annual emissions of any pollutant.

In summary, the applicant believes that the proposed project will result in more efficient combustion, which will allow the facility to complete the milling process more quickly and with less fuel. The revised grate design will also result in less frequent grate repairs. The applicant believes that the project should be considered "routine maintenance and repair" based on typical practices for the sugar mill industry as well as the nature, extent, purpose, frequency, and costs of the specific project. To verify that there will be no increase in hourly emissions as a result of the project, the applicant proposes to test for emissions of nitrogen oxides, particulate matter, and volatile organic compounds.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Required Permits, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review (Including PSD)
62-213	Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as defined in Rule 62-212.400, F.A.C. A PSD review is required only in areas currently in attainment with the National Ambient Air Quality Standard (AAQS) or areas designated as "unclassifiable" for a given pollutant. A facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- ≥ 250 tons per year of any regulated air pollutant,
- ≥ 100 tons per year of any regulated air pollutant and on the "List of 28" PSD Major Facility Categories, or
- ≥ 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. Pollutant emissions from a project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several PSD-significant pollutants.

PSD Applicability for Project

The Sugar Cane Growers Cooperative of Florida, Inc. operates a sugar mill in Palm Beach County, Florida. This is an area that is currently in attainment with the National Ambient Air Quality Standards (AAQS) for each regulated pollutant or is designated as "unclassifiable". The sugar mill includes six steam boilers with combined heat input rates for oil firing of more than 250 MMBtu/hour. This qualifies the mill as a facility with "fossil fuel boilers (or combinations thereof) that total more than 250 MMBtu/hour heat input" as listed in Table 62-212.400-1, F.A.C. The sugar mill is considered a PSD-major facility because it belongs to a category on the list of 28 PSD major facility categories and emits more than 100 tons per year of a regulated pollutant. As an existing PSD-major facility, a PSD applicability review is required for each proposed project.

3. DEPARTMENT REVIEW

The Department notes the following definition of "construction" contained in Rule 62-210.200(88), F.A.C., "The act of performing on-site fabrication, erection, installation or modification of an emissions unit or facility of a permanent nature, including installation of foundations or building supports; laying of underground pipe work or electrical conduit; and fabrication or installation of permanent storage structures, component parts of an

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

emissions unit or facility, associated support equipment, or utility connections. Land clearing and other site preparation activities are not a part of the construction activities.” Based on this definition, the Department believes that an air construction permit is required to perform the proposed work.

The Department recognizes that the sugar mill industry maintains a rigorous off-season maintenance and repair program. A portion of these annual efforts involve repairs to the grates upon which the bagasse fuel is combusted. Grates that are cooled by combustion air supply are particularly subject to damage from “hot spots” in the system. In 2000/2001, the Department approved a similar project to replace the dumping grate in Boiler 3 with a water-cooled pinhole grate. Boiler 3 is the smallest boiler (~100,000 lb/hour steam) at this facility. Emissions testing before and after the project for Boiler 3 are summarized in the following table.

Table 3A. Boiler 3, Tested Hourly Emission Rates for 1998 - 2002

Test Date	Emission Rates, lb/MMBtu Heat Input					
	NOx		PM		VOC	
	Limit	Actual	Limit	Actual	Limit	Actual
01/1998	0.45	0.24	0.25	0.20	1.5	1.20
11/1998		0.21		0.16		0.20
11/1999		0.24		0.25		1.5
11/2001		0.21		0.11		0.09
12/2002*		0.19		0.12		0.40

* Tests conducted after the grate replacement.

As shown, the short-term emissions rates for these pollutants after completion of the project are within the range of previous emissions tests and are well within the permitted emission limits. The following table shows the annual emission rates based on the Annual Operating Reports submitted to the Department.

Table 3B. Boiler 3, Annual Emission Rates for 2000 - 2002

Pollutant	Annual Emissions, Tons/Year		
	2000	2001	2002*
CO	78	72	59
NOx	65	65	64
PM	61	35	42
SO ₂	47	43	43
VOC	144	29	136

* Tests conducted after the grate replacement.

Note that the facility reports annual emissions of NOx, PM, and VOC based on single test results conducted during the given year combined with actual operation of the boiler. Nevertheless, the table shows that annual emissions after completion of the grate replacement were within the same range as before. The following table summarizes the operation of Boiler 3 before and after the project.

Table 3C. Boiler 3, Operational Data for 2000 - 2002

Year	Hours	Bagasse, TPY	Steam, x 10 ⁺⁰⁶ lb/hr	lb steam/ton bagasse
2000	3633	34,962	328.44	9394
2001	3596	32,362	302.96	9362
2002*	3329	26,568	271.85	10,232

* Data for operation after the grate replacement.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The above information appears to support the applicant's contention that the grate replacement will result in more efficient combustion (similar annual steam production with less bagasse firing), but also without resulting in increased boiler utilization. Data over the last three years for Boilers 1 and 2 reflect similar fluctuations in operation. The following table summarizes the annual steam production for each boiler at the sugar mill.

Table 3D. Annual Boiler Steam Production (x 10⁺⁰⁶ lb/year)

Boiler	1998/1999	1999/2000	2000/2001	2001/2002	Average
1	354.16	399.66	390.92	373.62	379.59
2	351.92	386.95	377.83	348.29	341.25
3	316.69	328.44	302.96	271.85	304.99
4	681.93	806.61	858.44	785.91	783.22
5	532.47	582.43	622.47	560.09	574.37
8	754.57	809.74	829.41	746.31	785.01
Total	2992.74	3313.83	3382.03	3086.07	~3190

As shown in the above table, the steam needs for the facility have varied by only about 6% from the average for the last four years. The steam production from individual boilers also shows relatively little variation from year to year. This also seems to support the applicant's argument that, although the steam needs depend on each season's sugarcane crop, the mill's steam needs have remained relatively constant from year to year. Therefore, the improved efficiency for single boiler is unlikely to result in increased facility production by itself.

The Department's remaining concern is that the project could result in an increase in boiler capacity. Recent stack tests have not been performed within 90% of the *permitted maximum* steam production rate. Based on stack test data presented in the application for 63 runs conducted on Boilers 1 and 2, the highest 1-hour steam production rate occurred in 1999 at about 143,000 lb/hour. This represents only about 80% of the permitted maximum steam production rate of 175,000 lb/hour. To satisfy the Department's concerns regarding the actual unit capacity, the applicant agrees to the following permit conditions:

- Prior to grate replacement, the boilers will be tested to determine the current maximum operating capacities. If a boiler is unable to achieve at least 90% of the permitted maximum steam production rate (175,000 lb/hour), the applicant will request enforceable capacity limits on steam production and heat input rates.
- Conduct emissions testing (NO_x, PM, and VOC) to verify that there will be no increase in emissions rates.

Repair of the traveling grates on an almost annual basis is considered fairly routine for the sugar mill industry. Replacement of the existing traveling grates for Boilers 1 and 2 with new water-cooled pinhole grates appears to be a logical and cost effective alternative to continued *routine repair* of the traveling grates. Given the above permit conditions, the replacement project is considered "routine" and not a physical change that requires PSD preconstruction review. This is based on the specific operating history of these two boilers, results from a similar project (Boiler 3), typical maintenance practices for the sugar mill industry, and the overall nature, extent, purpose, frequency and cost of the proposed project.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. The determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE:

Sugar Cane Growers Cooperative of Florida, Inc.
P.O. Box 666
Belle Glade, FL 33430-0666

Authorized Representative:

Mr. Jose F. Alvarez, V.P. of Planning and Plant Operations

Glades Sugar House Air Permit No. 0990026-006-AC Facility ID No. 0990026 SIC No. 2061 Permit Expires: October 1, 2005

PROJECT AND LOCATION

This permit authorizes the following work for Boilers 1 and 2: replacement of the existing fuel grates, addition of a new combustion air fan, modification of the combustion air distribution to provide more over-fire air, and the repair of concrete supports and refractory near the grates. The existing sugar mill boilers operate at the Glades Sugar House, which is located at 1500 West Sugar House Road in Belle Glade, Palm Beach County, Florida.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to perform the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This permit supplements all other air construction and operation permits for the affected emissions units.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Sugar Cane Growers Cooperative of Florida, Inc. operates a sugar mill that produces raw sugar and molasses from sugarcane grown in nearby fields. Bagasse, the fibrous plant residue remaining after milling, is burned in six boilers to generate steam for the plant. Only the following boilers are affected by this project.

ID	Emission Unit Description
001	Boiler 1
002	Boiler 2

REGULATORY CLASSIFICATION

Title III: The existing facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The existing facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department. This permit supplements all other air construction and operation permits for these boilers.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: Applications for permits to construct or modify emissions units subject to PSD preconstruction review shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Applications for other permits to construct, modify or operate an emissions unit shall be submitted to Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite #364, Fort Myers, Florida 33901-3381.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Pollution Control Section of the Palm Beach County Health Department at P.O. Box 29 (901 Evernia Street), West Palm Beach, FL 33402-0029. Copies of all such documents shall be submitted to the Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite #364, Fort Myers, Florida 33901-3381.
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Format), and Appendix GC (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. Emissions units at this facility are subject to all applicable provisions of Chapter 403, F.S. and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes the specified construction activities and initial operation of the affected emissions units to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU-001/002 – Boilers 1 and 2

This section of the permit addresses the following emissions units.

ID No.	Emissions Unit Description
001 and 002	Boilers 1 and 2 are identical boilers manufactured by Riley in 1963 and are primarily fired with bagasse. The current Title V permit specifies the maximum steam production rate as 175,000 lb/hour (24-hour average) at the design operating conditions of 400 psig and 585°F. Particulate matter emissions are reduced by a mechanical dust collectors followed by wet scrubbers.

CONSTRUCTION

- Grate Replacement Project:** The permittee is authorized to perform the following work: replace the existing traveling grate on each boiler with a water-cooled pinhole grate; add a new combustion air fan; modify the combustion air distribution to provide more over-fire air; and repair concrete supports and refractory near the grates. The project shall not increase the capacity of either boiler. *{Permitting Note: The proposed work is expected to be performed during the 2004 off-season.}* [Applicant Request]

EMISSIONS AND PERFORMANCE REQUIREMENTS

{Permitting Note: The authorized construction shall not result in any increases in current permitted capacities of these boilers. The project does not alter any fuels, emissions standards or restrictions on operation that are specified in other air construction or operation permits. This permit supplements all other air construction and operation permits for these boilers.}

PERFORMANCE TESTING

- Capacity Test:** Prior to conducting any of the proposed work, the permittee shall conduct an initial capacity test on each boiler when firing only bagasse. Each test shall be conducted for a minimum of three continuous hours and the following information shall be recorded at 15-minute intervals: steam and feed water temperatures (° F); steam and feed water pressures (psig); and steam production (lb). Within 45 days of completing each capacity test, the permittee shall submit a report summarizing the test and the results. In addition to the recorded data, the test report shall identify the average steam production rate (lb/hour) and the calculated heat input rate (MMBtu/hour) for the three hour test. If a boiler is unable to achieve an average steam production rate during the capacity test of at least 157,500 lb/hour, then the permittee shall apply for modification of this permit to restrict the steam production rate (24-hour average) of the boiler to the average steam production attained during the test and include an equivalent heat input rate restriction (MMBtu/hour). If the average steam production rate during the capacity test is at least 157,500 lb/hour, then no further action is necessary. *{Permitting Note: This condition ensures that the grate replacement project will not result in an increase in capacity, which could trigger PSD review.}* [Application; Rules 62-210.200(PTE) and Rule 62-212.400(PSD), F.A.C.]
- Emissions Tests:** In accordance with the methods and procedures specified in Appendix C of 40 CFR 60, each boiler shall be tested to determine whether or not a change resulted in the hourly emission rates of particulate matter, nitrogen oxides, and volatile organic compounds. Tests shall be conducted at permitted capacity and performed in accordance with the methods and procedures specified in the current Title V operation permit. Rule 62-297.310(2)(b), F.A.C. defines *permitted capacity* as “90 to 100 percent of the maximum operation rate allowed by the permit.” Tests shall be conducted during the crop season immediately following the authorized construction. A summary of the tests conducted and the results shall be provided with 45 days of completing the tests. *{Permitting Note: Each boiler is currently required to test annually for emissions of particulate matter, nitrogen oxides, and volatile organic compounds. The annual test may be used for this determination. Test results showing increased hourly emissions may require additional permitting actions to address PSD applicability.}* [Appendix C of 40 CFR 60; Rule 62-212.400(PSD), F.A.C.]

SECTION 4. APPENDICES
CONTENTS

Appendix CF. Citation Format

Appendix GC. General Conditions

SECTION 4. APPENDIX CF
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX GC

GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX GC

GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (NA);
 - b. Determination of Prevention of Significant Deterioration (NA); and
 - c. Compliance with New Source Performance Standards (NA).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

P.E. CERTIFICATION STATEMENT

PERMITTEE

Sugar Cane Growers Cooperative of Florida, Inc.
P.O. Box 666
Belle Glade, FL 33430-0666

Draft Air Permit No. 0990026-006-AC
Glades Sugar House
Boilers 1 and 2 – Grate Replacement
Palm Beach County, Florida

Authorized Representative:

Mr. Jose F. Alvarez, V.P. of Planning and Plant Operations

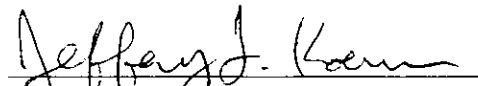
PROJECT DESCRIPTION

The Sugar Cane Growers Cooperative of Florida, Inc. operates an existing sugar mill in Belle Glade at 1500 West Sugar House Road in Palm Beach County, Florida. The draft permit authorizes the following work for existing Boilers 1 and 2: replacement of the existing fuel grates, addition of a new combustion air fan, modification of the combustion air distribution to provide more over-fire air, and the repair of concrete supports and refractory near the grates. The project should not increase hourly or annual emissions of air pollutants, but should result in more efficient combustion with the firing of less bagasse to produce the same amount of steam.

In 2000/2001, the Department approved a similar project for Boiler 3, the smallest boiler at this facility. The existing dumping grate of Boiler 3 was replaced with a water-cooled pinhole grate, which is the design proposed for this current project. Testing of Boiler 3 after completing the grate replacement indicates no increase in hourly emissions. Annual Operating Reports indicate no increase in utilization of the boiler after the grate was replaced. Other operational records indicate that the steam production needs of the facility remain relatively constant from year-to-year. It is reasonable to expect similar results for the grate replacement project for Boilers 1 and 2.

Typical practices of the sugar mill industry are to perform nearly annual repairs to traveling grates, which are subject to wear and heat damage. Such frequent repairs are conducted during the normal five-month off-season. The proposed project appears to be a cost effective alternative to continued routine repair of the traveling grates. Routine repairs are not subject to PSD review. The draft permit contains conditions to verify that the project will not increase pollutant emission rates or result in increased boiler capacities.

***I HEREBY CERTIFY** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*


Jeffery F. Koerner, P.E.
P.E. Number: 49441

4-18-03
(Date)

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Chief
Bureau of Air Regulation

THROUGH: Al Linero, Manager *AL*
New Source Review Section

FROM: Jeff Koerner, New Source Review Section *JK*

DATE: April 18, 2003

SUBJECT: Draft Air Construction Permit No. 0990026-006-AC
Sugar Cane Growers Cooperative of Florida, Inc.
Boilers 1 and 2 – Grate Replacement Project

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- P.E. Certification

The Sugar Cane Growers Cooperative of Florida, Inc. operates an existing sugar mill in Belle Glade at 1500 West Sugar House Road in Palm Beach County, Florida. The draft permit authorizes the following work for existing Boilers 1 and 2: replacement of the existing fuel grates, addition of a new combustion air fan, modification of the combustion air distribution to provide more over-fire air, and the repair of concrete supports and refractory near the grates. The project should not increase hourly or annual emissions of air pollutants, but should result in more efficient combustion with the firing of less bagasse to produce the same amount of steam.

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The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The P.E. certification briefly summarizes the proposed project. Day #74 is June 7, 2003. I recommend your approval of the attached Draft Permit for this project.

Attachments