

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603
March 25, 2003



0237588-0300

Florida Department of Environmental Protection
Department of Air Resources Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Attention: Mr. Jeffery Koerner, P. E., New Source Review Section

RECEIVED

MAR 26 2003

RE: SUGAR CANE GROWERS COOPERATIVE OF FLORIDA
BELLE GLADE MILL
GRATE REPLACEMENTS FOR BOILER NOS. 1 AND 2
DEP PROJECT NO. 0990026-006-AC

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

Sugar Cane Growers Cooperative of Florida (SCGCF) has received the Department's letter dated January 30, 2003, regarding the request to replace the existing traveling grates in Boiler Nos. 1 and 2 with water-cooled pinhole grates. Each of the Department's comments is addressed below, in the same order as they appear in the letter.

- 1. The annual bagasse firing rates and emission rates for Boiler Nos. 1 through 3 are provided below, as taken from the Annual Operating Reports:

2002 Bagasse Firing Rate (dry tons/yr)

Boiler 1: 37,959
Boiler 2: 34,858
Boiler 3: 26,568

2002 Emission Rates (tons/yr)

	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOC</u>
Boiler 1	85.04	88.89	42.31	63.59	27.03
Boiler 2	78.09	72.96	73.47	58.27	121.10
Boiler 3	59.45	64.43	42.03	43.08	135.94

- 2. The annual steam production rates for all the mill boilers for the years 1998 through 2002 are provided below.

Annual Steam Production (MM lb/yr) by Crop Year

	<u>1998-99</u>	<u>1999-00</u>	<u>2000-01</u>	<u>2001-02</u>
Boiler 1	354.16	399.66	390.92	373.62
Boiler 2	351.92	386.95	377.83	348.29
Boiler 3	316.69	328.44	302.96	271.85
Boiler 4	681.93	806.61	858.44	785.91
Boiler 5	532.47	582.43	622.47	560.09
Boiler 8	<u>754.57</u>	<u>809.74</u>	<u>829.41</u>	<u>746.31</u>
Total	2,991.74	3,313.83	3,382.03	3,086.07

3. The Department's comments are acknowledged. It should be noted however that SCGCF does not normally need to operate the boilers any higher during the annual compliance tests, since no other boilers at the mill are shut down at these times. During the crop season, when one or more a boilers are shut down, it may be necessary to operate a boiler at a rate higher than during the compliance testing (not to exceed 110 percent of the rate during the testing or the permit limit, whichever is less).

Nevertheless, SCGCF is willing to conduct performance tests on Boiler Nos. 1 and 2 during the next crop season to demonstrate each boiler's maximum steam production rate. Based on the results of these performance tests, SCGCF is willing to accept a permit limitation to restrict the boiler operation to 110 percent of the tested rate.

4. Boiler Nos. 1 and 2 were identical boilers constructed by Riley Stoker in 1963. No documentation exists at SCGCF on the maximum heat input rate or maximum steam production rates of these boilers. However, it is important to note that conditions have changed since the original design of these boilers, i.e., bagasse fuel characteristics, no longer use of residue fuel, addition of wet scrubbers to the boilers, addition of other boilers at the mill, etc. Therefore, the original design information would be of little value at this time.
5. See attached copies of permits.
6. A separate request to lower the allowable VOC emissions from Boiler Nos. 1 and 2 has been submitted to the Ft. Myers District office.

Please call or e-mail me if you have any questions concerning this additional information.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

DB/nav

Enclosures

cc: Jose Alvarez
Kathy Lockhart
Gary Perko

R. Blackburn, SD
Q. Stormer, Palm Beach Co.
Q. Little, EPA
Q. Banyak, NPS



STATE OF FLORIDA
 DEPARTMENT OF POLLUTION CONTROL
 SUITE 401
 2180 WEST 1ST STREET
 FORT MYERS, FLORIDA 33901

PETER P. BALJET
 EXECUTIVE DIRECTOR

February 10, 1975

W.D. FREDERICK, JR.
 CHAIRMAN

RECEIVED FEB 12 1975

Mr. George H. Wedgworth, Pres.
 Sugar Cane Growers Co-op of Fl.
 Post Office Box 666
 Belle Glade, Florida 33430

RE: Palm Beach Co. - AP

Sugar Cane Growers Co-op
 Boiler #1

Dear Mr. Wedgworth:

Pursuant to your recent application, please find enclosed a permit (No. AC50-2044A) dated 2-10-75 to construct the subject pollution source.

This permit will expire on 11-30-75 , and will be subject to the conditions, requirements and restrictions checked or indicated otherwise in the attached sheet construction "Permit Conditions."

This permit is issued under the authority of Florida Statutes 403.061(16). The time limits imposed herein are a condition of this permit and are enforceable under Florida Statute 403.161. You are hereby placed on Notice that the Department will review this permit before the scheduled date of expiry and will seek court action for violation of the conditions and requirements of this permit.

You have ten (10) days from the date of receipt hereof within which to seek a review of the conditions and requirements contained in this permit.

Your continued cooperation in this matter is appreciated, and in future communication please refer to your permit number.

Yours truly,

Philip R. Edwards

Philip R. Edwards,
 Regional Administrator

PRE/MPB/jp
 Encls.

cc: DPC - Tallahassee
 Palm Beach CHD
 Mr. E. R. Hendrickson

John R. Middlemas
 BOARD MEMBER

Susan Wilson
 BOARD MEMBER

Mark D. Hollis
 BOARD MEMBER

Y.E. Hall
 BOARD MEMBER

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER
POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR SUGAR CANE GROWERS CO-OP OF FL.
POST OFFICE BOX 666
BELLE GLADE, FLORIDA 33430

PERMIT NO. AC50-2044A

DATE 2-10-75

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES AND CHAPTER 17-4, FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO MR. GEORGE H. WEDGWORTH, PRESIDENT

FOR THE CONSTRUCTION OF THE FOLLOWING
SCRUBBER SYSTEM FOR BOILER #1 CONSISTING OF TWO JOY TURBULAIRE
TYPE D-40 IMPINGEMENT SCRUBBERS

LOCATED AT: 1/2 MILE NORTH OF AIRPORT ROAD, BELLE GLADE, PALM BCH.
UTM: EAST: 7,534,900 NORTH: 2,953,274

IN ACCORDANCE WITH THE APPLICATION DATED 12-9-74
AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN,
ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS
PERMIT

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL 11-30-75
AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REG-
ULATIONS OF THE DEPARTMENT.

Philip R. Edwards
PHILIP R. EDWARDS,
REGIONAL ADMINISTRATOR

PETER P. BALJET,

EXECUTIVE DIRECTOR

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC50-2044A

Date: 2-10-75

- (X) 1. Construction of this installation shall be completed by 6-30-75. Application for Permit to Operate to be submitted by 11-30-75.
- (X) 2. This construction permit expires on 11-30-75 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.
- (X) 5. This boiler shall be tested* for particulates within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC Southwest Florida Regional Office 2180 W. First Street, Suite 401, Fort Myers, FL. 33901
- *FUEL ANALYSIS MAY BE SUBMITTED FOR REQUIRED SULFUR DIOXIDE EMISSION TEST.
- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Florida Regional Office,
- (X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (X) 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (X) 9. All fugitive dust generated at this site shall be adequately controlled.

(Continued)

PERMIT NO. AC50-2044A

- (X) 10. Submit within sixty (60) days upon receipt of this permit, the scrubbers design operating data as specified by the manufacturer, including pressure drop, water flow rates, etc.

- (X) 11. This boiler shall not be operated after July 1, 1975 without the control system indicated on this permit being installed and operational.



MAR 04 '75 AM

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL
2180 WEST 1ST STREET
FORT MYERS, FLORIDA 33901

Routing	Initial
1. Mr. Miller	
2. Mr. Wedgworth	
4. Mr. McIntyre	
5. Mr. Vicils	
6. Mr. Ferguson	
7. Mr. Underwood	
8. Mr. Fletcher	W.D. FREDERICK, JR. CHAIRMAN
9. Mr. Moecki	
10. Mr. Adams	
11. Mr. Arvesu	
12. Mr. Fowler	
13. Mr. S. Hiale	
14.	

PETER P. BALJET
EXECUTIVE DIRECTOR

SUGAR CANE GROWERS
COOP OF FLORIDA

February 28, 1975

Mr. E. R. Arias, Vice-Pres. Planning
Sugar Cane Growers Co-op of Florida
Post Office Box 666
Belle Glade, Florida 33430

RE: Palm Beach Co. - AP

Sugar Cane Growers Co-op
Boilers #1, #2

Dear Mr. Arias:

Concerning the above referenced sources and your letter dated February 22, 1975, please be advised that Construction Permits AC50-2044A and AC50-2045A are amended as follows:

(A) Proviso No. 1 - Construction completion date is changed to August 15, 1975.

The above amendment is in accordance with the informal agreements reached between the Department and Florida Sugar Cane League concerning assigned compliance schedules.

All other conditions of these permits remain as issued.

Your continued cooperation in this matter is appreciated.

Sincerely,

Philip R. Edwards,
Regional Administrator

PRE/TWD/jp

cc: Palm Beach CHD

John R. Middlemas
BOARD MEMBER

Alice C. Wainwright
BOARD MEMBER

Mark D. Hollis
BOARD MEMBER

Y.E. Hall
BOARD MEMBER



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

SUITE 401
2180 WEST 1ST STREET
FORT MYERS, FLORIDA 33901

PETER P. BALJET
EXECUTIVE DIRECTOR

February 10, 1975

W.D. FREDERICK, JR.
CHAIRMAN

Mr. George H. Wedgworth, President
Sugar Cane Growers Co-op of Florida
Post Office Box 666
Belle Glade, Florida 33430

RE: Palm Beach Co. - AP

Sugar Cane Growers Co-op
Boiler #2

Dear Mr. Wedgworth:

Pursuant to your recent application, please find enclosed a permit (No. AC50-2045A) dated 2-10-75 to construct the subject pollution source.

This permit will expire on 11-30-75 , and will be subject to the conditions, requirements and restrictions checked or indicated otherwise in the attached sheet construction "Permit Conditions."

This permit is issued under the authority of Florida Statutes 403.061(16). The time limits imposed herein are a condition of this permit and are enforceable under Florida Statute 403.161. You are hereby placed on Notice that the Department will review this permit before the scheduled date of expiry and will seek court action for violation of the conditions and requirements of this permit.

You have ten (10) days from the date of receipt hereof within which to seek a review of the conditions and requirements contained in this permit.

Your continued cooperation in this matter is appreciated, and in future communication please refer to your permit number.

Yours truly,

Philip R. Edwards
Philip R. Edwards,
Regional Administrator

PRE/MPB/jp
Encls.

cc: DPC - Tallahassee
E. R. Hendrickson, Ph.D, P.E.
Palm Beach County Health Dept.

to R. Middlemas
BOARD MEMBER

Susan Wilson
BOARD MEMBER

Mark D. Hollis
BOARD MEMBER

Y.E. Hall
BOARD MEMBER

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER
POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR SUGAR CANE GROWERS CO-OP OF FL
POST OFFICE BOX 666
BELLE GLADE, FLORIDA 33430

PERMIT NO. AC50-2045A

DATE 2-10-75

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES AND CHAPTER 17-4, FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO
MR. GEORGE H. WEDGWORTH, PRESIDENT

FOR THE CONSTRUCTION OF THE FOLLOWING:
SCRUBBER SYSTEM FOR BOILER #2 CONSISTING OF TWO JOY TURBULAIRE
TYPE D-40 IMPINGEMENT SCRUBBERS

LOCATED AT 1/2 MILE NORTH OF AIRPORT ROAD, BELLE GLADE, PALM BCH. FL.
UTM EAST: 7,534,900 NORTH: 2,953,274

IN ACCORDANCE WITH THE APPLICATION DATED 12-9-74
AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN,
ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS
PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL 11-30-75
AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REG-
ULATIONS OF THE DEPARTMENT.

Philip R. Edwards
PHILIP R. EDWARDS,
REGIONAL ADMINISTRATOR

PETER P. BALJET,

EXECUTIVE DIRECTOR

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC50-2045A

Date: 2-10-75

- (X) 1. Construction of this installation shall be completed by 6-30-75. Application for Permit to Operate to be submitted by 11-30-75.
- (X) 2. This construction permit expires on 11-30-75 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.
- (X) 5. This boiler shall be tested* for particulates within 30 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC Southwest Florida Regional Office 2180 W. First St., Fort Myers, Fl. 33901 (Suite 401).
- *FUEL ANALYSIS MAY BE SUBMITTED FOR REQUIRED SULFUR DIOXIDE EMISSION TEST.
- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Florida Regional Office,
- (X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- (X) 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- (X) 9. All fugitive dust generated at this site shall be adequately controlled.

PERMIT NO. AC50-2045A

- (X) 10. Submit within sixty (60) days upon receipt of this permit, the scrubbers design operating data as specified by the manufacturer, including pressure drop, water flow rates, etc.
- (X) 11. This boiler shall not be operated after July 1, 1975 without the control system indicated on this permit being installed and operational.



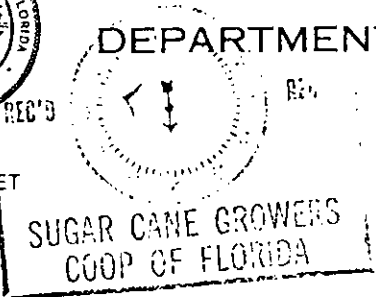
MAR 04 '75 AM

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

2180 WEST 1ST STREET
FORT MYERS, FLORIDA 33901

February 28, 1975

PETER P. BALJET
EXECUTIVE DIRECTOR



Routing	Initials
1. Mr. Miller	
2. Mr. Wadsworth	
4. Mr. Pickens	
5. Mr. Vicks	
6. Mr. Ferguson	
7. Mr. Underwood	
8. Mr. Fincher	W.D. FREDERICK, JR.
9. Mr. Mocerki	CHAIRMAN
10. Mr. Allen	
11. Mr. Arvesu	
12. Mr. Foster	
13. Mr. Smith	
14.	

Mr. E. R. Arias, Vice-Pres. Planning
Sugar Cane Growers Co-op of Florida
Post Office Box 666
Belle Glade, Florida 33430

RE: Palm Beach Co. - AP

Sugar Cane Growers Co-op
Boilers #1, #2

Dear Mr. Arias:

Concerning the above referenced sources and your letter dated February 22, 1975, please be advised that Construction Permits AC50-2044A and AC50-2045A are amended as follows:

- (A) Proviso No. 1 - Construction completion date is changed to August 15, 1975.

The above amendment is in accordance with the informal agreements reached between the Department and Florida Sugar Cane League concerning assigned compliance schedules.

All other conditions of these permits remain as issued.

Your continued cooperation in this matter is appreciated.

Sincerely,

Philip R. Edwards,
Regional Administrator

PRE/TWD/jp

cc: Palm Beach CHD

John R. Middlemas
BOARD MEMBER

Alice C. Wainwright
BOARD MEMBER

Mark D. Hollis
BOARD MEMBER

Y.E. Hall
BOARD MEMBER

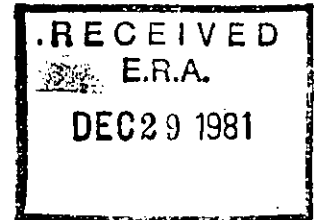


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 4 1981



REF: 4AH-AF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Enrique R. Arias
Executive Vice President
Sugar Cane Growers Cooperative
P.O. Box 666
Belle Glade, Florida 33430

Re: PSD-FL-077

Dear Mr. Arias:

Review of your April 27, 1981, application to construct a new bagasse boiler at your existing plant near Belle Glade, Florida, has been completed. The construction is subject to rules for the Prevention of Significant Air Quality Deterioration (PSD) contained in 40 CFR 52.21. The Florida Bureau of Air Quality Management performed the preliminary determination concerning the proposed construction and published a request for public comment on September 11, 1981. Only comments from your company and the US EPA were submitted.


Authority to construct a stationary source is hereby granted for the facility described above, subject to the conditions in the permit to construct (enclosed). This authority to construct is based solely on the requirements of 40 CFR 52.21, the federal regulations governing significant deterioration of air quality. It does not apply to NPDES or other permits issued by this agency or by other agencies. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Please be advised that a violation of any condition issued as part of this approval, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.

2

This final permitting decision is subject to appeal under 40 CFR 124.19 by petitioning the Administrator of the US EPA within 30 days after receipt of this letter of approval to construct. The petitioner must submit a statement of reasons for the appeal and the Administrator must decide on the petition within a reasonable time period. If the petition is denied, the permit becomes immediately effective. The petitioner may then seek judicial review.

Any questions concerning this approval may be directed to Dr. Kent Williams, Chief, New Source Review Section at (404) 881-4552.

Sincerely yours,


Charles R. Jeter
Regional Administrator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

PERMIT TO CONSTRUCT UNDER THE RULES FOR THE
PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clear Air Act, as amended, 42 U.S.C. § 7470 et seq., and the regulations promulgated thereunder at 40 C.F.R. § 52.21, as amended at 45 Fed. Reg. 52676, 52735-41 (August 7, 1980),

Sugar Cane Growers Cooperative
P.O. Box 666
Belle Glade, Florida 33430

is hereby authorized to construct/modify a stationary source at the following location:

Sugar Cane Growers Cooperative's existing plant site located about a mile east northeast of Belle Glade, Palm Beach County, Florida

UTM Coordinates: 2,945.9 km. N, 552.9 km E.

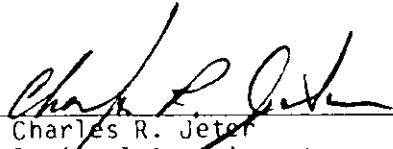
Upon completion of this authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements, and other conditions set forth in the attached Specific Conditions (Part I) and General Conditions (Part II).

This permit shall become effective on DEC 4 1981

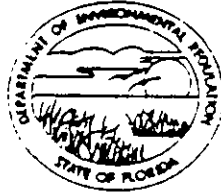
If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time this permit shall expire and authorization to construct shall become invalid.

This authorization to construct/modify shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and Local law.

Dec. 4, 1981
Date Signed


Charles R. Jeter
Regional Administrator

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



4
BOB GRAHAM
GOVERNOR
Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Sugar Cane Growers Cooperative of
Florida (SCGC)
P. O. Box 666
Belle Glade, Florida 33430

PERMIT/CERTIFICATION
NO. AC 50-42476

COUNTY: Palm Beach
PROJECT: Boiler No. 8

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a 264,000 pounds of steam per hour bagasse/residue fuel (No. 6 oil supplementary fuel) fired boiler equipped with an impingement scrubber to be located at SCGC's existing plant that is approximately a mile east northeast of Belle Glade, Palm Beach County, Florida. The UTM coordinates of the proposed plant are 2,953.3 km north and 534.9 km east.

Construction shall be in accordance with the attached permit application plans, documents and drawings except as otherwise noted on pages 3, 4, and 5, Specific Conditions.

Attachments:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16), received on April 24, 1981.
2. DER's incompleteness letter to SCGC, dated May 21, 1981.
3. SCGC's response to DER, dated May 29, 1981.
4. DER's second incompleteness letter to SCGC, dated June 25, 1981.
5. SCGC's response to DER, dated July 9, 1981.
6. ESE's response to DER, dated July 15, 1981.
7. BACT and LAER determinations, dated August 6 and 10, 1981.

PAGE 1 OF 6

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PERMIT NO.: AC 50-42476
APPLICANT: Sugar Cane Growers Cooperative of Florida

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information related 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
 - Determination of Best Available Control Technology (BACT)
 - Determination of Prevention of Significant Deterioration (PSD)
 - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 50-42476

APPLICANT: Sugar Cane Growers Cooperative of Florida

SPECIFIC CONDITIONS:

1. The proposed boiler shall be constructed in accordance with the capacities and specifications stated in the application and additional information supplied by the applicant.
2. The proposed boiler's maximum emission rates shall not exceed the emission limits listed below.

Maximum Allowable Emissions

<u>Pollutant</u>	<u>lb/hr</u>	<u>ton/day</u>	<u>ton/yr</u>
PM	75.6 (95.0)*		243 (324)*
SO ₂		14.0 ⁺	
CO ₂	140		326
VOC	140		325
NO _x	123		209

Visible emissions: 30% opacity except for 40% no more than two minutes per hour.

* The air quality impact analysis was conducted on the basis of the emissions contained in parentheses. The numbers not contained in parantheses are based upon the BACT determination. The BACT determination gives the permittee the right to seek revision if the 0.15 lb/10⁶ Btu input limit cannot be met on a continuous basis. However, any revision of the BACT emission cannot exceed the 0.20 lb/10⁶ Btu input Florida new source limit, nor will the allowable lb/hr and ton/yr emissions be allowed to exceed the numbers contained in parentheses.

+ SO₂ emissions for all boilers from Unit 1 through 8.

3. SCGC shall meter daily oil consumption by Units 6 and 7, and unit 8, individually. The total quantity of fuel oil consumed on a daily basis by Units 6,7, and 8 shall be replaced by the addition to the system of an equal or greater amount of 1% or less sulfur fuel oil within 72 hours (excluding weekends). Records shall be retained for two years. The balance of the oil in the system should not exceed 2.4% sulfur. For the purpose of simplicity, compliance with the 14 ton per day plant wide SO₂ emission limit shall be presumed based upon the fuel purchase scheme above when the total plant wide fuel oil consumption does not exceed 31,500** gallons. In the event that the daily consumption of oil exceeds 31,500** gallons, permittee must demonstrate compliance with the 14 ton per day limit by providing the amounts of bagasse, residue, and oil combusted, and the sulfur content of the oil for each such day. The demonstration of compliance shall be based on the same assumptions used to derive the threshold oil consumption figure except that the actual sulfur

PERMIT NO.: AC 50-42476
APPLICANT: Sugar Cane Growers Cooperative of Florida

content of the oil for each such day shall be substituted for 1.15%.

** This threshold oil consumption figure is based upon the assumptions that the bagasse, residue and oil sulfur contents are 0.2%, 0.5% and 1.15%, respectively, and also that SO₂ emissions from bagasse and residue are 40% below the amounts calculated stoichiometrically and all sulfur in fuel oil is emitted as SO₂. If further tests show that the foregoing assumptions are significantly incorrect, the 31,500 gallons per day figure shall be adjusted accordingly.

4. Emissions of VOC and CO shall be maintained at the lowest possible level through good combustion control. A flue gas oxygen or CO₂ monitor shall be installed.
5. From 16 April through 12 October plant operation shall be restricted to no more than three boilers of unit numbers 1, 2, 4, 5, or 8, and to no more than 120 days. During this period of restricted operation, steam production shall not exceed a maximum daily average of 450,000 lb/hr.
6. Compliance with the emission limits required in condition No. 2 shall be determined by performance tests. Particulate matter emissions tests shall be made while burning bagasse with the minimal amount of oil necessary to reach test capacity. The two SO₂ emission tests shall be made while burning bagasse only and residue only with the minimal amounts of fuel oil necessary to reach test capacity. These tests are to determine compliance with the SO₂ emission limits of 299 lb/hr from non-fossil fuel while burning residue, and 152 lb/hr from non-fossil fuel while burning bagasse. EPA reference method 25 shall be used to establish VOC emissions during compliance tests. The boiler shall be at or near to full operating capacity during all performance tests. The performance tests shall be conducted in accordance with EPA reference methods (40 CFR 60, Appendix A) and the provisions of 40 CFR 60.8 and 40 CFR 60.46.
7. Visible emissions from the bagasse handling system shall not exceed 10 percent opacity over any 6 minute period as measured by EPA reference method 9.
8. Instruments shall be installed to continuously measure the amount of fuel oil used individually by the proposed boiler 8 and boilers 6 and 7, the total amount of fuel oil used by boilers 1 through 5, and the

PERMIT NO.: AC 50-42476
APPLICANT: Sugar Cane Growers Cooperative of Florida

SPECIFIC CONDITIONS:

total amount of residue used in all boilers. Bagasse consumption shall be calculated from steam consumption. The records of fuel oil, residue and bagasse usage will be kept by the company, available for regulatory agency inspection, for two years.

- 9. The scrubber shall be equipped with a manometer or equivalent instrument to measure the total pressure drop of the flue gas stream across the scrubber, with pressure gauges to measure the water pressure at the spray nozzles, with a flow meter or equivalent device (weir) to measure the quantity of water circulating through the scrubber. The pH of scrubber water at the scrubber inlet and outlet shall be measured. Data from these instruments shall be recorded each shift (every 8 hours) and available for regulatory agencies inspection for two years.
- 10. The stack sampling configuration of the proposed boiler shall comply with the minimum of 2D downstream and 0.5D upstream distances to the sampling ports required to use reference method 2.
- 11. The quantity of 325 tons per year of VOC emissions is hereby assigned to the boiler from the new source allowance balance for Palm Beach County pursuant to 17-2.17(7)(a) and (d). At such time as the LAER determination for this boiler is revised, based on data acquired under Specific Condition #6, any VOC emission allowance not required shall revert to Palm Beach County available new source allowance.
- 12. Before the Operation Permit is issued, SCGC shall finish the stack modifications and revise the operation permits of existing boilers based on the following commitments.
 - (a) A 155-foot tall stack will be built for Boiler 8.
 - (b) The three 85-foot stacks serving Boiler 4 will be ducted into a single stack 110 feet tall.
 - (c) The exit gases from Boiler 6 and 7 (Currently passing through two 40-foot stacks) will be combined into a single 40-foot stack.
 - (d) Boilers 6 and 7 each will be limited to a maximum production of 75,000 pounds of steam per hour instead of 125,000 pounds of steam per hour.
 - (e) Permit conditions of the existing boilers will be changed to reduce allowable particulate matter emissions from 0.3 pound per million BTU to 0.25 pound per million BTU.

7

PERMIT NO.: AC 50-42476
APPLICANT: Sugar Cane Growers Cooperative of Florida

(f) Based on Specific Condition Number 3, operating permits for existing boilers from units 1 through 7 shall be revised to reflect the way fuel oils should be blended in the oil storage tank.

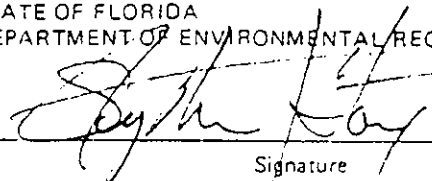
13. The maximum fuel oil consumption of the proposed boiler is limited to the quantity equivalent to 250 MMBTU/hr (1,667 gallons per hour; if the heating value of the fuel oil is 18,500 BTU per pound).

Expiration Date: May 31, 1983

Issued this 28 day of October, 1981

Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION


Signature

PAGE 6 OF 6

Final Determination

Sugar Cane Growers Cooperative of Florida

Application PSD-FL-077

The preceding Final Determination is adopted by reference for the Federal Permit, PSD-FL-077.

Special Conditions listed in the State Permit, AC 50-42476, are adopted as special conditions for the Federal Permit, PSD-FL-077, for this source.

The attached General Conditions are also made a part of the Federal Permit PSD-FL-077 for this source.

Attachment: General Conditions (Federal)

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

- 6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
- 7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.
- 8. The permittee shall allow representatives of the State environmental control agency or representatives of the Environmental Protection Agency, upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to any copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emission of pollutants;

and

 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
- 9. The applicant shall submit for approval by EPA and FDER, a TSP post-construction continuous ambient monitoring plan prior to startup of the subject facilities in this permit. This plan should meet all of the requirements and procedures as stated in the "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD)," EPA-450/4-80-012, Nov. '80 and the quality assurance procedures of 40 CFR 58, Appendix B. Such monitoring shall be continued until such time as the effects of this modification on the ambient air quality have been quantified and determined to be well within the limitations of the short term secondary standard for particulates.

10. All correspondence required to be submitted by this permit to the permitting agency shall be mailed to:

Chief, Air Facilities Branch
Air and Waste Management Division
US Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, GA 30365

11. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit constitute a violation of the terms and conditions of this permit.

GENERAL CONDITIONS

1. The permittee shall notify the permitting authority in writing of the beginning of construction of the permitted source within 30 days of such action and the estimated date of start-up of operation.
2. The permittee shall notify the permitting authority in writing of the actual start-up of the permitted source within 30 days of such action and the estimated date of demonstration of compliance as required in the specific conditions.
3. Each emission point for which an emission test method is established in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the permitting authority of the scheduled date of compliance testing at least thirty (30) days in advance of such test. Compliance test results shall be submitted to the permitting authority within forty-five (45) days after the complete testing. The permittee shall provide (1) sampling ports adequate for test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.
4. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
5. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the permitting authority with the following information in writing within five (5) days of such conditions:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission,and
 - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

- 6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
- 7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.
- 8. The permittee shall allow representatives of the State environmental control agency or representatives of the Environmental Protection Agency, upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to any copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emission of pollutants;

and

 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
- 9. The applicant shall submit for approval by EPA and FDER, a TSP post-construction continuous ambient monitoring plan prior to startup of the subject facilities in this permit. This plan should meet all of the requirements and procedures as stated in the "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD)," EPA-450/4-80-012, Nov. '80 and the quality assurance procedures of 40 CFR 58, Appendix B. Such monitoring shall be continued until such time as the effects of this modification on the ambient air quality have been quantified and determined to be well within the limitations of the short term secondary standard for particulates.

- 15
10. All correspondence required to be submitted by this permit to the permitting agency shall be mailed to:

Chief, Air Facilities Branch
Air and Waste Management Division
US Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, GA 30365

11. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit constitute a violation of the terms and conditions of this permit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30385

JAN 19 1982

REF: 4AW-AF

Mr. Enrique R. Arias
Executive Vice President
Sugar Cane Growers Cooperative of Florida
Post Office Box 666
Belle Glade, Florida 33430

Re: PSD-FL-077

Dear Mr. Arias:

The purpose of this letter is to amend the Federal PSD permit that was issued to you on December 4, 1981, for the construction of a new bagasse boiler at your existing plant near Belle Glade, Florida.

Specific Condition No. 2 shall be amended as follows:

<u>Pollutant</u>	<u>Annual Emissions (tons/yr)</u>
PM	276
CO	511
VOC	511
NO _x	449

It has been determined that these limits will not constitute an increase in significant impacts from those which were originally permitted and therefore does not constitute an application modification.

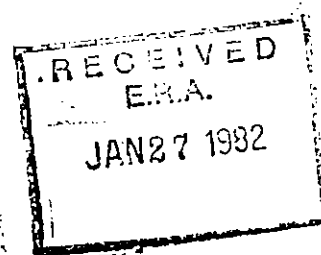
These revised limitations shall become effective on the date of this letter, which should be attached to and become a part of your December 4, 1981, permit.

If you have any questions concerning this matter, please contact Dr. Kent Williams of my staff at 404/881-4552.

Sincerely yours,

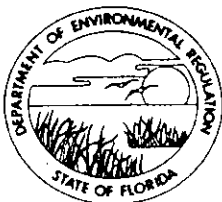
for *John A. Little, Deputy*
Charles R. Jeter
Regional Administrator

cc: Florida DER
Hopping, Boyd, Green & Sams



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

WIN TOWERS OFFICE BUILDING
600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

November 16, 1981

Mr. Enrique R. Arias
Executive Vice President
Sugar Cane Growers Cooperative of Florida
Post Office Box 666
Belle Glade, Florida 33430

Dear Mr. Arias:

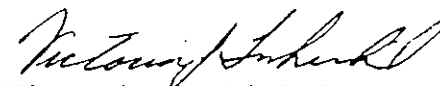
Modification of Conditions
Permit No. AC 50-42476

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

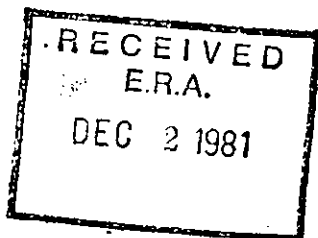
<u>Condition</u>	<u>Pollutant</u>	<u>From(ton/yr)</u>	<u>To(ton/yr)</u>
(Specific)	PM	243	276
	CO	326	511
#2	VOC	325	511
	NO _x	209	449

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,


Victoria Tschinkel
Secretary

VT:caa





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
Mr. Jose F. Alvarez
Vice President of Planning
and Plant Operation
Sugar Cane Growers Cooperative
of Florida
Post Office Box 666
Belle Glade, Florida 33430

APIS No: 52FTM50002608
Permit Number: AC50-250421/PSD-FL-213
Expiration Date: March 31, 1997
County: Palm Beach
Latitude/Longitude: 26°42'06"N
80°38'57"W

Project: Boiler No. 8 Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-212, 62-275, 62-296, and 62-297, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and specifically described as follows:

Authorization to increase allowable carbon monoxide (CO) emissions from the existing bagasse/residue/No. 6 residual fuel oil-fired Boiler No. 8 located at Sugar Cane Growers Cooperative of Florida's sugar mill. This mill is on West Sugar House Road in Belle Glade, Palm Beach County, Florida. The UTM Coordinates of this mill are Zone 17, 534.9 km E and 295 3.3 km N.

The modification shall be in accordance with the application received on May 6, 1994, and the additional information submitted with the transmittal letter from Hopping, Greene, Sams and Smith letters dated April 14, 1995 and August 30, 1995, except for the changes mentioned in the Technical Evaluation and Preliminary Determination and listed as Specific Conditions in this permit.

Attachments are listed below:

1. Application received May 6, 1994.
2. DEP May 19, 1994, letter.
3. DEP November 14, 1994, letter.
4. Hopping, Greene, Sams & Smith December 20, 1994, letter.
5. Hopping, Greene, Sams & Smith March 31, 1995, letter.
6. Hopping, Greene, Sams & Smith April 14, 1995, letter.
7. Hopping, Greene, Sams & Smith August 30, 1995, letter.
8. KBN February 1, 1996, letter

PERMITTEE:
Sugar Cane Growers Coop.

Permit Number: AC50-250421/PSD-FL-213
Expiration Date: December 29, 1996

GENERAL CONDITIONS:

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, F.S. 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), F.S., the issuance of this permit does not convey any 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 of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this 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 F.S. 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 and 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

PERMITTEE:
Sugar Cane Growers Coop.

Permit Number: AC50-250421/PSD-FL-213
Expiration Date: December 29, 1996

GENERAL CONDITIONS:

credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under 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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. 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 F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

PERMITTEE:
Sugar Cane Growers Coop.

Permit Number: AC50-250421/PBD-FL-213
Expiration Date: December 29, 1996

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, 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:

- (X) Determination of Best Available Control Technology (BACT)
- (X) Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

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 for 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:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used;
 - the results of such analyses.

PERMITTEE:
Sugar Cane Growers Coop.

Permit Number: AC50-250421/PSD-FL-213
Expiration Date: December 29, 1996

SPECIFIC CONDITIONS:

1. This permit supersedes permit No. AC50-42476, issued October 28, 1981, and its revisions dated November 16, 1981. Except for the changes that follow in Specific Condition No. 3, 4, 5, 6 and 7 the provision of amended permit No. AC 50-42476 and permit No. PSD-FL-077 are incorporated as a condition of this air construction permit.

2. This permit modified only the steam production parameters, stack heights for boiler Nos. 2, 3, and 5 and the allowable carbon monoxide (CO) emission limits and CO testing requirements for Boiler No. 8. Boiler No. 8 remains subject to all other previous permit conditions, permit modifications, and regulations, including Rule 62-296.570, F.A.C. - Requirements for major VOC and NO_x - Emissions Facilities.

3. The allowable operation parameters for Boiler No. are summarized in the following table:

Steam Pressure (psig)	Steam Temperature (°F)	Fuel Burned	Steam Production (lb/hr)	Heat Input (MMBtu/hr)	Amount of Fuel Consumed (lb/hr)
400	585	Bagasse	264,000	504.0 (a)	63,000 (a)
		Bagasse Residue	264,000	443.5 (b)	49,831 (b)
600	740	Bagasse	242,100	504.0 (a)	63,000 (a)
		Bagasse Residue	242,100	443.5 (b)	49,831 (b)
400	740	Bagasse	240,000	504.0 (a)	63,000 (a)
		Bagasse Residue	240,000	443.5 (b)	49,831 (b)

(a)Based upon 55% thermal efficiency and 8,000 Btu/lb (dry) while burning bagasse.

(b)Based upon 62.5% thermal efficiency and 8,900 Btu/lb while burning bagasse residue.

4. The allowable carbon monoxide emission limits listed in Specific Condition No. 2 of permit No. AC 50-42476 are changed from 140 lbs/hr and 511 tons per year (TPY) to 5.5 lbs/MMBtu heat input (assuming boiler has a thermal efficiency of 55% when burning bagasse), 2,772 lbs/hr (average of 3 runs of a minimum of 1 hour

PERMITTEE:
Sugar Cane Growers Coop.

Permit Number: AC50-250421/PSD-FL-213
Expiration Date: December 29, 1996

SPECIFIC CONDITIONS:

per run by EPA method 10 as described in 40 CFR 60, Appendix A), and 10,112 TPY based on a maximum of 7,296 hours per year operation. Crop season operation may last a maximum of 184 days while off-season operation may last a maximum of 120 days.

5. The CO emissions from Boiler No. 8 shall be measured annually by EPA Method 10 as described in 40 CFR 60, Appendix A. Test reports shall be submitted to the Department's South District office within 45 days of completion of the test.

6. The permittee shall install, maintain and operate an alarm system on Boiler No. 8 that will be triggered whenever the boiler oxygen level drops below 4 percent. The time the boiler operates with less than 4 percent oxygen shall be logged and may be used as a basis to modify the Operation and Maintenance Plan. The permittee shall use the Operation and Maintenance Plan for Carbon Monoxide Control for Boiler No. 8 (Revised January 31, 1996).

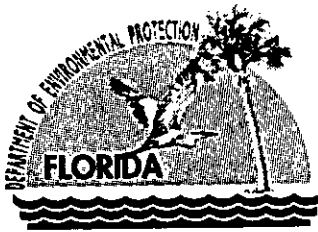
7. The stack heights on Boiler Nos. 2 and 5 shall be increased to a minimum of 150 feet above ground elevation. The stack height on Boiler No. 3 shall be increased to a minimum of 90 feet above ground elevation. These stacks shall be equipped with testing facilities meeting the requirements of Rule 62-297.345(3), F.A.C., Test Facilities.

8. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. (Rule 62-4.090, F.A.C.)

9. A timely application for a Title V operation permit must be submitted to the Department's South District office by the date specified in Rule 62-213, F.A.C.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes, Director
Division of Air Resources
Management



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 30, 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: **Request for Additional Information**
Boiler Nos. 1 and 2 – Grate Replacements
Project No. 0990026-006-AC

Dear Mr. Alvarez:

On January 21, 2003, the Department received your application for an air construction permit to replace the grates on Boiler Nos. 1 and 2 and modify the combustion air system. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. 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.

1. For Boiler Nos. 1-3, provide the 2002 annual bagasse firing rate (tons per year) and the 2002 annual emission rates (tons per year) for CO, NO_x, PM, SO₂, and VOC.
2. For all of the sugar mill boilers, provide the annual steam production (lb/year) for 1998 through 2002.
3. The application states that the maximum heat input rate for these identical boilers is 334.1 MMBtu/hour (24-hour average) and that the maximum steam rate is 175,000 lb/hour (24-hour average). Tables 1 and 2 of the application show information compiled from emissions tests performed on Boiler Nos. 1 and 2 from 1993 through 2001. For the 63 test runs presented, the highest *1-hour* heat input rate is about 277 MMBtu/hour (1999) and the highest *1-hour* steam production rate is about 142,600 lb/hour (1999). Based on this same data, the *1-hour* average rates are less than 235 MMBtu/hour and less than 130,000 lb/hour. These values represent only about 80% of the maximum values that are stated in the application as maximum *24-hour* averages. Based on records collected during the last five years, provide documentation of the actual maximum 1-hour steam production rate (lb/hour) and the actual maximum 24-hour steam production rate (lb/hour). Provide the actual steam production records as supporting documentation. Alternatively, conduct a performance test on Boiler No. 1 or Boiler No. 2 prior to the proposed modifications to show that these units are capable of operating at the stated maximum 1-hour steam rate and maximum 24-hour continuous steam rate. If unable to achieve the stated rates, provide data from the performance tests indicating the maximum 1-hour maximum 24-hour steam rates.
4. Provide the maximum heat input rate and steam production rate for each boiler based on the manufacturer's original specifications. Provide supporting documentation from the manufacturer.
5. Provide copies of any air construction permits held for Boiler Nos. 1 and 2 including the following: AC50-2044, AC50-2045, AC50-42476, and any modifications.
6. Page A-4 of the application indicates that you are proposing to lower the VOC emission standard from 1.5 to 0.7 lb/MMBtu. Is this proposal part of this request or a future request?


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The Department will resume processing your application after receipt of the requested information. 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. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,


Jeffery F. Koerner
New Source Review Section

cc: Ms. Kathy Lockhart, Sugar Cane Growers Coop.
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

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> 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. 	<p>A. Signature <i>x Evelyn B. Taylor</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Evelyn B. Taylor</i></p> <p>C. Date of Delivery <i>02-03-03</i></p>
<p>1. Article Addressed to:</p> <p>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</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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<p>PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540</p>	

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Sent To: **Jose F. Alvarez**

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

PS Form 3800, January 2001 See Reverse for Instructions