

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603
April 29, 2004



RECEIVED 0437524

APR 30 2004

BUREAU OF AIR REGULATION

* Project Withdrawn
in 2005

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

Attention : Mr. Jeffery E. Koerner, P.E.

RE: SUGAR CANE GROWERS COOPERATIVE OF FLORIDA, INC. – GLADES SUGAR HOUSE – REQUEST TO REVISE OPERATING HOURS AND CROP SEASON FOR BOILERS 1-5 AND 8, PROJECT NO. 0990026-009-AC

Dear Mr. Koerner:

Sugar Cane Growers Cooperative of Florida (SCGCF) has received the Department's request for additional information (RAI) dated September 26, 2003, regarding the application for extending the crop season window for the Glades Sugar House. Each of the Department's questions is answered below, in the same order as they appear in the RAI.

1. Revised pages of the application form will be submitted, as necessary, along with the air modeling report described in the response to Comment 5 below.
2. The project will have no effect on annual emissions. The current permit defines the crop milling season as Oct. 12 - April 16 (which is 4,512 hours/year). SCGCF is requesting an extension to the crop milling season window (revised crop season of October 5 through May 31), but not additional operation. Therefore, SCGCF is willing to accept a permit condition to limit crop season operation to 4,512 operating hours per year. The purpose of the request is to provide the flexibility to finish milling the sugarcane crop in April/May should adverse weather conditions interrupt normal operations. SCGCF has no intentions of operating the boilers more as a result of this request.
3. SCGCF does not wish to address off-season operation in the current permitting process. However, Condition H.1. should be revised to reflect flexible crop season ending and beginning dates. Suggested wording is as follows:

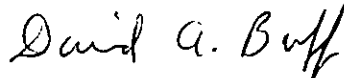
"Boiler Operation – During the off-season (from end of the crop until the beginning of the next crop season), plant operations shall be restricted to.....".
4. As stated in the response to Comment 2 above, SCGCF is willing to restrict crop season operation to a total of 4,512 operating hours per year, consistent with the current crop season operating window. Revised pages of the application form will be submitted, as necessary, along with the air modeling report.
5. An air modeling report addressing the Department's concerns is being prepared and will be submitted in the near future.

6. Facility-wide SO₂ emissions will be addressed in the air modeling report to be submitted in the near future. Revised conditions regarding the methods to comply with the new restrictions will be proposed in the report.

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

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer

DB/nav

Enclosure

cc: J. Alvarez, SCGCF
K. Lockhart, SCGCF
A. Satyal, PBCHU

RA1042904.doc

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers... Telephone: (352) 336 - 5600 ext. Fax: (352) 336 - 6603
4. Professional Engineer Email Address: <u>dbuff@golder.com</u>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature: <u>David A. Buff</u> Date: <u>4/29/04</u> (seal)

* Attach any exception to certification statement.

** Board of Professional Engineers Certificate of Authorization #00001670



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

April 9, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jose F. Alvarez, Vice President Planning and Plant Operations
Sugar Cane Growers Cooperative of Florida - Glades Sugar House
Post Office Box 666
Belle Glade, Florida 33430-0666

Re: Air Permit Project Status Updates
Sugar Cane Growers Cooperative of Florida, Glades Sugar House

Dear Mr. Alvarez:

This is simply a courtesy letter to provide an update on the status of two pending applications for air permits for the Glades Sugar House located in Belle Glade, Florida.

Project No. 0990026-007-AC - Request for a Revised Boiler Operating Season

Status: We received this application on September 3, 2003 and requested additional information in a letter dated September 26, 2003. On November 7, 2003, we sent a reminder. On December 17, 2003, we received an email request for an additional 90 days, which we approved on December 18, 2003. On February 23, 2004, we received an email request for an additional 30 days, which we approved on the same day. On March 26, 2004, we received an email request for an additional 30 days, which we approved on March 29, 2004. It is our understanding that your consultant is completing the air dispersion modeling analysis to support the request. This application remains incomplete and cannot be processed without the requested additional information. The final deadline for submitting this information is April 30, 2004.

Project No. 0990026-008-AC - Request to add Natural Gas to Boilers 4 and 5

Status: Our South District office received this application on December 8, 2003 and requested additional information in a letter dated January 7, 2004. On February 17, 2004, this application was transferred to the Bureau of Air Regulation in Tallahassee for processing. On February 23, 2004, the South District Office received your submittal of additional information, which was forwarded to the Bureau of Air Regulation on February 26, 2004. In a letter dated March 5, 2004, we requested additional information. Based on conversations with your consultant, we believe that the additional information will be submitted shortly. This application remains incomplete and cannot be processed without the requested additional information. The deadline for submitting this information is June 3, 2004.

We will resume processing your applications 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. If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,

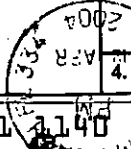
Jeffery F. Koerner, Air Permitting South
Bureau of Air Regulation

cc: Ms. Kathy Lockhart, SCG Coop
Mr. David Buff, Golder
Mr. Ron Blackburn, SD

Mr. James Stormer, PBCHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

"More Protection, Less Process"

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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>Xp 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>4/12/04</i></p>
<p>1. Article Addressed to: Mr. Jose F. Alvarez Vice President Planning and Plant Operations Sugar Cane Growers Cooperative of Florida Glades Sugar House Post Office Box 666 Belle Glade, Florida 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>2. Article Number 7001 1140 0002 1578 0904</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>PS Form 3811, August 2001</p>	<p>Domestic Return Receipt 102595-02-M-1540</p>

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only: No Insurance Coverage Provided)**

OFFICIAL USE

Mr. Jose F. Alvarez, Vice President

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

Sent To
 Mr. Jose F. Alvarez, Vice President
 Street, Apt. No.;
 or PO Box No. Post Office Box 666
 City, State, ZIP+4
 Belle Glade, Florida 33430-0666

PS Form 3800, January 2001 See Reverse for Instructions

7001 1140 0002 1578 0904