



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary - Designee

January 17, 2007

CERTIFIED MAIL 7005 1160 0000 2711 4812
RETURN RECEIPT REQUESTED

Jose Alvarez
Senior Vice President, Planning and Operations
1500 West Sugar House Road
P.O. Box 666
Belle Glade, FL 33430-0666

Re: Request for Additional Information Regarding Title V Permit Application
File No. 0990026-013-AV
Sugar Cane Growers Cooperative of Florida, Palm Beach County

Dear Mr. Alvarez:

Thank you for the additional information for your Title V Revision application File No.: 0990026-013-AV. The application(s) is incomplete. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

- (a) Fuel analysis was only submitted and presented for bagasse. The health-based compliance demonstration of 40 CFR 63 Subpart DDDDD did not appear to evaluate the following other fuels allowed by permit for Sugar Cane Growers Cooperative of Florida: bagasse residue, No. 6 fuel oil, used oil, and small quantities of hazardous waste. Fuel analysis for the health-based compliance demonstration should be site specific. Please provide site specific fuel analysis for all fuel types allowed by permit to demonstrate worst-case scenario and to demonstrate health-based compliance. [40 CFR 63 Subpart DDDDD, Appendix A.8(a)(3)]
- (b) The application did not appear to describe worst-case operating conditions in the performance test report for the process and control systems and explain why the conditions are worst case. The facility must test under worst-case operating conditions as defined in 40 CFR 63 Appendix A. [40 CFR 63 Subpart DDDDD, Appendix A.(4)(b)(2)]
- (c) Please provide justification for using the 90th percentile value from the fuel analysis data instead of the actual worst case as required by 40 CFR 63 Subpart DDDDD. [62-213.420(1)(b)3., F.A.C., 62-4.070(1), F.A.C.]
- (d) Figure 2-2 does not appear to depict nearby residences as indicated in the application. However, Figure 4-3 does appear to indicate a single residence even though there appears to be a number of possible residences on the map. Please verify that the figure(s) depict all places people congregate including residences, daycares, and churches as required by the 40

Page 1 of 2

"More Protection. Less Process"
www.dep.state.fl.us

Sugar Cane Growers Cooperative of Florida
DEP File No. 0990026-013-AV
January 17, 2007

- CFR 63 Subpart DDDDD, Appendix A.5(d)(2) and 8(a)(2)(iii). If necessary, please resubmit a figure with all required structures identified. [40 CFR 63 Subpart DDDDD, Appendix A.5(d)(2) and 8(a)(2)(iii)]
- (c) The proposed permit limits in Table 5.1 do not define all parameters that affect the source. Please provide all parameters to include, but not limited to, fuel type, fuel mix (annual average), emission rate, type of control devices, process parameters, and non-process parameter for incorporation in to the Title V permit. [40 CFR 63 Subpart DDDDD, Appendix A.8(a)(6) and 8(c)(d)]
- (f) Please submit RfC values as required by 40 CFR 63 Subpart DDDDD, Appendix A.8.(a)(4).

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996.

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

If you should have any questions, please call me at 239-332-6975, extension 127.

Sincerely,


Carter Endsley, P.E.
Engineer Supervisor III

CBE/jw

copy to:

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