

GLADES SUGAR HOUSE

Sugar Cane Growers Cooperative of Florida

POST OFFICE BOX 666

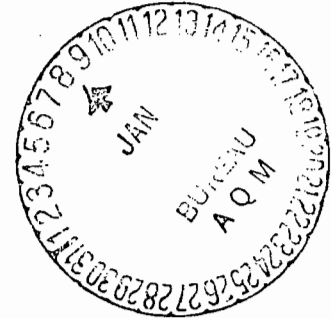
BELLE GLADE, FLORIDA

ZIP CODE 33430

file

January 6, 1982

REF: 4AH-AF



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

Your re: PSD-FL-077

Gentlemen:

Pursuant to Paragraph 1 of the General Conditions corresponding to the Permit PSD-FL-077, we hereby notify you that construction of the permitted source has started.

We are planning on the completion and start-up of this, our Boiler No. 8, on or about November 1, 1982.

Very truly yours,

E. R. Arias
Executive Vice President

ERA/st

cc: ✓ C. H. Fancy, Florida Department of Environmental Regulation
David M. Knowles, Department of Environmental Regulation,
South Florida District
Michael Martin, Palm Beach County Health Department
William H. Green, Atty.
David Buff, Environmental Science & Engineering, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

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.

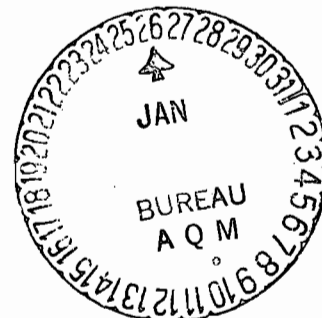
These revised limitations shall become effective on the date of this letter, which should be attached to and become a part of your December 4, 1981, permit.

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

Sincerely yours,

/s/ John A. Little
Deputy Regional Administrator
Charles R. Jeter
Regional Administrator

cc: Florida DER
Hopping, Boyd, Green & Sams





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:

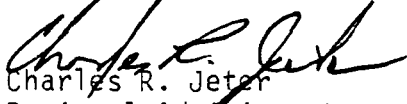
Review of your April 27, 1981, application to construct a new bagasse boiler at your existing plant near Belle Glade, Florida, has been completed. The construction is subject to rules for the Prevention of Significant Air Quality Deterioration (PSD) contained in 40 CFR 52.21. The Florida Bureau of Air 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.

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 Clean 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).

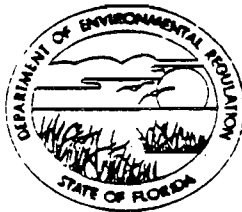
This permit shall become effective on DEC 4 1981

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
Charles R. Jeter
Regional Administrator



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.

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 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 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.

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.

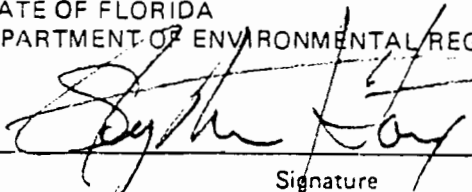
13. The maximum fuel oil consumption of the proposed boiler is limited to the quantity equivalent to 250 MMBTU/hr (1,667 gallons per hour; if the heating value of the fuel oil is 18,500 BTU per pound).

Expiration Date: May 31, 1983

Issued this 28 day of October 19 81

 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)

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.

12

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.

PSD-FL-077

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

October 28, 1981

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

RE: Final Determination - Sugar Cane Growers Cooperative,
Application for State and Federal PSD Permits to Con-
struct New Bagasse Boiler (AC 50-42476, PSD-FL-077)

Dear Mr. Arias:

Enclosed please find one copy of the referenced
Final Determination. State Permit Number AC 50-42476 is here-
by issued as of October 28, 1981, pursuant to Section 403,
Florida Statutes. Final approval of the Federal PSD permit,
which is incorporated with the state permit, is contingent
upon review and acceptance of the permit conditions by the
Environmental Protection Agency Region IV office in Atlanta.
Questions concerning final issuance of the Federal permit
should be directed to Mr. T. Michael Taimi of the EPA office,
at (404) 881-2017.

Acceptance of the state permit constitutes notice and
agreement that the Department will periodically review this
permit for compliance, including site inspections where appli-
cable, and may initiate enforcement actions for violation of
the conditions and requirements thereof.

Sincerely,

C. H. Fancy, Deputy Chief
Bureau of Air Quality Manage-
ment

cc: T. Michael Taimi, EPA Region IV
Michael Martin, Palm Beach Co. Health Department
Phil Edwards, FDER, South Florida District
David Buff, ESE Consultants

CHF/TP/bjm

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

October 28, 1981

Mr. T. Michael Taimi, Chief
Consolidated Permits Branch
EPA Region IV
345 Courtland Street
Atlanta, Georgia 30365

RE: Final Determination - Sugar Cane Growers
Cooperative Application to Construct New
Bagasse Boiler (PSD-FL-077)

Enclosed please find a copy of the proof of publication of the public notice, the public comments and the Department's response to the public comments, and Final Determination for the referenced project. We recommend that the applicant be granted Authority to Construct, subject to the conditions in the Final Determination.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/TP/bjm

Attachment

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

October 28, 1981

Phyllis Lilley
Municipal Library
530 South Main Street
Belle Glade, Florida 33430


RE: Final Determination - Sugar Cane
Growers Cooperative, Application to
Construct a New Bagasse Boiler
(PSD-FL-077)

Dear Ms. Lilley:

Please find enclosed one copy of the Final Determination for the Sugar Cane Growers Cooperative application for a Federal Prevention of Significant Deterioration Construction Permit. As was done with the Preliminary Determination, this information must be available upon request for a period of at least 30 days from the date of this letter.

Again, we appreciate your help in providing this valuable public service. Should you have any questions, please call Tim Powell at (904) 488-1344.

Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CF/TP/bjm

Attachment

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

December 30, 1981

Mr. David Bare
Director of Environmental Relations
Florida Sugar Cane League
Clewiston, Florida 33440

Dear ^{Dave} ~~Mr. Bare~~:

RE: Florida Sugar Cane League Ambient Air Monitoring
Network

This letter is a follow up on our evaluation of the Florida Sugar Cane League's ambient air monitoring network. We have made our evaluation of this network according to guidelines published in Ambient Monitoring Guidelines for Prevention of Significant Deterioration. EPA-450/4-80-012. These guidelines state the conditions under which existing representative air quality data may be used to satisfy PSD requirements.

Preferably, the existing monitoring data should be representative of three types of areas: (1) the location(s) of maximum concentration increase from the proposed source or modification, (2) the location(s) of the maximum air pollutant concentration from existing sources, and (3) the location(s) of the maximum impact area, i.e., where the maximum pollutant concentration would hypothetically occur based on the combined effect of existing sources and the proposed new source or modification. Basically, the locations and sizes of the three types of areas are determined through the application of air quality models.

None of the monitoring sites in the network are representative of these three areas according to the limited modeling results we have available to us. These modeling results were submitted to the Department in order to fulfill PSD requirements for construction permits for modifications to the Sugar Cane Growers Co-op mill, the Atlantic Sugar Association mill and the Osceola Farms Company mill.

If there are no existing monitors representative of the three preferred areas, the Department may determine that monitors sited outside these areas may be used to satisfy PSD requirements. For total suspended particulate matter (TSP) which is emitted from multiple point and area sources, the following criteria must be met in order that such monitors may be used: (1) the terrain in the area around the points of proposed emissions must be basically flat, and (2) the existing monitor(s) must be sited within 10 kilometers of the points of proposed emissions. The terrain around all of the sugar cane mills is basically flat; therefore, we have evaluated the TSP network on the basis of whether there is at least one monitor sited within 10 kilometers of each mill (site of any proposed emissions). For sulfur dioxide (SO₂) which is emitted from widely spaced and relatively remote points, an existing monitor located at a site which is characteristic of SO₂ air quality across a broad region including that in which the points of proposed emissions are located may be used. This monitor will be considered a "regional" monitor. We have evaluated the existing SO₂ monitor on this basis. Since Palm Beach County is located in an ozone nonattainment area and since all of the sugar mills except for one are located in this county, we have not evaluated the existing O₃ monitor in terms of whether or not it meets PSD siting criteria.

The data taken from TSP monitoring sites located within 10 kilometers of a mill may be used to give a background concentration appropriate to that mill. SO₂ data taken from the "regional" monitor may be used to give a background concentration for any of the mills. However, in order to determine a valid SO₂ background concentration for all averaging times, wind measuring equipment must also be collocated with the SO₂ monitor. The TSP and SO₂ background concentrations determined from the appropriate sites in the monitoring network may be used together with modeled estimates of concentrations due to emissions from the mill to be modified and other nearby significant sources to determine the concentrations at the three types of areas previously mentioned.

Our evaluation of the individual monitoring sites visited and our comments are as follows:

1. Site number 3 located at the USDA Sugar Cane Experimental station meets PSD siting criteria.
2. Site number 4 located at the City of Pahokee's water treatment plant meets PSD siting criteria. During the evaluation of this site, it was observed that walkways and the sidewalk in front of the plant had a significant amount of lime deposits on them.

These deposits, which may be the result of poor control over the use of lime in the water treatment operation, may impact the TSP monitor. It is suggested that several of the filters be analyzed to determine the impact, if any, of these operations on the monitor. If they are significant, you may want to relocate the monitor.

3. The collocated monitoring site 5/18 located in Belle Glade meets PSD siting criteria.
4. Site number 6 is located at the South Shore Water Association Pump station. This site is more than 10 kilometers from any sugar mill in the area.
5. Site number 7 located on the roof of the Florida Sugar Cane Growers building meets PSD siting criteria. The site is approximately two kilometers NNW of the U.S. Sugar Corporation, Clewiston, mill. This monitor may be impacted by the mill and the data may not be desirable for use in a PSD application relative to this mill. 1.6
6. Site number 11 is located approximately 13 kilometers SSE of the city of South Bay in the middle of several large sugar cane fields. The site meets PSD siting criteria with one exception. The sugar cane in the field adjacent to the monitor has grown to a height equal to or higher than the monitor. In order to meet all siting criteria, it is recommended that the monitor be elevated to a height that will insure it being above the sugar cane.
7. Site number 13 is located near the 13th green at the Belle Glade Country Club golf course. The monitor meets PSD siting criteria except for its being too close to the tall maiden cane growing adjacent to the site. In order to meet all siting criteria, the monitor should be elevated or the golf course's greens keeper should be requested to trim and keep the tops of the maiden cane below the height of the monitor. The height of vegetation adjacent to monitors has a tendency to go unnoticed unless a special effort is made to periodically observe it.

8. Site number 14 located on SR 827 southeast of Belle Glade meets PSD siting criteria.
9. Site number 15 located on SR 80 just west of nine mile bend meets PSD siting criteria.
10. Site number 17 located in Belle Glade across from Glades Central High School meets PSD siting criteria.
11. The SO₂ site at the Florida Celery exchange meets PSD siting criteria. However, wind measuring equipment must be collocated with the SO₂ monitor.

To further improve and complete the PSD network, we recommend that additional TSP monitors be installed at the following locations:

1. A site within 3-10 kilometers of the U.S. Sugar, Bryant, mill. ✓
2. A site 3-5 kilometers north of the Sugar Cane Growers Cooperative mill.
3. A site 3-10 kilometers SSE of the Osceola Farms + Site 3 Company mill.
4. A site 3-10 kilometers SSE of the U.S. Sugar, Clewiston, mill.

The Department would like to obtain the TSP, SO₂ and O₃ monitoring data from this network if at all possible. The data should be submitted to this office on Storage and Retrieval of Aerometric Data (SAROAD) forms for inputting into our data system. In order for the monitoring data to be acceptable, it will be necessary for our Quality Assurance Auditor to audit the operations of the monitors on a routine basis. This can be accomplished by scheduling an audit along with our Southeast Florida Audit. If you concur, please let us know so an audit schedule can be made.

The present network is a well operated and maintained network and it is a pleasure to evaluate such a network. The courtesy you showed Bill Blommel during his visit is appreciated. If you have any questions regarding the above, please feel free to call either one of us at (904) 488-1344.

Bill Blommel
Bill Blommel

Cleve Holladay
Cleve Holladay

BB:CH:caa

cc: Mirza Baig
Eugene Sacco

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELLORS
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CAROLYN S. RAEPPLE

March 12, 1982

OF COUNSEL,
W. ROBERT FOKES
JOHN C. WHITE

Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dr. Kent Williams
Air Facilities Branch
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

DER

MAR 15 1982

BAQM

Re: Sugar Cane Growers Cooperative, Belle Glade, Florida
PSD-FL-077
AC50-42476

Dear Sirs:

Our client, Sugar Cane Growers Cooperative of Florida (SCGC), was recently issued federal and Florida PSD permits for the construction of a new bagasse boiler at its existing plant near Belle Glade, Florida. The permits authorized the construction of a boiler capable of burning various combinations of bagasse, residue, and fuel oil.

Certain facility components needed for burning residue, such as residue handling and feeding systems, titanium stack-lining, etc., may not be installed and/or utilized until the boiler has operated on bagasse and/or oil for a season or two. Of course, in such a case, residue burning would be delayed correspondingly. The potential delay in the installation of these items is due primarily to economic factors.

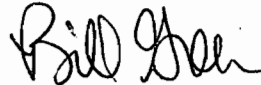
In compliance with General Condition 3 of the federal PSD permit and Specific Condition 6 of the Florida permit, SCGC will conduct performance tests to insure compliance with the established emission limits within sixty (60) days of achieving the maximum production rate or within one hundred eighty (180) days after initial startup of the bagasse and fuel oil burning operations. It is our under-

Mr. Steve Smallwood
Dr. Kent Williams
Page 2
March 8, 1982

standing that the analogous compliance deadlines for residue burning required by federal General Condition 3 and Florida Specific Condition 6 will not kick in until either sixty (60) days after achieving the maximum production rate while burning residue or within one hundred eighty (180) days after the initial startup of residue burning.

We believe that the delayed residue burning and compliance periods described above are consistent with both the federal and state PSD permits and the applicable regulations at 40 C.F.R. §§52.21, 51.24, and Ch. 17-2, Florida Administrative Code. If you disagree with our interpretation or foresee any difficulties with this course of action, please advise us accordingly as soon as possible.

Sincerely,



William H. Green
Counsel for Sugar Cane Growers
Cooperative of Florida

LA/lsd

cc: Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management

Mr. E. R. Arias
Executive Vice President

HOPPING BOYD GREEN & SAMS

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GEORGE N. MEROS, JR.
WILLIAM D. PRESTON
CAROLYN S. RAEPPLE

April 7, 1982

DER

APR 8 1982

OF COUNSEL,
W. ROBERT FOKES
JOHN C. WHITE

Mr. Steve Smallwood
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

BAQM

Re: Sugar Cane Growers Coop. of Florida, Belle Glade,
Florida - AC 50-42476; PSD-FL-077

Dear Mr. Smallwood:

By letter dated March 12, 1982, we corresponded with you and Dr. Kent Williams of EPA on behalf of our client Sugar Cane Growers Coop. of Florida (SCGC). The purpose of that correspondence was to apprise DER and EPA that SCGC might delay the burning of residue for a season or two at its recently permitted new multi-fuel boiler at Belle Glade, Florida. In view of the delay, SCGC sought concurrence from the agencies that compliance testing under Federal General Condition No. 3 and Florida Specific Condition No. 6 would not be required until after residue burning is commenced in the future.

Please find attached a response to our inquiry dated March 25, 1982 from Mr. Tommie A. Gibbs, Chief of EPA Region IV's Air Facilities Branch. As you will note, Mr. Gibbs interprets Federal General Condition No. 3 to allow compliance testing for residue burning within 60 days following initial startup thereof. The 180-day fine tuning period ordinarily allowed for new sources was not believed by Mr. Gibbs to be necessary. SCGC concurs with the position of EPA as stated by Mr. Gibbs, but of course, would reserve the right to seek more than 60 days time for compliance testing in the unlikely event that it should prove necessary.

Today I discussed this matter with Mr. Clare Fancy, Deputy Chief of the Department's Bureau of Air Quality Management. Mr. Fancy advised that DER concurred with EPA's position, but that DER would not rule out an extension of the 60-day compliance deadline should that become necessary.

Thank you for your continued assistance and consideration in this matter.

Sincerely,



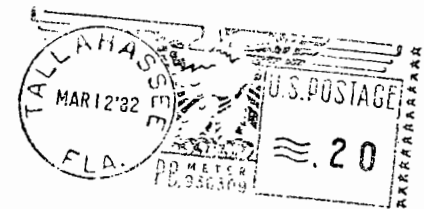
William H. Green

WHG/gs
Enclosure

HOPPING BOYD GREEN & SAMS

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32301



Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Mr. Steve Smallwood
April 7, 1982
Page 2

cc: Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management

Mr. E. R. Arias
Executive Vice President

Tommie A. Gibbs, Chief
Air Facilities Branch

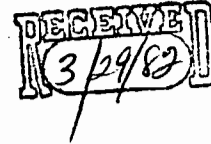


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

MAR 25 1982



REF: 4AW-AF

Mr. William H. Green
Hopping Boyd Green and Sams
Suite 420, Lewis State Bank Building
P.O. Box 6526
Tallahassee, Florida 32301

Dear Mr. Green:

My staff has reviewed your March 12, 1982, request delaying the compliance testing required when burning residue in Sugar Cane Growers' recently permitted bagasse boiler.

EPA's interpretation of Federal General Condition #3 is that the compliance deadline for residue burning will be 60 days following the initial startup of the residue burning. EPA feels that, since maximum production rates will have already been reached for the bagasse and oil boiler fuels, the 180 day fine tuning period should not be necessary in order to reach the maximum residue burning rates.

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

Sincerely yours,

Tommy A. Gibbs

Tommy A. Gibbs, Chief
Air Facilities Branch

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELLORS
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WILLIAM D. PRESTON
CAROLYN S. RAEPPLE

April 7, 1982

OF COUNSEL,
W. ROBERT FOKES
JOHN C. WHITE

Tommie A. Gibbs, Chief
Air Facilities Branch
Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

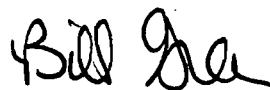
Re: Sugar Cane Growers Coop. of Florida -
AC 50-42476; PSD-FL-077

Dear Mr. Gibbs:

I am in receipt of your letter dated March 25, 1982 regarding delayed compliance testing when burning residue at the recently permitted multi-fuel boiler of Sugar Cane Growers Coop. of Florida. Your prompt response is greatly appreciated and provides the guidance necessary for our client to proceed. As you will notice from the attached letter, we have copied DER with your letter.

Once again, thank you very much for your timely assistance.

Sincerely,



William H. Green

WHG/gs

cc: E. R. Arias
Executive Vice President

C. H. Fancy, Deputy Chief
Bureau of Air Quality Management

HOPPING, BOYD GREEN & SAMS

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CAROLYN S. RAEPPLE

March 12, 1982

OF COUNSEL,
W. ROBERT FOKES
JOHN C. WHITE

Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
MAR 15 1982
BAQM

Dr. Kent Williams
Air Facilities Branch
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

Re: Sugar Cane Growers Cooperative, Belle Glade, Florida
PSD-FL-077
AC50-42476

Dear Sirs:

Our client, Sugar Cane Growers Cooperative of Florida (SCGC), was recently issued federal and Florida PSD permits for the construction of a new bagasse boiler at its existing plant near Belle Glade, Florida. The permits authorized the construction of a boiler capable of burning various combinations of bagasse, residue, and fuel oil.

Certain facility components needed for burning residue, such as residue handling and feeding systems, titanium stack-lining, etc., may not be installed and/or utilized until the boiler has operated on bagasse and/or oil for a season or two. Of course, in such a case, residue burning would be delayed correspondingly. The potential delay in the installation of these items is due primarily to economic factors.

In compliance with General Condition 3 of the federal PSD permit and Specific Condition 6 of the Florida permit, SCGC will conduct performance tests to insure compliance with the established emission limits within sixty (60) days of achieving the maximum production rate or within one hundred eighty (180) days after initial startup of the bagasse and fuel oil burning operations. It is our under-

Permit File Scanning Request from Elizabeth

Priority: -ASAP (Public Records Request, etc.) -Place in Normal Scanning Queue

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
0990026	AC 50-42476	AC	077		

File Approved For Disposal
 Return File to BAR

Correspondence Intent Permit Draft
 Amendment Application OGC Proposed

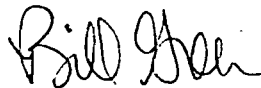
Document Date 4/15/82

Mr. Steve Smallwood
Dr. Kent Williams
Page 2
March 8, 1982

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We believe that the delayed residue burning and compliance periods described above are consistent with both the federal and state PSD permits and the applicable regulations at 40 C.F.R. §§52.21, 51.24, and Ch. 17-2, Florida Administrative Code. If you disagree with our interpretation or foresee any difficulties with this course of action, please advise us accordingly as soon as possible.

Sincerely,



William H. Green
Counsel for Sugar Cane Growers
Cooperative of Florida

LA/lsd

cc: Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management

Mr. E. R. Arias
Executive Vice President

ESE ENVIRONMENTAL SCIENCE AND ENGINEERING, INC.

August 2, 1982

80 190 200

DER
AUG 03 1982
BAOM

Mr. Cleve Holladay
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Re: SCGC Post-Construction Monitoring for Boiler #8 (PSD-FL-077; AC50-42476)

Dear Cleve:

On behalf of the Sugar Cane Grower's Cooperative it is proposed to monitor for total suspended particulate (TSP) at the location shown in the attached map in order to satisfy the post-construction monitoring requirements of the referenced permits.

The proposed location is approximately 1600 metres from the plant in the direction of 260 degrees from due north. This is approximately 600 metres from the predicted point of highest, second-highest 24-hour TSP impact with Boiler #8 in operation, as determined by the PSD modeling. The locations of predicted highest, second-highest impacts for each of the 5 years modeled varied from 800 to 1000 metres from the plant in directions from 250 degrees to 290 degrees from due north. The impact predicted at 1400 metres in direction 260 (the furthest point modeled in the PSD study) was about half that at the point of maximum impact.

The 1980 Ambient Monitoring Guidelines (EPA-450/4-80-012) recommend that the location of a monitor in a post-construction phase network be based on modeling techniques. In Section 3.2 of the chapter on network design the Guidelines state that a source should "...use the screening procedure or refined model estimates to determine the general location(s) for the maximum air quality concentrations...". They further state that "monitoring should then be conducted in or as close to these areas as possible...."

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO.		
		ACTION DUE DATE		
1.	TO: (NAME, OFFICE, LOCATION) <i>Marti Hall</i>	INITIAL		
		DATE		
2.	<i>Bill Thomas</i>	INITIAL		
		DATE		
3.		INITIAL		
		DATE		
4.		INITIAL		
		DATE		
REMARKS: <i>Do you agree? It seems strange that they have just "discovered" this limitation. Effects on interim limitations and "interpretations" should be carefully examined before we bite. Bi</i>		INFORMATION		
		REVIEW & RETURN		
 <i>Looks o.k. Marti</i>		REVIEW & FILE		
		INITIAL & FORWARD		
		DISPOSITION		
		REVIEW & RESPOND		
		PREPARE RESPONSE		
		FOR MY SIGNATURE		
		FOR YOUR SIGNATURE		
		LET'S DISCUSS		
		SET UP MEETING		
		INVESTIGATE & REPT		
		INITIAL & FORWARD		
		DISTRIBUTE		
		CONCURRENCE		
		FOR PROCESSING		
		INITIAL & RETURN		
		FROM:	<i>Clair Jowley</i>	DATE <i>3-16</i>
				PHONE

ENVIRONMENTAL SCIENCE AND ENGINEERING, INC.

Mr. Cleve Holladay
Page Two
August 2, 1982

The only clarification of the terms "general location" or "as close to these areas as possible" is found in Section 2.4.1 of the Guidelines, which discuss the conditions under which existing monitoring data may be used for pre-construction monitoring. In this section the Guidelines indicate that a monitor location could be considered representative of a plant's maximum impacts if it is within 1000 metres of an area enclosed by air quality concentration isopleths equal to or greater than one-half the estimated maximum concentration. The proposed monitoring location is well within this representative area, and is the only practicable location in this general area in terms of power availability.

We seek your concurrence on the location of the monitor. The probe siting and QA/SOP procedures are being arranged by David Bare of the Florida Sugar League. He will be addressing these issues in a separate letter. Please keep in mind that Boiler No. 8 is scheduled to start operation in the coming crop season, probably mid-October, and that sufficient lead time must be allowed for equipment purchase and set up.

Please don't hesitate to call with any questions.

Sincerely,

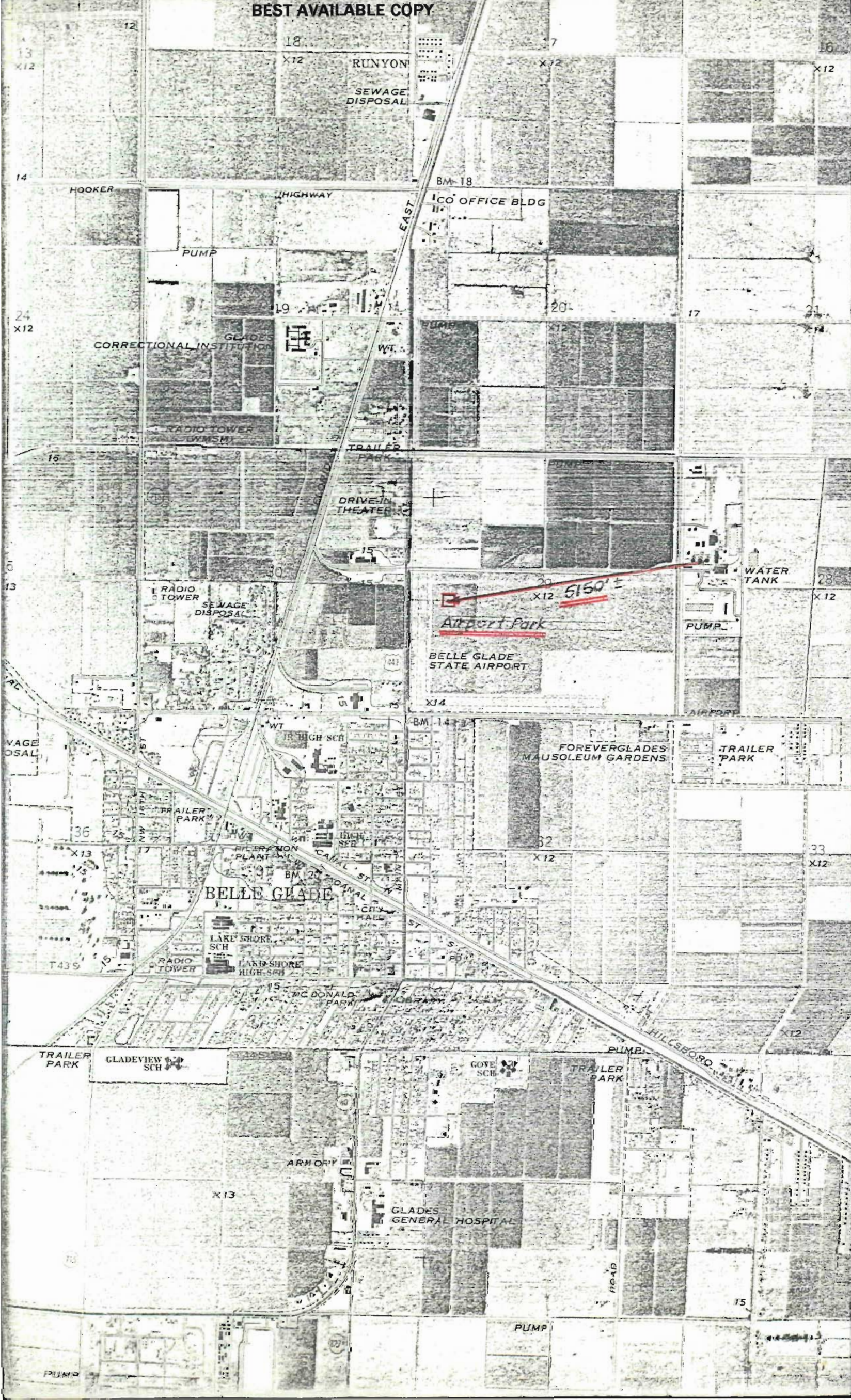


Michael H. Dybevic
Air Modeling and Permitting

MHD/ds

Enclosure

cc: Enrique Arias-w/o enclosure



18
X12
RUNYON
SEWAGE DISPOSAL

BM 18
CO OFFICE BLDG

19
CORRECTIONAL INSTITUTION

RADIO TOWER (WMSM)

DRIVE IN THEATER

RADIO TOWER
SEWAGE DISPOSAL

5150' ±
X12
Airport Park
BELLE GLADE STATE AIRPORT

WATER TANK

FOREVERGLADES MAUSOLEUM GARDENS

BELLE GLADE

LAKE SHORE SCH
LAKE SHORE HIGH SCH

MC DONALD PARK

GLADES GENERAL HOSPITAL

HILLSBORO

GLADEVIEW SCH

TRAILER PARK

GOVE SCH

ARMORY

PUMP

15

PUMP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

August 16, 1982

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

Re: Postconstruction Monitoring for Sugar Cane
Growers Cooperative (SCGC) Boiler #8
(PSD-FL-077; AC 50-42476)

Dear Mr. Arias:

As you are aware, one of the permit conditions accompanying the construction permit for Power Boiler #8 at SCGC requires postconstruction ambient monitoring for particulates. According to this condition, the particulate 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 limitation of the short-term secondary standard for particulates." In order for SCGC to satisfy this condition, the Bureau of Air Quality Management (BAQM) has determined that the following requirements for duration of monitoring and data sampling interval should be met:

1. The duration of monitoring shall be for a period of two years. Monitoring only has to be performed during the crop season (mid-October to mid-April).
2. The data sampling interval should be sufficient to show that the standards are being met; therefore, sampling shall occur at least once every three days during the first year of monitoring.
3. The adequacy of the three-day sampling interval may be reviewed after the first year of monitoring has occurred. If the monitoring data do not show that the ambient air quality is well within the limitations of the short-term secondary standard for

Enrique R. Arias
August 16, 1982
Page Two

particulates, the sampling interval required may be decreased to once every day. If at the end of two years of monitoring, the data still do not show that the ambient air quality is well within the limitations of the short-term secondary standard for particulate, an additional period of monitoring may be required.

The BAQM has also determined that one postconstruction monitoring site located according to the requirements and procedures as stated in the "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD)," EPA-450/4-80-012, November 1980, and operated according to the quality assurance procedures of 40 CFR 58, Appendix B will be sufficient to meet the postconstruction monitoring permit condition. However, this monitoring site is in addition to the monitoring site which will be operated by the Florida Sugar Cane League in order to establish a background concentration of particulate in the area surrounding SCGC.

If you have any questions concerning the postconstruction monitoring, please call Cleve Holladay at 488-1344.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/CH/bjm

cc: D. Bare
W. Green
M. Kahel
D. Knowles
E. Sacco

*Please provide us with all
quality assurance requirements as per
Part 40 CFR Part 58,
Appendix B for
the ozone monitor*

AGREEMENT CONCERNING THE PREVENTION
OF SIGNIFICANT DETERIORATION AMBIENT
AIR QUALITY MONITORING NETWORK
OF THE FLORIDA SUGAR CANE LEAGUE

The Florida Department of Environmental Regulation (DER) and the Florida Sugar Cane League (FSCL), in consideration of the matters set forth herein, agree as follows:

1. FSCL members own and operate six sugar mills in Palm Beach and Hendry Counties, Florida, the locations of which are set forth in Exhibit A. Boilers at these mills produce steam through the combustion of bagasse, fuel oil, and/or residue.

2. Following the enactment of the Clean Air Act Amendments of 1977, the U. S. Environmental Protection Agency (EPA) and DER promulgated extensive regulations dealing with the prevention of significant deterioration of air quality (PSD). Those regulations require new major sources and modifications of major sources to undergo extensive pre-construction review. In the case of FSCL boilers, that review now requires up to one year of pre-application ambient air quality monitoring for sulfur dioxide (SO₂) and total suspended particulate matter (TSP). Such pre-application monitoring is needed to establish the background concentration levels of these pollutants and must be carried out at monitoring sites meeting certain locational, quality assurance and other criteria.

3. FSCL currently owns and operates an ambient air quality monitoring network in Glades, Palm Beach and Hendry Counties, Florida. The network was originally designed to assess air quality impacts attributable to operations of the sugar industry in the three-county area, rather than to satisfy PSD pre-construction monitoring requirements. DER has carefully evaluated the existing network and made recommendations concerning how it would have to be modified in order to fulfill pre-application PSD monitoring requirements that might apply to the addition of new boilers or the modification of existing boilers at any of the six mills in the future. The goal of DER and FSCL in this regard is to commence recording reliable ambient air quality data for SO₂ and TSP in the near future. The data would be routinely added to DER's data banks, thereby avoiding pre-application monitoring delays that might otherwise be encountered with future PSD permitting associated with the six mills.

5. After extensive review, in light of existing regulatory requirements, DER and FSCL have developed a monitoring program attached hereto as Exhibit B.

WHEREFORE, in light of the premises and the matters set forth above, the parties hereto agree and covenant as follows:

1. FSCL will institute the monitoring program described in Exhibit B hereto (the program) within a reasonable time, and will provide DER with written notification when the program is fully implemented.

2. FSCL will provide DER with reports, pursuant to the terms of the program, on SAROAD forms on a quarterly basis.

3. Once implemented, the program and the data derived therefrom shall be deemed to satisfy the pre-application monitoring requirements set forth at Section 17-2500(5)^(f)/F.A.C. and, 40 CFR §52.21 (m), with regard to the addition of any new bagasse/fuel oil/residue boilers or modifications of such boilers at the six mills identified in Exhibit A hereto; provided, however, that a minimum of four months continuous monitoring data shall be required to support any such application and further that DER reserves the right to require up to one calendar year of such data for any given application.

4. The monitoring program and this agreement shall be reviewed on or before December 31, 1985 and every three years thereafter, unless an earlier review is proposed by either of the parties in writing.

5. This agreement shall bind the parties hereto and those whom they represent and may be modified only in writing with the consent of both parties; provided however, that each party reserves the right to rescind this agreement by providing at least six months written notice to the other party.

DEPARTMENT OF ENVIRONMENTAL REGULATION

FLORIDA SUGAR CANE LEAGUE

Terry Cole for

Victoria J. Tschinkel, Secretary
2600 Blair Stone Road
Tallahassee, Florida 32301

Roy Vandegrift, Jr.

Roy Vandegrift, Jr., President
Post Office Box 1148
Clewiston, Florida 33440

DATE: 8/27/82

DATE: August 18, 1982

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52 (9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Patricia Muller
Clerk

8/27/82
Date

EXHIBIT A

Atlantic Sugar Association
P. O. Drawer B
Belle Glade, Florida 33430

Mill location: 15 miles east of Belle Glade and 4 miles south of
U. S. 441.

Gulf+Western Food Products Company
P. O. Box 86
South Bay, Florida 33493

Mill location: Six miles south of South Bay and 3 miles west of
U. S. 27.

Osceola Farms Company
P. O. Box 679
Pahokee, Florida 33476

Mill location: Seven miles east of Canal Point and 2 miles north of
U. S. 98.

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

Mill location: One mile north of Belle Glade and one mile east of
U. S. 441.

United States Sugar Corporation
P. O. Drawer 1207
Clewiston, Florida 33440

Mills locations: Clewiston - One mile south of Clewiston;
Bryant - One mile east of Canal Point off U. S. 98.

EXHIBIT B - MONITOR LOCATIONS (Ref: Universal Transverse Mercator
Zone 17)

Existing TSP Monitors:

- FSCL 3: 2971.9 km N; 537.1 km E
USDA Sugarcane Field Station, Canal Point, Florida
T41S, R37E, Sec. 34
- FSCL 4: 2966.7 km N; 533.2 km E
Pahokee Water Treatment Plant, Pahokee, Florida
T42S, R37E, Sec. 18
- FSCL 5 & 18: 2951.1 km N; 533.1 km E
Colocation - Glades Mercantile Co. showroom, Belle Glade, Florida
T43S, R37E, Sec. 31
- FSCL 7: 2958.9 km N; 505.9 km E
Florida Sugar Cane League, Inc., Clewiston, Florida
T43S, R34E, Sec. 16
- FSCL 11: 2934.2 km N; 526.4 km E
Sunshine Sod Co., South Bay, Florida
T45S, R36E, S34
- FSCL 13: 2953.1 km N; 528.9 km E
Belle Glade Golf Course, Belle Glade, Florida
T 43S, R36E, Sec. 26
- FSCL 14: 2939.3 km N; 547.0 km E
Boyle residence on SR 827 (Six miles south of U.S. 441)
T45S, R38E, Sec. 10
- FSCL 15: 2949.8 km N; 544.9 km E
Badcock Farms (S.R. 80 just west of Nine Mile Bend)
T43S, R38E, Sec. 4
- FSCL 17: 2951.2 km N; 532.6 km E
Belle Glade Swimming Pool, Locker Room Building, Belle Glade, FL
T43S, R37E, Sec. 31

Proposed TSP Monitor

- (1) 2962.4 km N; 534.1 km E
Sugar Cane Growers Cooperative of Florida, Worker Camp #1,
Belle Glade, Florida
- (2) 2958.4 km N; 531.6 km E
East Shore Drainage District Pump Station (S-12)
Belle Glade, Florida
- (3) 2960.6 km N; 549.2 km E
New Hope Sugar Corporation, maintenance building
on U. S. 98
- (4) 2947.8 km N; 507.9 km E
Delta Ranch, south of Clewiston, Florida

These monitors will gather Total Suspended Particulates (TSP) data in accordance with the national 6-day sampling schedule. In addition, sulfur

dioxide (SO₂) is continuously monitored at the Florida Celery Exchange,
head house, Belle Glade, Florida located at 2947.4 km N and 535.9 km E
(UTM Zone 17). R37E, T44S, Sec. 16

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



*Cleve -
FYI - This
is my initial
review of the
QA Plan -
Lick*

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

August 25, 1982

Mr. David A. Bare
Director of Environmental
Relations
Florida Sugar Cane
League, Inc.
P. O. Box 1148
Clewiston, Florida 33440

Dear Mr. Bare:

Reference: Florida Sugar Cane League;
Quality Assurance Plan for
Ambient Air Network, 6/82.

The following items are forwarded for your consideration and necessary action in regard to the referenced Quality Assurance Plan:

1. Page 2, Section 2.0, (3), delete "if available". - Calibration standards must be NBS traceable, either through direct purchase of NSB SRMs, CRMs or through protocolling by an independent agency such as the Research Triangle Institute. (Reference 40 CFR 58, Appendix B, 2.3).
2. Page 3, Section 2.0, (7), lines 3 and 4, change reference to DER to EPA. (Reference 40 CFR 58, Appendix B, 2.4). Same section, last sentence, delete all after ". . . monthly Quality Assurance data report".
3. Page 3, Section 2.0, (8) is in error. See 40 CFR 58, Appendix B, 3.2. Rewrite this element to meet the quarterly audit requirement for each continuous instrument to meet PSD requirements.

Mr. David A. Bare
August 25, 1982
Page Two

4. Page 5, Section 2.0., 13 should be (13) - last sentence of the first paragraph, either change "DER" to "FSCL" or add after "DER"-"and the FSCL elect".
5. Page 6, Section 2.0, (14), you may wish to add a comment as to the availability of free protocolling of gaseous standards by Research Triangle Institute at Research Triangle Park, N.C..

Please feel free to contact me if you have any questions or comments. Once these actions have been completed, final approval will be provided in the form of a letter to be included in the QA Plan binder.

Sincerely,



Richard J. Arbes
Quality Assurance Section
Bureau of Air Quality Management

RJA:ht

cc: D. Barker

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Cleeve
ok

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

September 7, 1982

Mr. David A. Bare
Director of Environmental
Relations
Florida Sugar Cane League,
Inc.
P. O. Box 1148
Clewiston, Florida 33440

Dear Mr. Bare:

Reference: Florida Sugar Cane League;
Quality Assurance Plan for
Ambient Air Network,
6/82 as amended.

Review of the subject document has been completed by my staff. The document, as amended, meets the requirements for quality assurance activities needed to produce acceptable ambient air quality data in support of Prevention of Significant Deterioration (PSD) monitoring requirements.

Please post this letter with the referenced document as the final approval notice.

Please feel free to contact this office at any time if you have further questions or comments.

Sincerely,

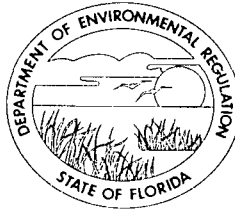
David R. Barker, Ph. D.
Environmental Administrator
Quality Assurance Section
Bureau of Air Quality Management

DRB:RJA:ht

cc: R. J. Arbes
C. Holladay

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

August 25, 1982

Mr. Michael H. Dybevick
Air Modeling and Permitting
Environmental Science and
Engineering, Inc.
P. O. Box ESE
Gainesville, Florida 32602

RE: SCGC Post-Construction Monitoring for Boiler
#8 (PSD-FL-077; AC 50-42476)

Dear Mike:

You submitted the proposed location of the Sugar Cane Growers Cooperative (SCGC) TSP post-construction monitor in your August 2, 1982 letter concerning the post-construction monitoring requirement for SCGC Boiler #8. We have evaluated your proposed location and concur on the location of the monitor.

Sincerely,

Cleve Holladay
Meteorologist
Bureau of Air Quality
Management

CH:ras

cc: D. Bare
E. Arias
M. Kahel
D. Knowles
E. Sacco

Larry Cleve - we need to resolve this issue with Bare and company, too

STATE OF FLORIDA

Bob Graham, Governor

hrs

DEPARTMENT OF

Health & Rehabilitative Services

District Nine
P. O. Box 29

Palm Beach County Health Dept.
West Palm Beach, Florida 33402

September 23, 1981



Please Address

Reply to:

Mr. Dalton Yancey
General Manager
Florida Sugar Cane League, Inc.
P.O. Box 1148
Clewiston, Florida 33440

Dear Mr. Yancy:

In recent months, our agency reviewed construction permit applications for boiler installations at three separate sugar mills. Each of the mills is considered a "major emitting facility" for air pollution. A "Prevention of Significant Deterioration" (PSD) analysis must be conducted prior to issuing a permit to construct a major emitting source. All sources subject to PSD review must provide reasonable assurance that their emissions will not cause a significant increase in air pollution.

The air pollution dispersion model normally included in a PSD determination is usually considered reasonable assurance. A dispersion model is influenced by many estimates, and it is, therefore, essential that whenever possible, measured data representative of the area of interest be utilized. Each of the dispersion models recently reviewed utilized meteorological data observed by the National Weather Service at Palm Beach International Airport (PBI) in West Palm Beach. The data can not be considered to be representative of the sugar industry area because of the distance between locations and the influence of Lake Okeechobee on the western portion of Palm Beach County.

The purpose of this letter is to recommend that the Sugar Cane League, in conjunction with their air monitoring network, establish a meteorological site somewhere in the area of interest to measure wind direction and speed in order to provide representative data for future sugar industry PSD analysis requirements.

By copy of this letter to interested companies and the engineering consultants involved in the recent applications, our agency is advising that PBI meteorological data will not be valid when developing a dispersion model for an industry in western Palm Beach County.

Should you have any questions concerning this matter, please contact the undersigned.

Sincerely,

Eugene J. Sacco
EUGENE J. SACCO, Administrator
Air Pollution, Solid and Hazardous Waste Control

EJS/o

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

September 14, 1982

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

Re: Postconstruction Monitoring for Sugar Cane Growers
Cooperative (SCGC) Boiler #8
(PSD-FL-077; AC 50-42476)

Dear Mr. Arias:

The particulate data collected from the postconstruction monitor required as one of the conditions accompanying the construction permit for Power Boiler #8 should be submitted to this office on Storage and Retrieval of Aerometric Data (SAROAD) forms, computer tape or floppy disk for inputting into our data system. Included with this letter are a set of monitoring site information forms and a set of instructions for completing these forms. These forms should be completed and returned to the Bureau of Air Quality Management (BAQM). A SAROAD Site Number which allows the data to be entered into the system will then be assigned to the monitor.

If you have any questions concerning these forms, please call Cleve Holladay at (904)488-1344.

Sincerely,

C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality
Management

CHF/CH/bjm

Enclosure

cc: D. Knowles
E. Sacco

Sugar Cane Growers Cooperative of Florida



POST OFFICE BOX 666

BELLE GLADE, FLORIDA

ZIP CODE 33430

November 15, 1982

*Larry
FYI - Cleve, then
to Dave*

DER
NOV 17 1982
BAQM

Mr. C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

Re: Post construction monitoring for our New Boiler No. 8
(PSD-FL-077; AC 50 42476)

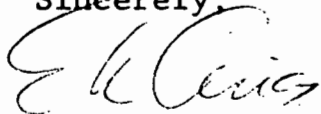
The enclosed copy of Sugar Cane Growers Cooperative of Florida Quality Assurance Plan for Post Construction Monitor dated November 12, 1982, (Rev. No. 0) completes the information required by the provisions of the FDER and EPA permits as well as by those requested by you in your various letters on the subject of reference.

We understand that your group has been working with EPA on this matter. The submission of this report is intended to satisfy the requirements of both FDER and EPA. We also understand that no further action involving EPA is necessary on our part.

Mr. C. H. Fancy, P.E.
Page 2
November 15, 1982

The operation of the post construction ~~monitor~~ has already started and the new boiler is due to ~~commence~~ operation on Tuesday, November 16, which is the ~~first day~~ of our 1982-83 crop season.

Sincerely,



E. R. Arias
Executive Vice President

ERA/st

Enc.

cc: Chief, Air Facilities Branch, Air ~~Quality~~ Waste Management
Division; U.S. Environmental ~~Protection~~ Agency, Region IV

Mr. David Buff
Mr. David Bare
Mr. William Green
Mr. David Knowles
Mr. E. Sacco

FLORIDA SUGAR CANE LEAGUE AMBIENT AIR MONITORING NETWORK

Network Purpose

- A. To provide League members with reliable (both accurate and precise) ambient air monitoring information and to ensure that this information is collected in accordance with recognized standard operating and quality control procedures.
- B. To allow member mills to utilize collected information as background data to fulfill PSD requirements for construction permits for future mill modifications.

Network Design

The original design objective of the network was to evaluate the air quality in the Everglades Agricultural Area (EAA), including rural as well as populated areas. It was also intended to estimate the influence of sugarcane harvesting and mill operations on the air quality.

The present day network has 17 hi-vol sites in which one site has collocated hi-vol monitors. These sites are located throughout the EAA, ranging from Moore Haven to the west to Royal Palm Beach to the east, from Canal Point to the north to the Palm Beach County/Broward County border to the south. The current network represents both urban and rural (with and without sugarcane harvesting influence) areas. Attached is a map showing monitor locations and a listing of exact locations referenced to the Florida grid system.

Also included in the current network are a continuous sulfur dioxide (SO₂) and an ozone (O₃) monitor located just to the south east of Belle Glade, Florida. The existing wind speed and direction monitor will be relocated with the continuous monitors mentioned above.

Monitoring Procedures

The League's hi-volume air samplers are operated in conjunction with the national six-day monitoring schedule. All of the existing hi-vol sites comply with probe siting criteria as set forth in section 3.3 of "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD)" EPA-450/4-80-012. All the TSP samplers are equipped with Dickson flow recorders and seven-day timers. Elapsed time meters are on order for all hi-vols. The hi-vols are operated and maintained in accordance with applicable sections of Department of Environmental Regulation's Standard Operating Procedures (DER SOP), number DER-03-1. All parameters and limits established by DER's SOP are equaled or bettered in our lab (e.g., League tolerance limit for unexposed/exposed filter audit is 1.0 mg/2.7 mg versus DER's 2.8 mg/5.0 mg in SOP 03-1)

The Thermo Electron 43 SO₂ analyzer and Dasibi 1003-AH O₃ analyzer are also operated and maintained in accordance with applicable sections of DER's SOP numbers DER-06-4 and DER-07-1. The monitors are housed in a temperature controlled environmental facility. The strip chart recorders for each parameter are Leeds and Northrup Speedomax type H.

Calibration Procedure

The TSP monitors are calibrated on a quarterly basis in accordance with applicable sections of DER-03-1 and DER-03-3. Each sampler is calibrated and 25% are audited each quarter. The League has both a VRC orifice for calibrations and a calibrated place orifice for flow audits.

The Thermo-Electron 43 SO₂ monitor is calibrated with a Thermo Electron 143 multipoint, 30° oven unit in accordance with applicable sections of DER-12-4. The calibration system utilizes an NBS traceable 5 cm SO₂ permeation tube (Analytical Instrument Development, Inc.)

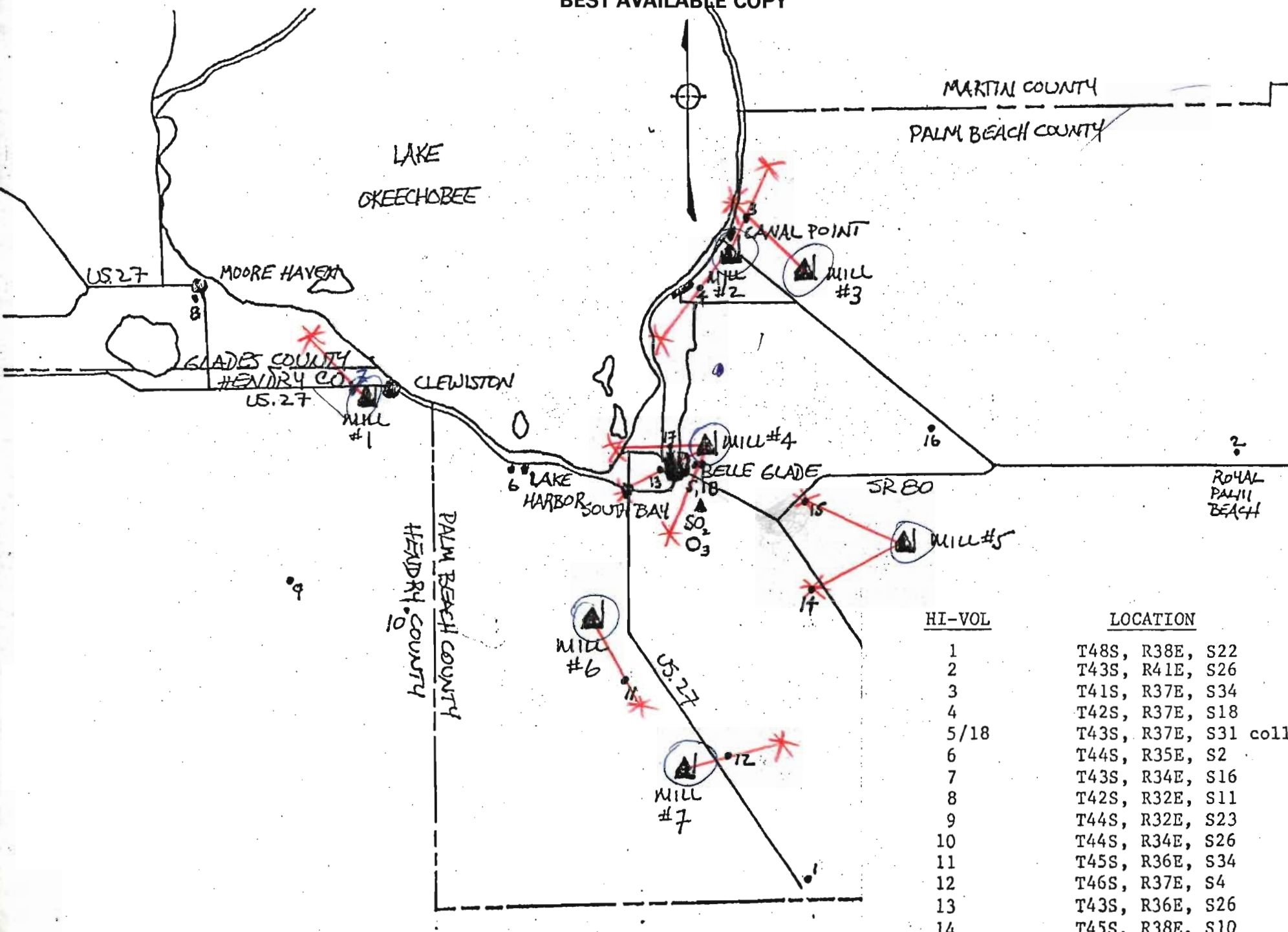
The Dasibi 1003-AH O₃ monitor is calibrated quarterly with a Dasibi 1003-PC with a multipoint ozone generator in accordance with applicable sections of DER's SOP for O₃ calibration. The Dasibi 1003-PC is referenced quarterly to Palm Beach County Health Department's primary ozone standard at their Delray, Florida laboratory.

Both monitors are calibrated quarterly with zero/span checks every two weeks.

Quality Assurance

Our program utilizes DER's SOP as the foundation for achieving acceptable standards for data collection, manipulation and validation. Deviations from the SOP's are noted in the text.

- Descending order of adm. complexity
1. Please tell us where the sugarcane fields were located.



HI-VOL

LOCATION

1	T48S, R38E, S22
2	T43S, R41E, S26
3	T41S, R37E, S34
4	T42S, R37E, S18
5/18	T43S, R37E, S31 collocation
6	T44S, R35E, S2
7	T43S, R34E, S16
8	T42S, R32E, S11
9	T44S, R32E, S23
10	T44S, R34E, S26
11	T45S, R36E, S34
12	T46S, R37E, S4
13	T43S, R36E, S26
14	T45S, R38E, S10
15	T43S, R38E, S4
16	T43S, R39E, S27
17	T43S, R37E, S31
SO ₂ /O ₃	T44S, R37E, S16

Cleve

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

November 24, 1982

Mr. David A. Bare
Florida Sugar Cane League
Post Office Box 1148
Clewiston, Florida 33440

Dear Mr. *Cleve* Bare:

Reference the Sugar Cane Growers Cooperative QA Plan submission for post construction monitoring of Power Boiler #8 for TSP.

Request clarification of the last paragraph on page 5, Section 5.0, on performance and systems audits. Specify the season length in regard to performance audit; PSD requirements are for each hi-vol to be audited at least once per quarter (40 CFR 58, Appendix B, 3.4.1). Also review the list of FDER SOPs in Appendix I. DER-03-2 and DER-03-3 on flow requirements may also be needed to fully meet the hi-vol requirements as specified.

Please feel free to contact me if you have any questions on the above specifications. Phone (904) 488-1344.

Sincerely,

Richard J. Arbes

Richard J. Arbes
Quality Assurance Section
Bureau of Air Quality Management

RJA/dt

cc: D. Buff
C. Holladay

business

Tallahassee Democrat/Wednesday, September 29, 1982

State's sugarcane growers say Florida's harvest will top Hawaii's

CLEWISTON (AP) — Florida sugarcane growers expect to take the No. 1 ranking away from Hawaii again by producing a record raw sugar crop this season, industry leaders say.

"Farmers report the crop is looking great," said Dalton Yancey, vice president and general manager of the Florida Sugar Cane League in Clewiston. "The heavy rainfall combined with adequate amounts of sunshine during the summer months are the main reasons for such a healthy-looking crop."

The South Florida cane harvest begins next month, and mills are expected to be in full operation by November.

Thousands of Caribbean cane cutters are scheduled to arrive in October, mainly from Jamaica.

Cane cutters are paid a minimum of \$4.69 an hour, but their average wage is more than \$5 an hour due to incentive pay, said Chris Papaneri of the cane league.

Florida sugarcane growers say they will produce an estimated 1,144,000 tons of raw sugar during the 1982-83 grinding season, according to a preliminary crop projection.

If the estimate is accurate, the cane crop would break

the record set in 1980-81, when production was 1,121,000 tons of raw sugar. Florida's crop topped Hawaii's sugar production for the first time that year as the state of islands produced 1.02 million tons.

Florida's crop dipped 220,000 tons below forecasts last year, to 936,000 tons, due to three freezes and drought. Hawaii ground out 1.05 million tons.

Papaneri said this year's crop, if it met expectations, would put Florida back on top.

"Compared to this time last year, our water situation is much better," said Yancey.

June, July and August are the peak growing months for Florida cane. This summer, some plants were growing more than an inch per day.

Florida produces nearly 12 percent of the sugar consumed in the United States.

The sugar industry in South Florida accounts for more than \$1 billion worth of economic activity, the industry group said.

More than 300,000 acres are under cane cultivation in Florida, mainly in Palm Beach, Hendry, Glades and Martin counties in an area north of Miami near Lake Okeechobee.

Local Climatological Data

Annual Summary With Comparative Data

1980

WEST PALM BEACH, FLORIDA

LIBRARY
STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION



Narrative Climatological Summary

West Palm Beach and Palm Beach, both located on the coastal sand ridge of southeastern Florida, are separated by Lake Worth, a portion of the inland Waterway. The entire coastal ridge is only about 5 miles wide and in early times the Everglades reached to its western edge. Now most of the swampland has been drained and is devoted to agriculture, the peat-like "muck" soil being very fertile when fortified with certain lacking minerals. The Atlantic Ocean forms the eastern edge of Palm Beach, and the Gulf Stream flows northward about 2 miles offshore, this being its nearest approach to the Florida coast.

Because of its southerly location and marine influences, the Palm Beach area has a notably equable climate. Cold continental air must either travel over water or flow down the Florida Peninsula to reach the area, and in either case its cold is appreciably modified. Actually the coldest weather, with infrequent frosts, is experienced the second or third night after the arrival of the cold air, with the loss of heat through radiation. The frequency of temperatures as low as the freezing mark is about one per three years at the National Weather Service Office, but in the farmlands farther from the coast the frequency of light freezes is considerably higher.

Summer temperatures are tempered by the ocean breeze, and by the frequent formation of cumulus clouds, which shade the land somewhat without completely obscuring the sun. Temperatures of 89° F or higher have occurred in all months of the year, but the 100° mark has been reached only once. August is the warmest month and has an average maximum temperature of about 91°. The occurrence of 90° temperatures in August is so common that such can be expected on more than two-thirds of the days; however, temperatures as high as 96° are so rare that occurrences average less than two days per August.

The moist, unstable air in this area results in frequent showers, usually of short duration. Thunderstorms are frequent during the summer, occurring on an average of every other day. Rainfall is heaviest during the summer and fall, the fall rainfall average being "loaded" with occasional heavy rains accompanying the passage of tropical disturbances. These disturbances sometimes pass as full hurricanes, accompanied by high winds. The most severe one to pass through West Palm Beach in recent years occurred on August 26, 1949. The anemometer blew down when the wind velocity reached 120 m.p.h., so that the highest velocity is not known. It is estimated to have reached 140 m.p.h. in the northern part of the City.

Flying weather is usually very good in this area, with "instrument" weather occurring only rarely. Heavy fog occurs on an average of only one morning a month in the winter and spring, and almost never in the summer and fall.

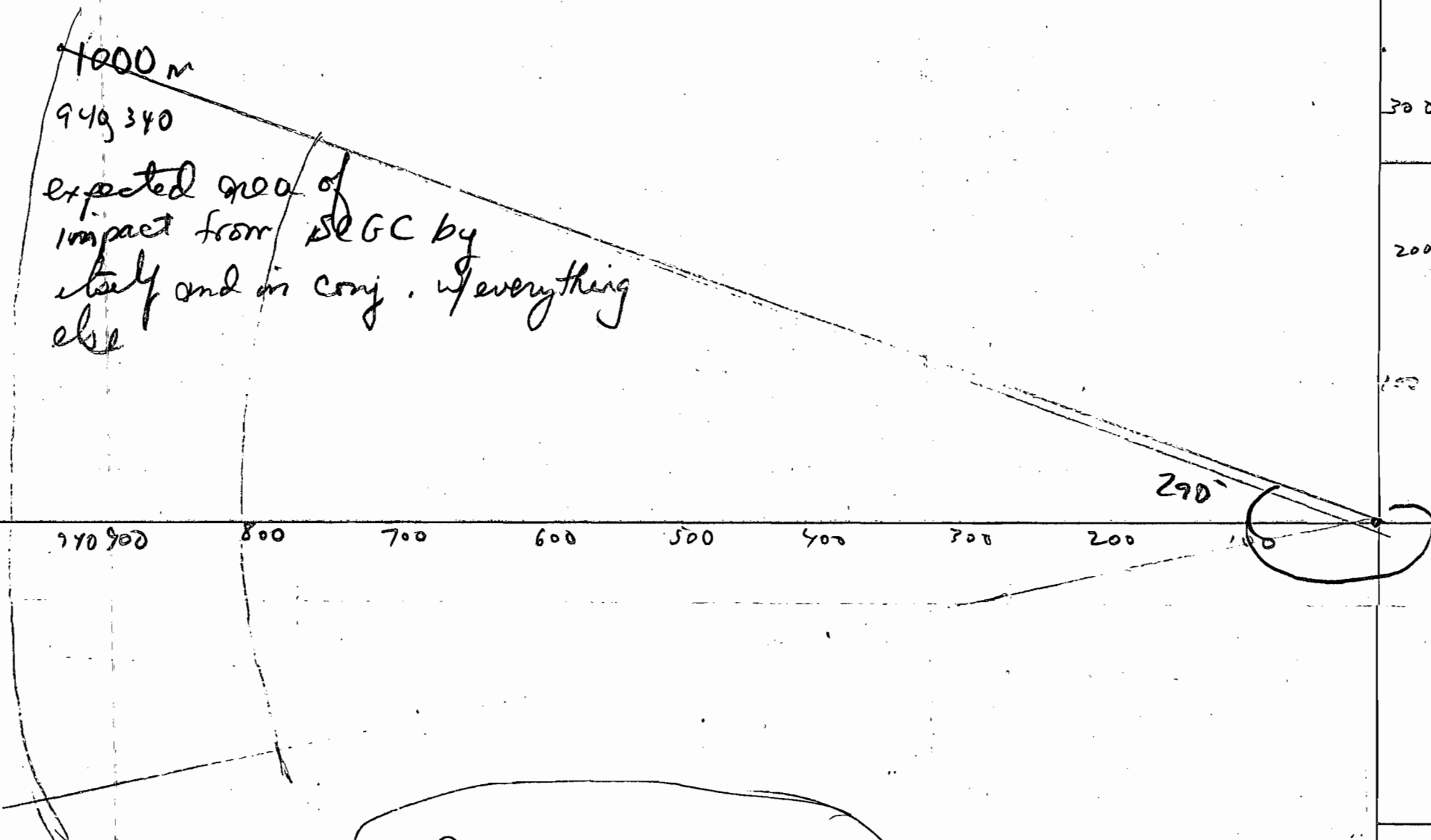
noaa

NATIONAL OCEANIC AND
ATMOSPHERIC ADMINISTRATION

ENVIRONMENTAL DATA AND
INFORMATION SERVICE

NATIONAL CLIMATIC CENTER
ASHEVILLE, N.C.

Anywhere from 800m and 260 to
1000m and 300



from 260° - 300°

I later modified this to be from 250° - 300°
out from 800 - 1200 m.

Look at modeling -

✓ Atmospheric Environment

~~PLT~~

~~PLT~~ Oct-Nov
Dec

Sugar Cane Growing Season

Mo. Wind Directions

Direction of Max Impact

Oct	ENE	←	248°
Nov	ENE	←	248°
Dec	NNW	↓	158°
Jan	NW	↘	135°
Feb	SE	↖	315°
Mar	SE	↖	315°

Monitors within 10km of mill?

# 1	No		
# 2	No		
# 3	9.0	WNW	Osceola
	3.2	N-NW	Bryant
# 4	5.2	SW	Bryant
# 5	3.0	SW	SCGC
# 6	No		
# 7	1.2	NW	USS Clewiston
# 8	No		
# 9	No		
# 10	No		
# 11	5.7	S-SSE	G+W Foods
# 12	3.2	NNE	Talisman
# 13	6.2	W	SCGC
# 14	8.9	SW	ASA
# 15	9.3	NW	ASA
# 16	10.2	N-NNE	ASA
# 17	3.0	SW	SCGC
# 18	3.0	SW	SCGC

High	2nd high	Ann Avg
102	100	35
105	90	43
-	-	-
110	89	50
106	92	32
107	107	60
-	-	-
102	83	42

ASA	# 14	8.9 km
	# 15	9.3 km
Osceola	# 3	9.0 km
Bryant	# 3	3.2 km
	# 4	5.2 km
SCGC	# 13	6.2 km
	# 5, # 17, # 18	~ 3.0 km
G+W	# 11	5.7 km
USS Clew	# 7	1.2 km

Looking at
Composite 2nd highest

106.8	290°	, 1000 m
105.7	260°	, 800 m
103.4	270°	, 800 m
102.9	290°	, 1200 m
100.5	270°	, 1000 m
99.7	260°	, 1000 m
99.3	250°	, 800 m
99.2	290°	, 800 m

Existing Monitors
230° , 2.6 km
210° , 3.1 km

Write ~~for~~ Sugar Cane Growers a ltr
stating need for PK monitoring
Suggest initial location + number of monitors
needed.

State that they have up until next growing
season to come up with a plan.

Copy FSCL + Dave Bone

State that they may be able to use
FSCL pt monitoring league to satisfy
some of the requirements.

Talked w/ Bill Wagner - EPA will let
states + source work out problem w/ monitoring

EPA - will they approve this?

3 years prior to Dec 85 or sooner

Need final proposal on siting from Dave Base

Multi-form of agreement

Dave & ^{Barker} Brian review

42-381 100 SHEETS 3 SQUARE
42-382 100 SHEETS 3 SQUARE
42-383 200 SHEETS 3 SQUARE
MADE IN U.S.A.



Dave

Appendix A - Network + maps

B -

Brian K. - photographs will be good enough

Dave Base will go by probe-siting methods in
EPA guidelines

Appendices

Q/A & Siting Plan - Include as appendices to
package

Map of plants & location of sites

Meteorological data - Wind speed & direction
(very time intensive)

M.H. ~~29~~²⁸th - 8th June, 82

met. after June 8

E. Shore & Runyon

Clewiston - south of that mill

Osceola - moving ¹⁶ to S of Osceola

June 15th - 10:00 AM

42,381 50 SHEETS
42,382 50 SHEETS
42,383 50 SHEETS
42,384 50 SHEETS
42,385 50 SHEETS
42,386 50 SHEETS
42,387 50 SHEETS
42,388 50 SHEETS
42,389 50 SHEETS
42,390 50 SHEETS
NATIONAL
MADE IN U.S.A.

UNIVERSAL TRANSVERSE MERCATOR (zone 17)

NEW 1 SCGC - KENNEDY CAMP

9.7 km
scc c

2962.4 km N 534.1 km E

2 EAST SHORE PUMP STA (#12)

6 km
seal

2958.4 km N 531.6 km E

3 NEW HOPE (HATTON BROS SHOP) SUGAR

OK
~ 10 km

2960.6 km N 549.2 km E

4 DELTA RANCH (uscc)

OK

~ 10 km

2947.8 km N 507.9 km E

EXISTING

3 CANAL POINT - USDA

2971.9 km N 537.1 km E

4 PAHOKEE - WTP

2966.7 km N 533.2 km E

S/18 BELLE GLADE (CITY)

2951.1 km N 533.1 km E

7 CLEWISTON - FSCL ROOF

2958.9 km N 505.9 km E

11	SUNSHINE SOIL Co.	2934.2 km N	526.4 km E
13	BELLE GLADE GOLF COURSE	2953.1 km N	528.9 km E
14	BOYLES RESIDENCE	2939.3 km N	547.0 km E
15	SR 80 (WEST 9 MILE BEND)	2949.8 km N	544.9 km E
17	BELLE GLADE SWIMMING POOL	2952.1 km N	532.6 km E
SO ₂ /O ₃	FRA. CELERY EXCHANGE HEAD HOUSE	2947.4 km N	535.9 km E

HI-VOL DESCRIPTION

1 T48S, R38E, S22 AT SFUMD
PUMP STA 5-7 ... ENCLOSED BY
FENCE ... NO OBSTRUCTIONS...
NO VISIBLE EXHAUST STACKS FROM
PUMPS... 8220 AVT 1980

2 T43S, R41E, S26 AT ROYAL PALM
BEACH GOLF COURSE RESTROOM
ROOF ... LONE PINE TREE

3 T41S, R37E, S19⁵³⁴ AT USDA CANAL
POINT ... NO OBSTRUCTION

4 T42S, R37E, S19 AT PAHOKEE
WATER TREATMENT PLANT ... NO
OBSTRUCTIONS

5 T43S, R37E, S32 AT GLADES
MERCHANVILLE SHOWROOM, REELLE
GLADE ... ~30 FT FROM PAVEMENT

6 T44S, R35E, S2 AT SOUTH SHORES
WATER ASSN ... NO OBSTRUCTIONS

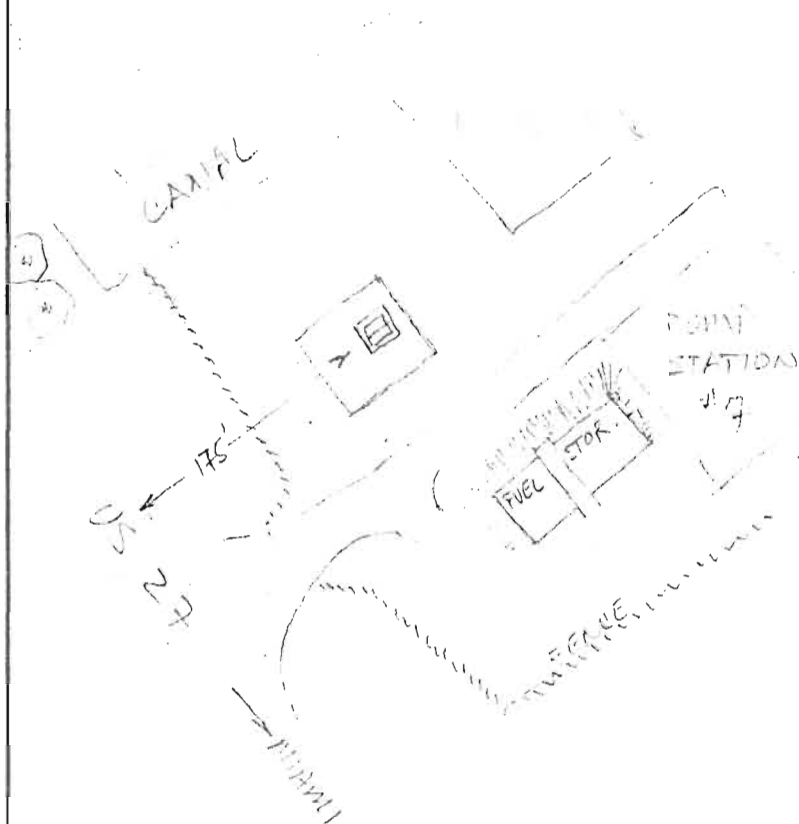
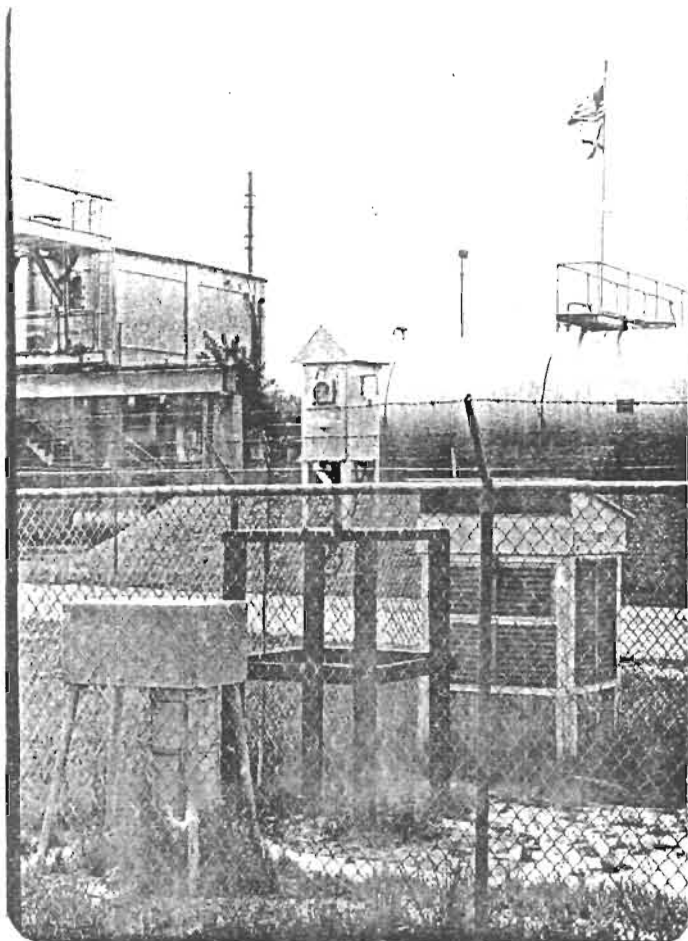
7 T43S, R34E, S16 AT FSCL ROOF...
NO OBSTRUCTIONS ... 10640 AVT '80
AT HENDRY/PALM BCH CO LINES

8 T42S, R32E, S10 AT DOLYE CORNER
COMPLEX IN MOORE HAYEN

9 T44S, R32E, S22 AT MONTURA
RANCH

- 10 T445, R34E, S26 AT USSC
FACILITY ON SR832, 1/2 MILE FROM
NORTH OF MICROWAVE TOWER... NO
OBSTRUCTIONS
- 11 T455, R36E, S34 AT SUNSHINE ✓
SOD FARM... 25 FEET FROM ROCK
ROAD... NO OBSTRUCTIONS
- 12 T465, R37E, S3 AT SHELTON LAND
AND CATTLE... ATOP WATER TREATMENT
PLANT ROOF
- 13 T435, R36E, S26 AT BELLE GLADE
CITY GOLF COURSE (HOLE #13) ...
TALL GRASSES IN VICINITY

- 14 T455, S3E, S14 AT BOULE RESIDENCE
ON SR827 (7 MILES SOUTH OF
6 MILE BEND)... NO OBSTRUCTIONS
- 15 T435, R38E, S4 AT BADCOCK
FARMS ON SR80 (2 1/2 MILES
NORTHEAST 6 MILE BEND)... NO
OBSTRUCTIONS
- 16 T435, R39E, S27 OLD PUMP
HOUSE ON US 98 (3 MILES
NORTHWEST OF 20 MILE BEND)
NO OBSTRUCTIONS.
- 17 T435, R37E, S31 AT BELLE GLADE
SWIMMING POOL ROOF... NO OB-
STRUCTION



LOCATION

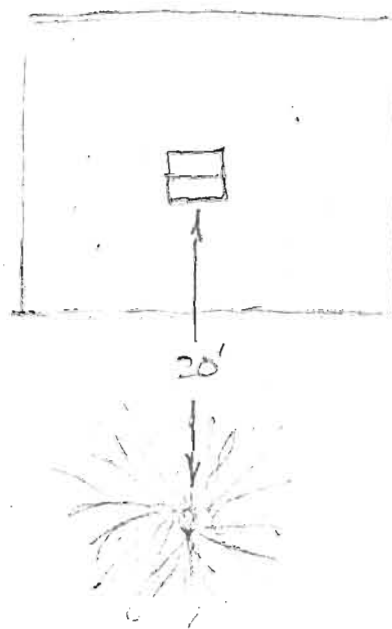
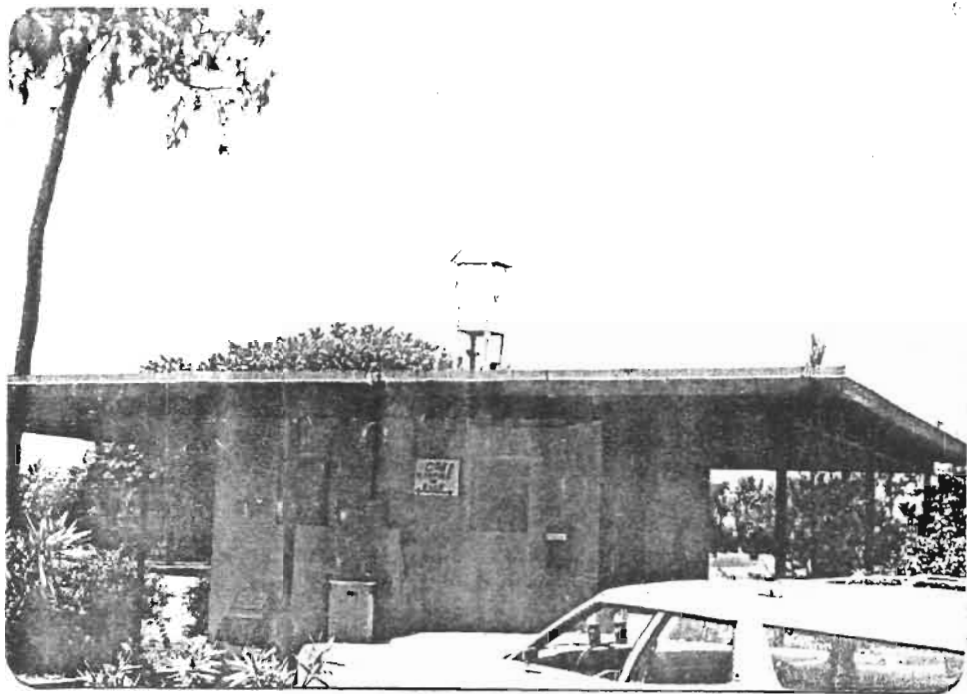
FLOOD CONTROL PUMP STATION
#7 - PALM BEACH/BROWARD
COUNTY LINE

T 485
R 38E
S 22

DESCRIPTION

- 175' FROM US 27
- NO TREES NEARBY
- HEIGHT - 8' ABOVE GND.

COMMENTS



LOCATION

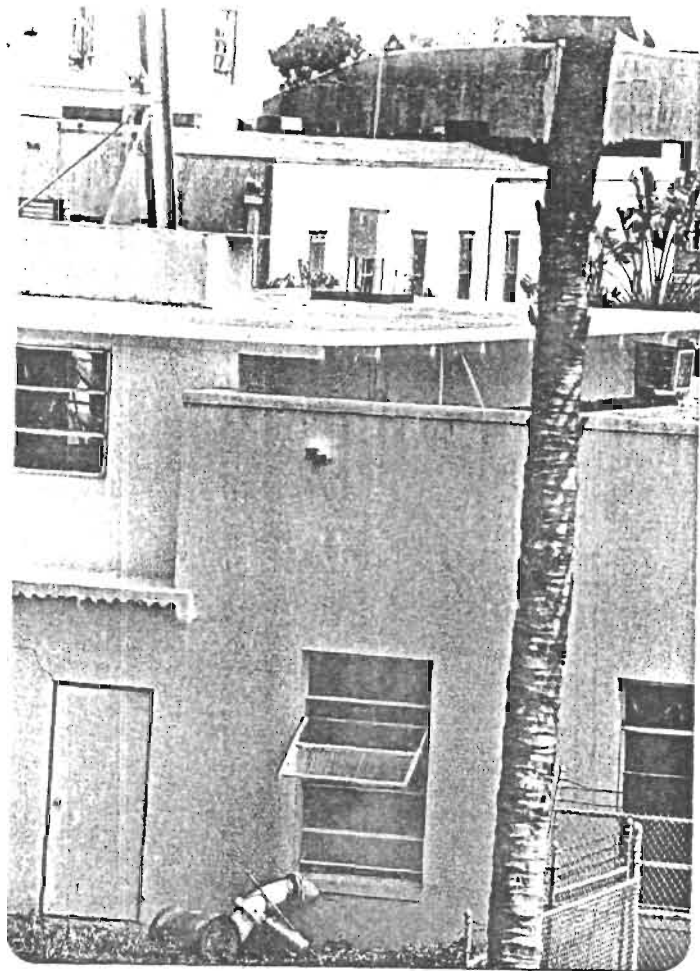
ROYAL PALM BEACH GOLF
COURSE RESTROOM FLOOR

T435
R41E
S26

DESCRIPTION

- 12' HEIGHT
- 30' PINE TREE, SINGLE,
20' SOUTH
- NO OTHER OBSTRUCTIONS

COMMENTS

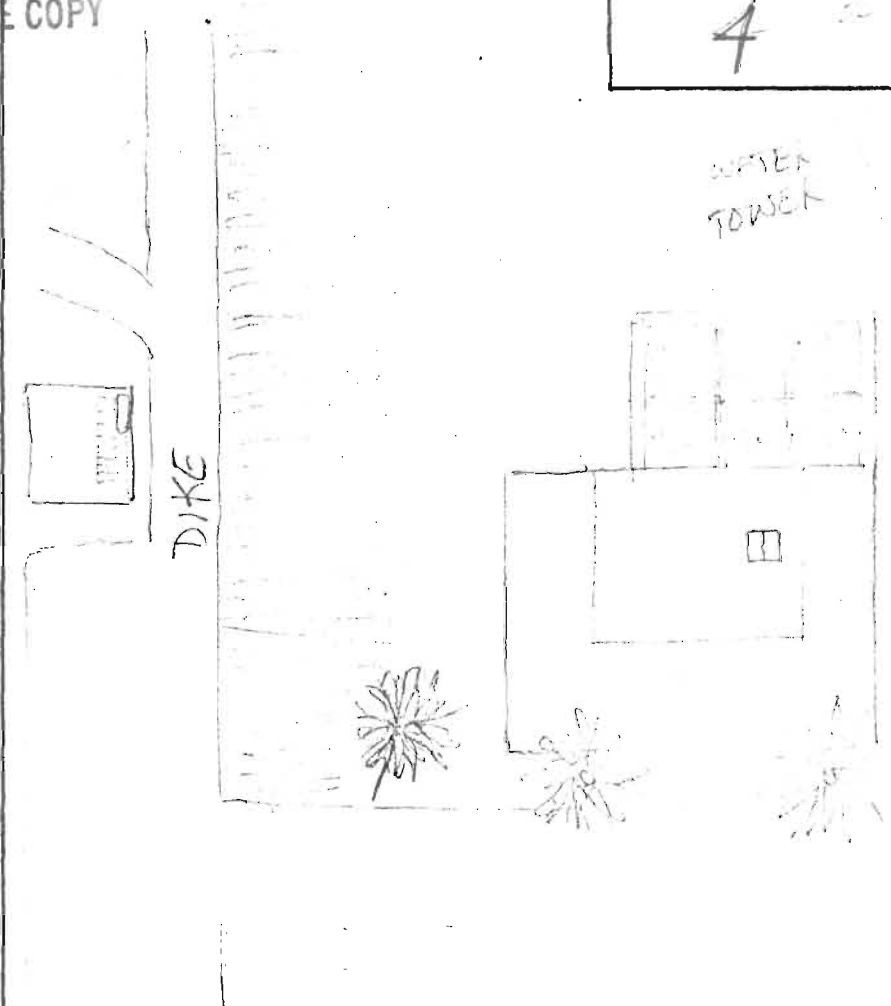


BEST AVAILABLE COPY

CITY NUMBER

4

WATER TOWER



LOCATION

PAHOKEE WATER
TREATMENT PLANT
ROOF

DESCRIPTION

- 35' HEIGHT

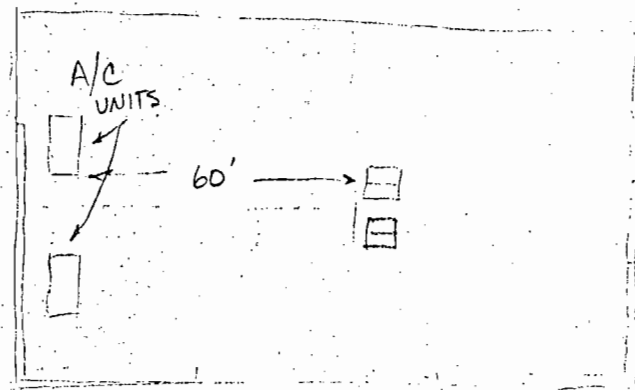
COMMENTS

T425
R37E
S19

BEST AVAILABLE COPY

UNIT NUMBER

5418



STATE RD 80

LOCATION

GLADES MERCHANTILE
SHOWROOM, BELLE
GLADE

T43S

R37E

S32

DESCRIPTION

~30 FT ABOVE PAVEMENT
NO OBSTRUCTIONS
~ 60 FT FROM A/C

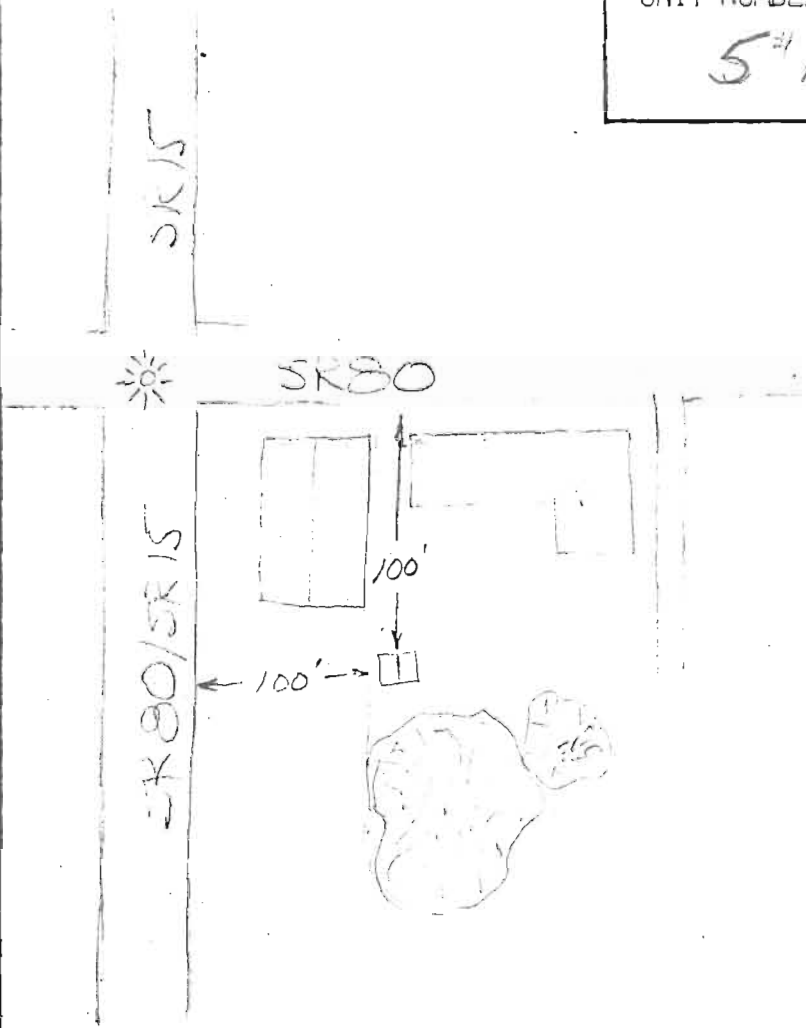
COMMENTS

10 SEPT. WIRED AND SITED AT PRESENT
LOCATION
COLOCATION OF #18

BEST AVAILABLE COPY

CIVIL NUMBER

5#18



LOCATION

SOUTH FLORIDA
 ENVIRONMENTAL
 SERVICES BACK-
 YARD

T 43S
 R 37E
 S 32

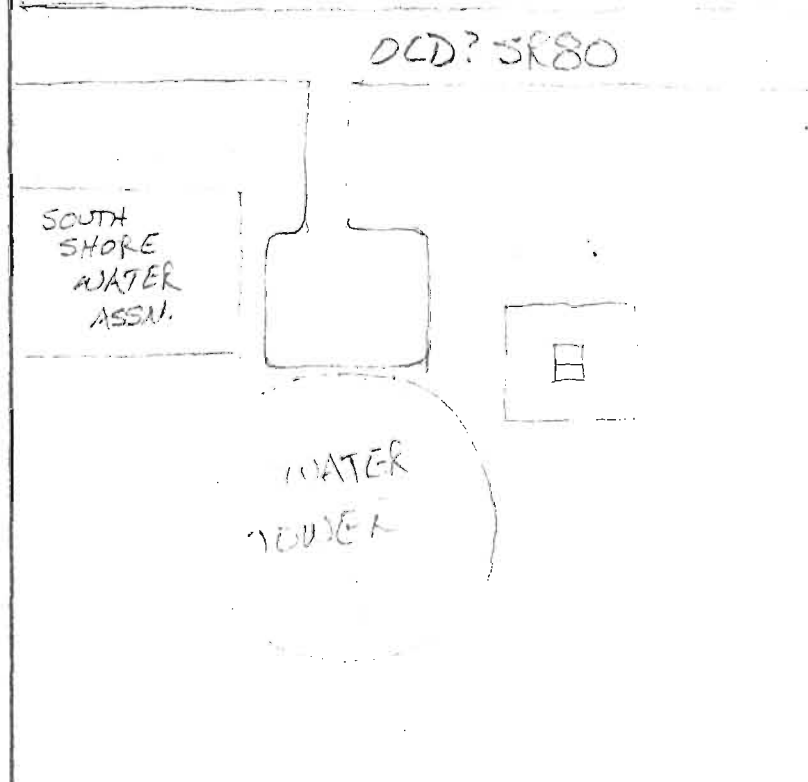
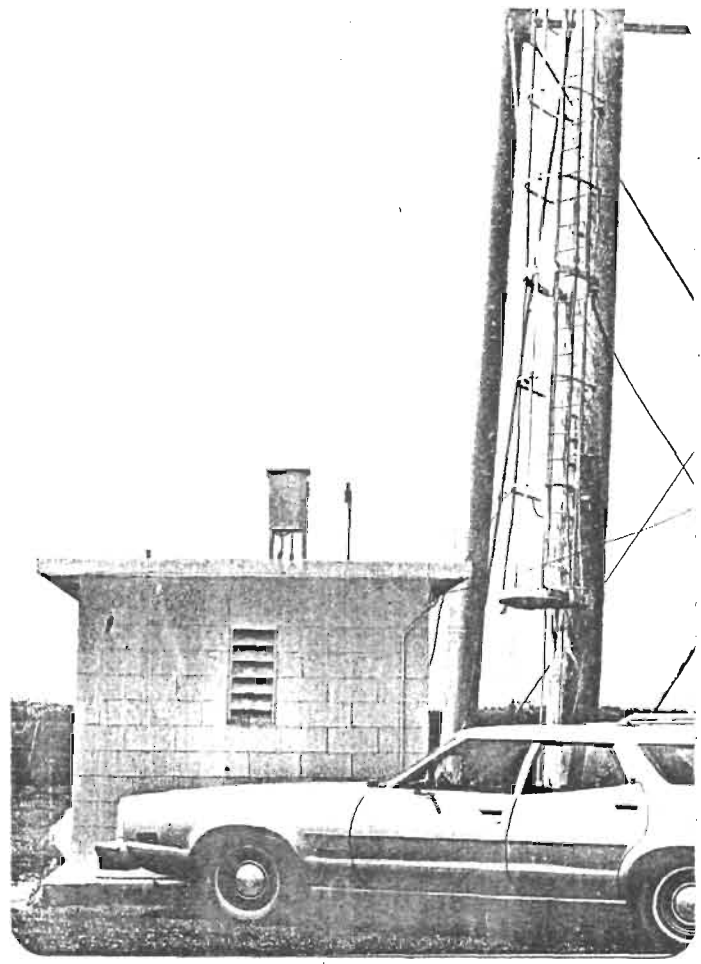
DESCRIPTION

- ~~10' HEIGHT.~~
- ~~TREES 15' WEST~~
- ~~SR 80 & SR 15 INTER-SECTION NEARBY (W 100' NORTH & WEST)~~

COMMENTS

RELOCATED 9/10 TO ROOF GLADES WERCHAMUT
 OPPOSITE PREVIOUS LOCATION
 COLLOCATION AT THIS SITE

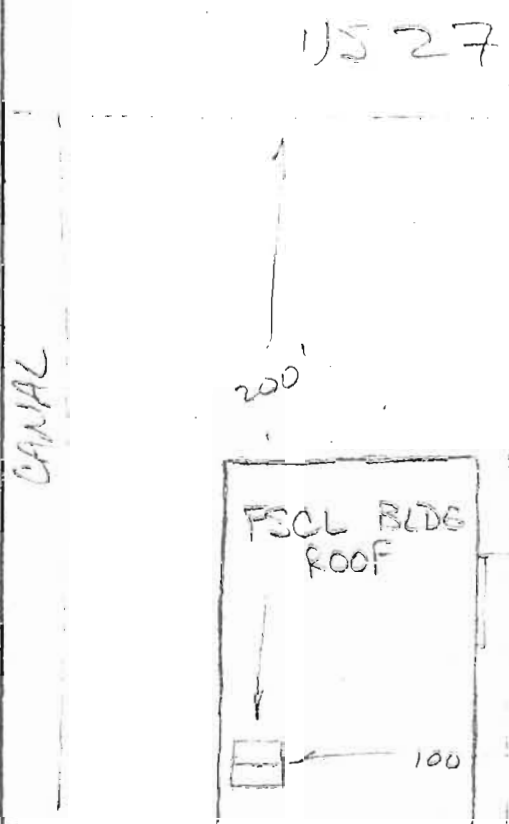
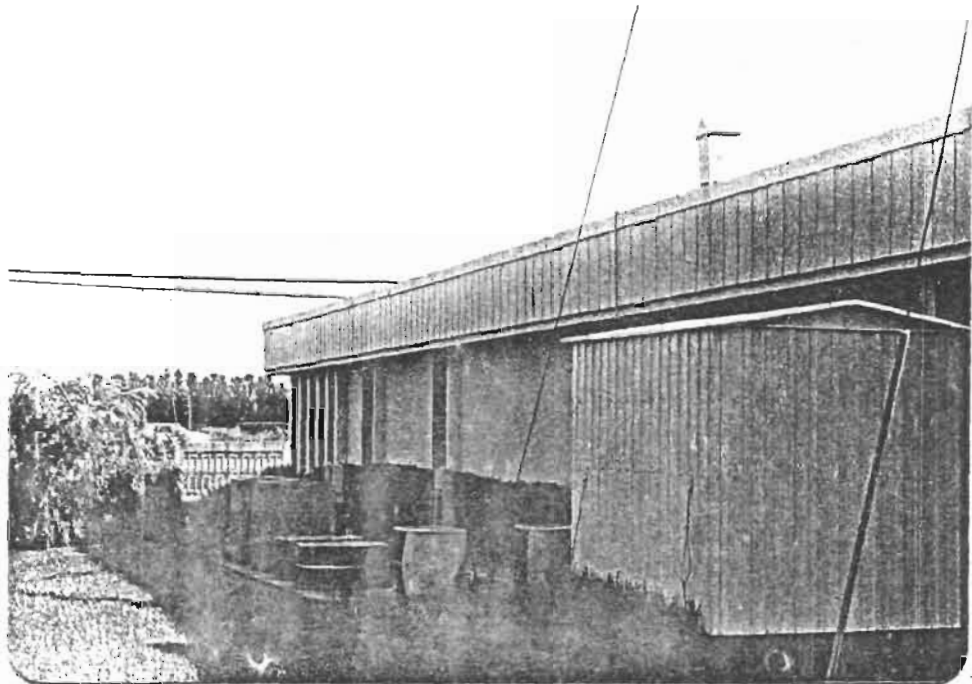
BEST AVAILABLE COPY



LOCATION	DESCRIPTION	COMMENTS
<p>SOUTH SHORE WATER ASSN. MAINTENANCE BLDG. ROOF</p> <p>T44S R35E S2</p>	<p>- 10' HEIGHT - NO OBSTRUCTIONS</p>	

BEST AVAILABLE COPY

7



LOCATION

FLORIDA SUGAR CANE
LEAFHORN ROOF

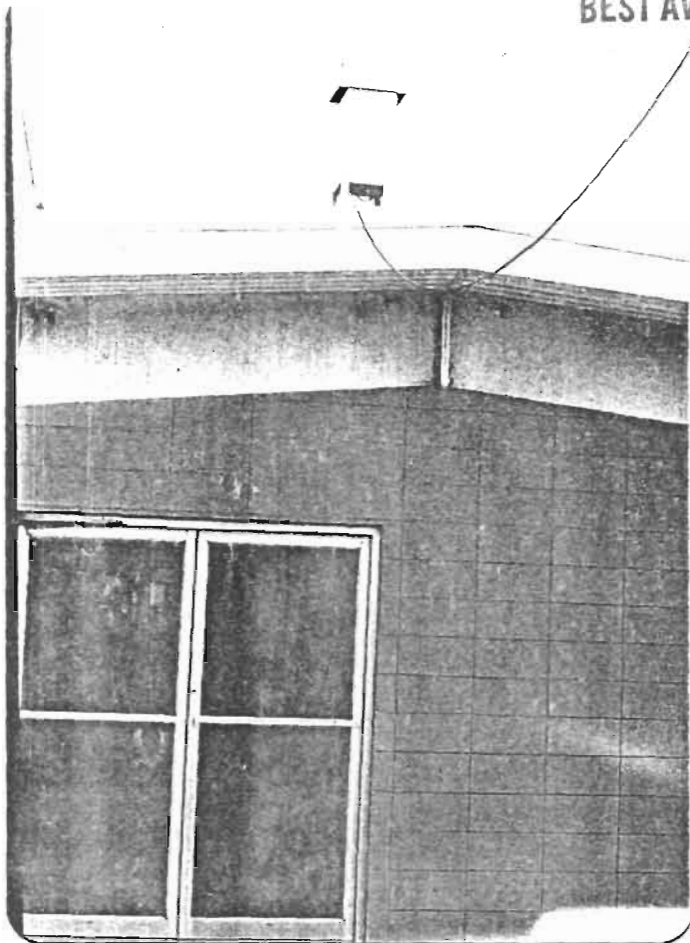
T 435
R 34E
S 16

DESCRIPTION

- 14' HEIGHT
- 200' FROM US 27
- 100' " LOPEZ ST.

COMMENTS

BEST AVAILABLE COPY



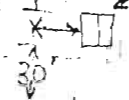
8

US 27

USDA
COMPLEX
ROOF

200'

MOVED
418



ANIMAL STOCK YARD

LOCATION: ^{DOLY} CORNER

MOORE HAVEN ~~WADA~~
COMPLEX, US 27

T 42S
R 32E
S 10

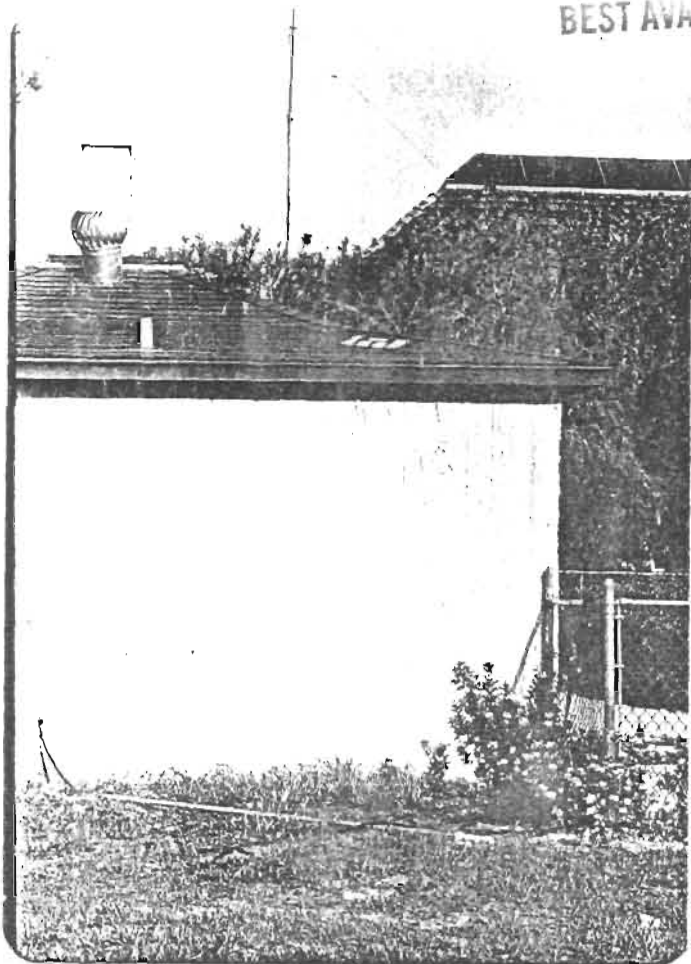
DESCRIPTION

- 17' HEIGHT
- 6' FROM ROOF (WEST)
- 200' US 27
- 30' FROM ABRI. STOCK YARD
- US 27 TRAFFIC: (79/80)
- EAST MH 8890
- WEST MH 9565

COMMENTS

BJUISEB1 - MOVED ~10 FT. EAST (ON-SITE)

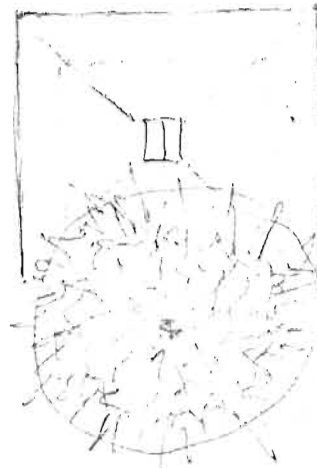
BEST AVAILABLE COPY



MAIN BUILDING

PARKING LOT

SWIMMING
POOL



REMOVED
7/16

LOCATION

WONTURA FANCH
SWIMM. POOL MAIN
BLDG. ROOF
SR833
T445
R32E
S22

DESCRIPTION

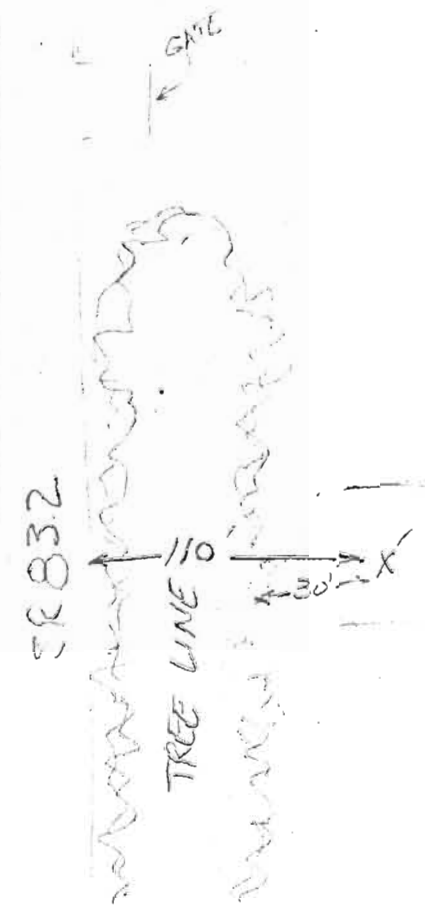
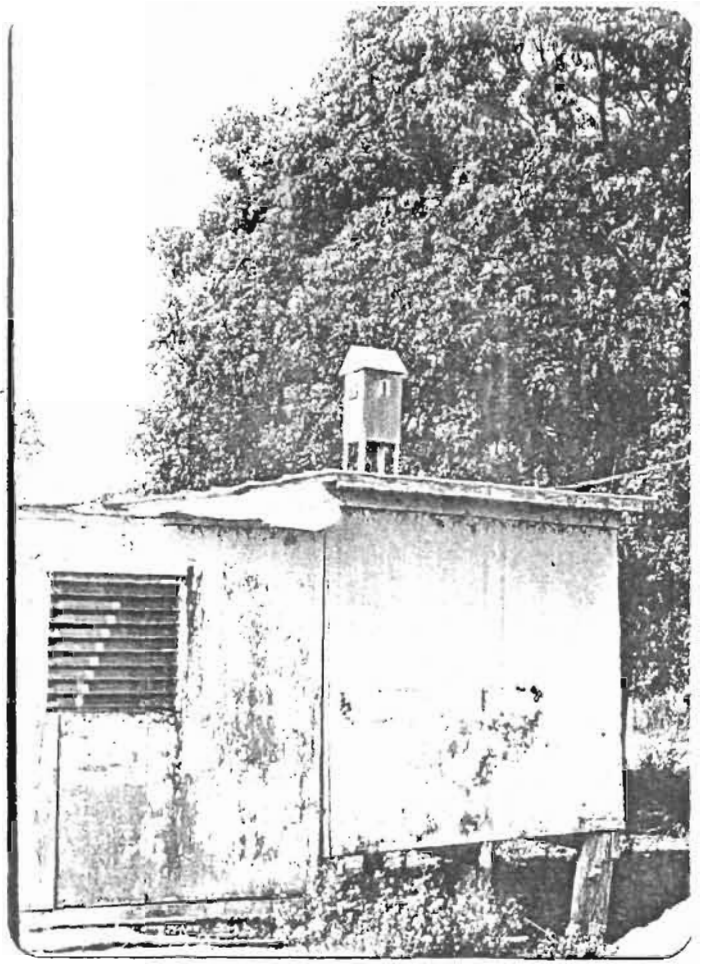
20' 4" 1647
- ~~OVERHANGING PINE~~
TREE TO SOUTH
- OTHERWISE UNOBSTRU-
CTED

COMMENTS

16 JULY 81 - REMOVED TREES (SOUTH)

BEST AVAILABLE COPY

PHOTO NOT OF NEW LOCATION



BLDG "A"
7 Moved
6/23

LOCATION

USMC CAMP ON SR 832
T445
R34E
S26

DESCRIPTION

- 12' HEIGHT
- 170' FROM SR 832
- 30' FROM TREES TO WEST

COMMENTS

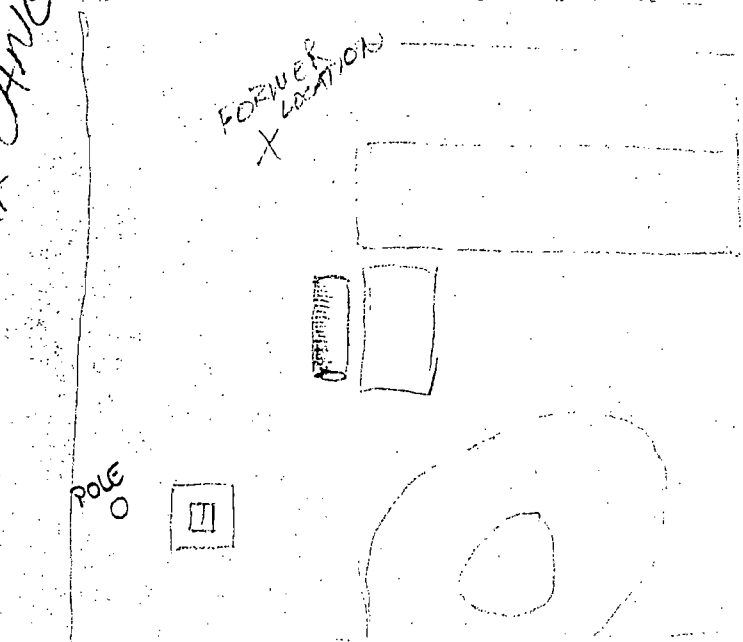
23 JUNE 81 - RELOCATED (LOW SITE) TO PLYS "A"
ROOF ... SAME DISTANCE

BEST AVAILABLE COPY

UNIT NUMBER

11

SUGAR CANE FIELD



ROCK ROAD

LOCATION

SUNSHINE SOD FARM

T4SS
R36E
S34

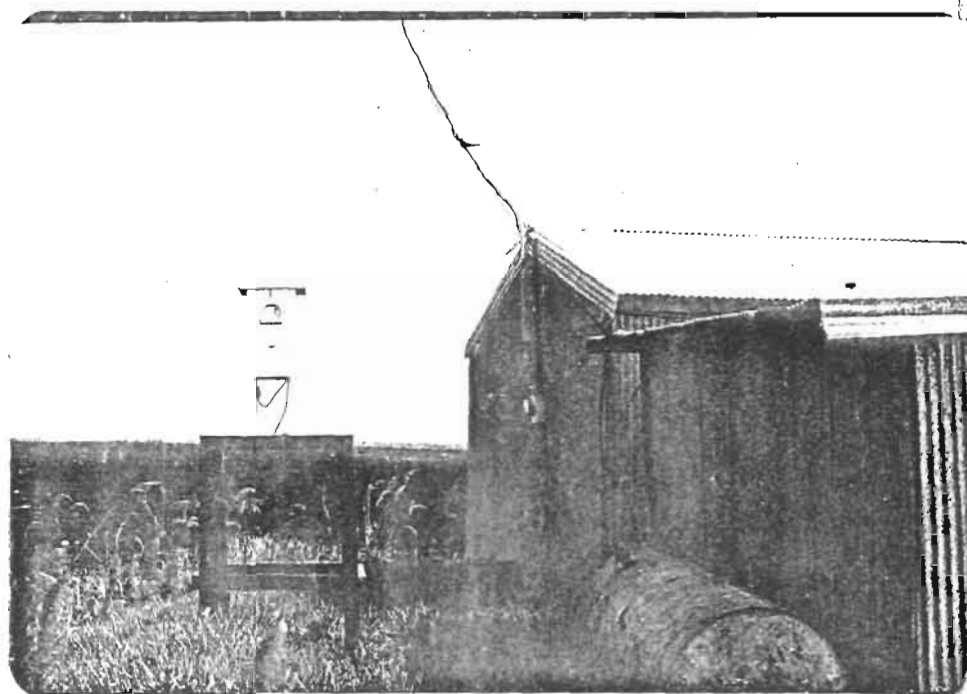
DESCRIPTION

~9' HEIGHT
NO OBSTRUCTIONS
~25 FT FROM ROCK ROAD

COMMENTS

23 JULY - RELOCATED TO PRESENT SITE

BEST AVAILABLE COPY



UNIT NUMBER

11 ✓

FIELD

FARM EQUIP.
BLDG



LOCATION

SUNSHINE FOOD FARM
3 MILES WEST OFF
US 27, SOUTH OF
GRAND OKEELANTA
MILL

T455
R36E
S34

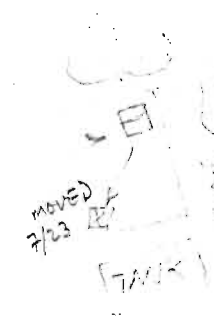
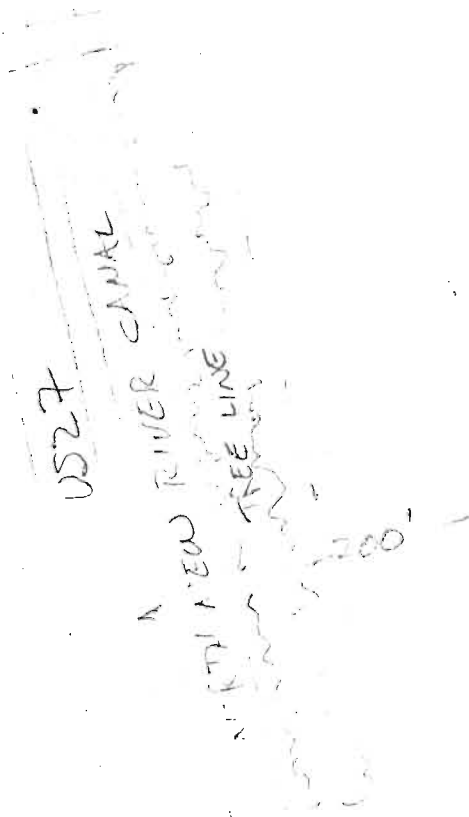
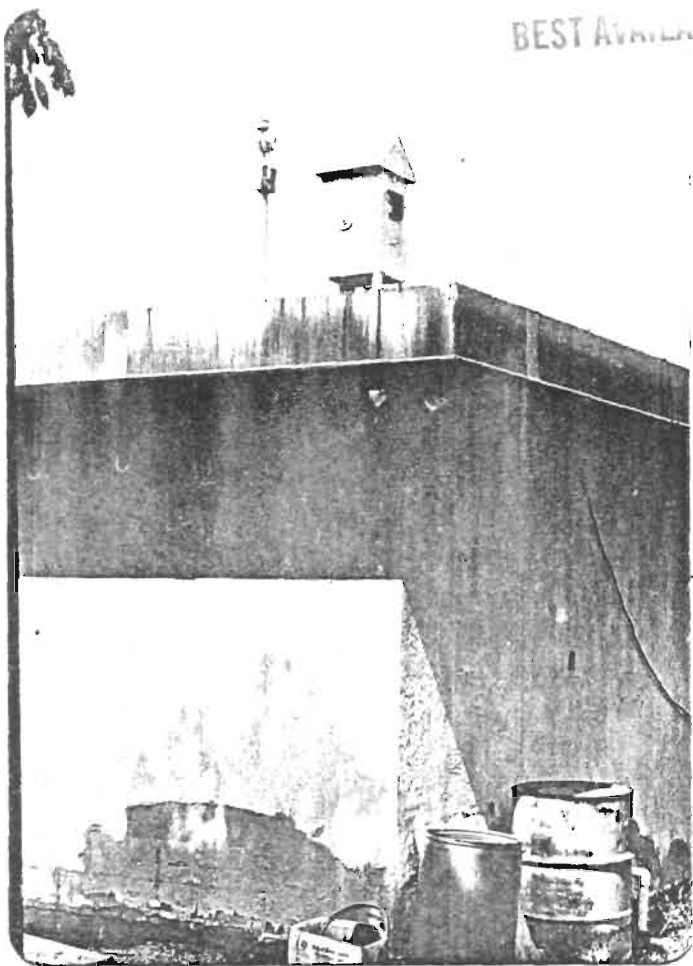
DESCRIPTION

- 9' HEIGHT
- BLDG 9' EAST
- 75' DIRT/GRAVEL
ROAD
- NO TREES

COMMENTS

23 JULY 81 - RELOCATED (ON-SITE) ~ SDIT.

BEST AVAILABLE COPY



LOCATION

SHELDON LAND CO.
 15.4 MILES SOUTH OF
 SOUTH BAY ON US27
 ON WATER SHED ROOF

DESCRIPTION

- 14' HEIGHT
- TREES: 20' EAST
 22' NORTH
- 200' FROM US27

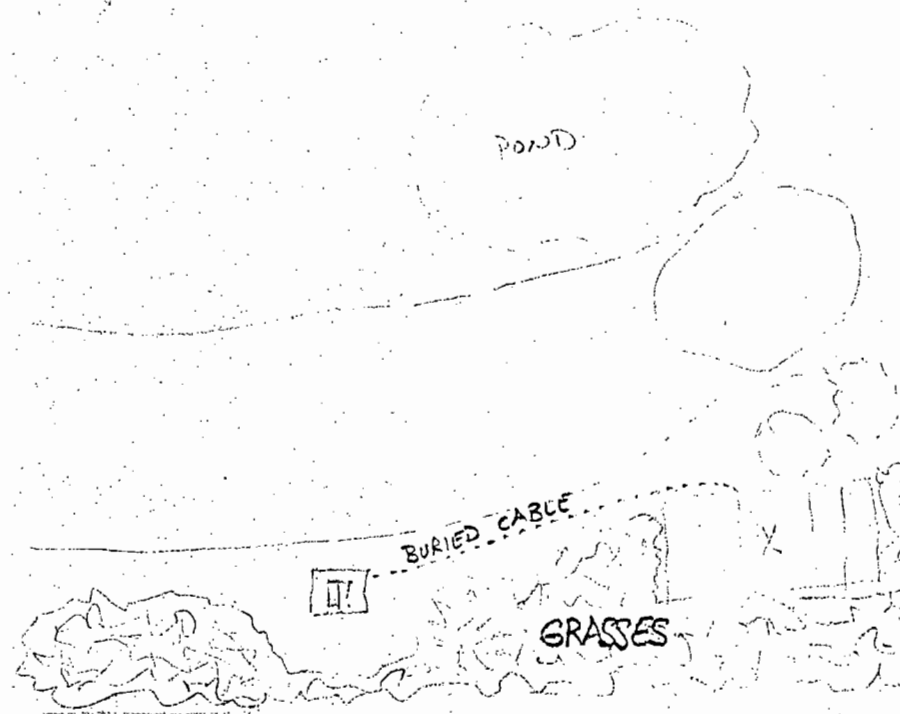
COMMENTS

23 JULY 81 - MOVED HI-VOL TO ADJACENT CORNER
 OF BLDG (ON-SITE)
 TREES WILL BE TRIMMED

BEST AVAILABLE COPY

UNIT NUMBER

13



LOCATION

BELLE GLADE MUNICIPAL
GOLF COURSE
(HOLE #13)

T43S

R36E

S26

DESCRIPTION

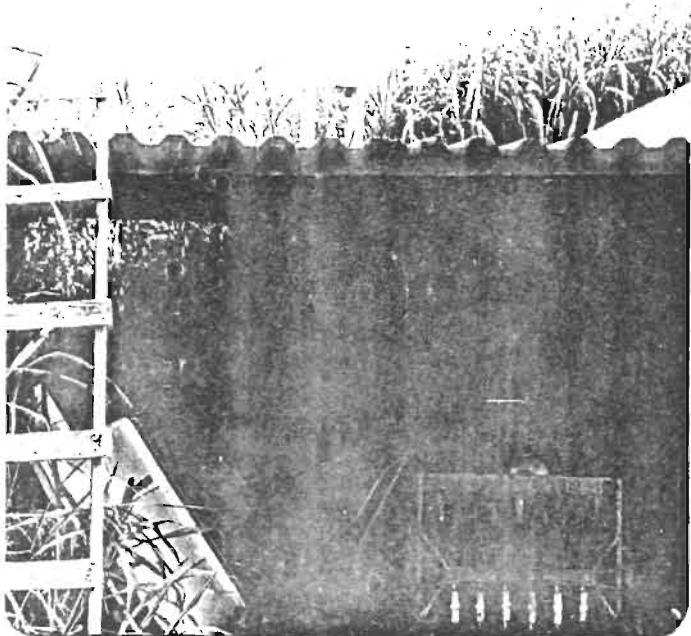
~10 FT HEIGHT

TALL GRASS SOUTH, WEST &
EAST ~8 FT.

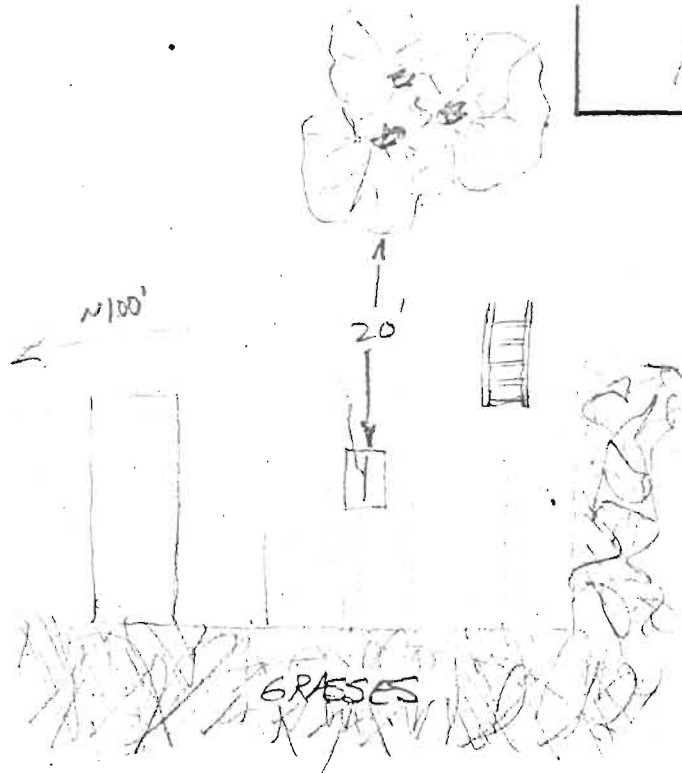
COMMENTS

A SEPT RELOCATED AT PRESENT SITE

BEST AVAILABLE COPY



13



LOCATION

BELLE GLADE GOLF COURSE
(S.E. CORNER)
EQUIP. BLDG ROOF

T43S
R36E
S26

DESCRIPTION

- 10' HEIGHT
~~- TREES 20' NORTH~~
- TALL GRASSES SOUTH
& EAST

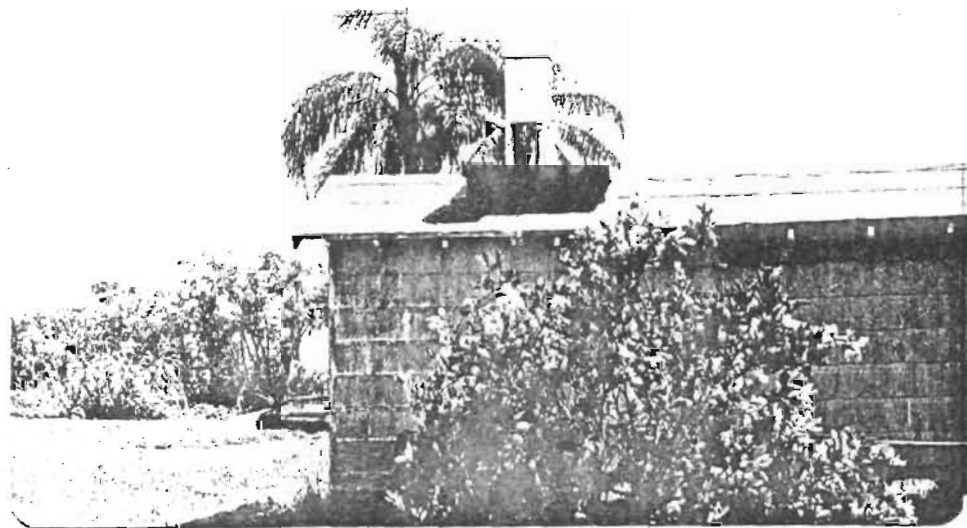
COMMENTS

14 SEPT - RELOCATED WEST N100 FT. (DOWN RIGHT
SIDE #13 FAIRWAY)

BEST AVAILABLE COPY

UNIT NUMBER

14



SR 827

WATER TANK

HOUSE

LOCATION

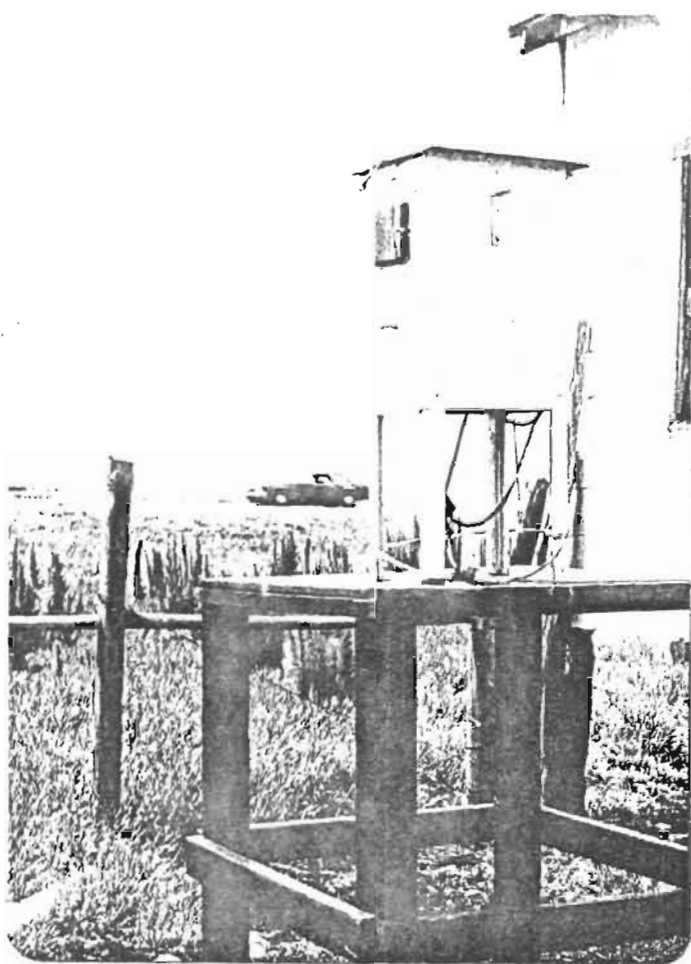
DESCRIPTION

COMMENTS

BOYLE RESIDENCE
SR 827 (6 MI SOUTH
US 441)

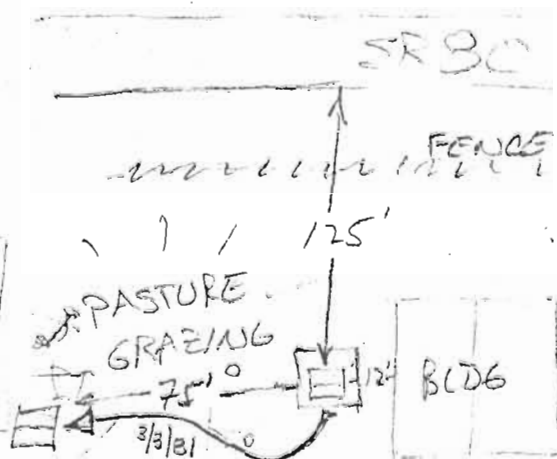
- 10' HEIGHT
- UNOBSTRUCTED

T455
R38E
S14



BEST AVAILABLE COPY

15



LOCATION

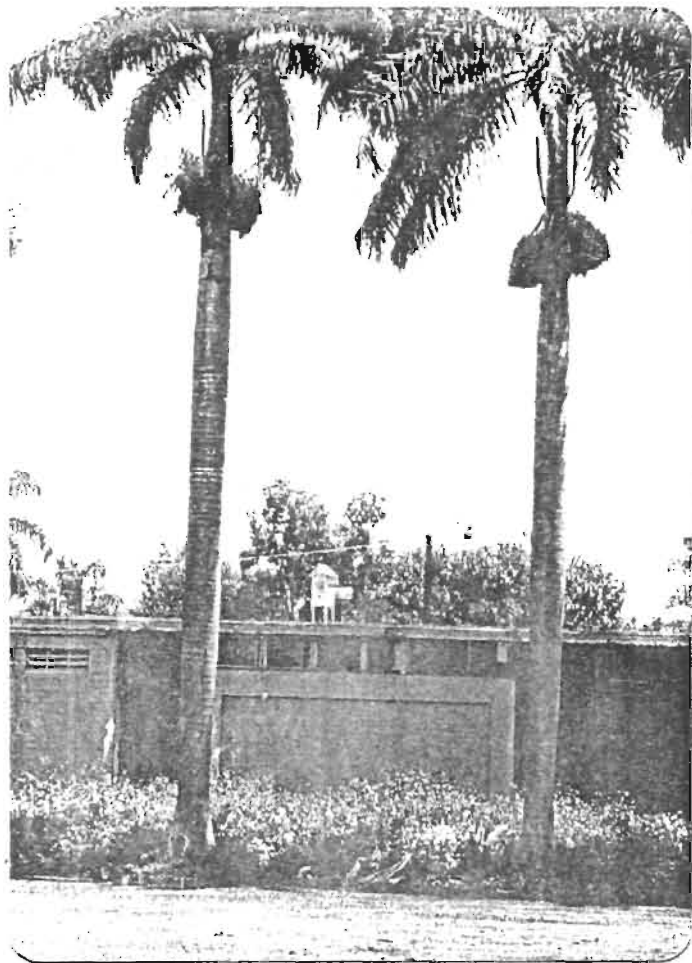
DADCOCK FARMS
T 43S
R 38E
S 4
SR 80 WEST OF
9 MILE BEND

DESCRIPTION

- 8' HEIGHT
- 2 STORY BLDG. 12' EAST
- NO TREES

COMMENTS

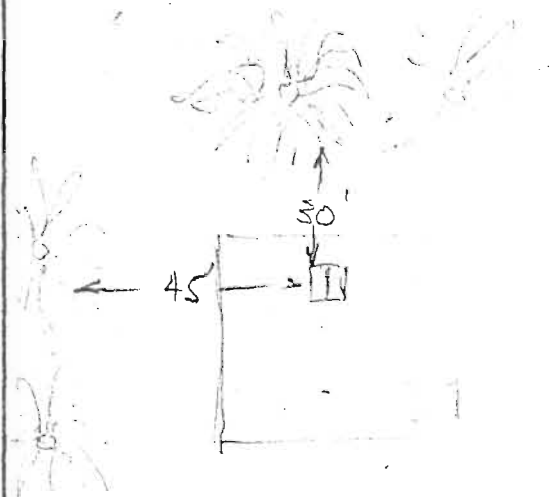
1980 AVE: 47 $\mu\text{g}/\text{m}^3$
ADVT: SR 80 AT 6 MI BEND 1977
3 MAR 81 - MOVED SW ~ 75 FT. w/ NEW ELECT.
METER & SERVICE



BEST AVAILABLE COPY

UNIT NUMBER

17



LOCATION

DESCRIPTION

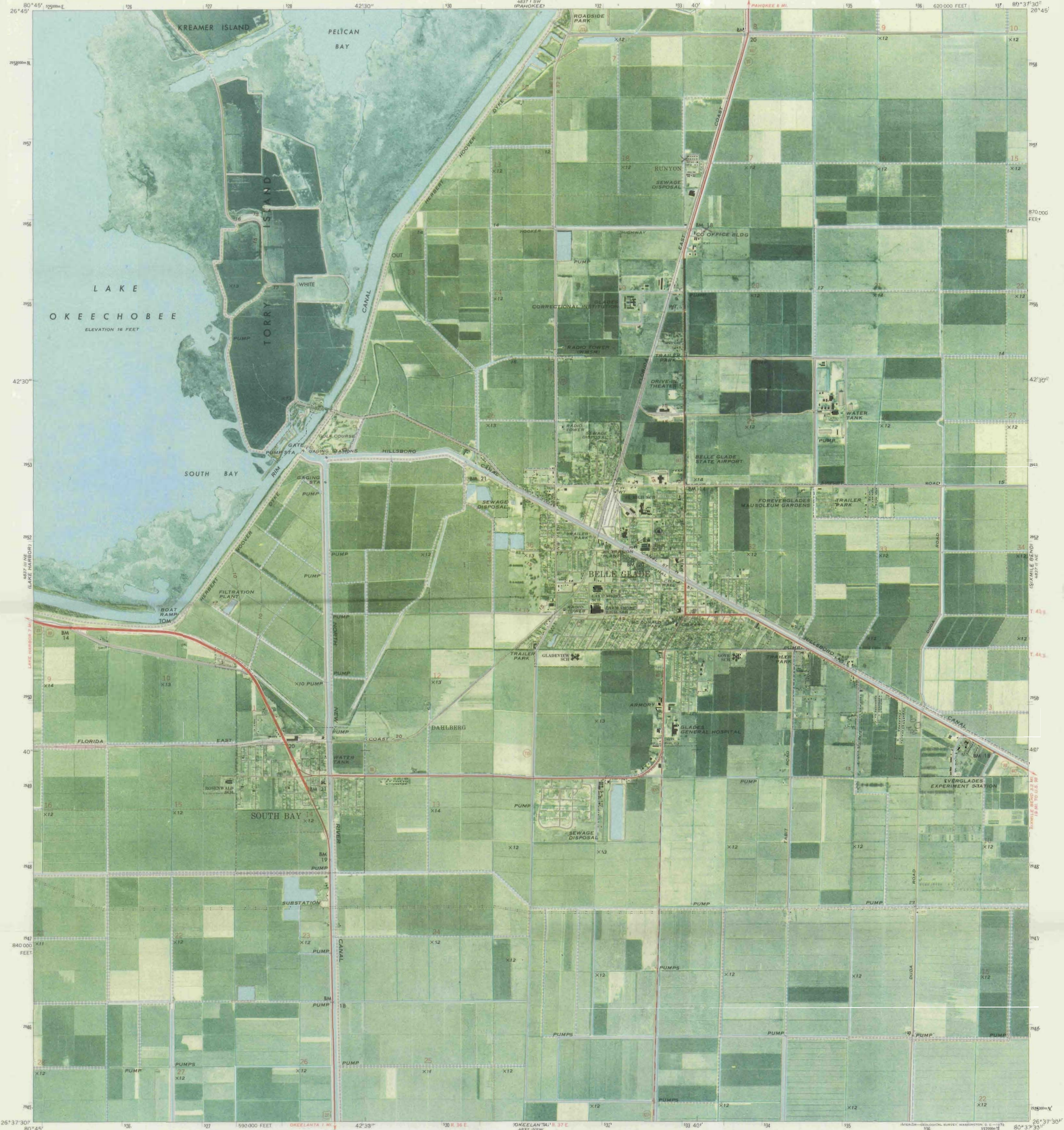
COMMENTS

BELLE GLADE SWIM.
POOL BLDG. ROOF

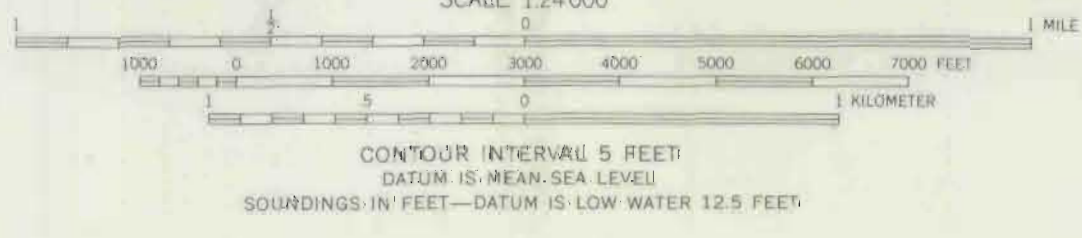
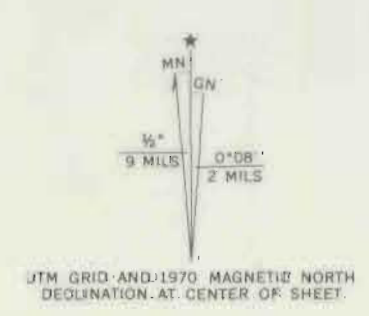
T 43S
R 37E
S 31

- 14' HEIGHT
- ROYAL PALMS
30' NORTH
45' WEST

?



Mapped, edited, and published by the Geological Survey Control by USGS and USCGS Orthophotomosaic by photogrammetric methods from aerial photographs taken January 1970. Topography by planetable surveys 1970 Selected hydrographic data compiled from USC&GS Chart 855 3C (1970). This information is not intended for navigational purposes Polyconic projection, 1927 North American datum, 10,000-foot grid based on Florida coordinate system, east zone 1000-meter Universal Transverse Mercator grid ticks, zone 17, shown in blue Dotted land lines established by private survey Where omitted, land lines have not been established Only landmark buildings indicated in urban area



ROAD CLASSIFICATION Primary highway: Light-duty road, hard or hard surface; Improved surface Secondary highway: Unimproved road Interstate Route U.S. Route State Route

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS FOR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D.C. 20242 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST.

BELLE GLADE, FLA. N263754-W83754 1970 AMS 4837-11-NW-58875-1647



HARLEM

SUGAR JUNCTION

WATER TANK
FILTRATION PLANT

SOUTH CLEWISTON

SEABOARD

SUBSTATION

21
19X

22

X17

28
18

27

X16

BM
23

33

34

X19

24
PUMP

26

35
X14

16X

X16

X14

PUMP

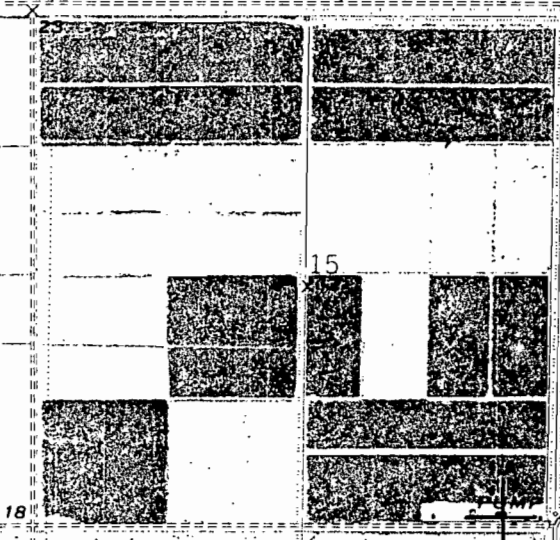
X13
2

21

9
X14

10
X14

11
X13



15

14
X13

18

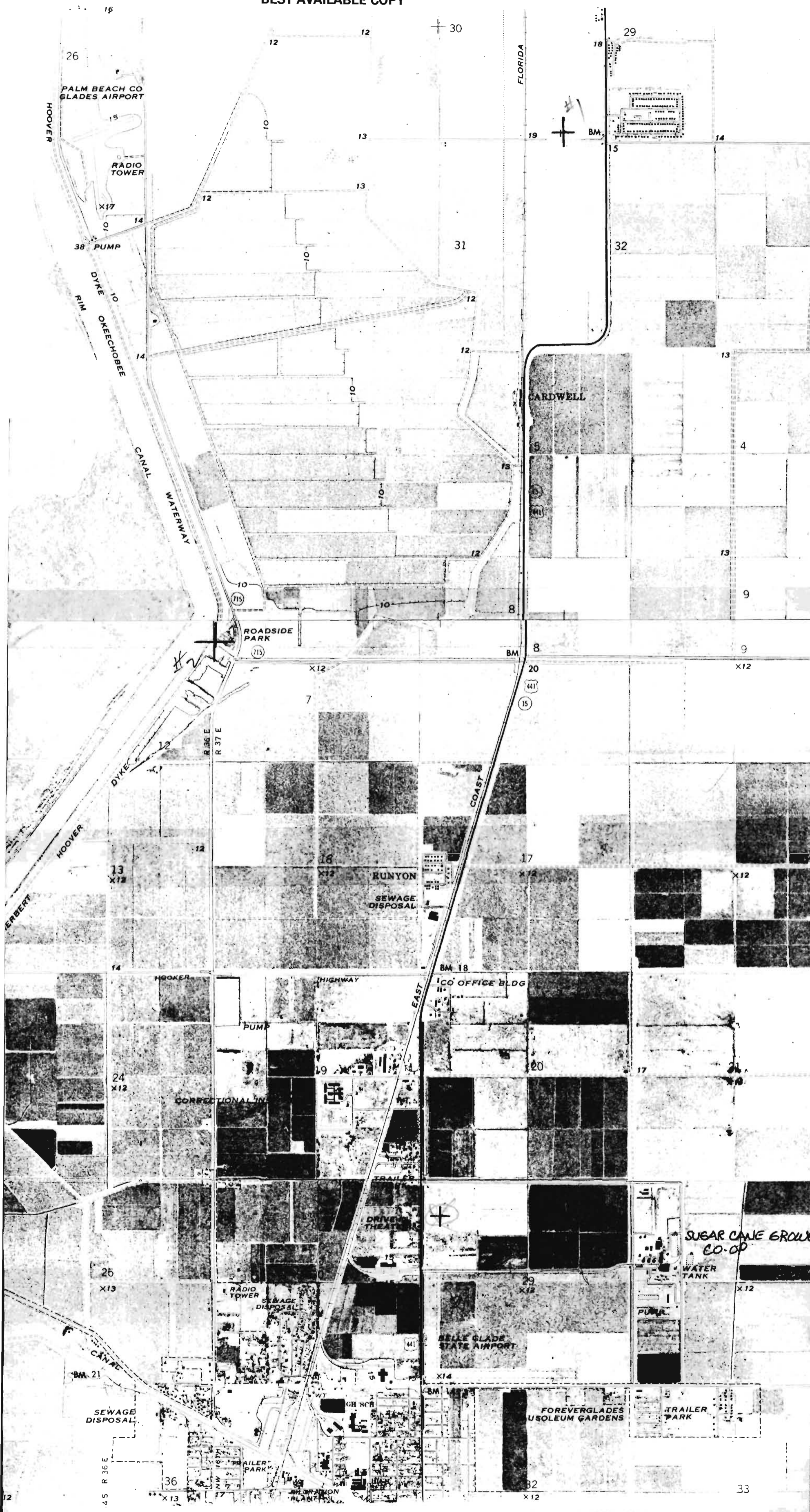
BM 19

PUMP

#4

22
X14

23
X14



PALM BEACH CO
GLADES AIRPORT

RADIO
TOWER

PUMP

HOOPER
DYKE
RIM
OKEECHOBEE
CANAL
WATERWAY

ROADSIDE
PARK

RUNYON
SEWAGE
DISPOSAL

CO OFFICE BLDG

CORRECTIONAL IN

DRIVE
THEATRE

RADIO
TOWER
SEWAGE
DISPOSAL

BELLE GLADE
STATE AIRPORT

SUGAR CANE GROW
CO-OP

WATER
TANK

SEWAGE
DISPOSAL

FOREVERGLADES
USOLEUM GARDENS

TRAILER
PARK

45 R 36 E

36

BM 18

BM 19

BM 20

BM 21

BM 22

PUMP

PUMP

WT

GR NCH

CA

WATER
PLANT

33

X13

X17

X18

X19

X20

X21

X22

X23

X24

X25

X26

X27

X28

X29

X30

X31

X12

X12

X13

X13

X12

X12

X13

X13

X12

X12

X13

X17

X12

X12

X13

X18

X12

X12

X13

X19

X12

X12

X13

X20

X12

X12

X13

X21

X12

X12

X13

X22

X12

X12

X13

X23

X12

X12

X13

X24

X12

X12

X13

X25

X12

X12

X13

X26

X12

X12

X13

X27

X12

X12

X13

X28

X12

X12

X13

X29

X12

X12

X13

X30

X12

X12

X13

X31

16

12

12

30

26

18

29

15

10

13

19

15

14

14

12

13

31

32

38

10

12

13

14

10

12

13

10

10

12

9

10

10

BM

8

9

X2

X12

BM

8

X12

7

20

441

15

X12

13

12

18

17

X12

14

HOOKER

HIGHWAY

BM 18

24

X12

PUMP

19

20

17

CORRECTIONAL IN

TRAILER

PARK

25

X13

RADIO
TOWER
SEWAGE
DISPOSAL

15

29

X12

SUGAR CANE GROW
CO-OP

WATER
TANK

X12

BM 21

SEWAGE
DISPOSAL

BELLE GLADE
STATE AIRPORT

BM 18

BM 19

BM 20

BM 21

BM 22

PUMP

PUMP

WT

GR NCH

CA

WATER
PLANT

33

X13

X17

X18

X19

X20

X21

X22

X23

X24

X25

X26

X27

X28

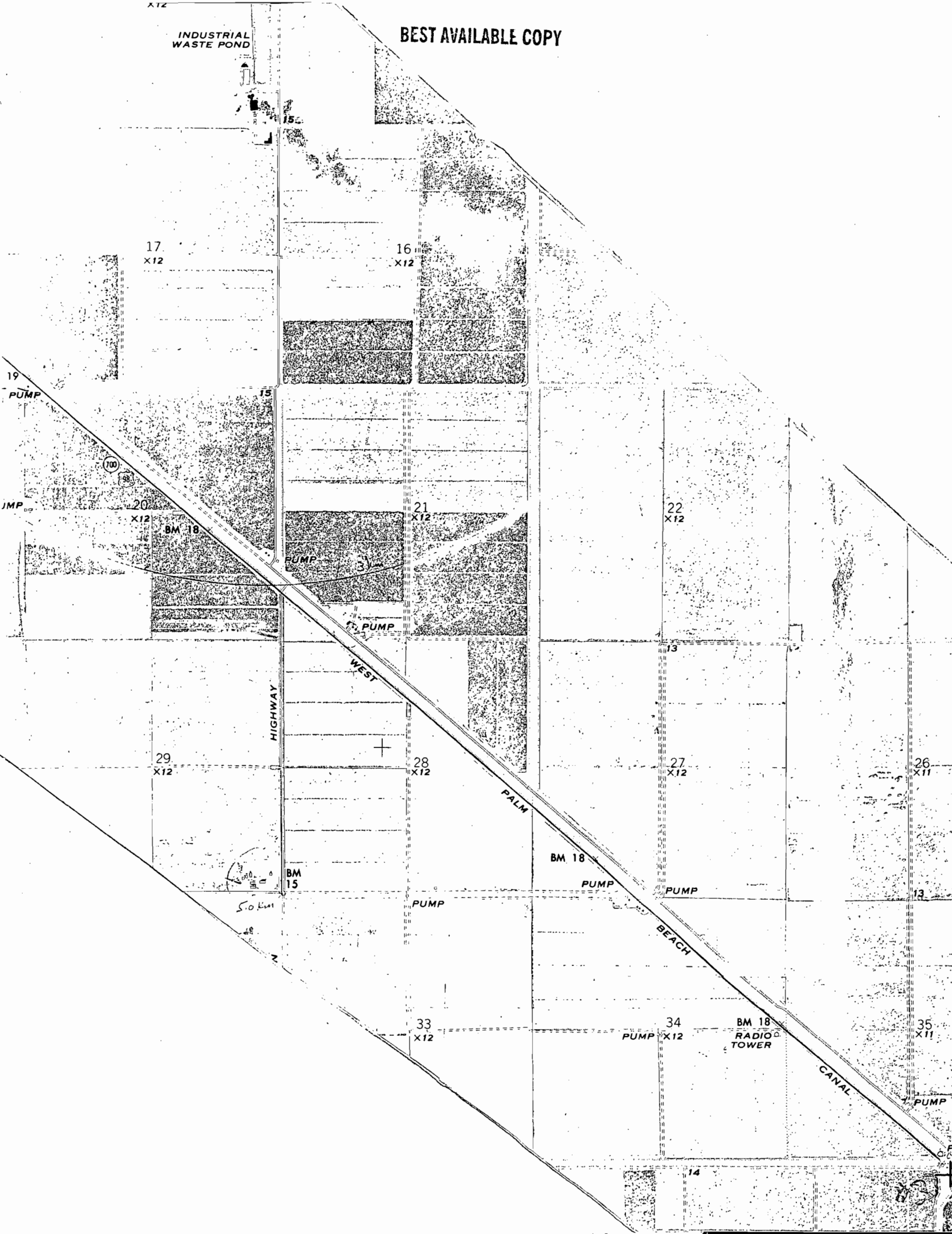
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INDUSTRIAL WASTE POND



GLADES SUGAR HOUSE

Sugar Cane Growers Cooperative of Florida



POST OFFICE BOX 666

BELLE GLADE, FLORIDA

ZIP CODE 33430

December 27, 1982

*CA
Pitt check / file*

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DEC 28 1982

BAQM

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
State of Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Permit Nos. AC50-42476
PSD FL077
Project: Boiler No. 8

Dear Mr. Fancy:

Pursuant to and in accordance with the provisions of the construction permit referred to above, we hereby inform you that on Tuesday, January 24, 1983, we intend to conduct the compliance tests on the pollutants emitted by this facility.

South Florida Environmental Services, Inc. will perform the PM and SO₂ tests and Environmental Science and Engineering, Inc. will test for CO, VOC, and NOx. It is expected that the tests will be completed in one day, but they could be continued the next day if necessary.

Sincerely,

Enrique R. Arias
Executive Vice President

ERA/ss

cc: Chief, Air Facilities Branch
Air and Waste Management Division
U.S. Environmental Protection Agency
Region IV

David Knowles, DER South Florida District
Michael Martin, Palm Beach County Health Department
William H. Green, Hopping, Boyd, Green & Sams
David Buff, Environmental Science & Engineering, Inc.
Steve Neck, " " " "
William D. Arlington, So. Fla. Environmental Services, Inc.