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1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

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

Evelyn B. Taylor 5/30/03

C. Signature

X Evelyn B. Taylor Agent
 Addressee

D. Is delivery address different from item 1? Yes
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PS Form 3811, July 1999

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2
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7

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

Postmark
Here

Sent To
 Jose F. Alvarez
 Street, Apt. No.
 or PO Box No.
 PO Box 666
 City, State, ZIP+4
 Belle Glade, FL 33430-0666

PS Form 3800, January 2001

See Reverse for Instructions

THE PALM BEACH POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared **Tracey Diglio**, who on oath says that she is **Telephone Sales Supervisor** of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being **Notice** in the matter of **Permit # 0990026-006-AC** was published in said newspaper in the issues of **April 26, 2003**. Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

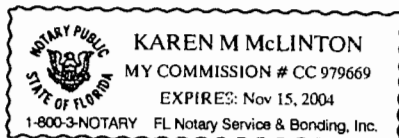
Tracey Diglio

Sworn to and subscribed before this 28th day of April, A.D. 2003

[Signature]

Personally known XX or Produced Identification _____

Type of Identification Produced _____



NO. 7604492
PUBLIC NOTICE OF INTENT
TO ISSUE AIR
CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
Draft Air Permit
No. 0990026-006-AC
Sugar Cane Growers Coop-
erative of Florida, Inc.
Glades Sugar House
Boilers 1 and 2.
Grate Replacement Project
The Department of Environ-
mental Protection (Depart-
ment) gives notice of its
intent to issue an air con-
struction permit to the Sugar
Cane Growers Cooperative
of Florida, Inc. to replace the
existing traveling grates with
water-cooled pinhole grates
for Boilers 1 and 2. The
existing sugar mill is located
in Belle Glade at 1500 West
Sugar House Road in Palm
Beach County, Florida. The
applicant's authorized rep-
resentative is Mr. Jose F.
Alvarez, the V.P. of Plan-
ning and Plant Operations.
The applicant's mailing
address is Sugar Cane
Growers Cooperative of
Florida, Inc., P.O. Box 666,
Belle Glade, FL 33430-
0666.

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

The Department will issue
the Final Permit with the
attached conditions unless
a response received in
accordance with the follow-
ing procedures results in a
different decision or signifi-
cant change of terms or
conditions. The Depart-
ment will accept written
comments concerning the
proposed permit issuance
action for a period of four-
teen (14) days from the date
of publication of this Public
Notice of Intent to Issue Air
Construction Permit. Writ-
ten comments should be
provided to the Depart-
ment's Bureau of Air Regu-
lation at 2600 Blair Stone
Road, Mail Station # 5505,
Tallahassee, FL 32399-
2400. Any written com-
ments filed shall be made
available for public inspec-
tion. If written comments
received result in a signifi-
cant change in the propo-
sed agency action, the
Department shall revise the
proposed permit and
require, if applicable,
another Public Notice.

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

A person whose substantial
interests are affected by the
proposed permit may petition
for an administrative proceeding
(hearing) under Sections
120.569 and 120.57 F.S.
The petition must contain
the information set forth
below and must be filed
(received) in the Office of
General Counsel of the
Department at 3900 Com-
merce Boulevard Mail

Florida, 52399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the public notice, or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

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

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public

inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
(111 S. Magnolia Drive,
Suite 4)
2600 Blair Stone Road,
MS #5505
Tallahassee, Florida
32399-2400
Telephone: 850/488-0114
Dept. of Environmental Protection
South District Office
Air Resources Section
2295 Victoria Avenue,
Suite 364
Fort Myers, FL 33901-3381
Telephone: 239/332-6975.
Palm Beach County
Health Department
Environmental Health &
Engineering
Air Pollution Control Section
P.O. Box 29
(901 Evernia Street)
West Palm Beach, FL
33402-0029

Telephone: (561) 355-3136
The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project for additional information at the address and phone numbers listed above.
PUB: The Palm Beach Post
April 26, 2003

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1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

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

Evelyn B. Taylor 4/21/03

C. Signature

x Evelyn B. Taylor Agent Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

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

Postmark
Here

Sent To
 Jose F. Alvarez
 Street, Apt. No.,
 or PO Box No. BOX 666
 City, State, ZIP+4
 Belle Glade, FL 33430-0666

PS Form 3800, January 2001

See Reverse for Instructions

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1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) Agent
 Evelyn B. Taylor Addressee

C. Date of Delivery
 02-03-03

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 6983

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
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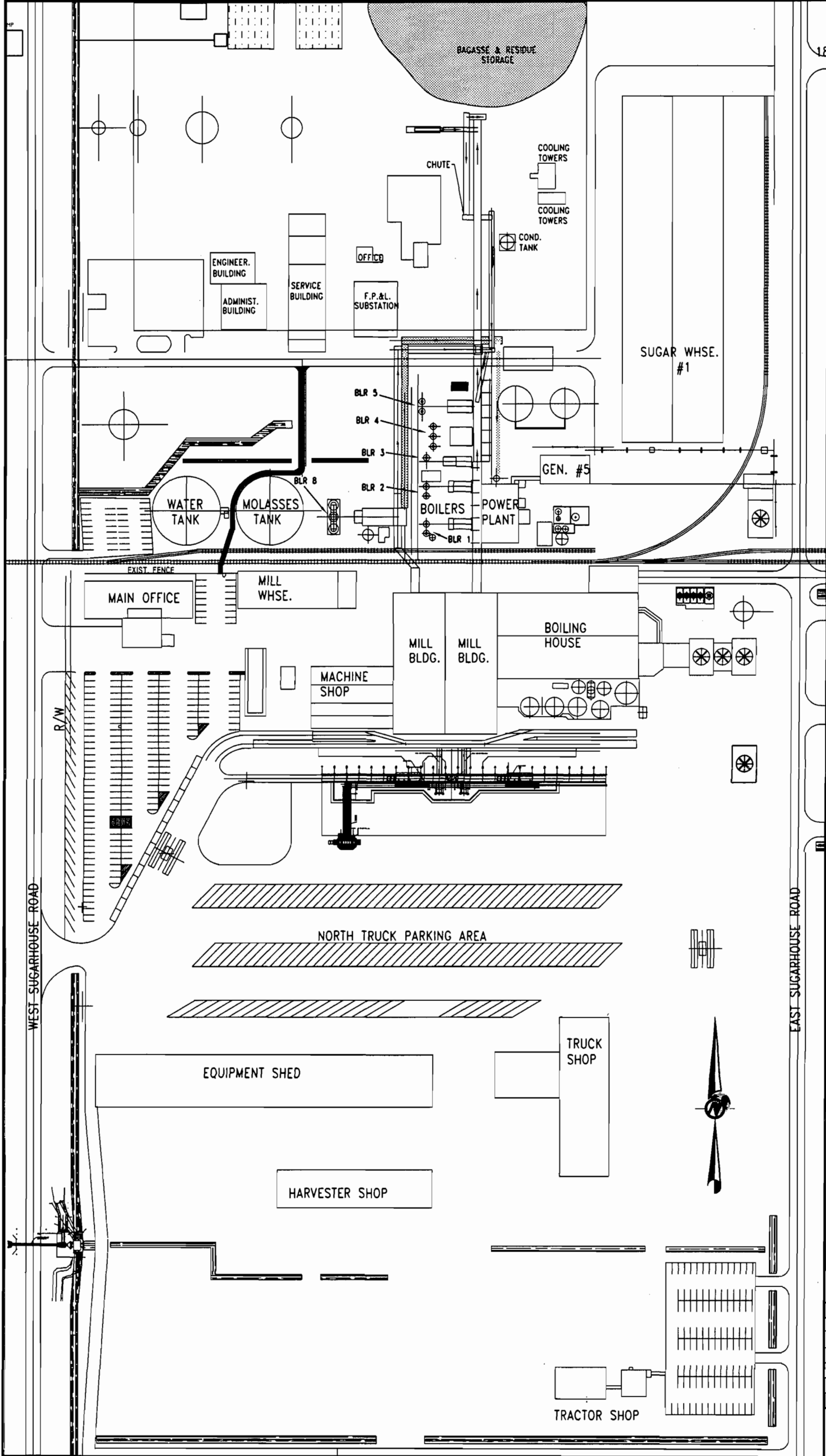
OFFICIAL USE

7001 0320 0001 3692 6983

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

Postmark
 Here

Sent To: Jose F. Alvarez
 Street, Apt. No.,
 or PO Box No. Box 666
 City, State, ZIP+4
 Belle Glade, FL 33430-0666



**SUGAR CANE GROWERS
COOPERATIVE OF FLORIDA**
BELLE GLADE, FLORIDA

PROJECT

**ATTACHMENT GSH-FI-C2
FACILITY PLOT PLAN**

TITLE

PROJECT No.	013-7571		
FILE No.	GSH-FI-C2.DWG		
REV.	SCALE		
DESIGN			
CADD	AMB	1/7/03	
CHECK	DB	1/8/03	
REVIEW			

TRACTOR SHOP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

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

Air Permit No. 0990026-006-AC
Glades Sugar House
Boilers 1 and 2 – Grate Replacements

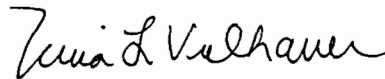
Authorized Representative:

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

Enclosed is Final Air Permit No. 0990026-006-AC, which authorizes the following work for Boilers 1 and 2: replacement of the existing fuel grates, addition of a new combustion air fan, modification of the combustion air distribution to provide more over-fire air, and the repair of concrete supports and refractory near the grates. The existing sugar mill boilers operate at the Glades Sugar House, which is located near Belle Glade in Palm Beach County, Florida. As noted in the Final Determination (attached), only minor changes to correct typographical errors were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

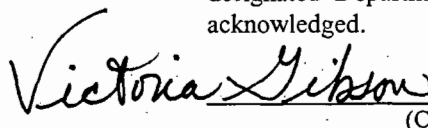
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5/28/03 to the person(s) listed:

cc: Mr. Jose Alvarez, SCGCF*
Ms. Kathy Lockhart, SCGCF
Mr. David Buff, Golder Associates Inc.
Mr. James Stormer, PBCHD

Mr. Ron Blackburn, SD Office
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Clerk Stamp

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



(Clerk)

May 28, 2003
(Date)

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

COMPLETE THIS SECTION ON DELIVERY

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

Evelyn B. Taylor 5/30/03

C. Signature Agent Addressee

X Evelyn B. Taylor

D. Is delivery address different from item 1? Yes No

If YES, enter delivery address below:

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
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4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 5887

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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

7001 0320 0001 3692 5887

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

Sent To
 Jose F. Alvarez
 Street, Apt. No.
 or PO Box No. 666
 City, State, ZIP+4
 Belle Glade, FL 33430-0666

PS Form 3800, January 2001 See Reverse for Instructions

FINAL DETERMINATION

PERMITTEE

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

Authorized Representative:

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400

PROJECT

Air Permit No. 0990026-006-AC
Glades Sugar House, Grate Replacements for Boilers 1 and 2

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

NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on April 18, 2003. The applicant published the "Public Notice of Intent to Issue" in The Palm Beach Post on April 26, 2003. The Department received the proof of publication on May 12, 2003. No requests for administrative hearings were filed.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's South District Office, or the applicant.

CONCLUSION

Only minor revisions were made to correct typographical errors. The final action of the Department is to issue the permit with the changes described above.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE:

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

Authorized Representative:

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

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

PROJECT AND LOCATION

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

STATEMENT OF BASIS

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

CONTENTS

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

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

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

ID	Emission Unit Description
001	Boiler 1
002	Boiler 2

REGULATORY CLASSIFICATION

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

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

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

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

RELEVANT DOCUMENTS

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU-001/002 – Boilers 1 and 2

This section of the permit addresses the following emissions units.

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

CONSTRUCTION

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

EMISSIONS AND PERFORMANCE REQUIREMENTS

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

PERFORMANCE TESTING

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

SECTION 4. APPENDICES
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Appendix CF. Citation Format
Appendix GC. General Conditions

SECTION 4. APPENDIX CF
CITATION FORMATS

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

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

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

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

New Permit Numbers

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

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

PSD Permit Numbers

Example: Permit No. PSD-FL-317

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

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

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

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

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

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

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

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

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

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

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

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

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

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

Florida Department of Environmental Protection

Memorandum

TO: Howard Rhodes, DARM
THRU: Trina Vielhauer, BAR ✓
Al Linero, NSR ✓
FROM: Jeff Koerner, NSR ✓
DATE: May 20, 2003
SUBJECT: Final Air Construction Permit No. 0990026-006-AC
Sugar Cane Growers Cooperative of Florida, Inc.
Boilers 1 and 2 – Grate Replacements

The Final Permit for this project is attached for your approval and signature, which authorizes the following work for Boilers 1 and 2: replacement of the existing fuel grates, addition of a new combustion air fan, modification of the combustion air distribution to provide more over-fire air, and the repair of concrete supports and refractory near the grates. The existing sugar mill boilers operate at the Glades Sugar House, which is near Belle Glade in Palm Beach County, Florida. The Department distributed an "Intent to Issue Permit" package on April 18, 2003. The applicant published the "Public Notice of Intent to Issue" in The Palm Beach Post on April 26, 2003. The Department received the proof of publication on May 12, 2003. No requests for administrative hearings were filed. No comments on the draft permit were received.

Day #90 is July 30, 2003. I recommend your approval of the attached Final Permit for this project.

Attachments

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION) 3. _____

1. JEFF KOERNER- ARM 4. _____

2. MAIL STATION 5505 – MAGNOLIA PLAZA 5. _____

PLEASE PREPARE REPLY FOR:
____ SECRETARY'S SIGNATURE
____ DIV/DIST DIR SIGNATURE
____ MY SIGNATURE
____ YOUR SIGNATURE
____ DUE DATE: _____

ACTION/DISPOSITION:
____ DISCUSS WITH ME
____ COMMENTS/ADVISE
____ REVIEW AND RETURN
____ SET UP MEETING
____ FOR YOUR INFORMATION
____ HANDLE APPROPRIATELY
____ INITIAL AND FORWARD
____ SHARE WITH STAFF
 FOR YOUR FILES

COMMENTS:
SCGC – 0990026-006-AC

RECEIVED
MAY 12 2003
BUREAU OF AIR REGULATION

FROM: Mara Nasca / SD DATE: 5/9/2003 PHONE: SC 748-6975

Sugar Cane Growers Cooperative of Florida



POST OFFICE BOX 666

BELLE GLADE, FLORIDA

33430-0666

April 30, 2003

VIA: Certified Mail # 7001 2510 0002 9630 5845
Return Receipt Requested

Mr. Richard W. Cantrell
Director of District Management
Florida Department of Environmental Protection
South District
P. O. Box 2549
Ft. Myers, FL 33902-2549

RECEIVED
MAY 05 2003
DEP. - South District

Subject: Palm Beach County – AP
Draft Title V Permit No: 0990026-006-AC
Glades Sugar House
EMA – Everglades Agricultural Area

Dear Mr. Cantrell:

Sugar Cane Growers Cooperative of Florida has published the Department's Public Notice on Intent to Issue Title V Air Operation Permit pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C. The proof is attached.

Sincerely,

Jose F. Alvarez
Sr. Vice President and Operations

Enclosure

JFA/mt

THE PALM BEACH POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared **Tracey Diglio**, who on oath says that she is **Telephone Sales Supervisor** of **The Palm Beach Post**, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being **Notice** in the matter of **Permit # 0990026-006-AC** was published in said newspaper in the issues of **April 26, 2003**. Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

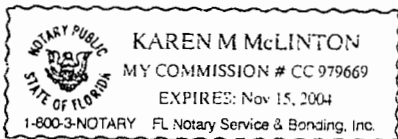
Tracey Diglio

Sworn to and subscribed before this 28th day of April, A.D. 2003

[Signature]

Personally known XX or Produced Identification _____

Type of Identification Produced _____



NO. 7604492
PUBLIC NOTICE OF INTENT
TO ISSUE AIR
CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
Draft Air Permit
No. 0990026-006-AC
Sugar Cane Growers Coop-
erative of Florida, Inc.
Glades Sugar House
Boilers 1 and 2.
Grate Replacement Project
The Department of Environ-
mental Protection (Depart-
ment) gives notice of its
intent to issue an air con-
struction permit to the Sugar
Cane Growers Cooperative
of Florida, Inc. to replace the
existing traveling grates with
water-cooled pinhole grates
for Boilers 1 and 2. The
existing sugar mill is located
in Belle Glade at 1500 West
Sugar House Road in Palm
Beach County, Florida. The
applicant's authorized rep-
resentative is Mr. Jose F.
Alvarez, the V.P. of Plan-
ning and Plant Operations.
The applicant's mailing
address is Sugar Cane
Growers Cooperative of
Florida, Inc., P.O. Box 666,
Belle Glade, FL 33430-
0666.

The applicant proposes to
perform the following work:
replacement of the existing
fuel grates, addition of a
new combustion air fan,
modification of the combus-
tion air distribution to pro-
vide more over-tire air, and
the repair of concrete sup-
ports and refractory near the
grates. The project should
not increase hourly or
annual emissions of air pol-
lutants, but should result in
more efficient combustion
with the firing of less
bagasse to produce the
same amount of steam. The
project is a cost effective
alternative to continued rou-
tine repair of the traveling
grates. The draft permit
contains conditions to verify
that the project will not in-
crease pollutant emission rates
or result in increased boiler
capacities. As a routine
replacement, the project is
not subject to PSD pre-con-
struction review.

The Department will issue the
Final Permit with the
attached conditions unless
a response received in
accordance with the follow-
ing procedures results in a
different decision or signifi-
cant change of terms or
conditions. The Depart-
ment will accept written
comments concerning the
proposed permit issuance
action for a period of four-
teen (14) days from the date
of publication of this Public
Notice of Intent to Issue Air
Construction Permit. Writ-
ten comments should be
provided to the Depart-
ment's Bureau of Air Regu-
lation at 2600 Blair Stone
Road, Mail Station # 5505,
Tallahassee, FL 32399-
2400. Any written com-
ments filed shall be made
available for public inspec-
tion. If written comments
received result in a signifi-
cant change in the pro-
posed agency action, the
Department shall revise the
proposed permit and
require, if applicable,
another Public Notice.

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

A person whose substantial
interests are affected by the
proposed permitting
decision may petition for an
administrative proceeding
(hearing) under Sections
120.569 and 120.57 F.S.
The petition must contain
the information set forth
below and must be filed
(received) in the Office of
General Counsel of the
Department at 2900 Con-

Florida: 52399-3000.

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

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

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding in accordance with the requirements set forth above. A complete project file is available for public

inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
(111 S. Magnolia Drive, Suite 4)
2600 Blair Stone Road,
MS #5505
Tallahassee, Florida
32399-2400
Telephone: 850/488-0114
Dept. of Environmental Protection
South District Office
Air Resources Section
2295 Victoria Avenue,
Suite 364
Fort Myers, FL 33901-3381
Telephone: 239/332-6975
Palm Beach County
Health Department
Environmental Health & Engineering
Air Pollution Control Section
P.O. Box 29
(901 Evernia Street)
West Palm Beach, FL
33402-0029

Telephone: (561) 355-3136
The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project for additional information at the address and phone numbers listed above.
PUB: The Palm Beach Post
April 26, 2003



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 18, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

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

Dear Mr. Alvarez:

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

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

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

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *Evelyn B. Taylor* B. Date of Delivery *4/21/03*

C. Signature *X Evelyn B. Taylor* Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 6457

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

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

7001 0320 0001 3692 6457

OFFICIAL USE

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

Postmark
Here

Sent To *Jose F. Alvarez*

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

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

In the Matter of an
Application for Air Permit by:

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

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

Authorized Representative:

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

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

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

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

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

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

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

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

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

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

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

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

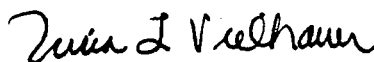
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal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

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

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

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

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

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

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

Clerk Stamp

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

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

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Permit No. 0990026-006-AC

Sugar Cane Growers Cooperative of Florida, Inc.
Glades Sugar House
Boilers 1 and 2 – Grate Replacement Project

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

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

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

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

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

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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

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

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

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

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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

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

COUNTY

Palm Beach County

APPLICANT

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

**PERMITTING
AUTHORITY**

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



April 18, 2003

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

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

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

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

Processing Schedule

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

Facility Description and Location

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

Regulatory Classifications

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

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

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

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

Project Description

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

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

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

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

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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

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

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

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

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

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

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

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

2. APPLICABLE REGULATIONS

State Regulations

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

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

General PSD Applicability

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

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

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

PSD Applicability for Project

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

3. DEPARTMENT REVIEW

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

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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

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

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

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

* Tests conducted after the grate replacement.

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

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

Pollutant	Annual Emissions, Tons/Year		
	2000	2001	2002*
CO	78	72	59
NOx	65	65	64
PM	61	35	42
SO2	47	43	43
VOC	144	29	136

* Tests conducted after the grate replacement.

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

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

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

* Data for operation after the grate replacement.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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

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

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

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

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

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

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

4. PRELIMINARY DETERMINATION

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

DRAFT PERMIT

PERMITTEE:

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

Authorized Representative:

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

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

PROJECT AND LOCATION

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

STATEMENT OF BASIS

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

CONTENTS

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

(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

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

ID	Emission Unit Description
001	Boiler 1
002	Boiler 2

REGULATORY CLASSIFICATION

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

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

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

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

RELEVANT DOCUMENTS

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

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU-001/002 – Boilers 1 and 2

This section of the permit addresses the following emissions units.

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

CONSTRUCTION

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

EMISSIONS AND PERFORMANCE REQUIREMENTS

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

PERFORMANCE TESTING

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

SECTION 4. APPENDICES
CONTENTS

Appendix CF. Citation Format

Appendix GC. General Conditions

SECTION 4. APPENDIX CF
CITATION FORMATS

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

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

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

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

New Permit Numbers

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

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

PSD Permit Numbers

Example: Permit No. PSD-FL-317

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

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

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

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

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

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

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

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

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

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

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

SECTION 4. APPENDIX GC
GENERAL CONDITIONS

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

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

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

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

Authorized Representative:

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

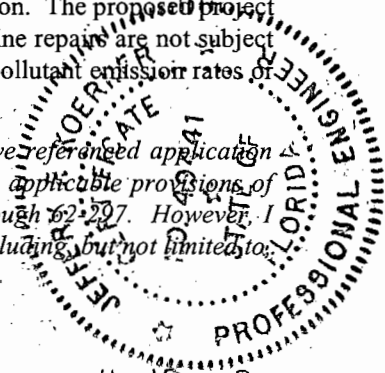
PROJECT DESCRIPTION

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

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

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

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-207. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffrey F. Koerfer
Jeffrey F. Koerfer, P.E.
P.E. Number: 49441

4-18-03
(Date)

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Chief
Bureau of Air Regulation

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

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

DATE: April 18, 2003

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

Attached for your review are the following items:

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

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

Attachments

Golder Associates Inc.

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



0237588-0300

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

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

RECEIVED

MAR 26 2003

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

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

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

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

2002 Bagasse Firing Rate (dry tons/yr)

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

2002 Emission Rates (tons/yr)

	CO	NO _x	PM	SO ₂	VOC
Boiler 1	85.04	88.89	42.31	63.59	27.03
Boiler 2	78.09	72.96	73.47	58.27	121.10
Boiler 3	59.45	64.43	42.03	43.08	135.94

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

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

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

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

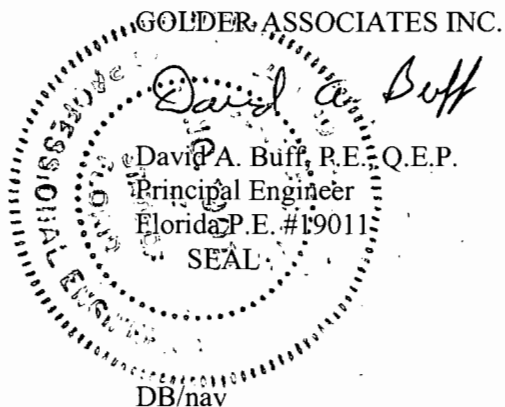
Nevertheless, SCGCF is willing to conduct performance tests on Boiler Nos. 1 and 2 during the next crop season to demonstrate each boiler's maximum steam production rate. Based on the results of these performance tests, SCGCF is willing to accept a permit limitation to restrict the boiler operation to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

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

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

Sincerely,

GOLDER ASSOCIATES INC.



DB/nav

Enclosures

cc: Jose Alvarez
Kathy Lockhart
Gary Perko

0237588\032403\032403.doc

R. Blackburn, SD
J. Stormer, Palm Beach Co.
G. Little, EPA
G. Bunnak, NPS



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

PETER P. BALJET
 EXECUTIVE DIRECTOR

February 10, 1975

W.D. FREDERICK, JR.
 CHAIRMAN

RECEIVED FEB 12 1975

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

RE: Palm Beach Co. - AP

Sugar Cane Growers Co-op
 Boiler #1

Dear Mr. Wedgworth:

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

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

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

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

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

Yours truly,

Philip R. Edwards,
 Regional Administrator

PRE/MPB/jp
 Encls.

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

John B. Middlemas
 BOARD MEMBER

Susan Wilson
 BOARD MEMBER

Mark D. Hollis
 BOARD MEMBER

Y.E. Hall
 BOARD MEMBER

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER
POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR SUGAR CANE GROWERS CO-OP OF FL.

POST OFFICE BOX 666

BELLE GLADE, FLORIDA 33430

PERMIT NO. AC50-2044A

DATE 2-10-75

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

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

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

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

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

Philip R. Edwards
PHILIP R. EDWARDS,
REGIONAL ADMINISTRATOR

PETER P. BALJET,

EXECUTIVE DIRECTOR

Best Available Copy

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC50-2044A

Date: 2-10-75

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

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



MAR 04 '75 AM

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

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

PETER P. BALJET
EXECUTIVE DIRECTOR

REC'D
SUGAR CANE GROWERS
COOP OF FLORIDA

February 28, 1975

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

RE: Palm Beach Co. - AP

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

Dear Mr. Arias:

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

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

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

All other conditions of these permits remain as issued.

Your continued cooperation in this matter is appreciated.

Sincerely,

Philip R. Edwards,
Regional Administrator

PRE/TWD/jp

cc: Palm Beach CHD

John R. Middlemas
BOARD MEMBER

Alice C. Wainwright
BOARD MEMBER

Mark D. Hollis
BOARD MEMBER

Y.E. Hall
BOARD MEMBER



STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

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

PETER P. BALJET
EXECUTIVE DIRECTOR

February 10, 1975

W.D. FREDERICK, JR.
CHAIRMAN

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

RE: Palm Beach Co. - AP

Sugar Cane Growers Co-op
Boiler #2

Dear Mr. Wedgworth:

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

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

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

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

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

Yours truly,

Philip R. Edwards,
Regional Administrator

PRE/MPB/jp
Encls.

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

in R. Middlemas
BOARD MEMBER

Susan Wilson
BOARD MEMBER

Mark D. Hollis
BOARD MEMBER

Y.E. Hall
BOARD MEMBER

STATE OF FLORIDA
DEPARTMENT OF AIR AND WATER
POLLUTION CONTROL

CONSTRUCTION PERMIT

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

PERMIT NO. AC50-2045A

DATE 2-10-75

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

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

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

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

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

Philip R. Edwards
PHILIP R. EDWARDS,
REGIONAL ADMINISTRATOR

PETER P. BALJET,

EXECUTIVE DIRECTOR

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC50-2045A

Date: 2-10-75

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

PERMIT NO. AC50-2045A

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



MAR 04 '75 AM

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

2180 WEST 1ST STREET ;
FORT MYERS, FLORIDA 33901

February 28, 1975

PETER P. BALJET
EXECUTIVE DIRECTOR

REC'D

SUGAR CANE GROWERS
COOP OF FLORIDA

Routing	Initials
1. Mr. Miller	
2. Mr. Wadsworth	
3. Mr. Melbyre	
4. Mr. Vicks	
5. Mr. Ferguson	
6. Mr. Underwood	
7. Mr. Finch	W.D. FREDERICK, JR.
8. Mr. Nocercki	CHAIRMAN
9. Mr. Allen	
10. Mr. Arvesu	
11. Mr. Foster	
12. Mr. S. Hild	
13.	
14.	

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

RE: Palm Beach Co. - AP

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

Dear Mr. Arias:

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

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

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

All other conditions of these permits remain as issued.

Your continued cooperation in this matter is appreciated.

Sincerely,

Philip R. Edwards,
Regional Administrator

PRE/TWD/jp

cc: Palm Beach CHD

John R. Middlemas
BOARD MEMBER

Alice C. Wainwright
BOARD MEMBER

Mark D. Hollis
BOARD MEMBER

Y.E. Hall
BOARD MEMBER

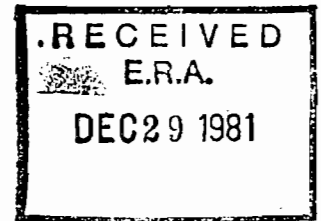


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 4 1981



REF: 4AH-AF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: PSD-FL-077

Dear Mr. Arias:

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


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

2

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

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

Sincerely yours,


Charles R. Jeter
Regional Administrator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30385

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

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

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

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

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

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

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

This permit shall become effective on DEC 4 1981

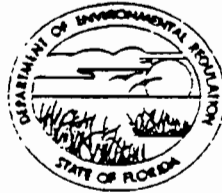
If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time this permit shall expire and authorization to construct shall become invalid.

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

Dec. 4 1981
Date Signed

Charles R. Jeter
Charles R. Jeter
Regional Administrator

TWIN TOWERS OFFICE BUILDING
2500 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



4
BOB GRAHAM
GOVERNOR
Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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

PERMIT/CERTIFICATION
NO. AC 50-42476

COUNTY: Palm Beach

PROJECT: Boiler No. 8

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

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

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

Attachments:

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

PAGE 1 OF 6

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

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information related to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

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

SPECIFIC CONDITIONS:

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

<u>Pollutant</u>	<u>Maximum Allowable Emissions</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.

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

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

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

Expiration Date: May 31, 1983

Issued this 28 day of October, 1981

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

[Signature]
Signature

PAGE 6 OF 6

Final Determination
Sugar Cane Growers Cooperative of Florida
Application PSD-FL-077

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

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

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

Attachment: General Conditions (Federal)

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

- 6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
- 7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.
- 8. The permittee shall allow representatives of the State environmental control agency or representatives of the Environmental Protection Agency, upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to any copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emission of pollutants;
 and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
- 9. The applicant shall submit for approval by EPA and FDER, a TSP post-construction continuous ambient monitoring plan prior to startup of the subject facilities in this permit. This plan should meet all of the requirements and procedures as stated in the "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD)," EPA-450/4-80-012, Nov. '80 and the quality assurance procedures of 40 CFR 58, Appendix B. Such monitoring shall be continued until such time as the effects of this modification on the ambient air quality have been quantified and determined to be well within the limitations of the short term secondary standard for particulates.

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

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

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

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

GENERAL CONDITIONS

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

14

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.



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.

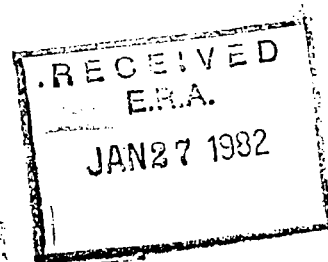
These revised limitations shall become effective on the date of this letter, which should be attached to and become a part of your December 4, 1981, permit.

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

Sincerely yours,

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

cc: Florida DER
Hopping, Boyd, Green & Sams



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

November 16, 1981

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

Dear Mr. Arias:

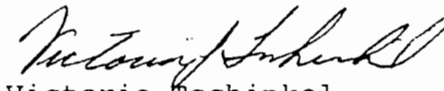
Modification of Conditions
Permit No. AC 50-42476

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

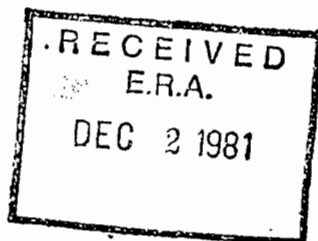
<u>Condition</u>	<u>Pollutant</u>	<u>From(ton/yr)</u>	<u>To(ton/yr)</u>
(Specific)	PM	243	276
	CO	326	511
#2	VOC	325	511
	NO _x	209	449

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

Sincerely,


Victoria Tschinkel
Secretary

VT:caa





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

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

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

Project: Boiler No. 8 Modification

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

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

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

Attachments are listed below:

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

PERMITTEE:
Sugar Cane Growers Coop.

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

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of

PERMITTEE:
Sugar Cane Growers Coop.

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

GENERAL CONDITIONS:

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

- a. Have access to and copy any records that must be kept under conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and,
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

PERMITTEE:
Sugar Cane Growers Coop.

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

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used;
 - the results of such analyses.

PERMITTEE:
Sugar Cane Growers Coop.

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
Sugar Cane Growers Coop.

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

SPECIFIC CONDITIONS:

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

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

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

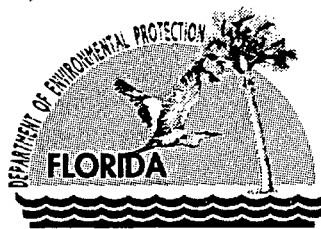
7. The stack heights on Boiler Nos. 2 and 5 shall be increased to a minimum of 150 feet above ground elevation. The stack height on Boiler No. 3 shall be increased to a minimum of 90 feet above ground elevation. These stacks shall be equipped with testing facilities meeting the requirements of Rule 62-297.345(3),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

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

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

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes, Director
Division of Air Resources
Management



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 30, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

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

Dear Mr. Alvarez:

On January 21, 2003, the Department received your application for an air construction permit to replace the grates on Boiler Nos. 1 and 2 and modify the combustion air system. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

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

"More Protection, Less Process"

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

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

Sincerely,



Jeffery F. Koerner
New Source Review Section

cc: Ms. Kathy Lockhart, Sugar Cane Growers Coop.
Mr. David Buff, Golder Associates Inc.
Mr. James Stormer, PBCHD
Mr. Ron Blackburn, SD Office
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee <i>x Evelyn B. Taylor</i>
1. Article Addressed to: Mr. Jose F. Alvarez V.P. of Planning and Plant Operations Sugar Cane Growers Cooperative of Florida, Inc. P. O. Box 666 Belle Glade, FL 33430-0666	B. Received by (Printed Name) <i>Evelyn B. Taylor</i>
7001 0320 0001 3692 6983	C. Date of Delivery <i>02-03-03</i>
PS Form 3811, August 2001	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
Domestic Return Receipt	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
102595-02-M-1540	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
7001 0320 0001 3692 6983	<div style="border: 1px solid black; padding: 5px; text-align: center;"> OFFICIAL RECEIPT </div>
Postage \$ Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees \$	<div style="border: 1px solid black; padding: 10px; text-align: center;"> Postmark Here </div>
Sent To: <i>Jose F. Alvarez</i> Street, Apt. No., or PO Box No. <i>Box 666</i> City, State, ZIP+4 <i>Belle Glade, FL 33430-0666</i>	
PS Form 3800, January 2001 See Reverse for Instructions	

Golder Associates Inc.

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

January 8, 2003



0237588

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

RECEIVED

JAN 21 2003

BUREAU OF AIR REGULATION

Attention: Mr. A. A. Linero, P. E.

RE: SUGAR CANE GROWERS COOPERATIVE OF FLORIDA
BELLE GLADE MILL
GRATE REPLACEMENTS FOR BOILER NOS. 1 AND 2

Dear Mr. Linero:

Sugar Cane Growers Cooperative of Florida (SCGCF) operates six bagasse/oil-fired boilers at its Belle Glade sugar mill located in Palm Beach. The facility currently operates under Title V permit No. 0990026-004-AV, issued August 28, 2002. The purpose of this correspondence is to request authorization to replace the existing traveling grates in Boiler Nos. 1 and 2 with water-cooled pinhole grates. These changes are very similar to the grate replacement project approved a few years ago for Boiler No. 3. As in that case, we believe this replacement falls under the definition of routine maintenance, repair and replacement, and that there will be no increase in emissions associated with this replacement.

Three (3) copies of a construction permit application to request this change is attached. One (1) copy is also being sent to the Department's Fort Myers District office. SCGCF would like to implement this change in the coming off-season. Please call or e-mail me if you have any questions concerning this application.

Sincerely,
GOLDER ASSOCIATES INC.

A handwritten signature in cursive script that reads 'David A. Buff'.

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

DB/jkw

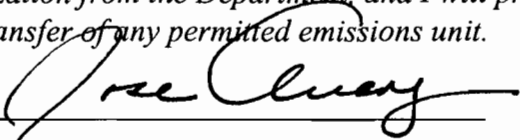
Enclosure

cc: Ron Blackburn, Ft. Myers District
Jose Alvarez
Kathy Lockhart
Gary Perko

P:\Projects\2002\0237588 SCGC - Glades\4\4.1\1L020803.doc

A handwritten signature in cursive script that reads 'Q. Kalamen'.
Handwritten initials 'PBC HD' in a bold, blocky font.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Jose F. Alvarez, V.P. Planning and Plant Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Sugar Cane Growers Cooperative of Florida Street Address: 1500 West Sugar House Road/P.O. Box 666 City: Belle Glade State: FL Zip Code: 33430-0666
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (561) 996 - 4759 Fax: (561) 996 - 4747
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature _____ Date <u>1/20/03</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address: Organization/Firm: Golder Associates Inc.* Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers: Telephone: (352) 336 - 5600 Fax: (352) 336 - 6603

*Board of Professional Engineers Certificate of Authorization #00001670

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

(seal)

Date

Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Boiler No. 1	AC1F	
002	Boiler No. 2	AC1F	

Application Processing Fee

Check one: [] Attached - Amount: \$: _____ [] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Replace existing grates and modify combustion air systems on Boiler No. 1 and Boiler No. 2.

2. Projected or Actual Date of Commencement of Construction: **01 April 2003**

3. Projected Date of Completion of Construction: **01 April 2004**

Application Comment

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 534.9 North (km): 2,953.3			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 26 / 42 / 06 Longitude (DD/MM/SS): 80 / 38 / 57			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 20	6. Facility SIC(s): 2061
7. Facility Comment (limit to 500 characters): This facility represents a sugar mill and a group of emission units which provide logistic support to manufacturing operations.			

Facility Contact

1. Name and Title of Facility Contact: Kathy Lockhart, Environmental Manager			
2. Facility Contact Mailing Address: Organization/Firm: Sugar Cane Growers Cooperative of Florida Street Address: 1500 West Sugar House Road/P.O. Box 666 City: Belle Glade State: FL Zip Code: 33430-0666			
3. Facility Contact Telephone Numbers: Telephone: (561) 996 - 4779 Fax: (561) 996 - 4780			

Facility Regulatory Classifications

Check all that apply:

1. [] Small Business Stationary Source?	[] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. [] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [X] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [] Synthetic Minor Source of HAPs?	
6. [] One or More Emissions Units Subject to NSPS?	
7. [] One or More Emission Units Subject to NESHAP?	
8. [] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	

List of Applicable Regulations

See Attached Applicable Rule List – effective 3/01/02	

Title V Core List

Effective: 03/01/02

[**Note:** The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

Federal: (description)

40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: (description)

CHAPTER 62-4, F.A.C.: PERMITS, effective 06-01-01

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application.

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review.

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 06-21-01

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.

Title V Core List

Effective: 03/01/02

- 62-210.350, F.A.C.: Public Notice and Comment.
- 62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.
- 62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.
- 62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

- 62-210.360, F.A.C.: Administrative Permit Corrections.
- 62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
- 62-210.400, F.A.C.: Emission Estimates.
- 62-210.650, F.A.C.: Circumvention.
- 62-210.700, F.A.C.: Excess Emissions.

- 62-210.900, F.A.C.: Forms and Instructions.
- 62-210.900(1), F.A.C.: Application for Air Permit – Title V Source, Form and Instructions.
- 62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.
- 62-210.900(7), F.A.C.: Application for Transfer of Air Permit – Title V and Non-Title V Source.

CHAPTER 62-212, F.A.C.: STATIONARY SOURCES - PRECONSTRUCTION REVIEW, effective 08-17-00

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 04-16-01

- 62-213.205, F.A.C.: Annual Emissions Fee.
- 62-213.400, F.A.C.: Permits and Permit Revisions Required.
- 62-213.410, F.A.C.: Changes Without Permit Revision.
- 62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
- 62-213.415, F.A.C.: Trading of Emissions Within a Source.
- 62-213.420, F.A.C.: Permit Applications.
- 62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
- 62-213.440, F.A.C.: Permit Content.
- 62-213.450, F.A.C.: Permit Review by EPA and Affected States
- 62-213.460, F.A.C.: Permit Shield.

- 62-213.900, F.A.C.: Forms and Instructions.
- 62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.
- 62-213.900(7), F.A.C.: Statement of Compliance Form.

Title V Core List

Effective: 03/01/02

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-02-99

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING, effective 03-02-99

62-297.310, F.A.C.: General Test Requirements.

62-297.330, F.A.C.: Applicable Test Procedures.

62-297.340, F.A.C.: Frequency of Compliance Tests.

62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions
Unit.

62-297.350, F.A.C.: Determination of Process Variables.

62-297.570, F.A.C.: Test Report.

62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

Miscellaneous:

CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests

**CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective
07-01-98**

CHAPTER 62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94

CHAPTER 62-257, F.A.C.: Asbestos Notification and Fee, effective 02-09-99

**CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and
Recycling, effective 09-10-96**

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
SO ₂	A				Sulfur Dioxide
VOC	A				Volatile Organic Compounds
PM	A				Particulate Matter - Total
PM ₁₀	A				Particulate Matter - PM ₁₀
CO	A				Carbon Monoxide
NO _x	A				Nitrogen Oxides
H017	A				Benzene
H115	A				Methanol
H132	A				Naphthalene
H151	A				Polycyclic organic matter
HAPs	A				Total HAPs

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

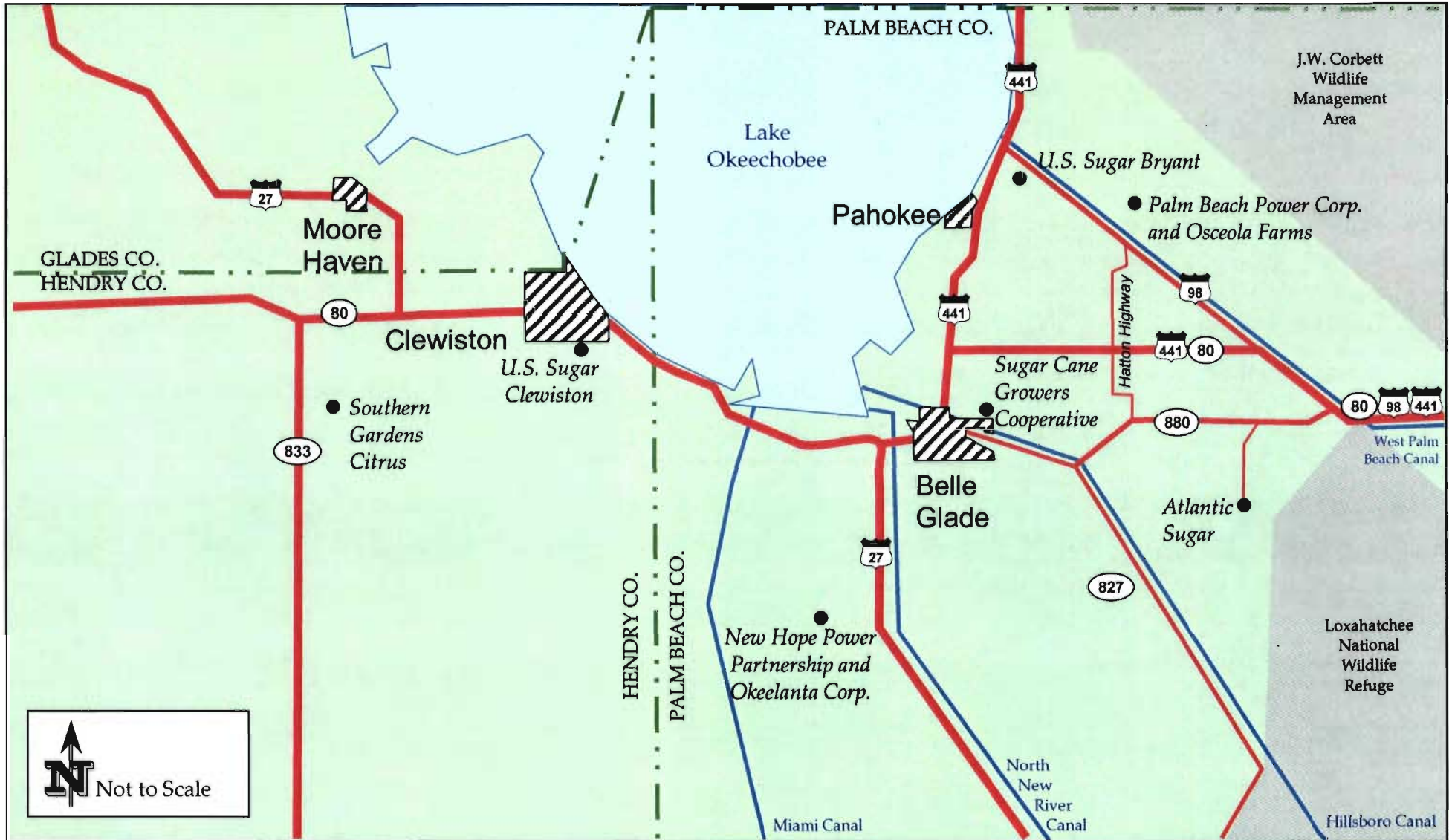
1. Area Map Showing Facility Location: <input checked="checked" type="checkbox"/> Attached, Document ID: <u>GSH-FI-C1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input checked="checked" type="checkbox"/> Attached, Document ID: <u>GSH-FI-C2</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input checked="checked" type="checkbox"/> Attached, Document ID: <u>GSH-FI-C3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="checked" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="checked" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input checked="checked" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT GSH-FI-C1

AREA MAPS



Attachment GSH-FI-C1a
 Area Map Showing Facility Location (Including Florida Sugar Mills)
 Glades Sugar House, Sugar Cane Growers Corporation, Belle Glade, Florida

Source: Golder Associates Inc., 2002.





Attachment GSH-FI-C1b
Area Map (USGS)
Glades Sugar House, Sugar Cane Growers Corporation, Belle Glade, Florida

Source: Golder, 2002.



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JAN 21 2003

BUREAU OF AIR REGULATION

**AIR CONSTRUCTION PERMIT
APPLICATION
BOILER NOS. 1 AND 2 – GRATE REPLACEMENT
BELLE GLADE, FLORIDA**

**Prepared For:
Sugar Cane Growers Cooperative of Florida
1500 West Sugar House Road
Belle Glade, Florida 33430**

**Prepared By:
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500**

**January 2003
0137571**

**DISTRIBUTION:
4 Copies - FDEP
3 Copies – SCGCF
2 Copies – Golder Associates Inc.**



Department of Environmental Protection

Division of Air Resources Management

RECEIVED

JAN 21 2003

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

BUREAU OF AIR REGULATION

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Sugar Cane Growers Cooperative of Florida	
2. Site Name: Glades Sugar House	
3. Facility Identification Number: 0990026 [] Unknown	
4. Facility Location: Street Address or Other Locator: 1500 West Sugar House Road City: Belle Glade County: FL Zip Code: 33430-0666	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Jose F. Alvarez, V.P. Planning and Plant Operations	
2. Application Contact Mailing Address: Organization/Firm: Sugar Cane Growers Cooperative of Florida Street Address: 1500 West Sugar House Road/P.O. Box 666 City: Belle Glade State: FL Zip Code: 33430-0666	
3. Application Contact Telephone Numbers: Telephone: (561) 996 - 4759 Fax: (561) 996 - 4747	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	1-21-2003
2. Permit Number:	0990026-006-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

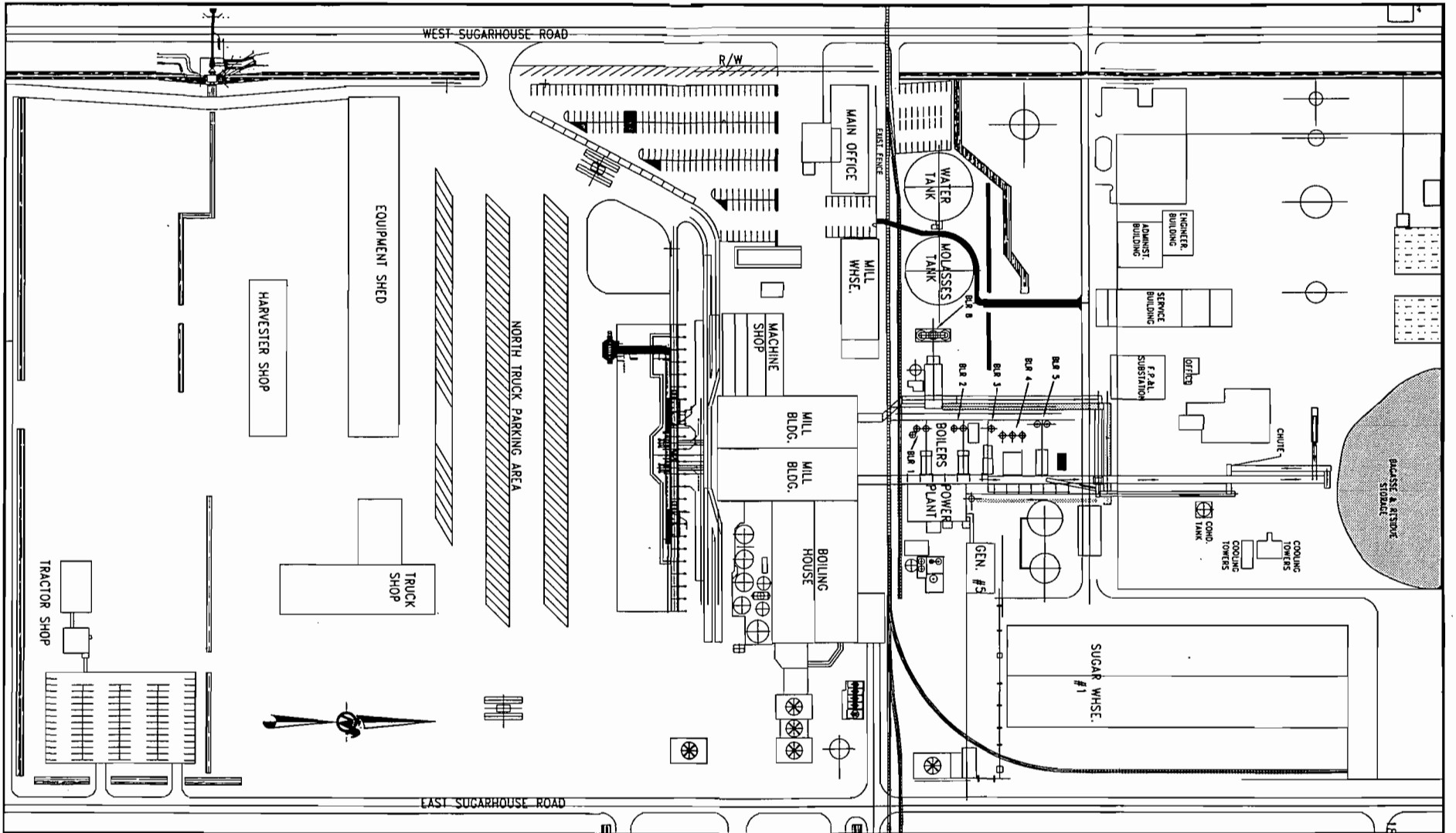
Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

ATTACHMENT GSH-FI-C2

FACILITY PLOT PLAN



PROJECT No.	013-3571
FILE No.	GSH-FI-C2.DWG
REV	SCALE
DESIGN	
CAAD	AH8 1/17/03
CHECK	DB 1/18/03
REVIEW	

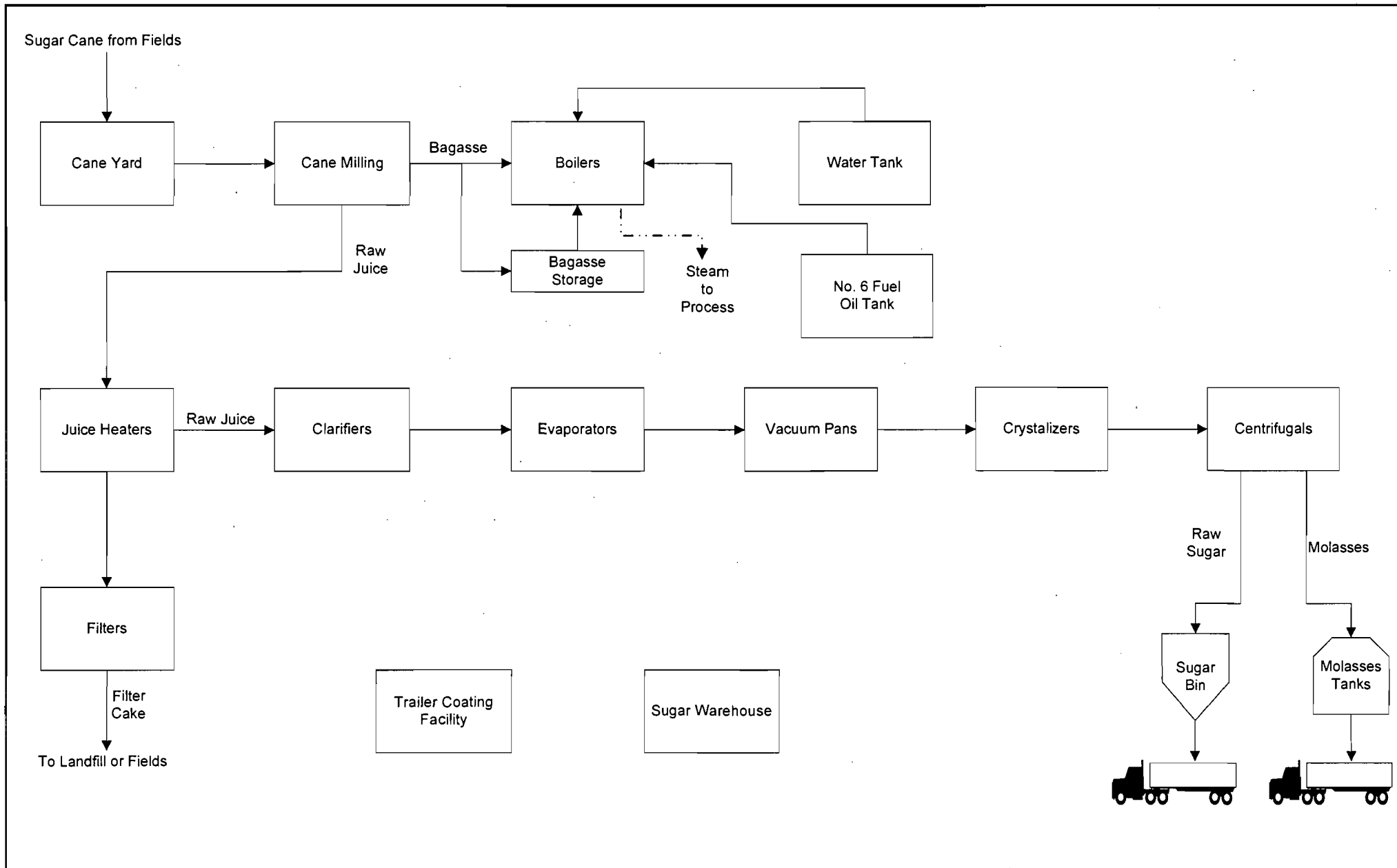
**ATTACHMENT GSH-FI-C2
FACILITY PLOT PLAN**

PROJECT
**SUGAR CANE GROWERS
COOPERATIVE OF FLORIDA**
BELLE GLADE, FLORIDA

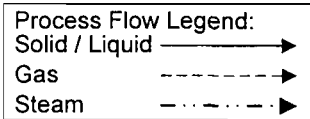


ATTACHMENT GSH-FI-C3

PROCESS FLOW DIAGRAM



ATTACHMENT GSH-FI-C3
 PROCESS FLOW DIAGRAM
 SUGAR CANE GROWERS COOPERATIVE OF FLORIDA
 GOLDBER, 2002.



0237571\4.2\4.4.1 GLADES\GSH-FI-C3.VSD

01/07/03



III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <p style="margin-left: 20px;">Boiler No. 1</p>			
4. Emissions Unit Identification Number: [] No ID ID: 001 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 20	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters) <p style="margin-left: 20px;">This boiler is a traveling grate boiler fired by bagasse, residue, and fuel oil. This emission unit produces steam for use in the production process of raw sugar cane. A water-cooled pin-hole grate will be installed in the boiler, along with combustion air modifications.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

**Mechanical Dust Collector
Joy Turbulaire Impingement Wet Scrubber, Type D**

2. Control Device or Method Code(s): **002, 076**

Emissions Unit Details

1. Package Unit: Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	334.1	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:	175,000	lb/hr
5. Requested Maximum Operating Schedule:		
	24	7
	hours/day	days/week
	44	7,296
	weeks/year	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>The maximum rates are based on a 24-hour average. Max heat input based on burning bagasse. Boiler operating pressure & temperature: 400 psig, 585°F.</p>		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-296.410(1)(b), F.A.C: Carbonaceous Fuel Burning Equipment
62-296.410(3), F.A.C: Carbonaceous Fuel Burning Equipment
62-296.500(1)(b), F.A.C: RACT for VOC and NO _x
62-296.500(2)(a), F.A.C: RACT for VOC and NO _x
62-296.500(2)(c), F.A.C: RACT for VOC and NO _x
62-296.500(6), F.A.C: RACT for VOC and NO _x
62-296.570(1), F.A.C: RACT for VOC and NO _x
62-296.570(2), F.A.C: RACT for VOC and NO _x
62-296.570(3), F.A.C: RACT for VOC and NO _x
62-296.570(4)(a), F.A.C: RACT for VOC and NO _x
62-296.570(4)(b)6., F.A.C: RACT for VOC and NO _x
62-296.570(4)(c), F.A.C: RACT for VOC and NO _x
62-297.310(1), F.A.C: General Compliance Test Requirements
62-297.310(2)(b), F.A.C: General Compliance Test Requirements
62-297.310(3), F.A.C: General Compliance Test Requirements
62-297.310(4), F.A.C: General Compliance Test Requirements
62-297.310(5), F.A.C: General Compliance Test Requirements
62-297.310(6), F.A.C: General Compliance Test Requirements
62-297.310(7)(a)3., F.A.C: General Compliance Test Requirements
62-297.310(7)(a)4., F.A.C: General Compliance Test Requirements
62-297.310(7)(a)5., F.A.C: General Compliance Test Requirements
62-297.310(7)(a)9., F.A.C: General Compliance Test Requirements
62-297.310(8), F.A.C: General Compliance Test Requirements
62-297.401(5), F.A.C: EPA Test Method 5
62-297.401(7)(e), F.A.C: EPA Test Method 7E
62-297.401(9), F.A.C: EPA Test Method 9
62-297.401(18), F.A.C: EPA Test Method 18
62-297.401(25)(a), F.A.C: EPA Test Method 25A
62-297.440(1)(b), F.A.C: Supplemental Test Procedures

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? Blr 1		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 150 feet	7. Exit Diameter: 7.00 feet	
8. Exit Temperature: 160 °F	9. Actual Volumetric Flow Rate: 159,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 4

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External combustion boilers: Industrial: Bagasse		
2. Source Classification Code (SCC): 1-02-011-01	3. SCC Units: Tons Burned	
4. Maximum Hourly Rate: 20.88	5. Maximum Annual Rate: 152,350	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 16
10. Segment Comment (limit to 200 characters): Based on 334.1 MMBtu/hr (24-hr average) and a heating value of 8,000 Btu/lb (dry) for bagasse.		

Segment Description and Rate: Segment 2 of 4

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External combustion boilers: Industrial: Solid Fuels		
2. Source Classification Code (SCC): 1-02-012-01	3. SCC Units: Tons Burned	
4. Maximum Hourly Rate: 16.52	5. Maximum Annual Rate: 120,507	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 17.8
10. Segment Comment (limit to 200 characters): Based on 294.0 MMBtu/hr (24-hr average) and a heating value of 8,900 Btu/lb (dry) for bagasse residue.		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 1000 Gallons of #6 Oil Burned		
2. Source Classification Code (SCC): 1-02-004-01		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 1.521	5. Maximum Annual Rate: 11,098	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 2.40	8. Maximum % Ash:	9. Million Btu per SCC Unit: 151
10. Segment Comment (limit to 200 characters): Based on 229.7 MMBtu/hr (24-hr average) and heating value of 151,000 Btu/gal for No. 6 fuel oil.		

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External combustion boilers: Industrial: Waste Oil		
2. Source Classification Code (SCC): 1-02-013-02		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 0.04	5. Maximum Annual Rate: 75.00	6. Estimated Annual Activity Factor:
8. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 151
10. Segment Comment (limit to 200 characters): The used oil is generated solely by the facility, mostly during the repair season. The on-specification used oil is properly stored and burned in our boilers for energy recovery. The amount generated ranges between 50,000 and 75,000 gallons per year.		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM ₁₀	002		NS
NO _x			EL
VOC			EL
SO ₂			EL
CO			NS
H017			NS
H115			NS
H132			NS
H151			NS
HAPS			NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control:
3. Potential Emissions: 83.5 lb/hour 304.7 tons/year	4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 0.25 lb/MMBtu Reference: Permit Limit	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 334.1 MMBtu/hr (24-hr average) x 0.25 lb/MMBtu = 83.5 lb/hr 83.5 lb/hr x 7,296 hr/yr ÷ 2,000 lb/ton = 304.7 TPY	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission limit for carbonaceous burning only.	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.25 lb/MMBtu	4. Equivalent Allowable Emissions: 83.5 lb/hour 304.7 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The Requested Allowable Emission limit is based on permit condition. The Equivalent Allowable Emissions were calculated as if only bagasse were being burned while the source achieves its maximum steam rate.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.10 lb/MMBtu		4. Equivalent Allowable Emissions: 22.97 lb/hour 83.8 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 5			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): RULE 62-296.410(1)(b)2, F.A.C. The maximum allowable figures have been calculated as if only oil were being used at the maximum oil firing rate.			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: NO_x	2. Total Percent Efficiency of Control:
3. Potential Emissions: 191.1 lb/hour 697.1 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.65 lb/MMBtu Reference: Permit Limit	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $294.0 \text{ MMBtu/hr (24-hr average)} \times 0.65 \text{ lb/MMBtu} = 191.1 \text{ lb/hr}$ $191.1 \text{ lb/hr} \times 7,296 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 697.1 \text{ TPY}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission limit for residue burning only.	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.65 lb/MMBtu	4. Equivalent Allowable Emissions: 191.1 lb/hour 697.1 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 7 or 7E	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The maximum allowable figures have been calculated as if only residue were being used while the boiler achieves its maximum steam rate. The allowable emission rate of 0.65 lb/MMBtu was requested by permittee pursuant to rule 62-296.470, F.A.C.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: NO_x		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.45 lb/MMBtu		4. Equivalent Allowable Emissions: 150.3 lb/hour 548.5 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 7 or 7E			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The maximum allowable figures have been calculated as if only bagasse were being used while the boiler achieves its maximum steam rate. The allowable emission rate of 0.45 lb/MMBtu was requested by permittee pursuant to rule 62-296.570, F.A.C.			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control:
3. Potential Emissions: 233.9 lb/hour 853.2 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 0.70 lb/MMBtu Reference: Proposed Permit Limit	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $334.1 \text{ MMBtu/hr (24-hr average)} \times 0.70 \text{ lb/MMBtu} = 233.9 \text{ lb/hr}$ $233.9 \text{ lb/hr} \times 7,296 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 853.2 \text{ TPY}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission limit for bagasse fuel burning.	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.70 lb/MMBtu	4. Equivalent Allowable Emissions: 233.9 lb/hour 853.2 tons/year
5. Method of Compliance (limit to 60 characters): EPA Methods 25A and 18 Combined	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The equivalent allowable figures have been calculated as if only bagasse fuel were being used while the boiler achieves its maximum steam rate. The allowable emission rate of 0.70 lb/MMBtu was requested by permittee pursuant to rule 62-296.570, F.A.C.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.40 lb/MMBtu		4. Equivalent Allowable Emissions: 117.6 lb/hour 429.0 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Methods 25A and 18 combined			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The equivalent allowable figures have been calculated as if only residue were being used while the boiler achieves its maximum steam rate. The allowable emission rate of 0.4 lb/MMBtu was requested by permittee pursuant to rule 62-296.570, F.A.C.			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 597.7 lb/hour 2,180.4 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 2.4% S oil Reference: Permit Limit		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): See Attachment GSH-EU1-G8			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 2.4% S oil		4. Equivalent Allowable Emissions: 591.4 lb/hour 2,157.4 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 5			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Allowable emissions based on fuel oil burning only.			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2,004.6 lb/hour 7,312.8 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 6.0 lb/MMBtu Reference: Test Data		7. Emissions Method Code: 1	
8. Calculation of Emissions (limit to 600 characters): $334.1 \text{ MMBtu/hr (24-hr average)} \times 6.0 \text{ lb/MMBtu} = 2,004.6 \text{ lb/hr}$ $2,004.6 \text{ lb/hr} \times 7,296 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 7,312.8$			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Maximum and annual emissions based on average of 6.0 lb/MMBtu.			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
 (Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 30 % Exceptional Conditions: 40 % Maximum Period of Excess Opacity Allowed: 2 min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.410(1)(b)1, F.A.C.	

I. CONTINUOUS MONITOR INFORMATION
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 3

1. Parameter Code: PRS	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information: Manufacturer: Foxboro Model Number: 863DP-M2D1SS-AM Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Measures total pressure drop across wet scrubber.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 3

1. Parameter Code: Water Pressure	2. Pollutant(s):
3. CMS Requirement:	[] Rule [X] Other
4. Monitor Information: Manufacturer: Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Measures inlet water pressure to the wet scrubber.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 3 of 3

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement:	[] Rule [<input checked="" type="checkbox"/>] Other
4. Monitor Information: Manufacturer: Rosemount Model Number: 1151DP4S22M1B1 Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Measures steam flow on Boiler No. 1.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>GSH-EU1-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>GSH-EU1-J2</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>GSH-EU1-J3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

<p>11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>15. Acid Rain Part Application (Hard-copy Required)</p> <p><input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____</p> <p><input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____</p> <p><input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____</p> <p><input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p>

ATTACHMENT GSH-EU1-G8

EMISSION CALCULATIONS

Attachment GSH-EU1-G8. SCGC Boiler Nos. 1 and 2 Maximum Fuel Oil Burning And SO₂ Emissions

Boiler	Total Maximum Heat Input (MMBtu/hr)	Maximum Heat Input From Fuel Oil (MMBtu/hr)	Maximum SO ₂ Emissions							
			Fuel Oil ^a		Bagasse ^a (MMBtu/hr)	Fuel Oil ^b (lb/hr)	Bagasse ^c (lb/hr)	Total		
			gal/hr	MMBtu/hr						
<u>MAXIMUM 24-HOUR CASE</u>										
1	334.1	229.7	1,521	229.7	104.4	591.4	6.3	597.7	75.31	
2	334.1	229.7	1,521	229.7	104.4	591.4	6.3	597.7	75.31	

^a Assumes 55% combustion efficiency for both bagasse and fuel oil.

^b Based on stoichiometric calculation for SO₂ emissions:

Fuel oil : 2.4% sulfur

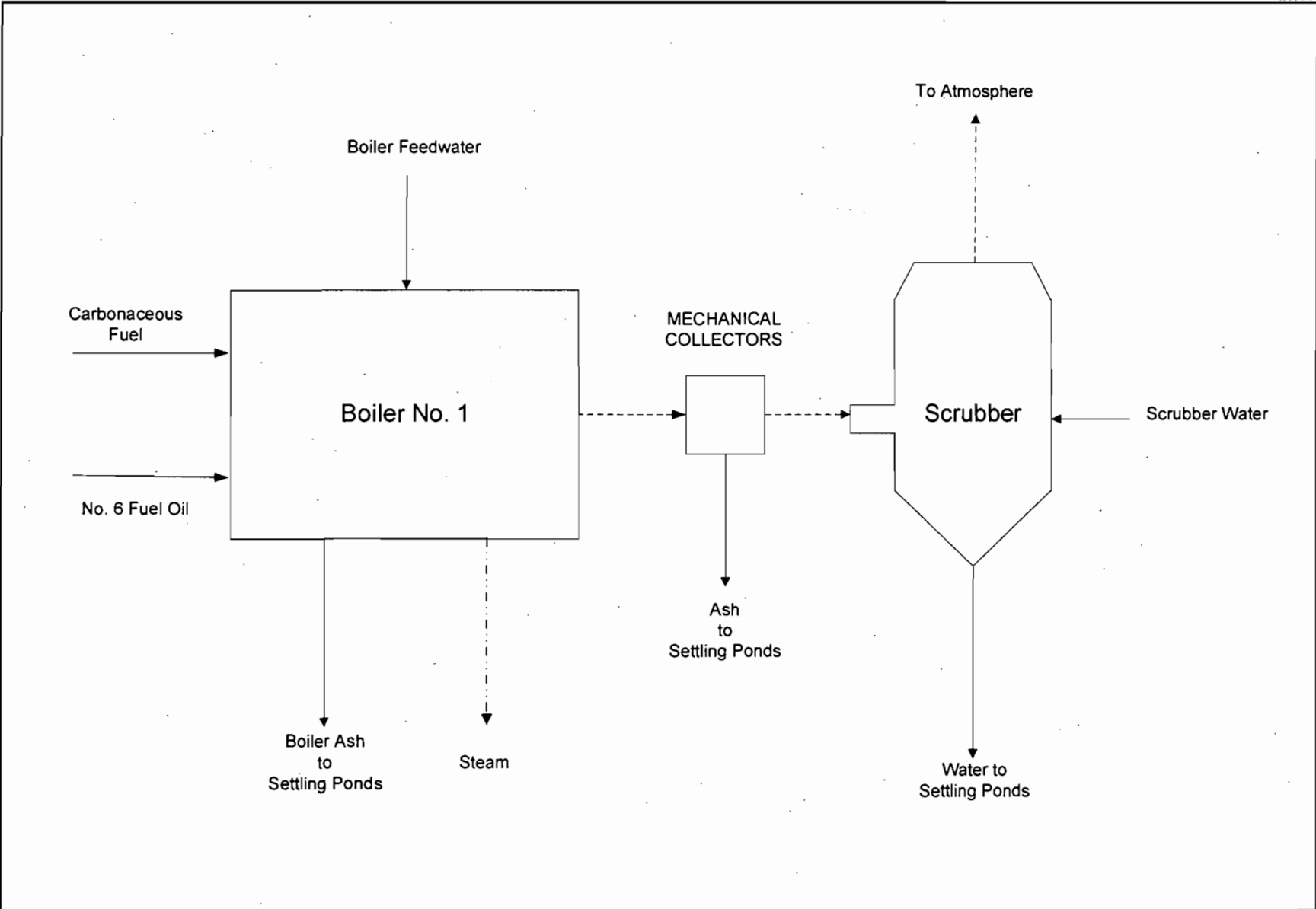
18,642 Btu/lb; 151,000 Btu/gal

8.1 lb/gal

^c Based on SO₂ emissions from bagasse of 0.06 lb/MMBtu.

ATTACHMENT GSH-EU1-J1

PROCESS FLOW DIAGRAM



Attachment GSH-EU1-J1
Process Flow Diagram

Process Area: Boiler No. 1

Sugar Cane Growers Cooperative of Florida

Latest Revision Date: 1/7/2003

Process Flow Legend:	
Solid / Liquid	→
Gas	- - - - -
Steam	- · - · -



ATTACHMENT GSH-EU1-J2

FUEL ANALYSIS

**ATTACHMENT GSH-EU1-J2
BOILER FUEL ANALYSIS**

SUGAR CANE GROWERS COOPERATIVE OF FLORIDA

PARAMETER	BAGASSE*	RESIDUE*	NO. 6 FUEL OIL**
Dry Basis:			
BTU/LB	8,000	8,900	17,500
LBS/GAL	--	--	8.1
AVERAGE ULTIMATE ANALYSIS: (Dry Basis %)			
			**
Carbon	49	51	87.3
Hydrogen	6	5	10.5
Nitrogen	0.38	0.4	0.28
Oxygen	43	35	0.64
Sulfur	0.06	0.4--0.6	1.0
Ash	1.8	1.9--8.0	0.1
Water	54	40	0.2

* Sources: Sugar Cane Growers Cooperative, 2002. It represents average values, since biomass in particular could vary depending on environmental conditions, as well as, harvesting procedures.

** Source: Perry's Chemical Engineers' Handbook. Sixth Edition

ATTACHMENT GSH-EU1-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

**ATTACHMENT GSH-EU1-J3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT**

SUGAR CANE GROWERS COOPERATIVE OF FLORIDA
BOILER NO. 1

Control equipment: Mechanical collectors followed by one wet impingement turbulaire scrubber, custom design.

Scrubbing Liquid:	Water
Inlet Water Pressure (psi)	0-100
Pressure Drop Across Scrubber (Inches H ₂ O)	0-17

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <p style="margin-left: 20px;">Boiler No. 2</p>			
4. Emissions Unit Identification Number: [] No ID ID: 002 [] ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 20	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters) <p style="margin-left: 20px;">This boiler is a traveling grate boiler fired by bagasse, residue, and fuel oil. This emission unit produces steam for use in the production process of raw sugar cane. A water-cooled pin-hole grate will be installed in the boiler, along with combustion air modifications.</p>			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

**Mechanical Dust Collector
Joy Turbulaire Impingement Wet Scrubber, Type D**

2. Control Device or Method Code(s): **002, 076**

Emissions Unit Details

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	334.1	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:	175,000	lb/hr
5. Requested Maximum Operating Schedule:		
	24	hours/day
	7	days/week
	44	weeks/year
	7,296	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>The maximum rates are based on a 24-hour average. Max heat input based on burning bagasse. Boiler operating pressure & temperature: 400 psig, 585°F.</p>		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-296.410(1)(b), F.A.C: Carbonaceous Fuel Burning Equipment
62-296.410(3), F.A.C: Carbonaceous Fuel Burning Equipment
62-296.500(1)(b), F.A.C: RACT for VOC and NO _x
62-296.500(2)(a), F.A.C: RACT for VOC and NO _x
62-296.500(2)(c), F.A.C: RACT for VOC and NO _x
62-296.500(6), F.A.C: RACT for VOC and NO _x
62-296.570(1), F.A.C: RACT for VOC and NO _x
62-296.570(2), F.A.C: RACT for VOC and NO _x
62-296.570(3), F.A.C: RACT for VOC and NO _x
62-296.570(4)(a), F.A.C: RACT for VOC and NO _x
62-296.570(4)(b)6., F.A.C: RACT for VOC and NO _x
62-296.570(4)(c), F.A.C: RACT for VOC and NO _x
62-297.310(1), F.A.C: General Compliance Test Requirements
62-297.310(2)(b), F.A.C: General Compliance Test Requirements
62-297.310(3), F.A.C: General Compliance Test Requirements
62-297.310(4), F.A.C: General Compliance Test Requirements
62-297.310(5), F.A.C: General Compliance Test Requirements
62-297.310(6), F.A.C: General Compliance Test Requirements
62-297.310(7)(a)3., F.A.C: General Compliance Test Requirements
62-297.310(7)(a)4., F.A.C: General Compliance Test Requirements
62-297.310(7)(a)5., F.A.C: General Compliance Test Requirements
62-297.310(7)(a)9., F.A.C: General Compliance Test Requirements
62-297.310(8), F.A.C: General Compliance Test Requirements
62-297.401(5), F.A.C: EPA Test Method 5
62-297.401(7)(e), F.A.C: EPA Test Method 7E
62-297.401(9), F.A.C: EPA Test Method 9
62-297.401(18), F.A.C: EPA Test Method 18
62-297.401(25)(a), F.A.C: EPA Test Method 25A
62-297.440(1)(b), F.A.C: Supplemental Test Procedures

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? Blr 2		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 150 feet	7. Exit Diameter: 7.00 feet	
8. Exit Temperature: 160 °F	9. Actual Volumetric Flow Rate: 159,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 4

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External combustion boilers: Industrial: Bagasse		
2. Source Classification Code (SCC): 1-02-011-01		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 20.88	5. Maximum Annual Rate: 152,350	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 16
10. Segment Comment (limit to 200 characters): Based on 334.1 MMBtu/hr (24-hr average) and a heating value of 8,000 Btu/lb (dry) for bagasse.		

Segment Description and Rate: Segment 2 of 4

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External combustion boilers: Industrial: Solid Fuels		
2. Source Classification Code (SCC): 1-02-012-01		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 16.52	5. Maximum Annual Rate: 120,507	6. Estimated Annual Activity Factor:
9. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 17.8
10. Segment Comment (limit to 200 characters): Based on 294.0 MMBtu/hr (24-hr average) and a heating value of 8,900 Btu/lb (dry) for bagasse residue.		

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 1000 Gallons of #6 Oil Burned		
2. Source Classification Code (SCC): 1-02-004-01		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 1.521	5. Maximum Annual Rate: 11,098	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 2.40	8. Maximum % Ash:	9. Million Btu per SCC Unit: 151
10. Segment Comment (limit to 200 characters): Based on 229.7 MMBtu/hr (24-hr average) and heating value of 151,000 Btu/gal for No. 6 fuel oil.		

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type) (limit to 500 characters): External combustion boilers: Industrial: Waste Oil		
2. Source Classification Code (SCC): 1-02-013-02		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 0.04	5. Maximum Annual Rate: 75.00	6. Estimated Annual Activity Factor:
10. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 151
10. Segment Comment (limit to 200 characters): The used oil is generated solely by the facility, mostly during the repair season. The on-specification used oil is properly stored and burned in our boilers for energy recovery. The amount generated ranges between 50,000 and 75,000 gallons per year.		

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
PM ₁₀	002		NS
NO _x			EL
VOC			EL
SO ₂			EL
CO			NS
H017			NS
H115			NS
H132			NS
H151			NS
HAPS			NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 83.5 lb/hour 304.7 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year			
6. Emission Factor: 0.25 lb/MMBtu Reference: Permit Limit		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): $334.1 \text{ MMBtu/hr (24-hr average)} \times 0.25 \text{ lb/MMBtu} = 83.5 \text{ lb/hr}$ $83.5 \text{ lb/hr} \times 7,296 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 304.7 \text{ TPY}$			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission limit for carbonaceous burning only.			

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.25 lb/MMBtu		4. Equivalent Allowable Emissions: 83.5 lb/hour 304.7 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 5			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The Requested Allowable Emission limit is based on permit condition. The Equivalent Allowable Emissions were calculated as if only bagasse were being burned while the source achieves its maximum steam rate.			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.10 lb/MMBtu		4. Equivalent Allowable Emissions: 22.97 lb/hour 83.8 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 5			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): RULE 62-296.410(1)(b)2, F.A.C. The maximum allowable figures have been calculated as if only oil were being used at the maximum oil firing rate.			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: NO_x	2. Total Percent Efficiency of Control:
3. Potential Emissions: 191.1 lb/hour 697.1 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.65 lb/MMBtu Reference: Permit Limit	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): $294.0 \text{ MMBtu/hr (24-hr average)} \times 0.65 \text{ lb/MMBtu} = 191.1 \text{ lb/hr}$ $191.1 \text{ lb/hr} \times 7,296 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 697.1 \text{ TPY}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission limit for residue burning only.	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.65 lb/MMBtu	4. Equivalent Allowable Emissions: 191.1 lb/hour 697.1 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 7 or 7E	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The maximum allowable figures have been calculated as if only residue were being used while the boiler achieves its maximum steam rate. The allowable emission rate of 0.65 lb/MMBtu was requested by permittee pursuant to rule 62-296.470, F.A.C.	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 233.9 lb/hour		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
		853.2 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.70 lb/MMBtu		7. Emissions Method Code:	
Reference: Proposed Permit Limit		0	
8. Calculation of Emissions (limit to 600 characters): 334.1 MMBtu/hr (24-hr average) x 0.70 lb/MMBtu = 233.9 lb/hr 233.9 lb/hr x 7,296 hr/yr ÷ 2,000 lb/ton = 853.2 TPY			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Emission limit for bagasse fuel burning.			

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.70 lb/MMBtu		4. Equivalent Allowable Emissions: 233.9 lb/hour 853.2 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Methods 25A and 18 Combined			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The equivalent allowable figures have been calculated as if only bagasse fuel were being used while the boiler achieves its maximum steam rate. The allowable emission rate of 0.70 lb/MMBtu was requested by permittee pursuant to rule 62-296.570, F.A.C.			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.40 lb/MMBtu		4. Equivalent Allowable Emissions: 117.6 lb/hour 429.0 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Methods 25A and 18 combined			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): The equivalent allowable figures have been calculated as if only residue were being used while the boiler achieves its maximum steam rate. The allowable emission rate of 0.4 lb/MMBtu was requested by permittee pursuant to rule 62-296.570, F.A.C.			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 597.7 lb/hour 2,180.4 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 2.4% S oil Reference: Permit Limit		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): See Attachment GSH-EU1-G8			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 2.4% S oil		4. Equivalent Allowable Emissions: 591.4 lb/hour 2,157.4 tons/year	
5. Method of Compliance (limit to 60 characters): EPA Method 5			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Allowable emissions based on fuel oil burning only.			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2,004.6 lb/hour 7,312.8 tons/year		4. Synthetically Limited? [<input checked="" type="checkbox"/>]	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 to tons/year			
6. Emission Factor: 6.0 lb/MMBtu Reference: Test Data		7. Emissions Method Code: 1	
8. Calculation of Emissions (limit to 600 characters): $334.1 \text{ MMBtu/hr (24-hr average)} \times 6.0 \text{ lb/MMBtu} = 2,004.6 \text{ lb/hr}$ $2,004.6 \text{ lb/hr} \times 7,296 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 7,312.8$			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Maximum and annual emissions based on average of 6.0 lb/MMBtu.			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

H. VISIBLE EMISSIONS INFORMATION
 (Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE	2. Basis for Allowable Opacity: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: 30 % Exceptional Conditions: 40 % Maximum Period of Excess Opacity Allowed: 2 min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): Rule 62-296.410(1)(b)1, F.A.C.	

I. CONTINUOUS MONITOR INFORMATION
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 1 of 3

1. Parameter Code: PRS	2. Pollutant(s):
3. CMS Requirement:	[<input type="checkbox"/>] Rule [<input checked="" type="checkbox"/>] Other
4. Monitor Information: Manufacturer: Dwyer Model Number: CAPSUHELIC 4015 C Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Measures total pressure drop across wet scrubber.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 2 of 3

1. Parameter Code: Water Pressure	2. Pollutant(s):
3. CMS Requirement:	[] Rule [X] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Measures inlet water pressure to the wet scrubber.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor 3 of 3

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other	
4. Monitor Information: Manufacturer: Rosemount Model Number: 1151DP4S22M1B1 Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Measures steam flow on Boiler No. 2.	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)****Supplemental Requirements**

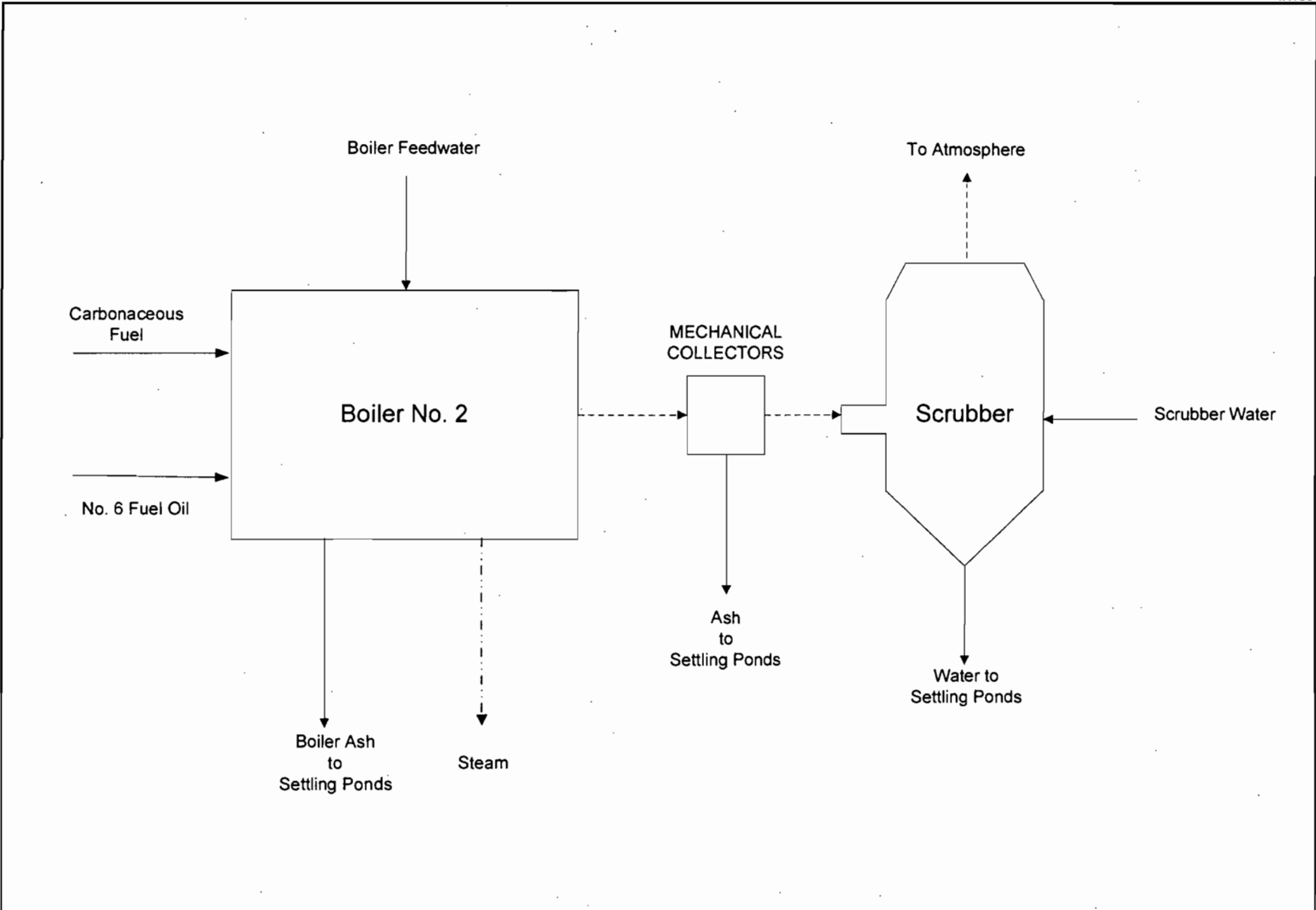
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>GSH-EU2-J1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>GSH-EU1-J2</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>GSH-EU2-J3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT GSH-EU2-J1

PROCESS FLOW DIAGRAM



Attachment GSH-EU2-J1
Process Flow Diagram

Process Area: Boiler No. 2

Sugar Cane Growers Cooperative of Florida

Latest Revision Date: 1/7/2003

Process Flow Legend:	
Solid / Liquid	→
Gas	- - - - -
Steam	- · - · -



ATTACHMENT GSH-EU2-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

**ATTACHMENT GSH-EU2-J3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT**

**SUGAR CANE GROWERS COOPERATIVE OF FLORIDA
BOILER NO. 2**

Control equipment: Mechanical collectors followed by one wet impingement turbulaire scrubber, custom design.

Scrubbing Liquid:	Water
Inlet Water Pressure (psi)	0-100
Pressure Drop Across Scrubber (Inches H ₂ O)	0-15

ATTACHMENT A

1.0 PROJECT DESCRIPTION

Sugar Cane Growers Cooperative of Florida, Inc. (SCGCF) operates a sugar mill located on West Sugar House Road in Belle Glade, Palm Beach County, Florida. At the mill, sugar cane is ground to remove the sugar cane juice. The remaining fibrous material is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill. SCGCF operates six bagasse/residue/oil-fired boilers ranging in capacity from 125,000 to 300,000 pounds per hour (lb/hr) of steam production.

Bagasse residue, a byproduct of the processing of bagasse into furfural, is permitted to be burned in the boilers. However, the furfural producing chemical company (Great Lakes Chemical) located next to SCGCF has been shutdown, and therefore SCGCF is currently not burning bagasse residue in the boilers. Nevertheless, SCGCF may find alternative sources of bagasse residue in the future, and therefore desires to maintain residue as a permitted fuel.

Boiler Nos. 1 and 2 are currently operating under Title V permit no. 0990026-004-AV (refer to Attachment B for pertinent excerpts). Boiler Nos. 1 and 2 are identical boilers that were constructed in 1963 and were manufactured by Riley. Each has a traveling grate. The grate is the component of the boiler where combustion of the bagasse occurs and ash is removed. As documented in the Title V permit for the SCGCF mill, the maximum steam rate for each boiler is 175,000 lb/hr (24-hour average). The maximum heat input to each boiler is 334.1 million British thermal units per hour (MMBtu/hr)(24-hour average), based on bagasse firing.

The sugar cane crop season typically lasts from mid-October through Mid-March, but may last through April depending upon weather conditions. During the crop season, the boilers operate nearly continuously. For economic reasons, SCGCF's goal is to process the sugar cane in the fewest amount of days, to reduce operating costs and to achieve the best yield. The boilers are then shut down and maintenance is performed during the off-season.

SCGCF intends to make changes to certain component parts of Boiler No. 1 and Boiler No.2 at its Belle Glade sugar mill. Inspection of these boilers indicated damage to the grates has occurred, as well as to the concrete supports and refractory near the grates. SCGCF is planning on removing the existing traveling grates and replacing the grates with a water-cooled pinhole grates. In order to gain the full benefits of the water-cooled pinhole grate design, related changes to the combustion air systems will also be performed.

The existing traveling grates on Boiler Nos. 1 and 2 are relatively high maintenance items that are also susceptible to damage from the heat of the furnace. Two years ago, SCGCF performed a replacement of the dumping grate on Boiler No. 3 with a water-cooled pinhole grate. Coupled with modifications to the combustion air system, this replacement proved to be very successful. The water-cooled pinhole grate requires almost no maintenance and is not susceptible to damage from the heat of the furnace. Emission testing on Boiler No. 3 prior to and after the replacement demonstrated no increase in emissions from the boiler. As explained below, the replacement of the grates on Boiler Nos. 1 and 2 are not expected to result in an increase in emissions from the boilers.

A water-cooled grate is protected by the natural water circulation in the boiler. However, this feature has a more significant advantage: more effective distribution of the forced draft air. The existing traveling grates depend on forced draft air to keep the components of the grate from being damaged. Accumulation of unburned bagasse on top of the grate can prevent the airflow through that portion of the grate and the grate can be damaged. The traveling grate needs a large percentage of the total forced draft air to be supplied under the grate, in order to keep the grate working properly. A water-cooled grate does not depend on the forced draft air for any cooling since it is cooled by the natural circulation of the boiler feedwater. Therefore, the water-cooled grate allows for better distribution of the forced draft air inside the furnace, and the temperature of the forced draft air can be increased above the temperature limits of the traveling grate (about 400 degrees F). Most of the forced draft air can be used as overfire air. More overfire air results in a better mixing zone above the furnace. This promotes a faster drying of the bagasse (about 50-percent moisture) and it results in a more complete combustion.

As a result of the grate replacement, SCGCF will improve the overfire air distribution system on Boiler Nos. 1 and 2 to take full advantage of the new pinhole grate design. The improvements will consist of the addition of one small fan on each boiler, in order to redistribute the underfire and over fire air. SCGCF's Boiler No. 8 has a modern overfire air distribution system, and Boiler No. 3's new overfire air distribution system is more like Boiler No. 8 after the recent replacement.

The maximum steam rate of Boiler Nos. 1 and 2 will not change as a result of the grate replacements. However, with more complete combustion, less fuel is expected to be burned to achieve the same steam rate. The furnace volume will not change nor will the temperature of the air leaving the boilers. There will be no changes to the air preheaters on the boilers.

The cost to replace the existing grate and to improve the air distribution system on each boiler is estimated at \$200,000 per boiler. This cost consists of approximately \$115,000 for the new grate, \$57,000 for concrete and refractory (brick lining) work, and \$28,000 for the new fan. All these costs are "expensed" (i.e., are paid for out of current operating budget), except for the fans, which will be "capital" costs. Thus, 86 percent of total cost will be expensed while only 14 percent of the cost will be capitalized.

By comparison, the cost to repair the existing traveling dumping grate on each boiler is approximately \$175,000 (per boiler), so the cost is roughly the same in either case. Historical maintenance and repair costs on the Boiler Nos. 1 and 2 traveling grates have averaged approximately \$50,000/yr per boiler over the last 5 years.

The cost of an entirely new boiler of comparable size to Boiler No. 1 or Boiler No. 2 is estimated at between \$6 million and \$8 million per boiler. Therefore, the total planned project represents only 3.3 percent or less of a new boiler cost, and the grate portion of the project represents only 1.4 percent or less of the cost of a new boiler.

SCGCF is planning on implementing the proposed changes to the boiler during the 2003 off-season.

2.0 AIR EMISSIONS

SCGCF believes that removing the existing traveling grates and replacing them with the water-cooled pin-hole grate design with combustion air changes will not increase emissions from Boiler No. 1 or Boiler No. 2. Emission test data from Boiler No. 3 prior to and after its recent grate replacement demonstrated no increase in emissions from Boiler No. 3 due to the replacement. Test data from the last ten years for the existing SCGCF Boiler Nos. 1 and 2 are presented in Tables 1 and 2 (does not include the current crop season test results).

Particulate matter (PM) emissions from Boiler Nos. 1 and 2 are not expected to increase after the proposed changes are implemented. The boilers are expected to have better combustion after the change. Less fuel will be required to produce the same amount of steam and less PM emissions will be generated from the boiler. The Boiler No. 3 grate replacement project demonstrated that PM emissions should not increase due to switching to a water-cooled pinhole grate. PM emissions from Boiler No. 1 over the last ten years have averaged 0.15 pounds per million British thermal unit

(lb/MMBtu). Individual test runs ranged from 0.10 to 0.21 lb/MMBtu. The PM permit limit for Boiler No. 1 is 0.25 lb/MMBtu. PM emissions from Boiler No. 2 over the last ten years have averaged 0.18 lb/MMBtu. Individual test runs ranged from 0.12 to 0.26 lb/MMBtu. The PM permit limit for Boiler No. 2 is 0.25 lb/MMBtu.

VOC and CO emissions are not expected to increase after the changes. Combustion will improve and better control over underfire and overfire air will be realized. VOC and CO emissions from Boiler No. 3 can be used as an indicator of VOC and CO emissions from Boiler Nos. 1 and 2 after the proposed changes are implemented. The Boiler No. 3 grate replacement project demonstrated that VOC and CO emissions should not increase due to switching to a water-cooled pinhole grate. Historic CO emissions test data from Boiler Nos. 1 and 2 are very limited. VOC emissions from Boiler No. 1 over the last five years have averaged 0.074 lb/MMBtu (as carbon). Individual test runs ranged from 0.0 to 0.216 lb/MMBtu. VOC emissions from Boiler No. 2 over the last five years have averaged 0.121 lb/MMBtu. Individual test runs ranged from 0.008 to 0.265 lb/MMBtu (as carbon). The VOC permit limit for Boiler Nos. 1 and 2 is 1.5 lb/MMBtu, but SCGCF is proposing to lower the VOC limits on these boilers to 0.7 lb/MMBtu.

Nitrogen oxides (NO_x) emissions are also not expected to increase after Boiler Nos. 1 and 2 are changed. With the replaced grate and improved combustion air system, combustion in the boilers will be more staged and there will be more control of the overfire and underfire air compared to current conditions. As shown in the test data for SCGC Boiler No. 3, NO_x emissions from this boiler after the grate replacement are lower than the NO_x emissions prior to the grate replacement, indicating no increase will occur in emissions from Boiler Nos. 1 and 2.

3.0 REGULATORY APPLICABILITY

SCGCF believes that the proposed changes to Boiler Nos. 1 and 2 do not constitute a "modification" or require prevention of significant deterioration (PSD) review. The proposed work constitutes a routine maintenance, replacement, and repair of component parts of the boiler, and is therefore not a "physical change" as defined in the regulations. No increase in actual emissions is expected due to the change.

In May 2000, the U.S. Environmental Protection Agency (EPA) rendered a PSD applicability decision for Detroit Edison. In this case, EPA described the general criteria for determining what activities constitute routine maintenance, replacement and repair. However, EPA stressed that the

decision is case-by-case based on the relevant facts of the case. The attached table (Attachment C) compares the proposed Boiler Nos. 1 and 2 project with the EPA criteria. As shown, the boiler projects meets the EPA criteria.

Historically, maintenance on Boiler Nos. 1 and 2 grates has been performed during the summer off-season (when the units are not operated). As a result, availability of the boilers during the sugar cane processing season has not been affected. Replacement with the water-cooled pinhole grates, and associated less maintenance, will therefore not affect availability or operating hours for Boiler Nos. 1 and 2. The SCGCF mill processes an amount of cane during the crop season that is dependent upon the amount of sugar cane harvested from the fields. There are six bagasse/oil/residue-fired boilers that support this operation. If a particular boiler has to be shutdown for repair or maintenance during the crop season, the sugar cane production rate is adjusted until the boiler becomes available again. As a result, any increased or decreased availability of Boiler Nos. 1 or 2 in itself will not cause overall air emissions from the mill to increase.

In summary, the proposed changes to Boiler Nos. 1 and 2 constitute routine maintenance, replacement and repair, and are not expected to increase emissions of any regulated pollutant. Therefore, the changes do not constitute a "modification" or trigger PSD review. This conclusion has been confirmed by the FDEP Bureau of Air Regulation in Tallahassee for the previous Boiler No. 3 grate replacement.

To further demonstrate that the proposed projects will not increase pollutant emissions, SCGCF proposes to conduct compliance tests on Boiler Nos. 1 and 2 after the new grates are installed, and compare the results with previous compliance test results using Appendix C of 40 CFR Part 60. Appendix C provides a statistical method of determining if emissions to the atmosphere have increased due to a particular change. The compliance tests will be performed for PM, NO_x, and VOC.

Table 1. Emission Tests Performed on Boiler No. 1 at Sugar Cane Growers Cooperative

Unit	Boiler Type	Test Date	Air Flow Rate (SCFMD)	Steam Rate (lb/hr)	Heat Input Rate (MMBtu/hr)	Bagasse Burning Rate ¹ (TPH)	PM Emissions (EPA Method 5)		CO Emissions (EPA Method 10)		NO _x Emissions (EPA Method 7E)		VOC Emissions as Reported (EPA Method 18/25A)		
							lb/hr	lb/MMBtu	lb/hr	lb/MMBtu	lb/hr	lb/MMBtu	lb/hr	lb/MMBtu	Basis
Boiler 1	Traveling Grate	03/16/93	69,003	130,500	220.45	30.62			126.23	0.573	51.41	0.233			
Boiler 1	Traveling Grate	03/16/93	70,229	128,000	216.13	30.02			166.56	0.771	51.82	0.240			
Boiler 1	Traveling Grate	03/16/93	69,121	125,538	212.07	29.45			112.10	0.529	51.99	0.245			
Boiler 1	Traveling Grate	12/07/93	60,949	134,000	258.96	35.97	36.59	0.141	449.86	1.737	45.26	0.175			
Boiler 1	Traveling Grate	12/07/93	58,373	133,714	258.34	35.88	34.53	0.134	269.50	1.043	47.80	0.185			
Boiler 1	Traveling Grate	11/30/94	61,105	131,496	212.89	29.57	29.70	0.133							
Boiler 1	Traveling Grate	11/30/94	59,225	131,702	213.42	29.64	29.77	0.133							
Boiler 1	Traveling Grate	11/30/94	58,618	129,684	209.75	29.13	31.48	0.143							
Boiler 1	Traveling Grate	11/22/95	66,631	127,111	215.40	29.92	42.20	0.196							
Boiler 1	Traveling Grate	11/22/95	67,050	128,621	217.96	30.27	20.90	0.096							
Boiler 1	Traveling Grate	11/22/95	68,493	130,743	221.55	30.77	22.28	0.101							
Boiler 1	Traveling Grate	11/20/96	63,946	130,093	220.90	30.68	36.89	0.169							
Boiler 1	Traveling Grate	11/20/96	68,093	132,110	224.40	31.17	44.18	0.197							
Boiler 1	Traveling Grate	11/20/96	67,732	132,857	225.00	31.25	46.16	0.205							
Boiler 1	Traveling Grate	11/19/97	64,886	125,070	241.64	33.56	40.44	0.167			43.59	0.180	11.01	0.046	As Carbon
Boiler 1	Traveling Grate	11/19/97	68,452	126,957	245.20	34.06	43.00	0.175			49.08	0.200	2.87	0.012	As Carbon
Boiler 1	Traveling Grate	11/19/97	66,247	125,217	241.44	33.53	38.51	0.160			48.20	0.200	1.39	0.006	As Carbon
Boiler 1	Traveling Grate	11/18/98	65,314	123,478	241.32	33.52	39.83	0.165			39.85	0.165	16.11	0.067	As Carbon
Boiler 1	Traveling Grate	11/18/98	65,399	116,471	226.38	31.44	38.65	0.171			36.45	0.161	1.30	0.006	As Carbon
Boiler 1	Traveling Grate	11/18/98	58,801	120,000	232.67	32.32	10.58	0.174			28.75	0.124	0.42	0.002	As Carbon
Boiler 1	Traveling Grate	12/09/99	56,310	139,412	270.74	37.60	42.61	0.157			31.10	0.060	100.93	0.193	As Carbon
Boiler 1	Traveling Grate	12/09/99	61,472	141,176	274.47	38.12	47.42	0.173			34.55	0.070	106.92	0.216	As Carbon
Boiler 1	Traveling Grate	12/09/99	59,761	142,609	276.71	38.43	43.79	0.158			34.90	0.070	105.25	0.210	As Carbon
Boiler 1	Traveling Grate	11/15/00	73,772	120,000	232.18	32.25	31.36	0.135			38.22	0.165	10.56	0.046	As Carbon
Boiler 1	Traveling Grate	11/15/00	71,585	121,765	236.19	32.80	35.92	0.152			24.92	0.105	4.28	0.018	As Carbon
Boiler 1	Traveling Grate	11/15/00	71,101	120,870	234.79	32.61	33.38	0.142			17.65	0.075	0.00	0.000	As Carbon
Boiler 1	Traveling Grate	11/14/01	65,459	127,059	246.84	34.28	32.83	0.133			3.75	0.015	46.17	0.187	As Carbon
Boiler 1	Traveling Grate	11/14/01	65,301	115,833	224.78	31.22	28.54	0.127			16.25	0.072	13.29	0.059	As Carbon
Boiler 1	Traveling Grate	11/14/01	65,000	111,045	215.18	29.89	25.64	0.119			20.36	0.095	10.52	0.049	As Carbon
	Number of Runs		29	29	29	29	26	26	5	5	20	20	15	15	
	MEAN		65,084	127,694	233.37	32.41	34.89	0.152	224.85	0.930	35.80	0.142	28.73	0.074	
	MINIMUM		56,310	111,045	209.75	29.13	10.58	0.096	112.10	0.529	3.75	0.015	0.00	0.000	
	MAXIMUM		73,772	142,609	276.71	38.43	47.42	0.205	449.86	1.737	51.99	0.245	106.92	0.216	
	STD DEVIATION		4,521	7,326	19.39	2.69	8.66	0.027	140.05	0.495	13.73	0.068	40.75	0.082	
	95% CL OF RUNS		74,126	142,346	272.15	37.80	52.21	0.207	504.96	1.920	63.25	0.278	110.24	0.239	
	GEOMETRIC MEAN		64,930	127,490	232.62	32.31	33.52	0.150	195.52	0.842	31.64	0.120	#NUM!	#NUM!	

Note:

lb/hr = pounds per hour.

lb/MMBtu = pounds per million British thermal units.

lb/ton = pounds per ton.

MMBtu/hr = million British thermal units per hour.

TPH = tons per hour.

¹ Assumed 3,600 Btu/lb average heat content for wet bagasse, except where noted.

Table 2. Emission Tests Performed on Boiler No. 2 at Sugar Cane Growers Cooperative

Unit	Boiler Type	Test Date	Air Flow Rate (SCFMD)	Steam Rate (lb/hr)	Heat Input Rate (MMBtu/hr)	Bagasse Burning Rate ¹ (TPH)	PM Emissions (EPA Method 5)		CO Emissions (EPA Method 10)		NO _x Emissions (EPA Method 7E)		VOC Emissions as Reported (EPA Method 18/25A)		
							lb/hr	lb/MMBtu	lb/hr	lb/MMBtu	lb/hr	lb/MMBtu	lb/hr	lb/MMBtu	Basis
Boiler 2	Traveling Grate	03/23/93	86,372	116,800	196.88	27.34			53.85	0.270	53.83	0.270			
Boiler 2	Traveling Grate	03/23/93	84,598	124,328	208.87	29.01			81.51	0.390	47.27	0.230			
Boiler 2	Traveling Grate	03/23/93	84,238	121,600	204.29	28.37			65.00	0.320	47.68	0.230			
Boiler 2	Traveling Grate	12/08/93	61,096	132,491	255.93	35.55	39.36	0.154	806.52	3.151	37.52	0.147			
Boiler 2	Traveling Grate	12/08/93	65,272	85,719	165.69	23.01	31.89	0.192	382.16	2.306	39.29	0.237			
Boiler 2	Traveling Grate	12/08/93	66,583	127,418	246.15	34.19	37.43	0.152	998.84	4.058	42.25	0.172			
Boiler 2	Traveling Grate	12/01/94	70,551	126,000	214.22	29.75	34.90	0.163							
Boiler 2	Traveling Grate	12/01/94	72,545	127,448	216.68	30.09	37.30	0.172							
Boiler 2	Traveling Grate	12/01/94	69,574	131,586	223.63	31.06	36.88	0.165							
Boiler 2	Traveling Grate	12/15/94	71,979	113,445	198.45	27.56			208.68	1.052	53.77	0.271			
Boiler 2	Traveling Grate	12/15/94	65,580	119,231	230.48	32.01			250.00	1.085	44.67	0.194			
Boiler 2	Traveling Grate	12/15/94	64,251	121,500	234.74	32.60			232.00	0.988	47.64	0.203			
Boiler 2	Traveling Grate	11/28/95	66,913	123,429	208.92	29.02	25.68	0.123							
Boiler 2	Traveling Grate	11/28/95	67,660	128,400	217.33	30.18	31.29	0.144							
Boiler 2	Traveling Grate	11/28/95	70,364	131,821	223.29	31.01	29.17	0.131							
Boiler 2	Traveling Grate	11/22/96	66,660	123,042	209.00	29.03	36.30	0.174							
Boiler 2	Traveling Grate	11/22/96	63,500	133,859	227.40	31.58	41.37	0.182							
Boiler 2	Traveling Grate	11/22/96	64,935	133,622	228.10	31.68	41.47	0.182							
Boiler 2	Traveling Grate	11/20/97	68,217	123,429	238.62	33.14	60.03	0.252			36.96	0.155	44.35	0.186	As Carbon
Boiler 2	Traveling Grate	11/20/97	67,469	118,442	228.70	31.76	44.58	0.195			40.44	0.177	15.59	0.068	As Carbon
Boiler 2	Traveling Grate	11/20/97	69,974	125,455	241.92	33.60	49.65	0.205			38.54	0.159	7.79	0.033	As Carbon
Boiler 2	Traveling Grate	11/19/98	65,875	121,739	234.51	32.57	55.03	0.235			30.97	0.132	58.35	0.249	As Carbon
Boiler 2	Traveling Grate	11/19/98	63,498	136,901	263.72	36.63	47.66	0.181			29.66	0.112	9.14	0.035	As Carbon
Boiler 2	Traveling Grate	11/19/98	65,441	123,692	238.48	33.12	46.13	0.193			34.07	0.143	32.45	0.136	As Carbon
Boiler 2	Traveling Grate	12/08/99	67,341	118,783	229.70	31.90	50.36	0.219			27.25	0.119	41.38	0.180	As Carbon
Boiler 2	Traveling Grate	12/08/99	66,385	116,291	224.70	31.21	57.19	0.255			26.04	0.116	41.54	0.185	As Carbon
Boiler 2	Traveling Grate	12/08/99	66,206	119,065	229.80	31.92	40.91	0.178			38.67	0.168	44.12	0.192	As Carbon
Boiler 2	Traveling Grate	12/08/99	64,654	119,304	230.78	32.05	57.90	0.251			33.77	0.146	61.20	0.265	As Carbon
Boiler 2	Traveling Grate	11/16/00	69,691	118,261	229.68	31.90	36.89	0.161			14.71	0.064	3.29	0.014	As Carbon
Boiler 2	Traveling Grate	11/16/00	70,127	121,739	237.01	32.92	43.63	0.184			14.19	0.060	1.87	0.008	As Carbon
Boiler 2	Traveling Grate	11/16/00	70,389	126,000	245.29	34.07	43.73	0.178			16.03	0.065	5.48	0.022	As Carbon
Boiler 2	Traveling Grate	11/16/01	75,613	121,714	237.30	32.96	33.20	0.140			36.32	0.153	38.06	0.160	As Carbon
Boiler 2	Traveling Grate	11/16/01	70,137	121,644	237.18	32.94	33.45	0.141			30.87	0.130	19.99	0.084	As Carbon
Boiler 2	Traveling Grate	11/16/01	74,721	120,870	235.12	32.66	32.29	0.137			30.17	0.128	28.33	0.120	As Carbon
	Number of Runs		34	34	34	34	28	28	9	9	25	25	16	16	
	MEAN		69,365	122,796	226.25	31.42	41.27	0.180	342.06	1.513	35.70	0.159	28.31	0.121	
	MINIMUM		61,096	85,719	165.69	23.01	25.68	0.123	53.85	0.270	14.19	0.060	1.87	0.008	
	MAXIMUM		86,372	136,901	263.72	36.63	60.03	0.255	998.84	4.058	53.83	0.271	61.20	0.265	
	STD DEVIATION		5,898	8,605	18.48	2.57	9.09	0.036	338.15	1.355	10.86	0.058	19.69	0.085	
	95% CL OF RUNS		81,161	140,007	263.22	36.56	59.46	0.253	1018.37	4.224	57.42	0.276	67.69	0.292	
	GEOMETRIC MEAN		69,140	122,465	225.47	31.32	40.34	0.177	216.91	1.013	33.77	0.148	19.10	0.081	

Note:
 lb/hr = pounds per hour.
 lb/MMBtu = pounds per million British thermal units.
 lb/ton = pounds per ton.
 MMBtu/hr = million British thermal units per hour.
 TPH = tons per hour.

¹ Assumed 3,600 Btu/lb average heat content for wet bagasse, except where noted.

ATTACHMENT B

BOILER NOS. 1 AND 2 EXISTING PERMIT CONDITIONS

Section III. Emissions Unit and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U.

ID No. Brief Description

-001 Boiler No. 1

Boiler No. 1 is a traveling grate boiler fired with carbonaceous fuel (bagasse and residue) and fuel oil. It has a maximum capacity of 175,000 pounds per hour of steam (24-hour average).

Particulate emissions are controlled by a Dust Collector followed by a Joy Turbulaire Type D, impingement wet scrubber.

{Permitting note(s): This emission unit is regulated under Rule 62-210.200, F.A.C. (Potential to Emit); Rule 62-213.440(1)(b), F.A.C. (Periodic Monitoring); Rule 62-296.570, F.A.C. (Reasonably Available Control Technology for NO_x and VOC; Rule 62-296.410, F.A.C. (Carbonaceous Fuel Burning Equipment.)}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. There is no limit on operating capacity of this unit. The operating steam production rate of 175,000 pounds per hour (24-hour average) at 400 psig and 585°F (or thermodynamically equivalent) is used to establish a 100% load for testing purposes. On-spec used oil can be fired at a rate not to exceed 6.04 MMBtu per hour (annual average).

[Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C., and Construction Permit AC50-2044A dated 2/10/75]

A.2. Methods of Operation - Boiler No. 1 is fired with carbonaceous fuel (bagasse and residue), No. 6 residual oil, and small quantities of on-spec used oil. Small quantities of on-spec used oil contaminated soil that is generated on-site can be burned, as well as small quantities of hazardous materials under the BIF rule. (See Specific Condition H.8. of Subsection H. Common Conditions)

[Rule 62-213.410, F.A.C.]

A.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 7296 hours/year.

[Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.]

Emission Limitations and Standards

A.4. Visible Emissions - Number 1.5 on the Ringelmann Chart (30 percent opacity) except that a density of Ringelmann Number 2 (40 percent opacity) is permissible for not more than two minutes in any one hour.

[Rule 62-296.410(1)(b)1., F.A.C.]

A.5. Particulate Matter - 0.25 pounds per million Btu of heat input of carbonaceous fuel plus 0.1 pounds per million Btu heat input of fossil fuel.

[Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81]

A.6. Not Federally Enforceable. Volatile Organic Compounds (VOC) - Emissions of VOC from Boiler No. 1 shall not exceed 1.5 pounds per million Btu heat input.

[Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C., voluntary limit proposed by permittee, and AO50-191721 permit amendment dated 1/27/97]

A.7. Not Federally Enforceable. Nitrogen Oxides (NO_x) - Emissions of NO_x from Boiler No. 1 shall not exceed 0.45 pounds per million Btu heat input.

[Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C., voluntary limit proposed by permittee, and AO50-191721 permit amendment dated 1/27/97]

A.8. Sulfur Dioxide (SO₂) - Boiler No. 1 is permitted to burn No.6 (residual) fuel oil and on-spec used oil with a maximum sulfur content of 2.4% by weight. The total fuel oil to Boilers 1 through 5 shall be measured and logged every 8 hours to comply with the daily SO₂ emission limit.

[Construction Permits AC50-2044A dated 2/10/75 and AC50-42476\PSD-FL-077 dated 10/28/81]

A.9. Compliance with the emission limits of Specific Conditions A.5 through A.7. shall be determined by computing the heat input from the steam output (pounds per hour) and net steam enthalpy, assuming a thermal efficiency of 55 percent (with bagasse and 62.5% with residue or fuel oil) for Boiler No. 1.

[Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

A.10. This emission unit shall be tested annually for the following pollutants:

1. Visible emissions, VE
2. Particulate matter, PM
3. Nitrogen Oxides, NO_x
4. Volatile Organic Compounds, VOC

[Rule 62-297.310(7)(a)4., F.A.C.]

A.11.1. All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

a. The test method for visible emissions shall be EPA Reference Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

b. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

[Rule 62-296.320(4)(b)4.a., F.A.C.]

c. The required minimum period of observation for an EPA Reference Method 9 compliance test shall be sixty (60) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

[Rule 62-297.310(4) (a) 2., F.A.C.]

A.11.2. Compliance test for particulate matter emissions shall be determined using EPA Reference Methods 1, 2, 3, 4, and 5, described in 40 CFR 60, Appendix A. Emissions units incorporating a scrubber for control of particulate matter shall use an acetone wash.
[Rule 62-297.401(1 through 5), F.A.C.]

A.11.3. For this facility, compliance with fuel oil sulfur limits may be determined based on:

A) a certification from the fuel supplier
where

Fuel supplier certification shall include the following information:

(i) The name of the oil supplier; and (ii) A statement from the oil supplier listing the actual sulfur content of the oil and the place where the sample was collected, or
[Rule 62-297.310(7)(c), F.A.C.]

B) Based on analysis by one of the following methods: ASTM Method D 129-91, D 1552, D2622-94, D 4294-90 or comparable Department approved method. See Specific Condition **H.4.3.** of Subsection H. Common Conditions.

A.11.4. Compliance test for nitrogen oxide emissions shall be determined using EPA Reference Method 7 or 7E, described in 40 CFR 60, Appendix A.
[Rules 62-297.401(7) and 62-296.570, F.A.C., and AO50-191721 permit amendment dated 1/27/97]

A.11.5. Compliance test for volatile organic compounds emissions shall be determined using EPA Reference Methods 25, or 25A, modified to incorporate a dilution system as approved by the Department under the provisions of Rule 62-297.620, F.A.C. If EPA Method 25A is employed, EPA Reference Method 18 may be used to quantify and subtract the methane fraction in the exhaust gases. Methods 25, 25A and 18 are described in 40 CFR 60, Appendix A.
[Rules 62-297.401(25) and 62-296.570, F.A.C., and AO50-191721 permit amendment dated 1/27/97]

Recordkeeping and Reporting Requirements

A.12.1. In order to document continuing compliance with Specific Conditions **A.1., A.5., A.8.**, records of the percent sulfur content of all fuel burned and the quantities of fuel burned shall be kept. The basis of these records of sulfur content shall be either as-shipped analyses from the vendor, analysis of shipments by the permittee, or in the case of on-site blending, analyses of a fuel sample from the fuel storage tank(s) each time a shipment of fuel is received. These records shall be kept for a period of 5 years and shall be available to the department upon request.
[Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.]

A.12.2. A record shall be kept of the steam flow from the boiler to determine the heat input for the purpose of compliance with the emission limits in Specific Conditions No. **A.5., A.6., and A.7.**
[Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.]

Reasonable Assurances

A.13. The scrubber control system shall be equipped with instrumentation to monitor total pressure drop and inlet water pressure. Such instrumentation shall be properly maintained so as to be functional at all times.

[Rule 62-4.070(3), F.A.C.]

A.14. This emissions unit is also subject to Specific Conditions **H.1.** through **H.10.** contained in Subsection H. Common Conditions.

Section III. Emissions Unit and Conditions.

Subsection B. This section addresses the following emissions unit.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
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-002	Boiler No. 2
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Boiler No. 2 is a traveling grate boiler fired with carbonaceous fuel (bagasse and residue) and fuel oil. It has a maximum capacity of 175,000 pounds per hour of steam (24-hour average).

Particulate emissions are controlled by a Dust Collector followed by 2 parallel Joy Turbulaire Type D impingement wet scrubbers.

{Permitting note(s): This emission unit is regulated under Rule 62-210.200, F.A.C. (Potential to Emit); Rule 62-213.440(1)(b), F.A.C. (Periodic Monitoring); Rule 62-296.570, F.A.C. (Reasonably Available Control Technology for NO_x and VOC; Rule 62-296.410, F.A.C. (Carbonaceous Fuel Burning Equipment.)}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. There is no limit on operating capacity of this unit. The operating steam production rate of 175,000 pounds per hour (24-hour average) at 400 psig and 585°F (or thermodynamically equivalent) is used to establish a 100% load for testing purposes. On-spec used oil can be fired at a rate not to exceed 6.04 MMBtu per hour (annual average).
[Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.]

B.2. Methods of Operation - Boiler No. 2 is fired with carbonaceous fuel (bagasse and residue), No. 6 residual oil, and small quantities of on-spec used oil. Small quantities of on-spec used oil contaminated soil that is generated on-site can be burned, as well as small quantities of hazardous materials under the BIF rule. (See Specific Condition **H.8.** of Subsection H. Common Conditions)
[Rule 62-213.410, F.A.C.]

B.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 7296 hours/year.
[Rules 62-4.160(2) and 62-210.200 (PTE), F.A.C.]

Emission Limitations and Standards

B.4. Visible Emissions - Number 1.5 on the Ringelmann Chart (30 percent opacity) except that a density of Ringelmann Number 2 (40 percent opacity) is permissible for not more than two minutes in any one hour.
[Rule 62-296.410(1)(b)1., F.A.C.]

B.5. Particulate Matter - 0.25 pounds per million Btu of heat input of carbonaceous fuel plus 0.1 pounds per million Btu heat input of fossil fuel.
[Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81]

B.6. Not Federally Enforceable. Volatile Organic Compounds (VOC) - Emissions of VOC from Boiler No. 2 shall not exceed 1.5 pounds per million Btu heat input.

[Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C., voluntary limit proposed by permittee, and AO50-191731 permit amendment dated 1/27/97]

B.7. Not Federally Enforceable. Nitrogen Oxides (NO_x) - Emissions of NO_x from Boiler No. 2 shall not exceed 0.45 pounds per million Btu heat input. Emissions of NO_x from burning residue shall not exceed 0.65 lb/MMBtu heat input.

[Rules 62-296.570(4)(b)6. and 62-296.570(2), F.A.C., voluntary limit proposed by permittee, and AO50-191731 permit amendment dated 1/27/97]

B.8. Sulfur Dioxide (SO₂) - Boiler No. 2 is permitted to burn No.6 (residual) fuel oil and on-spec used oil with a maximum sulfur content of 2.4% by weight. The total fuel oil to Boilers 1 through 5 shall be measured and logged every 8 hours to comply with the daily SO₂ emission limit.

[Construction Permits AC50-2045A dated 2/10/75 and AC50-42476(PSD-FL-077 dated 10/28/81)]

B.9. Compliance with the emission limits of Specific Conditions **B.5** through **B.7.** shall be determined by computing the heat input from the steam output (pounds per hour) and net steam enthalpy, assuming a thermal efficiency of 55 percent (with bagasse and 62.5% with residue or fuel oil) for Boiler No. 2.

[Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

B.10. This emission unit shall be tested annually for the following pollutants:

1. Visible emissions, VE
2. Particulate matter, PM
3. Nitrogen Oxides, NO_x
4. Volatile Organic Compounds, VOC

[Rule 62-297.310(7)(a)4., F.A.C.]

B.11.1. All visible emissions tests performed pursuant to the requirements of this permit shall comply with the following provisions:

- a. The test method for visible emissions shall be EPA Reference Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.
- b. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

[Rule 62-296.320(4)(b)4.a., F.A.C.]

- c. The required minimum period of observation for an EPA Reference Method 9 compliance test shall be sixty (60) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

[Rule 62-297.310(4) (a) 2., F.A.C.]

B.11.2. Compliance test for particulate matter emissions shall be determined using EPA Reference Methods 1, 2, 3, 4, and 5, described in 40 CFR 60, Appendix A. Emissions units incorporating a scrubber for control of particulate matter shall use an acetone wash.

[Rule 62-297.401 (1 through 5), F.A.C.]

B.11.3. For this facility, compliance with fuel oil sulfur limits may be determined based on:

A) certification from the fuel supplier

where

Fuel supplier certification shall include the following information:

- (i) The name of the oil supplier; and
- (ii) A statement from the oil supplier listing the actual sulfur content of the oil and the place where the sample was collected, or

[Rule 62-297.310(7)(c), F.A.C.]

B) Based on analysis by one of the following methods: ASTM Method D 129-91, D1552, D2622-94, D 4294-90 or comparable Department approved method. See Specific Condition **H.4.3.** of Subsection H. Common Conditions.

B.11.4. Compliance test for nitrogen oxide emissions shall be determined using EPA Reference Method 7 or 7E, described in 40 CFR 60, Appendix A.

[Rules 62-297.401(7) and 62-296.570, F.A.C., and AO50-191731, amendment dated 1/27/97]

B.11.5. Compliance test for volatile organic compounds emissions shall be determined using EPA Reference Methods 25, or 25A, modified to incorporate a dilution system as approved by the Department under the provisions of Rule 62-297.620, F.A.C. If EPA Method 25A is employed, EPA Reference Method 18 may be used to quantify and subtract the methane fraction in the exhaust gases. Methods 25, 25A and 18 are described in 40 CFR 60, Appendix A.

[Rules 62-297.401(25) and 62-296.570, F.A.C., and AO50-191731 amendment dated 1/27/97]

Recordkeeping and Reporting Requirements

B.12.1. In order to document continuing compliance with Specific Conditions No. **B.1., B.5., B.8.**, records of the percent sulfur content of all fuel burned and the quantities of fuel burned shall be kept. The basis of these records of sulfur content shall be either as-shipped analyses from the vendor, analysis of shipments by the permittee, or in the case of on-site blending, analyses of a fuel sample from the fuel storage tank(s) each time a shipment of fuel is received. These records shall be kept for a period of 5 years and shall be available to the department upon request.

[Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C., and Construction Permit AC50-2045A dated 2/10/75]

B.12.2. A record shall be kept of the steam flow from the boiler to determine the heat input for the purpose of compliance with the emission limits in Specific Condition Nos. **B.5, B.6, and B.7.**

[Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.]

Reasonable Assurances

B.13. Not Federally Enforceable. The scrubber control system shall be equipped with instrumentation to monitor total pressure drop and inlet water pressure. Such instrumentation shall be properly maintained so as to be functional at all times.
[Rule 62-4.070(3), F.A.C.]

B.14. This emissions unit is also subject to Specific Conditions **H.1.** through **H.10.** contained in Subsection H. Common Conditions.

ATTACHMENT C

Sugar Cane Growers Cooperative
Routine Maintenance and Grate Replacement for Boiler Nos. 1 and 2
January 6, 2003

Criteria Based on EPA May 23, 2000 Guidance	SCGC's Boiler Nos. 1 and 2--Grate Replacement
<p><u>Nature</u></p> <ol style="list-style-type: none"> 1. Whether major components of the facility are being modified or replaced. 2. Whether the unit is of considerable size, function, or importance to the operation of the facility. 3. Whether the source itself has characterized the change as non-routine. 4. Whether the change could be performed during full functioning of the facility or while it was in full working order. 5. Whether the materials, equipment and resources necessary to carry out the planned activity are already on site. 	<p>Replacement of the existing traveling grate on each boiler with a water-cooled pinhole grate; repair of concrete and refractory; and related changes to the combustion air system (addition of one fan to each boiler)</p> <ol style="list-style-type: none"> 1. The traveling grate itself is not a major component of the facility in terms of cost (less than 1.5 percent of total cost of a new boiler). The grate is small in size. The grate is removed, repaired and re-assembled annually. 2. Boiler Nos. 1 and 2 are two of six boilers at the facility. They are moderately sized boilers and are relatively important to the facility. 3. SCGC considers this project to be routine: the grates are removed, repaired and re-assembled on an annual basis. 4. Grate overhaul required annually and boiler shutdowns occur each year regardless (during off-season); will not affect boiler's availability during crop season. 5. Due to different grate design and addition of a fan on each boiler, additional parts are required.

Sugar Cane Growers Cooperative
Routine Maintenance and Grate Replacement for Boiler Nos. 1 and 2
January 6, 2003

Criteria Based on EPA May 23, 2000 Guidance	SCGC's Boiler Nos. 1 and 2--Grate Replacement
<p><u>Extent</u></p> <ol style="list-style-type: none"> 1. Whether an entire emissions unit will be replaced. 2. Whether the change will take significant time to perform. 3. Whether the collection of activities, taken as a whole, constitutes a non-routine effort, notwithstanding that individual elements could be routine. 4. Whether the change requires the addition of parts to existing equipment. 	<ol style="list-style-type: none"> 1. The entire Boiler No. 1 and Boiler No. 2 are not being replaced; only the grate on each boiler is being replaced. The grate is a component part of each boiler, but a relatively minor part in terms of cost. 2. The change can occur within a short amount of time, during the off-season when the boilers are already shut down. The grates will be replaced during the same time period when normal maintenance on the boilers is performed. 3. Grates on bagasse-fired boilers are dismantled, repaired, and re-installed annually (this is common for the industry). When traveling grates are damaged, the industry is tending towards replacement with the water-cooled, pin-hole design (design for newer boilers) rather than repairing the grate. The combustion air system is normally slightly changed to take advantage of the different grate design, but this is not essential. 4. The only additional parts required will be one small fan to be added to the combustion air system of each boiler; however, the fans are not essential to the replacement. The remaining parts will be replacement parts.
<p><u>Purpose</u></p> <ol style="list-style-type: none"> 1. Whether the purpose of the effort is to extend the useful life of the units; similarly, whether the source proposes to replace a unit at the end of its useful life. 2. Whether the modification will keep the unit operating in its present condition, or whether it will allow enhanced operation (e.g., will it permit increased capacity, operating rate, utilization, or fuel adaptability). 	<ol style="list-style-type: none"> 1. The existing grates could continue to be repaired on an annual basis, and therefore would not be a factor in determining the useful life of the existing boilers. As a result, the replacement and repair of the grates will have no effect upon the life of the unit. The grates are being replaced instead of repaired because the replacement cost is roughly equal to the cost for repair. The purpose is not to "extend the useful life" of the boilers. The useful life of the boilers is indefinite, due to the annual maintenance performed on the boilers. Conversely, without repair or replacement, the boiler's normal life would be prematurely shortened. 2. The water-cooled, pin-hole grates will have the same primary function as the existing grates. The replacement will not allow enhanced operation. Less fuel will be used to produce the same amount of steam; however, there is continuous economic incentive to decrease (not increase) boiler usage. The steam needs of the sugar mill remain the same, regardless of the boiler's efficiency in fuel use. Boiler Nos. 1 and 2 will operate as they have in the past; no increase in steam production capacity, operating rate, or utilization; decrease in fuel use; no increase in air emissions.

Sugar Cane Growers Cooperative
Routine Maintenance and Grate Replacement for Boiler Nos. 1 and 2
January 6, 2003

Criteria Based on EPA May 23, 2000 Guidance	SCGC's Boiler Nos. 1 and 2--Grate Replacement
<p><u>Frequency</u></p> <p>1. Whether the change is performed frequently in a typical unit's life</p>	<p>1. Grates on bagasse-fired boilers are dismantled, repaired, and re-installed annually (this is common for the industry). The industry is tending towards replacing traveling grates with water-cooled, pin-hole grates, and newer boilers use water-cooled, pin-hole grates (again, common for the industry). Boiler Nos. 1 and 2 grates have been dismantled, repaired, and re-installed annually since being constructed in 1963.</p>
<p><u>Cost</u></p> <p>1. Whether the change will be costly, both in absolute terms and relative to the cost of replacing the unit.</p> <p>2. Whether a significant amount of the cost of the change is included in the source's capital expenses, or whether the change can be paid for out of the operating budget (i.e., whether the costs are reasonably reflective of the costs originally projected during the source's or unit's design phase as necessary to maintain the day-to-day operation of the source)</p>	<p>1 & 2. Estimated cost is \$200,000 for entire project (for each boiler):</p> <ul style="list-style-type: none"> --\$28,000 for fan (capital) --\$115,000 for grate (operating expense) --\$57,000 for concrete and refractory (bricklining) work (operating expense). <p>Annual repairs on Boiler Nos. 1 and 2 grates have cost approximately \$50,000/yr on average over the last 5 years. This project is an attempt to reduce those maintenance expenses. The cost of this project, if the existing grates were retained, would be \$258,000. Of this total, \$144,000 would be for the grates repairs itself, while \$114,000 would be for refractory repair.</p> <ul style="list-style-type: none"> ▪ The cost of a comparable new boiler is estimated at \$6 to 8 million, based on a recent vendor quote, making the grate portion only 1.4% and the entire project 3.3% of the total replacement cost. ▪ 86% of the total costs are expenses being paid out of the current operating budget; 14% of the cost is to be capitalized.