Memorandum

Florida Department of Environmental Protection

TO: Michael G. Cooke, Division of Air Resource Management

THRU: Trina Vielhauer, Bureau of Air Regulation
Al Linero, Air Permitting South Program

FROM: Jeff Koerner, Air Permitting South Program

DATE: August 27, 2004

SUBJECT: Air Permit No. 0990026-008-AC
Sugar Cane Growers Cooperative of Florida
Glades Sugar House
Addition of Natural Gas to Boilers 4 and 5

The Final Permit for this project is attached for your approval and signature, which authorizes modification of the existing oil burners for Boilers 4 and 5 to accommodate natural gas as a startup and supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road in Belle Glade, Palm Beach County, Florida. The project results in a minor source air construction permit and is not subject to PSD preconstruction review as conditioned. The Bureau of Air Regulation processed this application due to potential PSD implications.

The Department distributed an "Intent to Issue Permit" package on July 21, 2004. The applicant published the "Public Notice of Intent to Issue" in the Palm Beach Post on August 7, 2004. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

Day #90 is October 22, 2004. I recommend your approval of the attached Final Permit for this project.

Attachments

Mike,
This is actually a good thing. Allowing them to use natural gas as start-up & supplementary fuel (as opposed to oil) should lower emissions at startup & shutdown except maybe a very small potential NOx increase (not significant/ not PSD).
Trina

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation, Air Permitting South Program
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400

PROJECT

Air Permit No. 0990026-008-AC
Sugar Cane Growers Cooperative of Florida – Glades Sugar House
West Sugar Road in Belle Glade, Palm Beach County, Florida

This permit authorizes modification of the existing oil burners for Boilers 4 and 5 to accommodate natural gas as a startup and supplementary fuel.

NOTICE AND PUBLICATION

The Bureau of Air Regulation distributed an "Intent to Issue Permit" package on July 21, 2004. The applicant published the "Public Notice of Intent to Air Issue" in the Palm Beach Post on August 7, 2004. The Bureau of Air Regulation received the proof of publication on August 25, 2004. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's South District Office, the Palm Beach County Health Department. The applicant provided the following comments on the draft permit after the official comment period closed.

Request: Change Condition 12 in Section 3 as follows, "Records shall be available for inspection within ~~ten~~ 15 days following each month." *Response*: The Department agreed and made this minor change."

Request: As an option to the current permit, allow the burner modification to consist of two modified gas burners in Boilers 4 and 5. The burners are identical and will not change the emissions increases. Response: The Department agreed to this minor change and included this option in the final permit.

CONCLUSION

The final action of the Department is to issue the permit with the minor changes described above.

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
Airport Road, P.O. Box 666
Belle Glade, Florida 33430-0666

Air Permit No. 0990026-008-AC
Glades Sugar House, Boilers 4 and 5
Additional of Natural Gas

Authorized Representative:
Mr. Jose F. Alvarez, Sr. Vice President – Planning Operations

Enclosed is Final Air Permit No. 0990026-008-AC, which authorizes modification of the existing oil burners for Boilers 4 and 5 to accommodate natural gas as a startup and supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road in Belle Glade, Palm Beach County, Florida. As noted in the attached Final Determination, only minor changes to 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 L Vielhauer

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 9/15/04 to the persons listed:

Mr. Jose F. Alvarez*, Sugar Cane Growers Cooperative of Florida
Ms. Kathy Lockhart, Sugar Cane Growers Cooperative of Florida
Mr. David Buff, Golder Associates Inc.
Mr. Ron Blackburn, SD
Mr. James Stormer, PBCHD
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.

Mary L Stamey (Clerk) 9/15/04 (Date)

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

PERMITTEE:

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

Authorized Representative:
Mr. Jose F. Alvarez, Sr. Vice President – Planning Operations

Glades Sugar House
Air Permit No. 0990026-008-AC
Facility ID No. 0990026
SIC No. 2061
Permit Expires: December 30, 2007

PROJECT AND LOCATION

This permit authorizes modification of the existing oil burners for Boilers 4 and 5 to accommodate natural gas as a startup and supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road in Belle Glade, Palm Beach County, Florida. The UTM coordinates are Zone 17, 534.9 km East, and 2953.3 km North.

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 install the proposed equipment 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 air construction permit supplements all other valid air construction permits.

CONTENTS

Michael G. Cooke, Director
Division of Air Resource Management

9/14/07
(Date)

FACILITY AND PROJECT DESCRIPTION

This facility consists of a sugar mill and boiling house where sugar cane is milled and pressed. The raw juice is clarified, crystallized, and centrifuged. Steam requirements are furnished by six boilers that fire bagasse as the primary fuel. Bagasse is the fibrous, vegetative material remaining after sugarcane is milled. Each boiler also fires No. 6 fuel oil as a supplementary fuel.

The proposed project will add natural gas-firing capabilities to the following existing boilers.

ID	Emission Unit Description
004	Boiler No. 4 is a traveling grate boiler with a steam production capacity of 300,000 pounds per hour.
005	Boiler No. 5 is a traveling grate boiler with a steam production capacity of 230,000 pounds per hour.

The conditions of this permit regulate Boilers 4 and 5 for the firing of natural gas and include operational restrictions necessary to avoid PSD preconstruction review.

REGULATORY CLASSIFICATION

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

Title IV: The existing facility has 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 facility in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

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.

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 minor source construction permits and operation permits shall be submitted to Air Resource Section of the Department's South District Office at 2295 Victoria Avenue, Suite #364, Fort Myers, Florida 33901-3381. Copies of permit applications shall also be submitted to each Compliance Authority listed below.
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 Resource 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 A (Citation Format); Appendix B (General Conditions); and Appendix C (Common 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. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. 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. Relaxations of Restrictions on Pollutant Emitting Capacity: If a previously permitted facility or modification becomes a facility or modification which would be subject to the preconstruction review requirements of this rule if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the preconstruction review requirements of this rule shall apply to the facility or modification as though construction had not yet commenced on it. [Rule 62-212.400(2)(g), F.A.C.]
8. Title V Permit: Pursuant to Rule 62-213.420(1)(a)2, F.A.C., the permittee shall submit an application for a revised Title V air operation permit at least ninety (90) days before the expiration of this permit, but no later than 180 days after commencing operation. In accordance with Rule 62-213.412(2), F.A.C., the permittee may immediately implement the changes authorized by this air construction permit after submitting the application for a revised Title V air operation permit to the Permitting Authority and providing copies of the application to EPA Region 4 and each Compliance Authority. To apply for a revised 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 Department's South District Office with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, 62-213.412, and 62-213.420, F.A.C.]

A. Boiler 4 (EU-004) and Boiler 5 (EU-005) – Gas Firing

This section of the permit addresses the following emissions units.

EU No.	Description
004	**Boiler No. 4** is a traveling grate boiler with a steam production capacity of 300,000 lb/ hour (572 MMBtu/hour). Steam production, steam temperature, and steam pressure are monitored and recorded. The primary fuel is bagasse. No. 6 residual fuel oil and natural gas are used as startup and supplementary fuels. Particulate matter emissions are controlled by two Joy Turbulaire Type D wet impingement scrubbers in parallel. The scrubber pressure drop and inlet water pressure are also monitored. The exhaust stack is 9.46 feet in diameter and 180 feet tall. Flue gases exit the stack at a flow rate of approximately 214,000 acfm and a temperature of 160° F.
005	**Boiler No. 5** is a traveling grate boiler with a steam production capacity of 230,000 lb/hour (439 MMBtu/hour). Steam production, steam temperature, and steam pressure are monitored and recorded. The primary fuel is bagasse. No. 6 residual fuel oil and natural gas are used as startup and supplementary fuels. Particulate matter emissions are controlled by a multi-cyclone dust collector followed by two Joy Turbulaire Type D wet impingement scrubbers in parallel. The scrubber pressure drop and inlet water pressure are also monitored. The exhaust stack is 7.0 feet in diameter and 150 feet tall. Flue gases exit the stack at a flow rate of approximately 165,320 acfm and a temperature of 160° F.

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit regulate Boilers 4 and 5 for the firing of natural gas and include operational restrictions necessary to avoid PSD preconstruction review. These conditions supplement prior air construction and operation permits. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

EQUIPMENT

2. Burner Modifications and Specifications: For Boilers 4 and 5, the permittee is authorized to modify the existing Peabody oil-fired burners to accommodate the firing of natural gas including, but not limited to, a new diffuser and new gas gun with supports. One of four existing oil burners will be modified for Boiler 4 and all three existing oil burners will be modified for Boiler 5. As an option, the permittee may modify two burners for each boiler. Each modified burner shall be designed for a maximum heat input rate of 100 MMBtu per hour from the firing of natural gas. The total maximum heat input rates to the existing boilers and the maximum heat input rates from firing oil remain unchanged. Each modified burner shall be designed to achieve an emissions rate of 0.20 lb/MMBtu or less for nitrogen oxides (NOx). *{Permitting Note: The preliminary design specification is 0.17 lb/MMBtu of carbon monoxide emissions from each modified burner.}* [Design; Applicant Request]

PERFORMANCE RESTRICTIONS

3. Authorized Fuel: In addition to other previously permitted fuels, Boilers 4 and 5 are authorized to fire natural gas as a startup and supplementary fuel. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]

4. Permitted Capacity: For Boiler 4, the maximum heat input rate from firing supplementary fuels (any combination of natural gas and fuel oil) is 393 MMBtu per hour. For Boiler 5, the maximum heat input rate from firing supplementary fuels (any combination of natural gas and fuel oil) is 302 MMBtu per hour. The maximum heat input rate to each modified burner is 100 MMBtu per hour from firing natural gas. *{Permitting Note: The permitted capacities for other fuels are specified in prior permits including the current Title V operation permit.}* [Rules 62-210.200(PTE) and 62-212.400(2)(g), F.A.C.]

5. Restricted Operation: Natural gas fired in both Boilers 4 and 5 combined shall not exceed 632,000,000 standard cubic feet of natural gas during any consecutive 12 months. *{Permitting Note: The restriction on natural gas firing allows this project to avoid PSD preconstruction review. The current Title V operation*

permit specifies additional operational restrictions for Boilers 4 and 5.} [Rules 62-4.070(3) and 62-212.400(2)(g), F.A.C.]

EMISSIONS STANDARDS

6. Nitrogen Oxides (NOx): Each modified burner shall be designed to achieve a NOx emissions performance specification of 0.20 lb/MMBtu or less from the firing of natural gas. NOx emissions are defined as all oxides of nitrogen as determined by EPA Method 7E and expressed as "NO_2". *{Permitting Note: Other than startup, natural gas will typically be co-fired (with bagasse) as a supplementary fuel. Except for NOx, emissions from firing natural gas are expected to be much less than emissions from firing bagasse. Therefore, no other additional standards are imposed by this permit.}* [Design; Rules 62-4.070(3) and 62-212.400(2)(g), F.A.C.]

7. Other Pollutant Emissions Standards: All existing emissions standards specified in prior permits for Boilers 4 and 5 shall also apply when firing natural gas alone or in combination with other fuels. *{Permitting Note: This requirement does not impose any additional testing because natural gas is used as a startup fuel and to supplement bagasse.}* [Design; Rules 62-4.070(3), F.A.C.]

EMISSIONS PERFORMANCE TESTING

8. Test Requirements: NOx emissions shall be determined in accordance with EPA Method 7E. EPA Methods 1 through 4 shall be used as necessary to support this test. These methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. Tests shall also be conducted in accordance with the requirements specified in Appendix C of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

9. Initial Tests: The permittee shall conduct an initial test on Boiler 5 to demonstrate compliance with the NOx emissions performance specification. The initial performance test shall be conducted within 60 days after achieving permitted capacity on natural gas, but no later than 180 days after initial firing on natural gas. The test shall be performed while Boiler 5 is firing only natural gas at a rate of 270 MMBtu per hour or greater. *{Permitting Note: No test is required for Boiler 4, which is only authorized for one modified burner representing less than 20% of the total permitted heat input rate.}* [Rule 62-4.070(3), F.A.C.]

10. Subsequent Tests: Subsequent tests are not required after the initial demonstration of compliance because natural gas will be fired during startups and to supplement the firing of bagasse. However, the Department may require subsequent "special compliance tests" in accordance with Rule 62-297.310(7)(b), F.A.C. [Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.]

RECORDS AND REPORTS

11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix C of this permit. For each test run, the report shall also indicate the actual natural gas firing rate (million cubic feet per hour), the heating value of the natural gas (MMBtu/ million cubic feet), the actual heat input rate (MMBtu per hour), and the actual boiler steam production rate (lb/hour). [Rule 62-297.310(8), F.A.C.]

12. Monitoring: In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate, and maintain flow meters with totalizers to monitor and record the natural gas consumption from each boiler. At the end of each month, the permittee shall record the amount indicated by the integrator on the flow meter. The permittee shall calculate and record the heat input rate and amount of natural gas fired during each month and during each consecutive 12-month period. Records shall be available for inspection within 15 days following each month. [Rules 62-4.070(3) and 62-212.400(2)(g), F.A.C.]

CONTENTS

SECTION 4. APPENDIX A
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 CRF 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
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

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 (not applicable);
    b. Determination of Prevention of Significant Deterioration (not applicable); and
    c. Compliance with New Source Performance Standards (not applicable).

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.

SECTION 4. APPENDIX C
COMMON CONDITIONS

{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permitee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(203), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.

    a. *Required Sampling Time.* Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.

    b. *Minimum Sample Volume.* Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

    c. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

14. Determination of Process Variables

    a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

    b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

    [Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.

16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the

test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

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
Sugar Cane Growers Cooperative
of Florida
Airport Road
Post Office Box 666
Belle Glade, Florida 33430-0666

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Evelyn B. Taylor ☐ Agent ☐ Addressee

B. Received by (Printed Name) Evelyn B. Taylor C. Date of Delivery 9/21/04

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

2. Article Number *(Transfer from service label)* 7000 1670 0013 3110 3094

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

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

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

Postmark Here

Sent To
Mr. Jose F. Alvarez/Sugar Cane Growers Cooperative of Florida
Street, Apt. No., or PO Box No.
Airport Road, Post Office Box 666
City, State, ZIP+4
Belle Glade, Florida 33430-0666

7000 1670 0013 3110 3094

PS Form 3800, May 2000 See Reverse for Instructions

GLADES SUGAR HOUSE

Sugar Cane Growers Cooperative of Florida

POST OFFICE BOX 666 BELLE GLADE, FLORIDA

33430-0666

August 18, 2004

VIA: Certified Mail #700 2510 0002 9630 5906
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

Subject: Palm Beach County- AP
Draft Title V Permit No: 0990026-008-AC
Glades Sugar House
EMA- Everglades Agricultural Area

Dear Mr. Cantrell:

Sugar Cane Growers Cooperative of Florida has published the Department's Public Notice of 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-Planning & Operations

Enclosure

JFA/mt

Telephone (561) 996-5556 Fax No. (561) 996-4747

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 **Wendy Elliott**, 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, **Notice** in the matter of **Air Construction Permit** was published in said newspaper in the issues of **August 7, 2004**. 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.

Wendy Elliott

Sworn to and subscribed before 9th day of August, A.D. 2004

Personally known XX or Produced Identification_____
Type of Identification Produced_____

NOTARY PUBLIC STATE OF FLORIDA
KAREN M McLINTON
MY COMMISSION # CC 979669
EXPIRES: Nov 15, 2004
1-800-3-NOTARY FL Notary Service & Bonding, Inc

RECEIVED
AUG 30 2004
BUREAU OF AIR REGULATION

NO. 1491558
PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Draft Air Permit No. 0990026-008-AC
Sugar Cane Growers Ccoperative of Florida
Glades Sugar House
Addition of Natural Gas to Existing Boilers 4 and 5

The Department of Environmental Protection (Department) gives notice if its intent to issue an air construction permit to Sugar Cane Growers Cooperative of Florida (applicant) to modify the existing oil burners in Boilers 4 and 5 to accommodate natural gas as an additional supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road, Belle Glade, Palm Beach County, Florida. The applicant's authorized representative is Mr. Jose F. Alvarez, Vice President Planning and Plant Operations. The applicant's mailing address is: Sugar Cane Growers Cooperative of Florida, Post Office Box 666, Belle Glade, Florida 33430-0666.

The applicant operates an existing sugar mill and boiling house where sugar cane is milled and pressed. The raw juice is clarified, crystallized, and centrifuges. Steam requirements are furnished by six boilder that fire bagasse as the primary fuel. Bagasse is the fibrous, vegetative material remaining after sugarcane is milled. Each boiler also fires No. 6 fuel oil as a startup and supplementary fuel. The combustion of fuels results in emissions of carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds. The applicant proposes to modify the existing oil burners for Boilers 4 and 5 to also accommodate natural gas as an additional startup and supplementary fuel.

Boilers 4 and 5 were originally constructed on the 1970s and are not curretly subject to Subpart Db of the federal New Source Performance Standards (NSPS). The burner project is not considered an NSPS modification because it will not increase the hourly emission rates of pullutants regulated by Subpart Db. In addition, the cost of the burner modification is well below 50% of the capital cost to replace a unit and is therefore not considered "reconstruction" as defined by the NSPS. Therefore, the project does not trigger the Subpart Db requirements.

The existing plant is a major facility in accordance Rule 62-212.400, F.A.C., the preconstruction review program for the Prevention of Significant Deterioration (PSD) of Air Quality. As restricted by the proposed conditions of the draft permit, all emissions increases from the project will be less than the PSD significant emissions rates and the project is not subject to PSD preconstruction review. Therefore, the burner modification wil be authorized in a minor source air construction permit.

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 form 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 adminsitrative hearing is filed pursuant to Section 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 substanital interests are affected by the proposed permitting decision may petition for an adminsitrative 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 aplicant 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 unbder 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 and administrative determination (hearing) under Section 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 substanital 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 indicatd; (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 releif sought by the petitioner, stating precisely the action petitioners 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 hearng process is designed to formulate final agency action, the filing of a petiton means that the Department's final action may be different from the position taken by it in this notice. Persons whose substanital 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, Ste 4)
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

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

Palm Beach County Health Department
Air Pollution Control Section
(901 Evernia Street)
P.O. Box 29
West Palm Beach, Florida 33402
Telephone: 561/355-3070

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
August 7, 2004

Memorandum

Florida Department of Environmental Protection

TO: Trina Vielhauer, Chief
Bureau of Air Regulation

THROUGH: Al Linero, Program Manager 7/13
Air Permitting South

FROM: Jeff Koerner, Air Permitting South

DATE: July 13, 2004

SUBJECT: Draft Air Permit No. 0990026-008-AC
Sugar Cane Growers Cooperative of Florida, Glades Sugar House
Addition of Natural Gas to Boilers 4 and 5

Attached for your review are the following items:

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

The draft permit authorizes the modification of existing oil burners in Boilers 4 and 5 to accommodate natural gas as a startup and supplemental fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road in Belle Glade, Palm Beach County, Florida. The draft permit is a minor source air construction permit to authorize the modification. As conditioned by the draft permit, the project does not trigger PSD preconstruction review or new NSPS Subpart Db requirements.

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 August 19, 2004. I recommend your approval of the attached Draft Permit for this project.

Attachments

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

July 21, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jose F. Alvarez, Sr. Vice President – Planning Operations
Sugar Cane Growers Cooperative of Florida
Airport Road, P.O. Box 666
Belle Glade, Florida 33430-0666

Re: Draft Air Permit No. 0990026-008-AC
Sugar Cane Growers Cooperative of Florida, Glades Sugar House
Addition of Natural Gas to Boilers 4 and 5

Dear Mr. Alvarez:

Enclosed is one copy of the draft permit to modify the existing oil burners in Boilers 4 and 5 to accommodate natural gas as an additional startup and supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road in Belle Glade, 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, Program Manager of Air Permitting South, at the above letterhead address. If you have any other questions, please contact Jeff Koerner at 850/921-9536.

Sincerely,

Trina L Vielhauer

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

In the Matter of an
Application for Air Permit by:

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

Authorized Representative:
Mr. Jose F. Alvarez, Sr. Vice President – Planning Operations

Draft Air Permit No. 0990026-008-AC
Glades Sugar House, Boilers 4 and 5
Addition of Natural Gas
Palm Beach County, Florida

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, applied on December 8, 2003 to the Department for a permit to modify the existing oil burners in Boilers 4 and 5 to accommodate natural gas as an additional supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road in Belle Glade, Palm Beach County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210, and 62-212, 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 7/21/04 to the persons listed:

Mr. Jose F. Alvarez*, Sugar Cane Growers Cooperative of Florida
Ms. Kathy Lockhart, Sugar Cane Growers Cooperative of Florida
Mr. David Buff, Golder Associates Inc.
Mr. Ron Blackburn, SD
Mr. James Stormer, PBCHD
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.

Mary D. Harry (Clerk) 7/21/04 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Permit No. 0990026-008-AC

Sugar Cane Growers Cooperative of Florida
Glades Sugar House
Addition of Natural Gas to Existing Boilers 4 and 5

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Sugar Cane Growers Cooperative of Florida (applicant) to modify the existing oil burners in Boilers 4 and 5 to accommodate natural gas as an additional supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road in Belle Glade, Palm Beach County, Florida. The applicant's authorized representative is Mr. Jose F. Alvarez, Vice President Planning and Plant Operations. The applicant's mailing address is: Sugar Cane Growers Cooperative of Florida, Post Office Box 666, Belle Glade, Florida 33430-0666.

The applicant operates an existing sugar mill and boiling house where sugar cane is milled and pressed. The raw juice is clarified, crystallized, and centrifuged. Steam requirements are furnished by six boilers that fire bagasse as the primary fuel. Bagasse is the fibrous, vegetative material remaining after sugarcane is milled. Each boiler also fires No. 6 fuel oil as a startup and supplementary fuel. The combustion of fuels results in emissions of carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds. The applicant proposes to modify the existing oil burners for Boilers 4 and 5 to also accommodate natural gas as an additional startup and supplementary fuel.

Boilers 4 and 5 were originally constructed in the 1970s and are not currently subject to Subpart Db of the federal New Source Performance Standards (NSPS). The burner project is not considered an NSPS modification because it will not increase the hourly emission rates of pollutants regulated by Subpart Db. In addition, the cost of the burner modifications is well below 50% of the capital cost to replace a unit and is therefore not considered "reconstruction" as defined by the NSPS. Therefore, the project does not trigger the Subpart Db requirements.

The existing plant is a major facility in accordance Rule 62-212.400, F.A.C., the preconstruction review program for the Prevention of Significant Deterioration (PSD) of Air Quality. As restricted by the proposed conditions of the draft permit, all emissions increases from the project will be less than the PSD significant emission rates and the project is not subject to PSD preconstruction review. Therefore, the burner modification will be authorized in a minor source air construction permit.

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

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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 Resource Section 2295 Victoria Avenue, Suite 364 Fort Myers, Florida 33901-3381 Telephone: 239/332-6975	Palm Beach County Health Department Air Pollution Control Section (901 Evernia Street) P.O. Box 29 West Palm Beach, Florida 33402 Telephone: 561/355-3070

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. 0990026-008-AC
Addition of Natural Gas to Boilers 4 and 5

COUNTY

Palm Beach County

APPLICANT

Sugar Cane Growers Cooperative of Florida
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

July 12, 2004

{Filename: 0990026-008-AC - TEPD}

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

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

Authorized Representative:

Mr. Jose F. Alvarez, Sr. Vice President – Planning Operations

Processing Schedule

12/08/03 South District received the application for a minor air construction permit.

01/07/04 South District requested additional information.

02/17/04 Application was transferred to the Bureau of Air Regulation in Tallahassee for processing.

02/23/04 Received additional information from applicant.

03/05/04 Bureau of Air Regulation requested additional information.

06/07/04 Department received additional information; application complete.

Facility Description and Location

The existing facility (Glades Sugar House) consists of a sugar mill and boiling house where sugar cane is milled and pressed. The raw juice is clarified, crystallized, and centrifuged. Steam requirements are furnished by six boilers that fire bagasse as the primary fuel. Bagasse is the fibrous, vegetative material remaining after the sugarcane milling process. Each boiler also fires No. 6 fuel oil as a startup and supplementary fuel. The existing sugar mill is located on West Sugar Road in Belle Glade, Palm Beach County, Florida. The UTM coordinates are Zone 17, 534.9 km East, and 2953.3 km North. 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).

Standard Industrial Classification Code (SIC)

SIC No. 2061 – Raw Sugar Processing.

Regulatory Categories

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

Title IV: The existing facility has 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 facility in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

Project Description

The existing sugar mill boilers fire bagasse as the primary fuel and No. 6 fuel oil as a startup and supplemental fuel. Natural gas is expected to be available within the next few years. The applicant requests authorization to modify the existing Peabody oil-fired burners to accommodate the firing of natural gas including, but not limited to, a new diffuser and new gas gun with supports. Only one of the existing four oil burners will be modified for Boiler 4. All three existing oil burners will be modified for Boiler 5. The design capacity of each modified burner is 100 MMBtu per hour for gas firing. The existing maximum heat input rates for oil firing are 393 MMBtu/hour for Boiler 4 and 302 MMBtu/hour for Boiler 5. The maximum heat input rates and design oil firing rates will remain unchanged. The preliminary design specifications for the modified burners are 0.17 lb/MMBtu for carbon monoxide emissions and 0.20 lb/MMBtu for nitrogen oxide emissions.

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.

Chapter	Description
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER
62-213	Title V Air 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

Applicability of New Source Performance Standards (NSPS)

NSPS Subpart Db applies to steam generating units (boilers) with a design heat input rate of 100 MMBtu per hour or greater that were constructed, reconstructed, or modified after June 19, 1984. Boilers 4 and 5 were constructed before this date and are not currently subject to this regulation. Based on available information, the proposed project is not a "modification" in terms of the NSPS because the physical changes to the burners will not result in increased hourly emissions of NOx, SO_2, or PM, which are the pollutants regulated under NSPS Subpart Db. In addition, the costs of the burner modifications are well below the 50% replacement cost criteria that would trigger "reconstruction" under the NSPS requirements. Therefore, the project does not trigger the NSPS Subpart Db requirements. Supporting calculations are provided in Table 4 of Attachment A.

Applicability of National Emissions Standards for Hazardous Air Pollutants (NESHAP)

Although EPA signed a final rule in February of 2004 to regulate hazardous air pollutants from industrial boilers (NESHAP Subpart DDDDD), the compliance dates have not yet been determined. Nevertheless, this project would not be subject to these new requirements because the costs of the burner modifications are also well below the 50% replacement cost criteria that would trigger "reconstruction" under the NESHAP requirements.

Applicability of Rule 62-296.405, F.A.C. (Fossil Fuel Fired Boilers > 100 MMBtu/hour)

The project will not result in any increases to the maximum fossil fuel heat input rate, so the project will not change the status of these units with respect to Rule 62-296.405, F.A.C.

PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and 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 new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Table 62-212.400-1, F.A.C.), or
- 5 tons per year of lead.

For new projects at existing 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. Emissions increases from the 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 "significant" regulated pollutants.

Natural gas will typically be fired in place of fuel oil. Therefore, it reasonable to compare the past actual annual emissions from oil firing to the future potential annual emissions from gas firing to determine whether there will be a significant emissions increase due to the project. Based on Annual Operating Reports previously submitted by the applicant, the highest 2-year average oil firing rate is 154,099 MMBtu/year. Initially, the applicant requested maximum annual heat input rates for firing natural gas of 260,000 MMBtu/year for Boiler 4 and 780,000 MMBtu/year for Boiler 5. Based on this initial request, the project would result in a significant increase in NOx emissions of about 80 tons per year. The applicant later requested a permit limit of 632 million scf of gas (632,000 MMBtu/year) from both boilers combined. Based on the revised request, the project does not trigger PSD preconstruction review. See Tables 5 and 6 of Attachment A for supporting calculations and comparisons. Therefore, the permit will include an operating restriction of 632 million scf of gas firing during any consecutive 12 months for the two boilers combined. This restriction will be subject to the "source obligation" requirements of Rule 62-212.400(2)(g), F.A.C.

3. PERMIT CONDITIONS

As a clean fuel, the firing of natural gas will result in reduced emissions of PM and SO_2 and only a very slight increase of VOC. Based on vendor specifications and the requested annual heat input restriction, CO emissions are estimated to be about half of the PSD significant emission rate of 100 tons per year while NOx emissions are just below the PSD significant emission rate of 40 tons per year. Natural gas will occasionally be used as a startup fuel, but will typically be co-fired with bagasse as a supplemental fuel. The draft permit includes the following specifications:

- Description of the burner modifications for Boiler 4 and 5;
- Authorization to fire natural gas as a permitted fuel for Boilers 4 and 5;
- Specification of 100 MMBtu/hour of gas firing as the maximum heat input rate from each modified burner;
- Restriction of $\leq$ 632 million scf of gas firing for any consecutive 12 months from both boilers combined;
- Specification of 0.20 lb/MMBtu as the NOx emissions standard for gas firing;
- Requirement for an initial test on Boiler 5 to demonstrate compliance with the NOx standard; and
- Requirement to monitor the natural gas consumption rate.

The project proposes to modify three burners for Boiler 5, but only a single burner for Boiler 4. Therefore, a single test for Boiler 5 is considered sufficient to demonstrate NOx emissions from the modified burners.

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. This 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.

ATTACHMENT A

Emissions and Calculations

Sugar Cane Growers Cooperative of Florida
Addition of Natural Gas to Boilers 4 and 5

Table 1. Boiler Specifications

Specifications	Boiler 4	Boiler 5
Boiler		
Steam Production Rate, lb/hour (24-hr avg.)	300,000	230,000
Max. Heat Input Rate, MMBtu/hr (24-hr avg.)	572	439
Hours of Operation	7296	7296
Fuel Oil Specifications		
Number of Burners	4	3
Heat Input Rate, MMBtu/hour/burner	98.3	100.7
Total Heat Input Rate, MMBtu	393	302
Natural Gas Specifications		
Number of Burners	1	3
Heat Input Rate, MMBtu/hour/burner	100	100
Total Heat Input Rate, MMBtu	100	300

Note: The total maximum heat input rate to each boiler will not increase.

Sugar Cane Growers Cooperative of Florida
Addition of Natural Gas to Boilers 4 and 5

Table 2. Fuel Oil Emission Factors and Actual Consumption

No. 6 Fuel Oil

151 MMBtu/1000 gallons
8.2 lb/gallon
2.4 % sulfur by weight

Emission Rates

Pollutant	EF lb/1000 gal	Equivalent lb/MMBtu	Emission Factor (EF) Reference
CO	5	0.033	AP-42, Table 1.3-1
NOx	47	0.311	AP-42, Table 1.3-1
PM	15.1	0.100	PM Limit of 0.10 lb/MMBtu
SO_2	393.6	2.607	Stoichiometry
VOC	0.28	0.002	AP-42, Table 1.3-3

Fuel Oil Usage (ARMS Data)

	Boiler 4 (x 1000 gallons)			Boiler 5 (x 1000 gallons)			
Year	No. 6	Used Oil	Total	No. 6	Used Oil	Total	Total
1998	421.56	0	421.56	375.84	0	375.84	797.4
1999	157.9	0	157.9	0	0	0	157.9
2000	610.33	6.62	616.95	442	4.79	446.79	1063.74
2001	520.65	6.11	526.76	389.96	4.58	394.54	921.3
2002	594.16	6.27	600.43	372.48	4.4	376.88	977.31

Highest 2-year average, 2000/2002 (gallons/year) = **1,020,525**

Highest 2-year average 2000/2002 (MMBtu/year) = **154099.3**

Sugar Cane Growers Cooperative of Florida
Addition of Natural Gas to Boilers 4 and 5

Table 3. Natural Gas Emission Factors

Natural Gas

1000 MMBtu/MMcf
0.045 lb gas/cf
0.1 grains of S/cf gas
0.03 % sulfur by weight

Pollutant	EF lb/MMcf	Equivalent lb/MMBtu	Emission Factor (EF) Reference
CO	166	0.166	Vendor
NOx	200	0.200	Vendor
PM	7.6	0.008	AP-42, Table 1.4-2
SO_2	0.6	0.001	Stoichiometry
VOC	5.5	0.006	AP-42, Table 1.4-2

Sugar Cane Growers Cooperative of Florida
Addition of Natural Gas to Boilers 4 and 5

Table 4. NSPS Subaprt Db Applicability

Boiler 4

100 MMBtu/hour on gas
98.3 MMBtu/hour on oil

	No. 6 Fuel Oil		Natural Gas			
Pollutant	EF lb/MMBtu	Emission Rate lb/hr	EF lb/MMBtu	Emission Rate lb/hr	Hourly Increase?	NSPS Pollutant?
CO	0.033	3.3	0.166	16.6	Yes	No
NOx	0.311	30.6	0.200	20.0	No	Yes
PM	0.100	9.8	0.008	0.8	No	Yes
SO_2	2.607	256.2	0.001	0.1	No	Yes
VOC	0.002	0.2	0.006	0.6	Yes	No

Boiler 5

300 MMBtu/hour on gas
302.1 MMBtu/hour on oil

	No. 6 Fuel Oil		Natural Gas			
Pollutant	EF lb/MMBtu	Emission Rate lb/hr	EF lb/MMBtu	Emission Rate lb/hr	Hourly Increase?	NSPS Pollutant?
CO	0.033	10.0	0.166	49.8	Yes	No
NOx	0.311	94.0	0.200	60.0	No	Yes
PM	0.100	30.2	0.008	2.3	No	Yes
SO_2	2.607	787.5	0.001	0.2	No	Yes
VOC	0.002	0.6	0.006	1.7	Yes	No

The project does not constitute an NSPS modification because none of the pollutants regulated by NSPS Subpart Db (NOx, PM, and SO_2) are predicted to increase.

Sugar Cane Growers Cooperative of Florida
Addition of Natural Gas to Boilers 4 and 5

Table 5. PSD Applicability - Original Application Request

Boilers 4 and 5

1,020,525 gallons/year of oil (2-year average for 2001-2002)
151,000 Btu/gallon of oil
154,099 MMBtu/year from oil (2-year average)
1,040,000 MMBtu/year from gas (initial request)

	No. 6 Fuel Oil		Natural Gas				
Pollutant	EF lb/MMBtu	Emission Rate TPY	EF lb/MMBtu	Emission Rate TPY	Project TPY	PSD SER TPY	PSD?
CO	0.033	2.6	0.166	86.3	83.8	100	No
NOx	**0.311**	**24.0**	**0.200**	**104.0**	**80.0**	**40**	**Yes**
PM	0.100	7.7	0.008	4.0	-3.8	25/15	No
SO_2	2.607	200.8	0.001	0.3	-200.5	40	No
VOC	0.002	0.1	0.006	2.9	2.7	40	No

Notes:

1. Based on the following maximum heat input rates:
   Boiler 4: 100 MMBtu/hour x 2600 hour/year = 260,000 MMBtu/year
   Boiler 5: 300 MMBtu/hour x 2600 hour/year = 780,000 MMBtu/year
   Total = 1,040,000 MMBtu/year

2. This compares the past actual emissions from oil firing to the future potential emissions from the reques
   gas firing. Note that "Table 4" *in the application* compares emissions from "potential" oil firing to future g

3. The applicant later requested a limit on gas firing to avoid PSD review. This is shown in Table 6 of this r

ited
gas firing

eport.

Sugar Cane Growers Cooperative of Florida
Addition of Natural Gas to Boilers 4 and 5

Table 6. PSD Applicability - Revised Application Request

Boiler 4 and 5

1,020,525 gallons/year of oil (2-year average for 2001-2002)
151,000 Btu/gallon of oil
154,099 MMBtu/year from oil (2-year average for 2001-2002)

1,000 MMBtu/MMcf
632 million scf of gas/year (proposed limit)
632,000 MMBtu/year from gas

	No. 6 Fuel Oil		Natural Gas		Project		
Pollutant	EF lb/MMBtu	Emission Rate TPY	EF lb/MMBtu	Emission Rate TPY	(Difference) TPY	PSD SER TPY	PSD?
CO	0.033	2.6	0.166	52.5	49.9	100	No
NOx	0.311	24.0	0.200	63.2	39.2	40	No
PM	0.100	7.7	0.008	2.4	-5.3	25/15	No
SO_2	2.607	200.8	0.001	0.2	-200.6	40	No
VOC	0.002	0.1	0.006	1.7	1.6	40	No

Notes:

1. The new revised restriction on gas firing (equivalent to 632,000 MMBtu/year) is four times the past actual 2-year average heat input for oil firing.

2. CO emissions increases are less than half of the PSD significant emission rate and VOC emissions increases are very small.

PERMITTEE:

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

Authorized Representative:
Mr. Jose F. Alvarez, Sr. Vice President – Planning Operations

Glades Sugar House
Air Permit No. 0990026-008-AC
Facility ID No. 0990026
SIC No. 2061
Permit Expires: December 30, 2007

PROJECT AND LOCATION

This permit authorizes modification of existing oil burners for Boilers 4 and 5 to accommodate natural gas as a startup and supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road in Belle Glade, Palm Beach County, Florida. The UTM coordinates are Zone 17, 534.9 km East, and 2953.3 km North.

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 install the proposed equipment 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 air construction permit supplements all other valid air construction permits.

CONTENTS

(DRAFT)

Michael G. Cooke, Director
Division of Air Resource Management

(Date)

FACILITY AND PROJECT DESCRIPTION

This facility consists of a sugar mill and boiling house where sugar cane is milled and pressed. The raw juice is clarified, crystallized, and centrifuged. Steam requirements are furnished by six boilers that fire bagasse as the primary fuel. Bagasse is the fibrous, vegetative material remaining after sugarcane is milled. Each boiler also fires No. 6 fuel oil as a supplementary fuel.

The proposed project will add natural gas-firing capabilities to the following existing boilers.

ID	Emission Unit Description
004	Boiler No. 4 is a traveling grate boiler with a steam production capacity of 300,000 pounds per hour.
005	Boiler No. 5 is a traveling grate boiler with a steam production capacity of 230,000 pounds per hour.

The conditions of this permit regulate Boilers 4 and 5 for the firing of natural gas and include operational restrictions necessary to avoid PSD preconstruction review.

REGULATORY CLASSIFICATION

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

Title IV: The existing facility has 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 facility in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

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.

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 minor source construction permits and operation permits shall be submitted to Air Resource Section of the Department's South District Office at 2295 Victoria Avenue, Suite #364, Fort Myers, Florida 33901-3381. Copies of permit applications shall also be submitted to each Compliance Authority listed below.
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 Resource 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 A (Citation Format); Appendix B (General Conditions); and Appendix C (Common 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. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. 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. Relaxations of Restrictions on Pollutant Emitting Capacity: If a previously permitted facility or modification becomes a facility or modification which would be subject to the preconstruction review requirements of this rule if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the preconstruction review requirements of this rule shall apply to the facility or modification as though construction had not yet commenced on it. [Rule 62-212.400(2)(g), F.A.C.]
8. Title V Permit: Pursuant to Rule 62-213.420(1)(a)2, F.A.C., the permittee shall submit an application for a revised Title V air operation permit at least ninety (90) days before the expiration of this permit, but no later than 180 days after commencing operation. In accordance with Rule 62-213.412(2), F.A.C., the permittee may immediately implement the changes authorized by this air construction permit after submitting the application for a revised Title V air operation permit to the Permitting Authority and providing copies of the application to EPA Region 4 and each Compliance Authority. To apply for a revised 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 Department's South District Office with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, 62-213.412, and 62-213.420, F.A.C.]

A. Boiler 4 (EU-004) and Boiler 5 (EU-005) – Gas Firing

This section of the permit addresses the following emissions units.

EU No.	Description
004	**Boiler No. 4** is a traveling grate boiler with a steam production capacity of 300,000 lb/ hour (572 MMBtu/hour). Steam production, steam temperature, and steam pressure are monitored and recorded. The primary fuel is bagasse. No. 6 residual fuel oil and natural gas are used as startup and supplementary fuels. Particulate matter emissions are controlled by two Joy Turbulaire Type D wet impingement scrubbers in parallel. The scrubber pressure drop and inlet water pressure are also monitored. The exhaust stack is 9.46 feet in diameter and 180 feet tall. Flue gases exit the stack at a flow rate of approximately 214,000 acfm and a temperature of 160° F.
005	**Boiler No. 5** is a traveling grate boiler with a steam production capacity of 230,000 lb/hour (439 MMBtu/hour). Steam production, steam temperature, and steam pressure are monitored and recorded. The primary fuel is bagasse. No. 6 residual fuel oil and natural gas are used as startup and supplementary fuels. Particulate matter emissions are controlled by a multi-cyclone dust collector followed by two Joy Turbulaire Type D wet impingement scrubbers in parallel. The scrubber pressure drop and inlet water pressure are also monitored. The exhaust stack is 7.0 feet in diameter and 150 feet tall. Flue gases exit the stack at a flow rate of approximately 165,320 acfm and a temperature of 160° F.

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit regulate Boilers 4 and 5 for the firing of natural gas and include operational restrictions necessary to avoid PSD preconstruction review. These conditions supplement prior air construction and operation permits. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

EQUIPMENT

2. Burner Modifications and Specifications: For Boilers 4 and 5, the permittee is authorized to modify the existing Peabody oil-fired burners to accommodate the firing of natural gas including, but not limited to, a new diffuser and new gas gun with supports. Only one of the existing four oil burners shall be modified for Boiler 4. All three existing oil burners will be modified for Boiler 5. Each modified burner shall be designed for a maximum heat input rate of 100 MMBtu per hour from the firing of natural gas. The total maximum heat input rates to the existing boilers and the maximum heat input rates from firing oil remain unchanged. Each modified burner shall be designed to achieve an emissions rate of 0.20 lb/MMBtu or less for nitrogen oxides (NOx). *{Permitting Note: The preliminary design specification is 0.17 lb/MMBtu of carbon monoxide emissions from each modified burner.}* [Design; Applicant Request]

PERFORMANCE RESTRICTIONS

3. Authorized Fuel: In addition to other previously permitted fuels, Boilers 4 and 5 are authorized to fire natural gas as a startup and supplementary fuel. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]

4. Permitted Capacity: For Boiler 4, the maximum heat input rate from firing supplementary fuels (any combination of natural gas and fuel oil) is 393 MMBtu per hour. For Boiler 5, the maximum heat input rate from firing supplementary fuels (any combination of natural gas and fuel oil) is 302 MMBtu per hour. The maximum heat input rate to each modified burner is 100 MMBtu per hour from firing natural gas. *{Permitting Note: The permitted capacities for other fuels are specified in prior permits including the current Title V operation permit.}* [Rules 62-210.200(PTE) and 62-212.400(2)(g), F.A.C.]

5. Restricted Operation: Natural gas fired in both Boilers 4 and 5 combined shall not exceed 632,000,000

standard cubic feet of natural gas during any consecutive 12 months. *{Permitting Note: The restriction on natural gas firing allows this project to avoid PSD preconstruction review. The current Title V operation permit specifies additional operational restrictions for Boilers 4 and 5.}* [Rules 62-4.070(3) and 62-212.400(2)(g), F.A.C.]

EMISSIONS STANDARDS

6. Nitrogen Oxides (NOx): Each modified burner shall be designed to achieve a NOx emissions performance specification of 0.20 lb/MMBtu or less from the firing of natural gas. NOx emissions are defined as all oxides of nitrogen as determined by EPA Method 7E and expressed as "NO_2". *{Permitting Note: Other than startup, natural gas will typically be co-fired (with bagasse) as a supplementary fuel. Except for NOx, emissions from firing natural gas are expected to be much less than emissions from firing bagasse. Therefore, no other additional standards are imposed by this permit.}* [Design; Rules 62-4.070(3) and 62-212.400(2)(g), F.A.C.]

7. Other Pollutant Emissions Standards: All existing emissions standards specified in prior permits for Boilers 4 and 5 shall also apply when firing natural gas alone or in combination with other fuels. *{Permitting Note: This requirement does not impose any additional testing because natural gas is used as a startup fuel and to supplement bagasse.}* [Design; Rules 62-4.070(3), F.A.C.]

EMISSIONS PERFORMANCE TESTING

8. Test Requirements: NOx emissions shall be determined in accordance with EPA Method 7E. EPA Methods 1 through 4 shall be used as necessary to support this test. These methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. Tests shall also be conducted in accordance with the requirements specified in Appendix C of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

9. Initial Tests: The permittee shall conduct an initial test on Boiler 5 to demonstrate compliance with the NOx emissions performance specification. The initial performance test shall be conducted within 60 days after achieving permitted capacity on natural gas, but no later than 180 days after initial firing on natural gas. The test shall be performed while Boiler 5 is firing only natural gas at a rate of 270 MMBtu per hour or greater. *{Permitting Note: No test is required for Boiler 4, which is only authorized for one modified burner representing less than 20% of the total permitted heat input rate.}* [Rule 62-4.070(3), F.A.C.]

10. Subsequent Tests: Subsequent tests are not required after the initial demonstration of compliance because natural gas will be fired during startups and to supplement the firing of bagasse. However, the Department may require subsequent "special compliance tests" in accordance with Rule 62-297.310(7)(b), F.A.C. [Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.]

RECORDS AND REPORTS

11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix C of this permit. For each test run, the report shall also indicate the actual natural gas firing rate (million cubic feet per hour), the heating value of the natural gas (MMBtu/million cubic feet), the actual heat input rate (MMBtu per hour), and the actual boiler steam production rate (lb/hour). [Rule 62-297.310(8), F.A.C.]

12. Monitoring: In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate, and maintain flow meters with totalizers to monitor and record the natural gas consumption from each boiler. At the end of each month, the permittee shall record the amount indicated by the integrator on the flow meter. The permittee shall calculate and record the heat input rate and amount of natural gas fired during each month and during each consecutive 12-month period. Records shall be available for inspection within ten days following each month. [Rules 62-4.070(3) and 62-212.400(2)(g), F.A.C.]

CONTENTS

SECTION 4. APPENDIX A
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 CRF 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
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

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 (not applicable);
    b. Determination of Prevention of Significant Deterioration (not applicable); and
    c. Compliance with New Source Performance Standards (not applicable).

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.

SECTION 4. APPENDIX C
COMMON CONDITIONS

{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permitee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(203), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.

    a. *Required Sampling Time.* Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.

    b. *Minimum Sample Volume.* Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

    c. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

14. Determination of Process Variables

    a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

    b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

    [Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.

16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the

test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Draft Air Permit No. 0990026-008-AC
Glades Sugar House, Boilers 4 and 5
Addition of Natural Gas
Palm Beach County, Florida

PROJECT DESCRIPTION

The applicant operates an existing sugar mill and boiling house where sugar cane is milled and processed. Steam requirements are furnished by six boilers that fire bagasse as the primary fuel. Each boiler also fires No. 6 fuel oil as a startup and supplementary fuel. The applicant proposes to modify the existing oil burners for Boiler 4 and 5 by installing a new diffuser and gas gun with supports to accommodate natural gas as a startup and supplementary fuel.

An analysis of applicable regulations indicates the following:

- NSPS Subpart Db does not apply because the project is not considered a "modification" or "reconstruction" as defined in the NSPS requirements.
- NESAHP Subpart DDDDD is not applicable because final "compliance dates" have not yet been established. Nevertheless, the project is not subject to this regulation because it is not a "reconstruction" as defined in the NESHAP requirements.
- The project will not result in any increases to the maximum fossil fuel heat input rate, so the project will not change the status of these units with respect to Rule 62-296.405, F.A.C. (fossil fuel fired steam generators > 250 MMBtu/hour heat input rate).
- A restriction on total natural gas firing allows the project to avoid PSD preconstruction review in accordance with Rule 62-212.400, F.A.C.

Therefore, the burner modification will be authorized in a minor source air construction permit that only regulates Boilers 4 and 5 for gas firing. The draft permit establishes a NOx emissions performance specification. Boiler 5 must be tested to demonstrate compliance with the NOx emissions performance specification. No testing is required for Boiler 4 because only one burner is being modified, which represents less than 20% of the total supplemental heat input rate. Subsequent tests may be required by the Department as "special compliance tests" in accordance with Rule 62-297.310(7)(b), F.A.C. All existing emissions standards specified in prior permits for Boilers 4 and 5 shall also apply when firing natural gas alone or in combination with other fuels.

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 62-297. 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).*

Jeffery J. Koerner 7-12-04

Jeffery F. Koerner, P.E. (Date)
Registration Number: 49441

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:
Jose F. Alvarez, Sr. Vice
resident - Planning Operations
gar Cane Growers Cooperative
of Florida
rport Road
st Office Box 666
lle Glade, Florida 33430-0666

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) SONIA VASQUEZ C. Date of Delivery 7/26/04

D. Is delivery address different from item 1? ☐ Yes
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☐ Insured Mail ☐ C.O.D.

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Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

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Street, Apt. No.: Airport Road, Post Office Box 666
City, State, ZIP+4: Belle Glade, Florida 33430-0666

7001 0320 0001 3692 6686

PS Form 3800, January 2001 See Reverse for Instructions

GLADES SUGAR HOUSE

Sugar Cane Growers Cooperative of Florida

POST OFFICE BOX 666

BELLE GLADE, FLORIDA

33430-0666

August 23, 2004

Certified Mail #7099 3400 0002 3353 9247
Return Receipt Requested

Mr. A. A. Linero, P. E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

RE: Sugar Cane Growers Cooperative of Florida, Inc. – Glades Sugar House
Boiler Nos. 4 and 5 Addition of Natural Gas Firing Capability
Draft Permit No. 0990026-008-AC
Comments on Draft Permit

Dear Mr. Blackburn:

Sugar Cane Growers Cooperative of Florida (SCGCF) has received the Department's draft air construction permit dated July 21, 2004, regarding the addition of natural gas firing capability in Boiler Nos. 4 and 5 at the Glades Sugar House. We have reviewed the draft permit and offer the following comments:

Technical Evaluation and Preliminary Determination

Page 2 of 4 – Facility Description and Location –Note that Palm Beach County is a "maintenance area" for ozone.

Attachment A - Table 2 Fuel Oil Usage (ARMS Data)
1999 Boiler 4 Fuel Oil should be 247.49; 1999 Boiler 5 Fuel Oil should be 185.82
1999 Boiler 4 Used Oil should be 6.9; 1999 Boiler 5 Used Oil should be 5.2

Draft Permit

Condition 12. Monitoring – It is requested that 15 calendar days after the end of each month be allowed to complete the necessary records.

Telephone (561) 996-5556

Fax No. (561) 996-4747

In addition to the changes requested above, after further consideration, it is requested that SCGCF be allowed the option of installing two gas burners in each Boiler Nos. 4 and 5 instead of one burner in Boiler No. 4 and three burners in Boiler No. 5. This will not affect the overall emissions from the two boilers combined due to natural gas burning.

Please call (561-996-4759) or e-mail (jfalvarez@scgc.org) me if you have any questions concerning this information.

Sincerely,

José Alvarez
Senior Vice President Planning and Operations

cc: D. Buff, Golder
A. Satyal, PBCHU
K. Lockhart, SCGCF

Golder Associates Inc.

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

June 3, 2004

0237588

Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Attention: Mr. Jeff F. Koerner, P.E.

RE: Sugar Cane Growers Cooperative of Florida
Project No. 0990026-008-AC
Request to Add Natural Gas Firing to Boiler Nos. 4 & 5

Dear Mr. Koerner:

Sugar Cane Growers Cooperative of Florida (SCGC) owns and operates a sugar cane processing facility, Glades Sugar House, located in Belle Glade, Florida. In November 2003, SCGC submitted an Air Construction Permit application to the Department requesting the modification of Boiler Nos. 4 and 5 at Glades Sugar House so that natural gas could be fired in addition to No. 6 fuel oil, used oil, and bagasse.

The Department responded to the application with a Request for Additional Information (RAI) dated, January 7, 2004, to continue processing the Air Construction Permit application for Boiler Nos. 4 and 5. On February 18, 2004, SCGC submitted the requested information to the Department. On March 5, 2004, SCGC received a second RAI. SCGC is submitting this letter to the Department to satisfy this second request. Each of the Department's inquiries is answered below in the same order as they appear in the RAI:

1. At the Department's suggestion, Table 3 has been revised to reflect a particulate matter (PM) emission factor of 15.1 pounds per thousands of gallons ($lb/10^3$ gal) of fuel oil.

2. At the Department's suggestion, Table 3 has been revised to reflect a volatile organic compound emission factor of 0.28 $lb/10^3$ gal of fuel oil.

3. SCGC is willing to accept a permit condition limiting the combined firing of natural gas in Boiler Nos. 4 and 5 to 632 million standard cubic feet per year (MMscf/yr) to avoid permitting under Prevention of Significant Deterioration (PSD) regulations. Maximum potential hourly and annual emission rates for firing natural gas in Boiler No. 4 are presented in Table 1. Annual emission rates for Boiler No. 4 are based on firing natural gas at a rate of 0.1 MMscf/hr for the requested 4,800 hour annual operating schedule.

   Maximum potential hourly and annual emission rates for firing natural gas in Boiler No. 5 are presented in Table 2. Annual emission rates for Boiler No. 5 are based on firing the entire allotment of natural gas of 632 MMscf/yr, since the boiler is capable of burning this amount of gas.

Past actual annual emissions from firing No. 6 and used fuel oil in Boiler Nos. 4 and 5 are presented in Table 3. Annual emission rates are based on the maximum consecutive 2-year average oil consumption which occurred during 2000 and 2001.

Annual emission rates for the proposed combined firing of 632 MMscf/yr of natural gas in Boiler Nos. 4 and 5 are presented in Table 4. The estimated potential annual emission rate for nitrogen oxides, the emissions-limited pollutant for PSD avoidance, is 63.2 tons per year (TPY).

The PSD applicability analysis is summarized in Table 5. As shown in Table 5, by limiting the combined firing of natural gas in Boiler Nos. 4 and 5 to 632 MMscf/yr, permitting under PSD regulations is avoided.

Attached are the revised tables and application pages including the P.E. certification page.

If you have any questions concerning this information, please call me at (352) 336-5600, ext. 545.

Sincerely,

GOLDER ASSOCIATES INC.

Scott A. McCann, P.E.
Associate

Robert C. McLaughlin for

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

SAM/nav

Enclosures

cc: Jose Alvarez – SCGC
Kathy Lockhart – SCGC
D. Nelson
Y:\Projects\2002\0237588 SCGC - Glades\4\4.1\060304\L060304.doc
R. Blackburn, SD
M. Harley, EPA
G. Bunyak, NPS
G. Latimer, PBCHD

Table 1. Calculation of Maximum Hourly and Annual Emission Rates from Firing 100 MMBtu/hr of Natural Gas in Boiler No. 4

Regulated Pollutant	Emission Factor ($lb/10^6$ scf)	Emission Factor (lb/MMBtu)	Activity Factor Hourly[a] (10^6 scf/hr)	Activity Factor Annual[b] (10^6 scf/yr)	Emission Rate (lb/hr)	Emission Rate (TPY)
Particulate Matter (PM)	7.6	0.0076	0.10	480	0.76	1.82
Sulfur Dioxide (SO_2)	0.6	0.00060	0.10	480	0.060	0.14
Nitrogen Oxides (NO_x)	200[c]	0.20	0.10	480	20.0	48.00
Carbon Monoxide (CO)	166[d]	0.166	0.10	480	16.6	39.84
Volatile Organic Compounds (VOC)	5.5	0.0055	0.10	480	0.55	1.32

Footnotes:

[a] Based on modification to the boiler to allow firing of 100 MMBtu/hr of natural gas and a heating value of 1,000 Btu/scf.

[b] Based on the maximum amount of gas that can be fired in in Boiler No. 4 in 4,800 hours of operation at a usage rate of 0.1 MMscf/hr.

[c] Based on a 0.20 lb/MMBtu NO_x emission factor provided by Babcock Power Systems and a heating value of natural gas of 1,000 Btu/scf (0.20 lb/MMBtu x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf /10^6 scf = 200 lb/10^6 scf).

[d] Based on a vendor guarantee for CO of 200 ppm at 3% O_2, dry, and the following calculations:

Exhaust flow rate (20% excess air [equivalent to 3% O_2], standard conditions, dry) = 100 MMBtu/hr x 1 scf/1,000 Btu x $1x10^6$ Btu/MMBtu x 11.442 ft^3 exhaust/ft^3 natural gas = 1,144,200 scf/hr.

CO Emissions (lb/hr) = 200/10^6 x 2116.8 lb_f/ft^2 x 1,144,200 scf/hr x 28/(1545.6 ft-lb_f/lb_m deg. R) x 1/528 deg. R = 16.6 lb/hr

CO Emissions (lb/10^6 ft^3 natural gas) = 16.6 lb/hr /100 MMBtu/hr x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf/10^6 scf = 166 lb/10^6 scf

Table 2. Calculation of Maximum Hourly and Annual Emission Rates from Firing 300 MMBtu/hr of Natural Gas in Boiler No. 5

Regulated Pollutant	Emission Factor ($lb/10^6$ scf)	Emission Factor (lb/MMBtu)	Activity Factor Hourly[a] (10^6 scf/hr)	Activity Factor Annual[b] (10^6 scf/yr)	Emission Rate (lb/hr)	Emission Rate (TPY)
Particulate Matter (PM)	7.6	0.0076	0.30	632	2.28	2.40
Sulfur Dioxide (SO_2)	0.6	0.00060	0.30	632	0.18	0.19
Nitrogen Oxides (NO_x)	200[c]	0.20	0.30	632	60.00	63.20
Carbon Monoxide (CO)	166[d]	0.166	0.30	632	49.86	52.52
Volatile Organic Compounds (VOC)	5.5	0.0055	0.30	632	1.65	1.74

Footnotes:

[a] Based on modification to the boiler to allow firing of 300 MMBtu/hr of natural gas and a heating value of 1,000 Btu/scf.

[b] Based on maximum annual amount of natural gas that can be fired in Boiler Nos. 4 and 5 while avoiding PSD.

[c] Based on a 0.20 lb/MMBtu NO_x emission factor provided by Babcock Power Systems and a heating value of natural gas of 1,000 Btu/scf (0.20 lb/MMBtu x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf /10^6 scf = 200 lb/10^6 scf).

[d] Based on a vendor guarantee for CO of 200 ppm at 3% O_2, dry, and the following calculations:

Exhaust flow rate (20% excess air [equivalent to 3% O_2], standard conditions, dry) = 300 MMBtu/hr x 1 scf/1,000 Btu x 1x10^6 Btu/MMBtu x 11.442 ft^3 exhaust/ft^3 natural gas = 3,432,600 scf/hr

CO Emissions (lb/hr) = 200/10^6 x 2116.8 lb_f/ft^2 x 3,432,600 scf/hr x 28/(1545.6 ft-lb_f/lb_m deg. R) x 1/528 deg. R = 49.86 lb/hr

CO Emissions (lb/10^6 ft^3 natural gas) = 49.86 lb/hr /300 MMBtu/hr x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf/10^6 scf = 166 lb/10^6 scf

Table 3. Calculation of Past Actual Annual Emission Rates from Firing No. 6 Fuel Oil and Used Oil in Boiler Nos. 4 & 5 Combined

Regulated Pollutant	Emission Factor ($lb/10^3$ gal)	Emission Factor (lb/MMBtu)	Annual Activity Factor[b] (10^3 gal)	Annual Activity Factor[b] (MMBtu/yr)	Annual Emission Rate (TPY)
Particulate Matter (PM)	15.1[a]	0.100	992.459	149,861	7.49
Sulfur Dioxide (SO_2)	393.6[c]	2.607	992.459	149,861	195.34
Nitrogen Oxides (NO_x)	47	0.311	992.459	149,861	23.32
Carbon Monoxide (CO)	5	0.033	992.459	149,861	2.48
Volatile Organic Compounds (VOC)	0.28	0.0019	992.459	149,861	0.14

Footnotes:

[a] PM emissions factors based on a permitted PM emission limit of 0.1 lb/MMBtu and a heat content of the fuel oil of 151,000 Btu/gal.

[b] Based on the maximum average combined fuel oil (No.6 and used oil) usage for Boiler Nos. 4 and 5 in any consecutive 2-year period, in this case 2000 and 2001.

Year	Boiler No. 4 (gal.)	Boiler No. 5 (gal.)	Total (gal.)	Average of Current and Previous Year
2003	535,497	353,755	889,252	933,280
2002	600,423	376,885	977,308	949,307
2001	526,764	394,542	921,306	992,459
2000	616,871	446,741	1,063,612	754,509
1999	254,401	191,005	445,406	--

[c] Calculated stoichiometrically based on a No. 6 fuel oil density of 8.2 lb/gal. and a sulfur content of the oil of 2.4% by weight:

Emission Factor ($lb/10^3$ gal.) = 8.2 lb/gal x 2.4 lb S/100 lb oil x 2 lb SO_2/lb S x 1,000 gal./10^3 gal.
= 393.6 $lb/10^3$ gal.

Emission Factor (lb/MMBtu) = 393.6 $lb/10^3$ gal. x 10^3/1,000 gal. x 1 gal./151,000 Btu x 10^6 Btu/MMBtu
= 2.61 lb/MMBtu

Table 4. Calculation of Annual Emission Rates from Firing 632 MMBtu/yr of Natural Gas in Boiler Nos. 4 and 5 Combined.

Regulated Pollutant	Emission Factor ($lb/10^6$ scf)	Emission Factor (lb/MMBtu)	Annual Activity Factor[a] (10^6 scf/yr)	Emission Rate (TPY)
Particulate Matter (PM)	7.6	0.0076	632	2.40
Sulfur Dioxide (SO_2)	0.6	0.00060	632	0.19
Nitrogen Oxides (NO_x)	200[b]	0.20	632	63.20
Carbon Monoxide (CO)	166[c]	0.166	632	52.46
Volatile Organic Compounds (VOC)	5.5	0.0055	632	1.74

Footnotes:

[a] Based on maximum annual natural gas firing rate to avoid PSD.

[b] Based on a 0.20 lb/MMBtu NO_x emission factor provided by Babcock Power Systems and a heating value of natural gas of 1,000 Btu/scf (0.20 lb/MMBtu x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf /10^6 scf = 200 lb/10^6 scf).

[c] Based on a vendor guarantee for CO of 200 ppm at 3% O_2, dry, and the following calculations:
Exhaust flow rate (20% excess air [equivalent to 3% O_2], standard conditions, dry) = 100 MMBtu/hr x 1 scf/1,000 Btu x 1x10^6 Btu/MMBtu x 11.442 ft^3 exhaust/ft^3 natural gas = 1,144,200 scf/hr.

CO Emissions (lb/hr) = 200/10^6 x 2116.8 lb_f/ft^2 x 1,144,200 scf/hr x 28/(1545.6 ft-lb_f/lb_m deg. R) x 1/528 deg. R = 16.6 lb/hr.

CO Emissions (lb/10^6 ft^3 natural gas) = 16.6 lb/hr /100 MMBtu/hr x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf/10^6 scf = 166 lb/10^6 scf.

Table 5. Summary of the Increase in Annual Emission Due to the Project and Comparison with Significant Emission Rates

Regulated Pollutant	Combined Actual Annual Emissions for No. 6/Used Fuel Oil Firing in Boilers 4 & 5[a] (TPY)	Combined Potential Annual Emissions for Natural Gas Firing in Boilers 4 & 5 (TPY)	Net Change in Annual Emission (TPY)	PSD Significant Emission Rate (TPY)	PSD Review Triggered? (Yes/No)
Particulate Matter (TSP)	7.5	2.40	-5.1	25	No
Particulate Matter (PM_{10})	7.5	2.40	-5.1	15	No
Sulfur Dioxide (SO_2)	195.3	0.19	-195.2	40	No
Nitrogen Oxides (NO_x)	23.3	63.2	39.9	40	No
Carbon Monoxide (CO)	2.48	52.5	50.0	100	No
Volatile Organic Compounds (VOCs)	0.14	1.74	1.6	40	No

APPLICATION INFORMATION

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**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext. **545** Fax: **(352) 336-6603**
4. Professional Engineer Email Address: **dbuff@golder.com**
5. 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.

(3) If the purpose of this application is to obtain a Title V 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 plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, 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.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, 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.

David A. Buff
Signature

6/03/04
Date

(seal)

* Attach any exception to certification statement.
** Board of Professional Engineers Certificate of Authorization #00001670

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Natural Gas (> 100 MMBtu/hr)**		
2. Source Classification Code (SCC): **1-02-006-01**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.10**	5. Maximum Annual Rate: **480**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,000**
10. Segment Comment: **Maximum annual usage rate based on 4,800 hours per year of operation.**		

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Solid Waste (Bagasse Residue)**		
2. Source Classification Code (SCC): **1-02-012-01**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **28.26**	5. Maximum Annual Rate: **135,649**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **17.8**
10. Segment Comment: **Maximum hourly rate based on 503.03 MMBtu/hr (24-hour average) from residue firing. Maximum annual rate based on 4,800 hours of operation per year.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Natural Gas (> 100 MMBtu/hr)**		
2. Source Classification Code (SCC): **1-02-006-01**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.300**	5. Maximum Annual Rate: **632**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,000**
10. Segment Comment: **Maximum annual usage rate based on the proposed limit on amount of natural gas fired in Boiler Nos. 4 and 5 combined.**		

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Solid Waste (Bagasse Residue)**		
2. Source Classification Code (SCC): **1-02-012-01**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **21.71**	5. Maximum Annual Rate: **104,198**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **17.8**
10. Segment Comment: **Maximum hourly rate based on 386.4 MMBtu/hr from bagasse residue firing. Maximum annual rate based on 4,800 hours of operation per year.**		

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

April 9, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

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

Dear Mr. Alvarez:

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

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

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

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

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

We will resume processing your applications after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,

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

cc: Ms. Kathy Lockhart, SCG Coop
Mr. David Buff, Golder
Mr. Ron Blackburn, SD
Mr. James Stormer, PBCHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

March 5, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Project No. 0990026-008-AC
Second Request for Additional Information
Sugar Cane Growers Cooperative of Florida, Glades Sugar House
Request to Add Natural Gas to Boilers 4 and 5

Dear Mr. Alvarez:

On February 23, 2004, the Department received your additional information response for the project to add natural gas as an authorized fuel to Boilers 4 and 5 at the Glades Sugar House in Belle Glade, Florida. Please note that your application has been transferred to the Bureau of Air Regulation for processing. The application remains incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. **PM Factor**: Table 3 of the application lists the emission factor for particulate matter as 14.1 lb/1000 gallons. However, this factor is calculated from a particulate matter limit of 0.10 lb/MMBtu and a heating value of 151 MMBtu/1000 gallons. It appears that the emissions factor should be:

   PM Factor = (0.10 lb/MMBtu) (151 MMBtu/1000 gallons oil) = 15.1 lb/1000 gallons of oil

   Please revise or comment.

2. **VOC Factor**: Table 3 of the application lists the emission factor for VOC as 0.76 lb/1000 gallons of oil and references Table 1.3-3 in AP-42. However, the factor referenced is for "utility boilers" firing No. 6 fuel oil. The appropriate factor for "industrial boilers" is 0.28 lb/1000 gallons of oil. Please revise or comment.

3. **PSD Applicability**: As discussed in your response, Table 4 of the application summarizes the expected increase in annual emissions and compares the net change in emissions to the PSD significant emission rates. However, this is a comparison of potential emissions for oil versus natural gas based on maximum heat input rates of 260,000 MMBtu/year for Boiler 4 and 780,000 MMBtu/year for Boiler 5, which is a total of 1,040,000 MMBtu/year. For industrial boilers, Rule 62-212.400, F.A.C. requires a comparison of past actual emissions to future potential emissions.

   Attachment A-1 to this letter summarizes the Department's PSD applicability review based on your initial request and the fuel oil usage over the last five years as provided in the Annual Operating Reports. The highest past actual 2-year average fuel oil firing rate for both boilers combined is 1,020,525 gallons per year. This includes used oil fuel, which is similar. Based on a heating value of 151,000 Btu per gallon, the

past actual 2-year average heat input rate is 154,099 MMBtu/year. The comparison shows that your current request will trigger PSD preconstruction review based on a comparison of past actual oil usage to requested future potential gas usage.

Note that your initial request for 1,040,000 MMBtu/year of gas firing is nearly 7 times the highest past actual 2-year average heat input rate for oil firing of 154,099 MMBtu/year. As shown in Attachment A-2 to this letter, reducing your request to 616,400 MMBtu/year of gas firing may allow the project to avoid PSD preconstruction review. This annual heat input rate for gas firing is still four times the highest past actual 2-year average for oil firing.

Please submit an application for a PSD permit based on your initial request or revise your request to avoid PSD preconstruction review.

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. 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: Mr. David Buff, Golder Associates Inc.
Mr. Ron Blackburn, DEP South District Office
Mr. James Stormer, PBCHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Sugar Cane Growers Cooperative of Florida
Addition of Natural Gas to Boilers 4 and 5
Attachment A-1

Boilers 4 and 5

1,020,525 gallons/year of oil (2-year average for 2001-2002)
151,000 Btu/gallon of oil
154,099 MMBtu/year from oil
1,040,000 MMBtu/year from gas or oil

	No. 6 Fuel Oil		Natural Gas				
Pollutant	EF lb/MMBtu	Emission Rate TPY	EF lb/MMBtu	Emission Rate TPY	Project TPY	PSD SER TPY	PSD?
CO	0.033	2.6	0.166	86.3	83.8	100	No
NOx	0.311	24.0	0.200	104.0	80.0	40	**Yes**
PM	0.100	7.7	0.008	4.0	-3.8	25/15	No
SO_2	2.607	200.8	0.001	0.3	-200.5	40	No
VOC	0.002	0.1	0.006	2.9	2.7	40	No

Notes:

1. Based on the following maximum heat input rates:
   Boiler 4: 100 MMBtu/hour x 2600 hour/year = 260,000 MMBtu/year
   Boiler 5: 300 MMBtu/hour x 2600 hour/year = 780,000 MMBtu/year
   Total = 1,040,000 MMBtu/year

2. This compares the past actual emissions from oil firing to the future potential emissions from the requested gas firing. Table 4 in the application compares emissions from potential oil firing to future gas firing.

Sugar Cane Growers Cooperative of Florida
Addition of Natural Gas to Boilers 4 and 5
Attachment A-2

Boiler 4 and 5

1,020,525 gallons/year of oil (2-year average for 2001-2002)
151,000 Btu/gallon of oil
154,099 MMBtu/year from oil
616,397 MMBtu/year from gas

	No. 6 Fuel Oil		Natural Gas		Project		
Pollutant	EF lb/MMBtu	Emission Rate TPY	EF lb/MMBtu	Emission Rate TPY	(Difference) TPY	PSD SER TPY	PSD?
CO	0.033	2.6	0.166	51.2	48.6	100	No
NOx	0.311	24.0	0.200	61.6	37.7	40	No
PM	0.100	7.7	0.008	2.3	-5.4	25/15	No
SO_2	2.607	200.8	0.001	0.2	-200.7	40	No
VOC	0.002	0.1	0.006	1.7	1.6	40	No

Notes:

1. The new revised restriction on gas firing (616,397 MMBtu/year) is four times the past actual 2-year average heat input for oil firing.

2. CO emissions increases are less than half of the PSD significant emission rate. Other increases are very small.

GLADES SUGAR HOUSE

Sugar Cane Growers Cooperative of Florida

POST OFFICE BOX 666

BELLE GLADE, FLORIDA

33430-0666

February 18, 2004

Certified Mail #7099 3400 0002 3354 0359
Return Receipt Requested

Mr. Ron Blackburn, P. E.
Florida Department of Environmental Protection
South District
2295 Victoria Avenue
Ft. Myers, FL 33901

RE: Sugar Cane Growers Cooperative of Florida, Inc. – Glades Sugar House
Boiler Nos. 4 and 5 Addition of Natural Gas Firing Capability
Permit No. 0990026-008-AC

Dear Mr. Blackburn:

Sugar Cane Growers Cooperative of Florida (SCGCF) has received the Department's request for additional information (RAI) dated January 7, 2004, regarding the application for the addition of natural gas burning to Boiler Nos. 4 and 5 at the Glades Sugar House. Each of the Department's questions is answered below, in the same order as they appear in the RAI.

1.a. SCGCF is requesting the ability to burn natural gas alone or in combination with No. 6 fuel oil, consistent with the capacities stated in the application. The ability to burn No. 6 fuel oil only is also being retained (of course any fossil fuel would normally be burned in combination with bagasse). This will give SCGCF the maximum flexibility when burning fossil fuels. However, it is also emphasized that SCGCF does not intend to burn more fossil fuel as a result of adding natural gas capability. As in the past, fossil fuel burning in the boilers will be minimized to the extent possible, since fossil fuel is much more costly to burn than bagasse.

1.b. The answer to the Department's question is found in Tables 1 and 2 of Part B in the application. As shown in Table 1, for Boiler No. 4, the CO emissions from firing 100 MMBtu/hr of natural gas are 16.6 lb/hr, and the CO emissions from firing 260,000 MMBtu/yr of natural gas are 21.58 tons per year (TPY). These are the proposed maximum firing rates for natural gas for Boiler No. 4.

Telephone (561) 996-5556

Fax No. (561) 996-4747

As shown in Table 2, for Boiler No. 5, the CO emissions from firing 300 MMBtu/hr of natural gas are 49.86 lb/hr, and the CO emissions from firing 780,000 MMBtu/yr of natural gas are 64.82 TPY. These are the proposed maximum firing rates for natural gas for Boiler No. 5.

Taken together, the total annual CO emissions due to natural gas firing are 86.4 TPY. This figure is below the PSD significant emission rate of 100 TPY. In reality, the increase will be much less than this because the gas firing will replace fuel oil firing, which also creates CO emissions. The true increase in CO emissions is shown in Table 4 of Part B, which shows that the increase in CO at the maximum annual firing rate will be only 69.1 TPY.

2. SCGCF is requesting 4,800 hrs/yr of operation for Boiler Nos. 4 and 5, as shown on page 16 of the application form. SCGCF does not wish to be limited to less than 4,800 hr/yr of operation on natural gas; instead, they desire 4,800 hr/yr on natural gas for each boiler, with an annual heat input limit of 260,000 MMBtu/yr for Boiler No. 4 (equivalent to 260 MMscf/yr) and 780,000 MMBtu/yr for Boiler No. 5 (equivalent to 780 MMscf/yr) (note that these rates are shown on page 18 of the application for each boiler). This is because SCGCF may fire natural gas at much lower heat input rates than the maximum heat input rate, and may want to utilize natural gas for more than 2,600 hr/yr. The reference to 2,600 hr/yr for each boiler was made only to provide the "equivalent" operating hours if natural gas were fired continuously at the maximum heat input rate. Regardless, annual emissions are only dependent upon the annual amount of fuel fired, not the hours of fuel firing.

3. Comment acknowledged.

4. There is no dust collector on Boiler No. 4. The description in the permit application was in error. Updates to the application form are provided in Attachment A.

5. The information is provided in Attachment A.

6. See Attachment A.

7. The maximum NOx emissions occur due to residue firing. The maximum heat input for residue is 503.03 MMBtu/hr; therefore the calculation and the form are correct. Refer also to Section D. Segment (Process/Fuel) Information, which shows the heat input rates for the various fuels.

8. Condition H.2. of the Title V permit places conditions on the facility-wide emissions of SO2, i.e. 14 TPD. It also requires monitoring and recordkeeping. However, these are facility-wide conditions and as such do not regulate individual boilers. The maximum SO2 emissions for Boiler Nos. 4 and 5 individually are presented in Attachments SCG-EU1-F8 and SCG-EU2-F8, respectively. These calculations are based on the worst-case assumptions for each fuel (i.e., bagasse, residue and fuel oil). Emissions due to fuel oil are based on 2.4% sulfur, and assuming no removal in the scrubbers. The use of 2.4% sulfur is worst-case, and could occur if Boiler No. 8 fired no fuel oil and therefore no 1% sulfur fuel oil was added to

the plant common tank. The assumptions used for bagasse residue are consistent with Condition H.2.2 of the Title V permit. SO2 emissions due to bagasse firing are based on sugar industry test data from bagasse-firing.

9. Comment acknowledged.

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

Sincerely,

Jose Alvarez
Senior Vice President Planning and Operations

cc: D. Buff, Golder
A. Satyal, PBCHU

ATTACHMENT A

UPDATES TO APPLICATION FORM
FOR BOILER NO. 4

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **114.4** lb/hour **274.6** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.20 lb PM/MMBtu (Carbonaceous Fuels)** Reference: **Permitted PM emission rate for bagasse (worst-case fuel)**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.20 lb PM/MMBtu x 572 MMBtu/hr = 114.4 lb/hr** **Annual: 114.4 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 274.6 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **Annual potential PM emissions based on 4,800 hr/yr of operation firing bagasse. Although Boiler No. 4 may also fire fuel oil and natural gas, firing bagasse results in worst-case PM emissions.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.20 lb/MMBtu (Carbonaceous Fuels)**	4. Equivalent Allowable Emissions: **114.4** lb/hour **274.6** tons/year
5. Method of Compliance: **EPA Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AC50-42476/PSD-FL-077 dated 10/28/81.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.1 lb/MMBtu (Fossil Fuel)**	4. Equivalent Allowable Emissions: **31.5** lb/hour **75.7** tons/year
5. Method of Compliance: **EPA Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on firing No. 6 Fuel Oil at a maximum heat input rate for fuel oil of 315.25 MMBtu/hr. Annual allowable emissions based on 4,800 hr/yr of operation. Permit No. AC50-42476/ PSD-FL-077 dated 10/28/81.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: NO_x	2. Total Percent Efficiency of Control:
3. Potential Emissions: **327.0** lb/hour **784.8** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.65 lb/MMBtu (Residue Firing)** Reference: **Permitted maximum emission rate for firing worst-case fuel.**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.65 lb/MMBtu x 503.03 MMBtu/hr = 327.0 lb/hr** **Annual: 327.0 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 784.8 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.45 lb/MMBtu**	4. Equivalent Allowable Emissions: **257.4** lb/hour **617.8** tons/year
5. Method of Compliance: **EPA Method 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AO50-191735 dated 1/27/97, RACT Permit Amendment. Applies when firing bagasse @ 572 MMBtu/hr.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.65 lb/MMBtu**	4. Equivalent Allowable Emissions: **327.0** lb/hour **784.8** tons/year
5. Method of Compliance: **EPA Method 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Applies when firing bagasse residue @ 503.03 MMBtu/hr.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control:
3. Potential Emissions: 400.4 lb/hour 961 tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: 0.7 lb VOC/MMBtu Reference: Permitted VOC Emission Rate	7. Emissions Method Code: 0
8. Calculation of Emissions: Hourly: 0.7 lb VOC/MMBtu x 572 MMBtu/hr = 400.4 lb/hr Annual: 400.4 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 961 TPY	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.7 lb/MMBtu**	4. Equivalent Allowable Emissions: **400.4** lb/hour **961** tons/year
5. Method of Compliance: **EPA Methods 25A and 18, combined.**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. 0990026-005-AC; dated 04/28/03.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: SO_2	2. Total Percent Efficiency of Control:
3. Potential Emissions: 1,099 lb/hour 2,638 tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: 2.4% S fuel oil Reference: Permit Limit	7. Emissions Method Code: 3
8. Calculation of Emissions: Hourly: see Attachment SCG-EU1-F8 Annual: 1,099 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 2,637.6 TPY	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: Maximum sulfur content of fuel = 2.4%	4. Equivalent Allowable Emissions: 1,024 lb/hour 2,458 tons/year
5. Method of Compliance: Record keeping of total fuel oil to Boiler Nos. 1 through 5 as described in the current Title V permit.	
6. Allowable Emissions Comment (Description of Operating Method): Construction Permit No. AC50-2334 dated 10/14/74 and Permit No. AC50-42476/PSD-FL-077 dated 10/28/81. See Attachment SCG-EU1-F8 for calculations.	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **Methanol (H115)**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **3.73** lb/hour **8.95** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **6.52E-03 lb/MMBtu (Carbonaceous Fuels)** Reference: **Test Data**	7. Emissions Method Code: **1**
8. Calculation of Emissions: **Hourly: 6.52E-03 lb/MMBtu x 572 MMBtu/hr = 3.73 lb/hr** **Annual: 3.73 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 8.95 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **Annual potential PM emissions based on 4,800 hr/yr of operation firing bagasse. Although Boiler No. 4 may also fire fuel oil and natural gas, firing bagasse results in worst-case methanol emissions.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliancc:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **POM (H151)**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **7.66** lb/hour **18.40** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **1.34E-02 lb/MMBtu (Carbonaceous Fuels)** Reference: **Test Data**	7. Emissions Method Code: **1**
8. Calculation of Emissions: **Hourly: 1.34E-02 lb/MMBtu x 572 MMBtu/hr = 7.66 lb/hr** **Annual: 7.66 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 18.40 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **Annual potential PM emissions based on 4,800 hr/yr of operation firing bagasse. Although Boiler No. 4 may also fire fuel oil and natural gas, firing bagasse results in worst-case methanol emissions.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

APPLICATION INFORMATION

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**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext.**545** Fax: **(352) 336-6603**
4. Professional Engineer Email Address: **dbuff@golder.com**
5. 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.

(3) If the purpose of this application is to obtain a Title V 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 plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, 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.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, 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.

David a. Buff — Signature

2/17/04 — Date

(seal)

* Attach any exception to certification statement.

**** Board of Professional Engineers Certificate of Authorization #00001670**

ATTACHMENT A

UPDATES TO APPLICATION FORM FOR BOILER NO. 4

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
   Two parallel Joy Turbulaire Type D wet impingement scrubbers.

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

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	002		EL
NO_x			EL
VOC			EL
SO_2			EL
Methanol (H115)			NS
POM (H151)			NS

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **114.4** lb/hour **274.6** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.20 lb PM/MMBtu (Carbonaceous Fuels)** Reference: **Permitted PM emission rate for bagasse (worst-case fuel)**	7. Emissions Method Code: **0**

8. Calculation of Emissions:

Hourly: 0.20 lb PM/MMBtu x 572 MMBtu/hr = 114.4 lb/hr

Annual: 114.4 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 274.6 TPY

9. Pollutant Potential/Estimated Fugitive Emissions Comment:

Annual potential PM emissions based on 4,800 hr/yr of operation firing bagasse. Although Boiler No. 4 may also fire fuel oil and natural gas, firing bagasse results in worst-case PM emissions.

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.20 lb/MMBtu (Carbonaceous Fuels)**	4. Equivalent Allowable Emissions: **114.4** lb/hour **274.6** tons/year
5. Method of Compliance: **EPA Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AC50-42476/PSD-FL-077 dated 10/28/81.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.1 lb/MMBtu (Fossil Fuel)**	4. Equivalent Allowable Emissions: **31.5** lb/hour **75.7** tons/year
5. Method of Compliance: **EPA Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on firing No. 6 Fuel Oil at a maximum heat input rate for fuel oil of 315.25 MMBtu/hr. Annual allowable emissions based on 4,800 hr/yr of operation. Permit No. AC50-42476/ PSD-FL-077 dated 10/28/81.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **NO_x**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **327.0** lb/hour **784.8** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.65 lb/MMBtu (Residue Firing)** Reference: **Permitted maximum emission rate for firing worst-case fuel.**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.65 lb/MMBtu x 503.03 MMBtu/hr = 327.0 lb/hr** **Annual: 327.0 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 784.8 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.45 lb/MMBtu**	4. Equivalent Allowable Emissions: **257.4** lb/hour **617.8** tons/year
5. Method of Compliance: **EPA Method 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AO50-191735 dated 1/27/97, RACT Permit Amendment. Applies when firing bagasse @ 572 MMBtu/hr.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.65 lb/MMBtu**	4. Equivalent Allowable Emissions: **327.0** lb/hour **784.8** tons/year
5. Method of Compliance: **EPA Method 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Applies when firing bagasse residue @ 503.03 MMBtu/hr.**	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **400.4** lb/hour **961** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.7 lb VOC/MMBtu** Reference: **Permitted VOC Emission Rate**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.7 lb VOC/MMBtu x 572 MMBtu/hr = 400.4 lb/hr** **Annual: 400.4 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 961 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.7 lb/MMBtu**	4. Equivalent Allowable Emissions: **400.4** lb/hour **961** tons/year
5. Method of Compliance: **EPA Methods 25A and 18, combined.**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. 0990026-005-AC; dated 04/28/03.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1,099** lb/hour **2,638** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **2.4% S fuel oil** Reference: **Permit Limit**	7. Emissions Method Code: **3**
8. Calculation of Emissions: **Hourly: see Attachment SCG-EU1-F8** **Annual: 1,099 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 2,637.6 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **Maximum sulfur content of fuel = 2.4%**	4. Equivalent Allowable Emissions: **1,024** lb/hour **2,458** tons/year
5. Method of Compliance: **Record keeping of total fuel oil to Boiler Nos. 1 through 5 as described in the current Title V permit.**	
6. Allowable Emissions Comment (Description of Operating Method): **Construction Permit No. AC50-2334 dated 10/14/74 and Permit No. AC50-42476/PSD-FL-077 dated 10/28/81. See Attachment SCG-EU1-F8 for calculations.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **Methanol (H115)**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **3.73** lb/hour **8.95** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **6.52E-03 lb/MMBtu (Carbonaceous Fuels)** Reference: **Test Data**	7. Emissions Method Code: **1**

8. Calculation of Emissions:

Hourly: 6.52E-03 lb/MMBtu x 572 MMBtu/hr = 3.73 lb/hr

Annual: 3.73 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 8.95 TPY

9. Pollutant Potential/Estimated Fugitive Emissions Comment:

Annual potential PM emissions based on 4,800 hr/yr of operation firing bagasse. Although Boiler No. 4 may also fire fuel oil and natural gas, firing bagasse results in worst-case methanol emissions.

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **POM (H151)**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **7.66** lb/hour **18.40** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **1.34E-02 lb/MMBtu (Carbonaceous Fuels)** Reference: **Test Data**	7. Emissions Method Code: **1**

8. Calculation of Emissions:
Hourly: 1.34E-02 lb/MMBtu x 572 MMBtu/hr = 7.66 lb/hr

Annual: 7.66 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 18.40 TPY

9. Pollutant Potential/Estimated Fugitive Emissions Comment:
Annual potential PM emissions based on 4,800 hr/yr of operation firing bagasse. Although Boiler No. 4 may also fire fuel oil and natural gas, firing bagasse results in worst-case methanol emissions.

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions __ of __

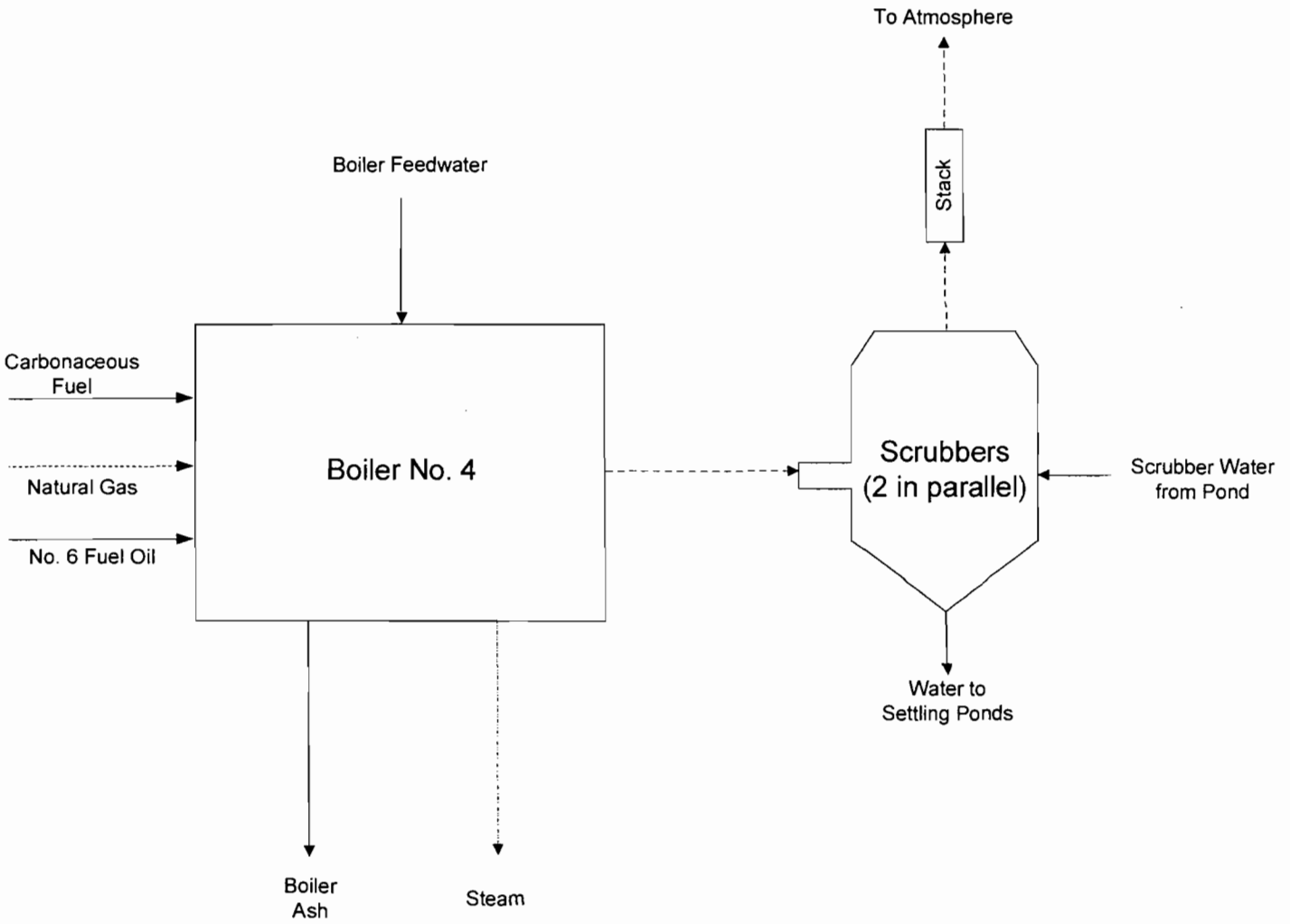
1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	



Attachment SCG-EU1-I1
Process Flow Diagram

Source: Golder, 2003.

Process Area: Boiler No. 4
0237588/4/4.4/4.4.1 Boilers 4&5/SCG-EU1-I1new.vsd
Latest Revision Date: 2/17/2004

Process Flow Legend:
Solid / Liquid
Gas
Steam

Golder Associates

ATTACHMENT SCG-EU1-I3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

SUGAR CANE GROWERS COOPERATIVE OF FLORIDA

BOILER NO. 4

Control equipment: Two (2) Joy Turbulaire wet impingement scrubbers, custom design.

Scrubbing Liquid:	Water
Inlet Water Pressure (psi)	0-100
Pressure Drop Across Scrubber (Inches H_2O)	0-15

Department of Environmental Protection

FILE

Jeb Bush
Governor

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

David B. Struhs
Secretary

January 7, 2004

RECEIVED
FEB 19 2004
BUREAU OF AIR REGULATION

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

Re: Palm Beach Co. – AP
Request for Additional Information
Permit No. 0990026-008-AC
Glades Sugar House

Dear Mr. Alvarez:

The Department received the construction application concerning Boiler Nos. 4 & 5 for Sugar Cane Growers Cooperative of Florida on December 8, 2003. Upon review, the Department has some questions regarding the addition of natural gas. In order to continue processing your application, the Department will need the additional information listed in this letter no later than 90 days from receipt. 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.

The Department will resume processing your application after the receipt of the requested information.

1. Part B of the application concerning section 1.0 Project Description
   a. It is stated in the 5th paragraph "SCGCF is proposing to add the capability to fire natural gas as a **substitute** for No. 6 fuel oil in Boilers Nos. 4 and 5." However in the 7th paragraph, it is stated that "the addition of natural gas burning capabilities will allow SCGCF the option of burning either oil, gas, or both when fossil fuels are needed." Please clarify if the burning of No. 6 Fuel oil is being substituted by natural gas for Boiler Nos. 4 and 5 or is the facility requesting the capability of using both.
   b. In the 8th paragraph, it is mentioned that "based on the best available data, emission of carbon monoxide (CO) may increase compared to fuel oil firing, but this increase will be less then the PSD significant emissions rate for CO of 100 tons per year." Please submit the calculations of carbon monoxide (CO) for natural gas usage for Boilers Nos. 4 and 5 for Section F1. Emissions Unit Pollutant Detail Information – Potential/Estimated Fugitive Emissions.

2. Part B of the application concerning section 2.0 Air Emissions and section 3.1 New Source Review
    a. Since there are some discrepancies throughout the application for the two boilers, please indicate what the hours of operation will be for Boilers Nos. 4 and 5. (In the 1st paragraph of section 2.0 Air Emission, it is stated that the estimates of Tables 1 and 2 are based on the AP-42 emissions factors for PM, SO2 and VOC, vendor performances data for NOx and CO, and the equivalent of 2,600 hr/yr of firing natural gas in each boiler. In the 3rd paragraph of section 3.1 New Source Review, it is stated that "in order to determine the potential increase in actual emissions due to the proposed modification of the burners, maximum annual emission rates due to firing natural gas for an equivalent of 2,6000 hr/yr in both Boiler Nos. 4 and 5 were calculated." On page 16 for both Boiler Nos. 4 and 5, the requested maximum operating schedule for each boiler indicates 4,800 hours/year.)
3. Part B of the application concerning section 3.2 New Source Performance Standards
   We will be consulting the Central Office for a determination of NSPS.
4. Emissions Unit Control Equipment for Boiler No. 4
   On page 15, it is stated in the Control Equipment/Method(s) Description that the "multi-cyclone dust collector followed by two parallel Joy Turbulaire Type D wet impingement scrubbers". At this time, the Department has been unable to verify the construction of the multi-cyclone dust collector. Please indicate if it is new to boiler?
5. Section E. Emissions Unit Pollutants.
   The list of pollutants emitted by Emission Unit for Boiler No. 4 had Methanol (H115) and POM (H151) listed but there are no corresponding F1. Emissions Unit Pollutant Detail Information – Potential/Estimated Fugitive Emissions sheets for these two HAPs. Please submit additional information of these HAPs for our files.
6. Particulate Matter (PM) for Boiler No. 4 of F1. Emissions Unit Pollutant Detail Information – Potential/Estimated Fugitive Emissions.
   The Emission Factor that is listed for Particulate Matter (PM) is 0.25 lb PM/MMBtu (Carbonaceous Fuels) for worst-case fuel. In Permit 0990026-004-AV, the limit for PM for Boiler No. 4 is listed as 0.20 lb/ MMBtu. Please explain the change in this and submit in calculations for the correct emission factor.
7. Nitrogen Oxides (NOx) for Boiler No. 4 of F1. Emissions Unit Pollutant Detail Information – Potential/Estimated Fugitive Emissions.
   For the hourly calculation for NOx, the heat input rate is listed as 503.03 MMBtu/hr. Under Section B. Emissions Unit Capacity Information, the Maximum Heat Input Rate for Boiler No. 4 is listed as 572 MMBtu/hr. Please revisit this issue.
8. Sulfur Dioxide (SO2) for Boiler No. 4 and Boiler No. 5 of F1. Emissions Unit Pollutant Detail Information – Potential/Estimated Fugitive Emissions.
   The Potential to Emit Emissions for SO2 is based on 2.4% S fuel oil. Please submit the calculations for the limit of SO2 using the common conditions in Section H. of Permit 0990026-004-AV, Conditions H.1. and H.2.
9. C. Emission Point (Stack/Vent) Information for Boilers No. 4 and 5.
   We are in the process of verifying the information submitted and we will be discussing this further.

If you should have any questions, please contact me at 239/332-6975 ext 173 or Mara Nasca at ext 188.

Sincerely,

Deanna L. Newburg

Deanna Newburg
Engineer III

DLN/dln
Cc: David A. Buff, P.E., Golder Associates Inc.
Kathy Lockhart, Environmental Manager, Sugar Cane Growers Cooperative of Florida

GLADES SUGAR HOUSE

Sugar Cane Growers Cooperative of Florida

POST OFFICE BOX 666

BELLE GLADE, FLORIDA

33430-0666

January 28, 2004

VIA: Certified Mail # 7099 3400 0002 3354 0380
Return Receipt Requested

Mr. Ron Blackburn
Florida Department of Environmental Protection
South District Office
P. O. Box 2549
Ft. Myers, FL 33902-2549

Re: Scrubber Replacement for Boiler 5

Dear Mr. Blackburn:

Sugar Cane Growers Cooperative of Florida is planning to replace the two scrubbers on Boiler 5 with two new scrubbers during the upcoming 2004 off-season. The existing scrubbers are more than twenty years old and in need of replacement. No increase in emissions is expected as a result of this replacement.

Should you have any questions, please contact Kathy Lockhart (561-996-4779). We would like to receive written confirmation that SCGC may proceed with the planned replacement.

Sincerely,

Jose F. Alvarez
Sr. Vice President-Planning and Operations

cc: A. K. Satyal – Palm Beach County Health Dept.
David Buff – Golder Associates, Inc.

Telephone (561) 996-5556

Fax No. (561) 996-4747

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
Vice President Planning and
Plant Operations
Glades Sugar House
Sugar Cane Growers Cooperative
of Florida
P. O. 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: 3/11/04

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

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

2. Article Number *(Copy from service label)*
7000 0600 0026 4129 8825

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)

7000 0600 0026 4129 8825

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

Postmark Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)
Mr. Jose Alvarez, Sugar Cane Growers
Street, Apt. No.; or PO Box No.
P.O. Box 666
City, State, ZIP+4
Belle Glade, FL 33430-0666

PS Form 3800, February 2000 See Reverse for Instructions

RECEIVED

DEC 0 8 2003

D.E.P. - South District

AIR CONSTRUCTION PERMIT APPLICATION
BOILER NOS. 4 & 5
SUGAR CANE GROWERS COOPERATIVE OF FLORIDA
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

November 2003
0237588

DISTRIBUTION:
4 Copies – FDEP
1 Copy – Palm Beach County
2 Copies – SCGCF
2 Copies – Golder Associates Inc.

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

RECEIVED
DEC 08 2003
D.E.P. - South District

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:
- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:
- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

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**
4. Facility Location...:
   Street Address or Other Locator: **West Sugar House Road**
   City: **Belle Glade** County: **Palm Beach** Zip Code: **33430-0666**
5. Relocatable Facility? ☐ Yes ☒ No
6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Kathy Lockhart**
2. Application Contact Mailing Address...
   Organization/Firm: **Sugar Cane Growers Cooperative of Florida**
   Street Address: **Airport Road P.O. Box 666**
   City: **Belle Glade** State: **FL** Zip Code: **33430-0666**
3. Application Contact Telephone Numbers...
   Telephone: **(516) 996-4779** ext. Fax: **(561) 996-4780**
4. Application Contact Email Address: **kdlockhart@scgc.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	12-08-04
2. Project Number(s):	0990026-008-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

☒ Air construction permit.

Air Operation Permit

☐ Initial Title V air operation permit.

☐ Title V air operation permit revision.

☐ Title V air operation permit renewal.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

☐ Air construction permit and Title V permit revision, incorporating the proposed project.

☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment *(Amendment Note: previously at end of Section I)*

Application to add the ability to also fire natural gas in Boiler Nos. 4 and 5.

APPLICATION INFORMATION

Scope of Application *(Amendment Note: previously at end of Section I)*

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
004	Boiler No. 4	AC1B	
005	Boiler No. 5	AC1B	

Application Processing Fee *(Amendment Note: previously at end of Section I)*

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :

   Jose F. Alvarez, Senior Vice President Planning Operations

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **Sugar Cane Growers Cooperative of Florida**
   Street Address: **Airport Road P.O. Box 666**
   City: **Belle Glade** State: **FL** Zip Code: **33430-0666**

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(561) 996-4759** ext. Fax: **(561) 996-4747**

4. Owner/Authorized Representative Email Address: **jfalvarez@scgc.com**

5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. 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 and all other requirements identified in this application to which the facility is subject. 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 the facility or any permitted emissions unit.

Signature

12/2/03
Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   ☐ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   ☐ The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

4. Application Responsible Official Telephone Numbers...
   Telephone: ( ) - ext. Fax: ( ) -

5. Application Responsible Official Email Address:

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

   Signature Date

APPLICATION INFORMATION

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**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext.**545** Fax: **(352) 336-6603**
4. Professional Engineer Email Address: **dbuff@golder.com**
5. 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.

(3) If the purpose of this application is to obtain a Title V 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 plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, 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.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, 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.

David a. Buff
Signature

11/26/03
Date

(seal)

* Attach any exception to certification statement.
** Board of Professional Engineers Certificate of Authorization #00001670

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 :			

Facility Contact

1. Facility Contact Name: **Kathy Lockhart, Environmental Manager**
2. Facility Contact Mailing Address... Organization/Firm: **Sugar Cane Growers Cooperative of Florida** Street Address: **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** ext. Fax: **(561) 996-4780**
4. Facility Contact Email Address: **kdlockhart@scgc.com**

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. ☒ Title V Source	
4. ☒ Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☒ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☐ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☐ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Sulfur Dioxide (SO_2)	**A**	**N**
Volatile Organic Compounds (VOC)	**A**	**N**
Particulate Matter (PM)	**A**	**N**
Carbon Monoxide (CO)	**A**	**N**
Nitrogen Oxides (NO_x)	**A**	**N**
Methanol (H115)	**A**	**N**
Napthalene (H132)	**A**	**N**
Polycyclic Organic Matter (H151)	**A**	**N**
Xylene (H186)	**A**	**N**

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
SO_2	N	See Comment	See Comment		See Comment

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

Item No. 3: **Boiler No. 1 (Emission Unit ID No. 001)**
Boiler No. 2 (Emission Unit ID No. 002)
Boiler No. 3 (Emission Unit ID No. 003)
Boiler No. 4 (Emission Unit ID No. 004)
Boiler No. 5 (Emission Unit ID No. 005)
Boiler No. 8 (Emission Unit ID No. 008)

Item No. 4: **The SO_2 emission cap is a daily limit of 14 tons per day.**

Item No. 6: **Permit No. 0990026-002-AV, Common Condition No. H.2 and AC50-42476/PSD-FL-077 dated 10/28/81.**

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SCG-FI-C1** ☐ Previously Submitted, Date:____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SCG-FI-C2** ☐ Previously Submitted, Date:____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:____ ☐ Previously Submitted, Date:____

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location:
   ☐ Attached, Document ID:____ ☒ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification:
   ☒ Attached, Document ID: **Part B**
3. Rule Applicability Analysis:
   ☒ Attached, Document ID: **SCG-FI-CC3**
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:____ ☒ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.):
   ☐ Attached, Document ID:____ ☒ Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.):
   ☐ Attached, Document ID:____ ☒ Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.):
   ☐ Attached, Document ID:____ ☒ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.):
   ☐ Attached, Document ID:____ ☒ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.):
   ☐ Attached, Document ID:____ ☒ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
    ☐ Attached, Document ID:____ ☒ Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:____ ☐ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
   ☐ Attached, Document ID:____ ☐ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
   ☐ Attached, Document ID:____
   ☐ Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
   ☐ Attached, Document ID:____
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
   ☐ Attached, Document ID:____
   ☐ Equipment/Activities On site but Not Required to be Individually Listed
   ☐ Not Applicable

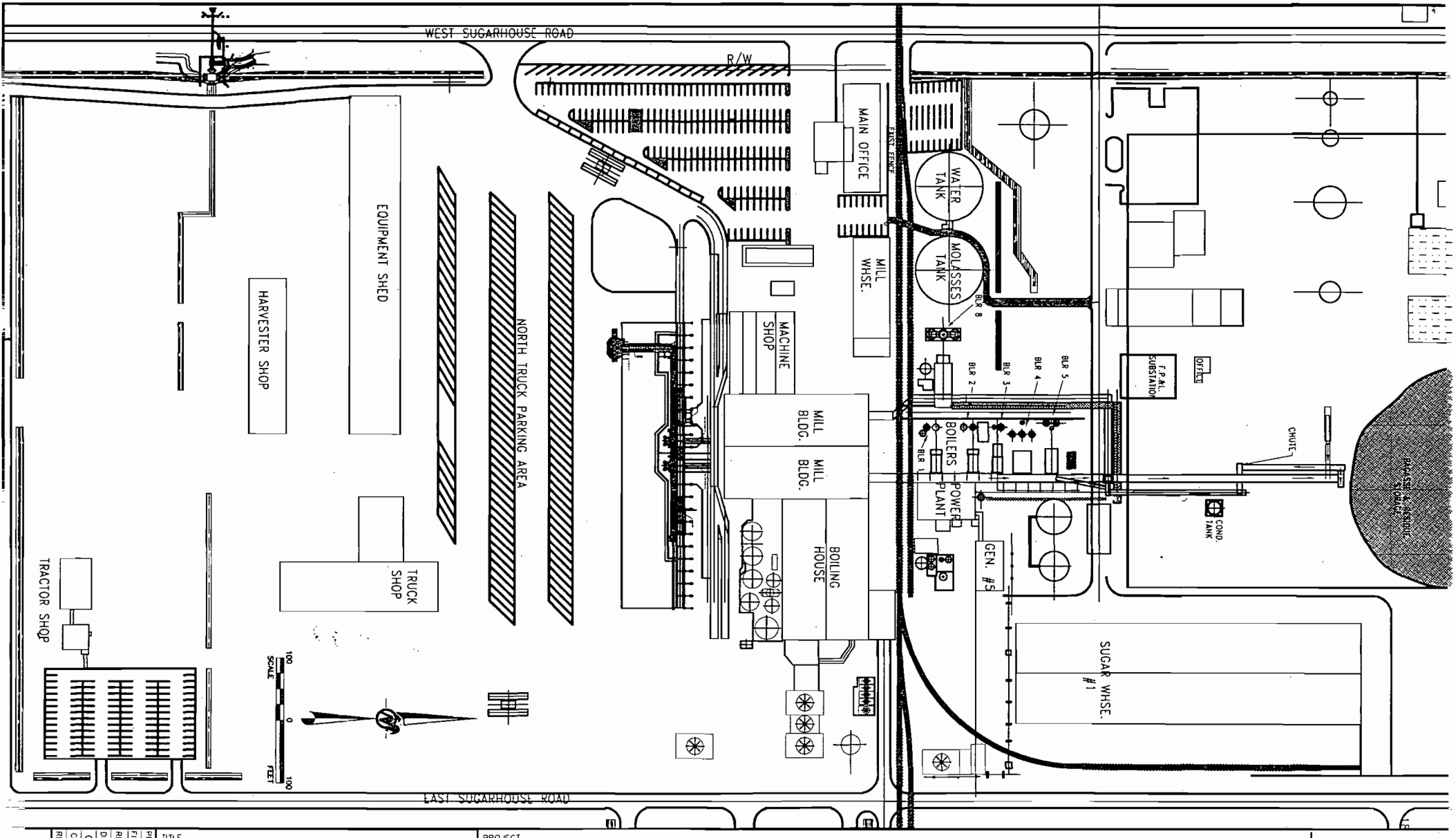
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:____ ☐ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID:____ ☐ Not Applicable

Additional Requirements Comment

ATTACHMENT SCG-FI-C1

FACILITY PLOT PLAN



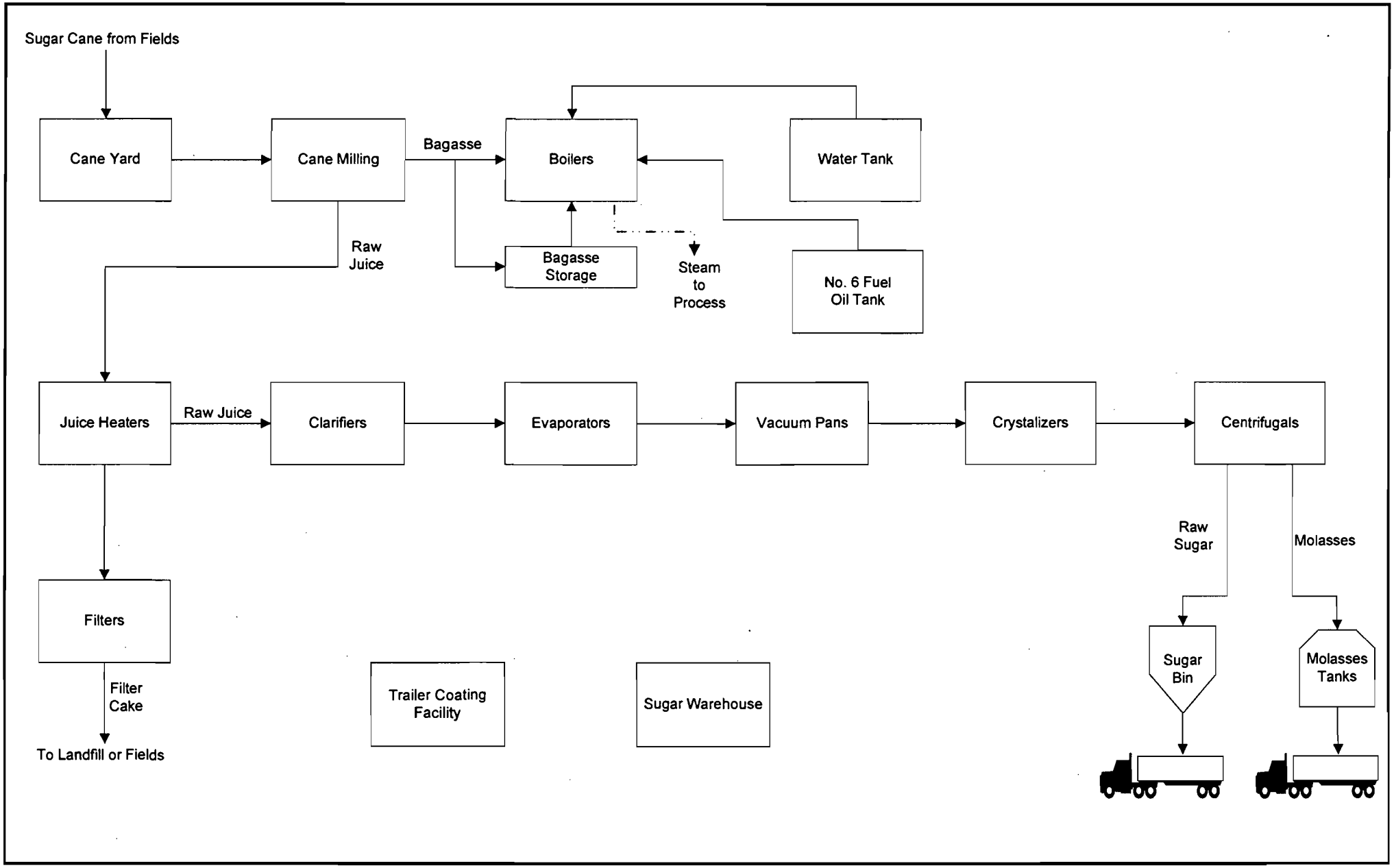
PROJECT No. 013-7571	TITLE	PROJECT	
FILE No. GSH-FI-C2.DWG	ATTACHMENT SCG-FI-CI FACILITY PLOT PLAN	SUGAR CANE GROWERS COOPERATIVE OF FLORIDA BELLE GLADE, FLORIDA	NOTE: ⊙ = STACK LOCATION
REV. SCALE			
DESIGN			
CADD AMB 1/7/03			
CHECK DB 1/8/03			
REVIEW			

Golder Associates

0237588/4/4.4/4.4.1 Boilers 4&5/SCG-FI-C1.dwg

ATTACHMENT SCG-FI-C2

PROCESS FLOW DIAGRAM



ATTACHMENT SCG-FI-C2
PROCESS FLOW DIAGRAM
SUGAR CANE GROWERS COOPERATIVE OF FLORIDA

Source: Golder, 2003.

Process Flow Legend:
Solid / Liquid
Gas
Steam

0237588/4/4.4/4.4.1 Boilers 4&5/SCG-FI-C2.vsd

11/25/03

Golder Associates

ATTACHMENT SCG-FI-CC3

RULE APPLICABILITY ANALYSIS

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.

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.

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

EMISSIONS UNIT REGULATIONS – BOILER NO. 4

List of Applicable Regulations

62-296.320(4)(b)4.a., F.A.C.: Visible Emissions Testing
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(7)(b), F.A.C.: General Compliance Test Requirements
62-297.310(7)(c), F.A.C: General Compliance Test Requirements
62-297.310(8), F.A.C: General Compliance Test Requirements
62-297.401(1-5), 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

EMISSIONS UNIT REGULATIONS – BOILER NO. 5

List of Applicable Regulations

62-296.320(4)(b)4.a., F.A.C.: Visible Emissions Testing
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(7)(b), F.A.C.: General Compliance Test Requirements
62-297.310(7)(c), F.A.C: General Compliance Test Requirements
62-297.310(8), F.A.C: General Compliance Test Requirements
62-297.401(1-5), 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

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

   ☒ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

   ☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

   ☒ 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).

   ☐ 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.

   ☐ 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. Description of Emissions Unit Addressed in this Section:
   Boiler No. 4

3. Emissions Unit Identification Number: **004**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A			**20**	☐ Yes ☒ No

9. Package Unit:
   Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
    This boiler is currently permitted to fire carbonaceous fuel (bagasse and residue) and fuel oil. The purpose of this application is to add the capability to also fire 100 MMBtu/hr of natural gas replacing some of the heat input currently supplied by firing fuel oil.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
   Multi-cyclone dust collector followed by two parallel Joy Turbulaire Type D wet impingement scrubbers

2. Control Device or Method Code(s): **002, 008**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate: **300,000 lb/hr steam (585°F, 400 PSIG)**	
3. Maximum Heat Input Rate: **572** million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
29 weeks/year	**4,800** hours/year
6. Operating Capacity/Schedule Comment: **Maximum production rate of 300,000 lb/hr steam is a 24-hour average.**	

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **BLR 4**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **180** feet	7. Exit Diameter: **9.46** feet
8. Exit Temperature: **159°F**	9. Actual Volumetric Flow Rate: **214,000** 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 Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: **Stack parameters based on compliance test performed November 25, 2002.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Bagasse**		
2. Source Classification Code (SCC): **1-02-011-01**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **79.44**	5. Maximum Annual Rate: **381,333**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **7.2**
10. Segment Comment: **Maximum hourly rate based on 572 MMBtu/hr from bagasse (max 24-hour average), and 3,600 Btu/lb (wet) minimum. Maximum annual rate based on 4,800 hours of operation per year.**		

Segment Description and Rate: Segment 2 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; No. 6 Fuel Oil**		
2. Source Classification Code (SCC): **1-02-004-01**	3. SCC Units: **Thousand Gallons Burned**	
4. Maximum Hourly Rate: **2.602**	5. Maximum Annual Rate: **12,490**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **2.4**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **151**
10. Segment Comment: **Maximum hourly rate based on 392.9 MMBtu/hr from fuel oil. Maximum annual rate based on 4,800 hours of operation per year.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Natural Gas (> 100 MMBtu/hr)**		
2. Source Classification Code (SCC): **1-02-006-01**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.10**	5. Maximum Annual Rate: **260**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,000**
10. Segment Comment: **Maximum hourly rate based on 100 MMBtu/hr from natural gas. Maximum annual rate based on 2,600 hours of operation per year.**		

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Solid Waste (Bagasse Residue)**		
2. Source Classification Code (SCC): **1-02-012-01**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **28.26**	5. Maximum Annual Rate: **135,649**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **17.8**
10. Segment Comment: **Maximum hourly rate based on 503.03 MMBtu/hr (24-hour average) from residue firing. Maximum annual rate based on 4,800 hours of operation per year.**		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	008	002	EL
NO_x			EL
VOC			EL
SO_2			EL
Methanol (H115)			NS
POM (H151)			NS

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **143** lb/hour **343** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.25 lb PM/MMBtu (Carbonaceous Fuels)** Reference: **Permitted PM emission rate for bagasse (worst-case fuel)**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.25 lb PM/MMBtu x 572 MMBtu/hr = 143 lb/hr** **Annual: 143 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 343.2 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: **Annual potential PM emissions based on 4,800 hr/yr of operation firing bagasse. Although Boiler No. 4 may also fire fuel oil and natural gas, firing bagasse results in worst-case PM emissions.**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.25 lb/MMBtu (Carbonaceous Fuels)**	4. Equivalent Allowable Emissions: **143** lb/hour **344** tons/year
5. Method of Compliance: **EPA Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AC50-42476/PSD-FL-077 dated 10/28/81.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.1 lb/MMBtu (Fossil Fuel)**	4. Equivalent Allowable Emissions: **31.5** lb/hour **75.7** tons/year
5. Method of Compliance: **EPA Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on firing No. 6 Fuel Oil at a maximum heat input rate for fuel oil of 315.25 MMBtu/hr. Annual allowable emissions based on 4,800 hr/yr of operation. Permit No. AC50-42476/ PSD-FL-077 dated 10/28/81.**	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **NO_x**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **327.0** lb/hour **784.8** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.65 lb/MMBtu (Residue Firing)** Reference: **Permitted maximum emission rate for firing worst-case fuel.**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.65 lb/MMBtu x 503.03 MMBtu/hr = 327.0 lb/hr** **Annual: 327.0 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 784.8 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.45 lb/MMBtu**	4. Equivalent Allowable Emissions: **257.4** lb/hour **617.8** tons/year
5. Method of Compliance: **EPA Method 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AO50-191735 dated 1/27/97, RACT Permit Amendment. Applies when firing bagasse @ 572 MMBtu/hr.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.65 lb/MMBtu**	4. Equivalent Allowable Emissions: **327.0** lb/hour **784.8** tons/year
5. Method of Compliance: **EPA Method 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Applies when firing bagasse residue @ 503.03 MMBtu/hr.**	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **400.4** lb/hour **961** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.7 lb VOC/MMBtu** Reference: **Permitted VOC Emission Rate**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.7 lb VOC/MMBtu x 572 MMBtu/hr = 400.4 lb/hr** **Annual: 400.4 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 961 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.7 lb/MMBtu**	4. Equivalent Allowable Emissions: **400.4** lb/hour **961** tons/year
5. Method of Compliance: **EPA Methods 25A and 18, combined.**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. 0990026-005-AC; dated 04/28/03.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1,099** lb/hour **2,638** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **2.4% S fuel oil** Reference: **Permit Limit**	7. Emissions Method Code: **3**
8. Calculation of Emissions: **Hourly: see Attachment SCG-EU1-F8** **Annual: 1,099 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 2,637.6 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **Maximum sulfur content of fuel = 2.4%**	4. Equivalent Allowable Emissions: **1,024** lb/hour **2,458** tons/year
5. Method of Compliance: **Record keeping of total fuel oil to Boiler Nos. 1 through 5 as described in the current Title V permit.**	
6. Allowable Emissions Comment (Description of Operating Method): **Construction Permit No. AC50-2334 dated.10/14/74 and Permit No. AC50-42476/PSD-FL-077 dated 10/28/81. See Attachment SCG-EU1-F8 for calculations.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE30**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **30** % Exceptional Conditions: **40** % Maximum Period of Excess Opacity Allowed: **2** min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Rule 62-296.410(1)(b)1, F.A.C.**	

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SCG-EU1-I1** ☐ Previously Submitted, Date ____

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SCG-EU1-I2** ☐ Previously Submitted, Date ____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SCG-EU1-I3** ☐ Previously Submitted, Date ____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: ____ ☐ Previously Submitted, Date ____
   ☒ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: ____ ☐ Previously Submitted, Date ____
   ☒ Not Applicable

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: ____
   Test Date(s)/Pollutant(s) Tested: ____
   ____
   ☐ Previously Submitted, Date: ____
   Test Date(s)/Pollutant(s) Tested: ____
   ____
   ☐ To be Submitted, Date (if known):____
   Test Date(s)/Pollutant(s) Tested: ____
   ____
   ☒ Not Applicable

   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute
   ☐ Attached, Document ID: ____ ☒ Not Applicable

EMISSIONS UNIT INFORMATION
Section [1] of [2]
Boiler No. 4

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID: ____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: ____ ☒ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: ____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements
   ☐ Attached, Document ID: ____ ☐ Not Applicable
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: ____ ☐ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: ____ ☐ Not Applicable
4. Alternative Modes of Operation (Emissions Trading)
   ☐ Attached, Document ID: ____ ☐ Not Applicable
5. Acid Rain Part Application
   ☐ Certificate of Representation (EPA Form No. 7610-1)
      ☐ Copy Attached, Document ID: ____
   ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
      ☐ Attached, Document ID: ____
      ☐ Previously Submitted, Date: ____
   ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
      ☐ Attached, Document ID: ____
      ☐ Previously Submitted, Date: ____
   ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
      ☐ Attached, Document ID: ____
      ☐ Previously Submitted, Date: ____
   ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
      ☐ Attached, Document ID: ____
      ☐ Previously Submitted, Date: ____
   ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
      ☐ Attached, Document ID: ____
      ☐ Previously Submitted, Date: ____
   ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
      ☐ Attached, Document ID: ____
      ☐ Previously Submitted, Date: ____
   ☐ Not Applicable

Additional Requirements Comment

ATTACHMENT SCG-EU1-F8

CALCULATION OF EMISSIONS

Attachment SCG-EU1-F8. SCGC Boiler No. 4 Maximum SO_2 Emissions Due to Bagasse/Residue and Fuel Oil Firing: 2.4% Sulfur Fuel Oil (11/11/2003)

	Boiler Design Rates				Steam Rate			Heat Input				SO_2 Emissions		
Boiler	Steam Rate (lb/hr)	Steam Enthalpy (Btu/lb)	Heat Input Total (MMBtu/hr)	Heat Input Oil Only (MMBtu/hr)	Total (lb/hr)	Bagasse or Residue (lb/hr)	Fuel Oil (lb/hr)	From Bagasse or Residue[a] (MMBtu/hr)	From Fuel Oil[b] (MMBtu/hr)	Fuel Oil Usage (gal/hr)	Bagasse or Residue Usage (lb/hr, dry)	Fuel Oil[b] (lb/hr)	Bagasse or Residue[c] (lb/hr)	Total (lb/hr)
					BAGASSE/OIL FIRING									
4	300,000	1,050	572.7	392.9	300,000	94,221	205,779	179.9	392.9	2,602	22,485	1,024.0	10.8	1,034.8
					RESIDUE/OIL FIRING									
4	300,000	1,050	504.0	392.9	300,000	66,131	233,869	111.1	392.9	2,602	12,483	1,024.1	74.9	1,099.0

(a) Based on 55% thermal efficiency for bagasse or bagasse/fuel oil firing, and 62.5% thermal efficiency for residue or residue/fuel oil firing.

(b) Assumes all sulfur in fuel oil is emitted out the stack.

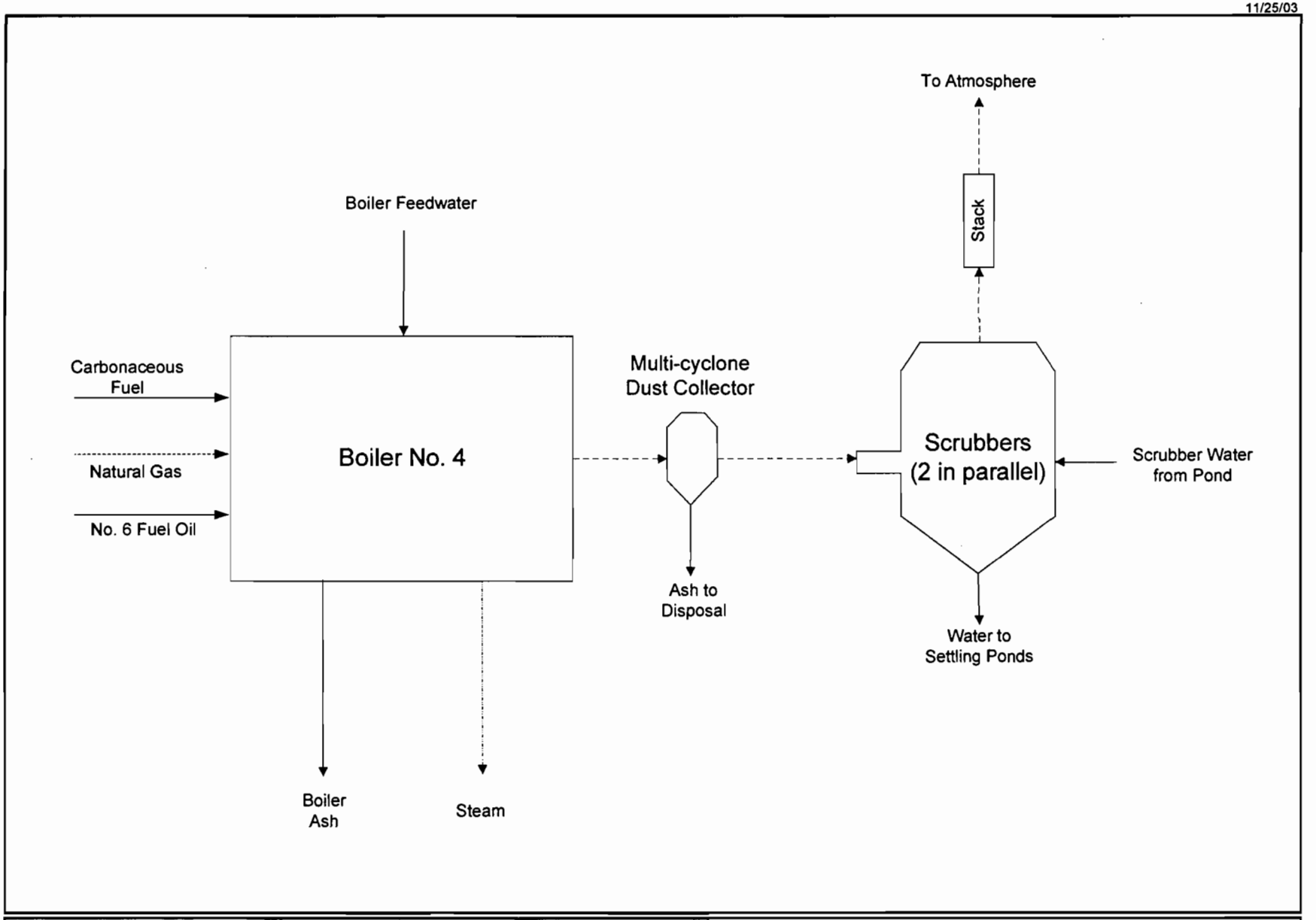
(c) Emission factor of 0.06 lb/MMBtu for SO_2 due to bagasse firing, based on industry test data. Sulfur content of residue assumed to be 0.5% (dry), with 40% removal in wet scrubbers.

Note: Fuel Oil- 2.4% Sulfur
18,415 Btu/lb; 151,000 Btu/gal
8.2 lb/gal
Bagasse - 8,000 Btu/lb (dry); 3,600 Btu/lb(wet)

ATTACHMENT SCG-EU1-I1

PROCESS FLOW DIAGRAM

11/25/03



Attachment SCG-EU1-I1
Process Flow Diagram

Source: Golder, 2003.

Process Area: Boiler No. 4

0237588/4/4.4/4.4.1 Boilers 4&5/SCG-EU1-I1.vsd

Latest Revision Date: 11/25/2003

Process Flow Legend:
Solid / Liquid
Gas
Steam

Golder Associates

ATTACHMENT SCG-EU1-I2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT SCG-EU1-I2

FUEL ANALYSIS AND SPECIFICATION

BOILER NO. 4

SUGAR CANE GROWERS COOPERATIVE OF FLORIDA

PARAMETER	BAGASSE*	RESIDUE*	NO. 6 FUEL OIL**
Dry Basis:			
Btu/lb	8,000	8,900	18,415
lb/gal	--	--	8.2
Btu/gal	--	--	151,000
AVERAGE ULTIMATE ANALYSIS: (Dry Basis %)			
			**
Carbon	49.5	51	87.3
Hydrogen	5.9	5	10.5
Nitrogen	0.35	0.4	0.28
Oxygen	42.4	35	0.64
Sulfur	0.06	0.4--0.6	2.4
Ash	1.74	1.9--8.0	0.1
Water	54	40	0.2

* Sources: Sugar Cane Growers Cooperative, 2003. 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 SCG-EU1-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT SCG-EU1-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

SUGAR CANE GROWERS COOPERATIVE OF FLORIDA

BOILER NO. 4

Control equipment: Multi-cyclone collector followed by two (2) Joy Turbulaire wet impingement scrubbers, custom design.

Scrubbing Liquid:	Water
Inlet Water Pressure (psi)	0-100
Pressure Drop Across Scrubber (Inches H_2O)	0-15

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☒ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

☒ 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).

☐ 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.

☐ 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. Description of Emissions Unit Addressed in this Section:
Boiler No. 5

3. Emissions Unit Identification Number: **005**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A			**20**	☐ Yes ☒ No

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
This boiler is currently permitted to fire carbonaceous fuel (bagasse and residue) and fuel oil. The purpose of this application is to add the capability to also fire 300 MMBtu/hr of natural gas as needed as a substitute for the heat input currently supplied by firing fuel oil.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:
Multicyclone Dust Collector followed by two parallel Joy Turbulaire Type D wet impingement scrubbers.

2. Control Device or Method Code(s): **002, 008**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate: **230,000 lb/hr steam (585°F, 400 PSIG)**	
3. Maximum Heat Input Rate: **439** million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
29 weeks/year	**4,800** hours/year
6. Operating Capacity/Schedule Comment: **Maximum production rate of 230,000 lb/hr steam is a 24-hour average.**	

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **BLR 5**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:		
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** feet
8. Exit Temperature: **157°F**	9. Actual Volumetric Flow Rate: **165,320** 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 Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: **Stack parameters based on compliance test performed November 26, 2002.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Bagasse**		
2. Source Classification Code (SCC): **1-02-011-01**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **60.972**	5. Maximum Annual Rate: **292,667**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **7.2**
10. Segment Comment: **Maximum hourly rate based on 439 MMBtu/hr for bagasse (maximum 24-hour average). Assumes minimum heating value for bagasse of 3,600 Btu/lb. Maximum annual rate based on 4,800 hours of operation per year.**		

Segment Description and Rate: Segment 2 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; No. 6 Fuel Oil**		
2. Source Classification Code (SCC):	3. SCC Units: **Thousand Gallons Burned (all liquid fuels)**	
4. Maximum Hourly Rate: **1.9993**	5. Maximum Annual Rate: **9,597**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **2.4**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **151**
10. Segment Comment: **Maximum hourly rate based on 301.9 MMBtu/hr from fuel oil. Maximum annual rate based on 4,800 hours of operation per year.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Natural Gas (> 100 MMBtu/hr)**		
2. Source Classification Code (SCC): **1-02-006-01**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.300**	5. Maximum Annual Rate: **780**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,000**
10. Segment Comment: **Maximum hourly rate based on 300 MMBtu/hr. Maximum annual rate based on 2,600 hours of operation per year.**		

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type): **External Combustion Boiler; Solid Waste (Bagasse Residue)**		
2. Source Classification Code (SCC): **1-02-012-01**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **21.71**	5. Maximum Annual Rate: **104,198**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **17.8**
10. Segment Comment: **Maximum hourly rate based on 386.4 MMBtu/hr from bagasse residue firing. Maximum annual rate based on 4,800 hours of operation per year.**		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	008	002	EL
NO_x			EL
VOC			EL
SO_2			EL

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **109.8** lb/hour **263.4** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.25 lb PM/MMBtu (Carbonaceous Fuels)** Reference: **Permitted PM emission rate for bagasse (worst-case fuel)**	7. Emissions Method Code: **0**

8. Calculation of Emissions:

Hourly: 0.25 lb PM/MMBtu x 439 MMBtu/hr = 109.8 lb/hr

Annual: 109.8 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 263.4 TPY

9. Pollutant Potential/Estimated Fugitive Emissions Comment:

Annual potential PM emissions based on 4,800 hr/yr of operation firing bagasse. Although Boiler No. 5 may also fire fuel oil and natural gas, firing bagasse results in worst-case PM emissions.

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.25 lb/MMBtu (Carbonaceous Fuels)**	4. Equivalent Allowable Emissions: **109.8** lb/hour **264** tons/year
5. Method of Compliance: **EPA Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AC50-42476/PSD-FL-077 dated 10/28/81.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.1 lb/MMBtu (Fossil Fuel)**	4. Equivalent Allowable Emissions: **30.2** lb/hour **72.5** tons/year
5. Method of Compliance: **EPA Method 5**	
6. Allowable Emissions Comment (Description of Operating Method): **Based on firing No. 6 Fuel Oil at a maximum heat input rate for fuel oil of 301.9 MMBtu/hr. Annual allowable emissions based on 4,800 hr/yr of operation. Permit No. AC50-42476/ PSD-FL-077 dated 10/28/81.**	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **NO_x**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **285.4** lb/hour **685** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.65 lb NO_x/MMBtu** Reference: **Permitted NO_x emission rate for bagasse residue.**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.65 lb NO_x/MMBtu x 439 MMBtu/hr = 285.4 lb/hr** **Annual: 285.4 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 684.8 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.45 lb/MMBtu**	4. Equivalent Allowable Emissions: **197.6** lb/hour **474** tons/year
5. Method of Compliance: **EPA Method 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AO50-191737 dated 1/27/97, RACT permit amendment. Applies when firing bagasse.**	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.65 lb/MMBtu**	4. Equivalent Allowable Emissions: **285.4** lb/hour **685** tons/year
5. Method of Compliance: **EPA Method 7E**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AO50-191737 dated 1/27/97, RACT permit amendment. Applies to firing bagasse residue.**	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **307.3** lb/hour **737.5** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.7 lb VOC/MMBtu** Reference: **Permitted VOC Emission Rate**	7. Emissions Method Code: **0**
8. Calculation of Emissions: **Hourly: 0.7 lb VOC/MMBtu x 439 MMBtu/hr = 307.3 lb/hr** **Annual: 307.3 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 737.5 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.7 lb/MMBtu**	4. Equivalent Allowable Emissions: **307.3** lb/hour **737.5** tons/year
5. Method of Compliance: **EPA Methods 25A and 18, combined.**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. 0990026-005-AC, dated 04/28/03.**	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **843.9** lb/hour **2,025** tons/year	4. Synthetically Limited? ☒ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **2.4% S Oil** Reference: **Permit Limit**	7. Emissions Method Code: **3**
8. Calculation of Emissions: **Hourly: see Attachment SCG-EU2-F8** **Annual: 843.9 lb/hr x 4,800 hr/yr x 1 ton/2,000 lb = 2,025.4 TPY**	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **Maximum sulfur content of fuel = 2.4%**	4. Equivalent Allowable Emissions: **786.9** lb/hour **1,889** tons/year
5. Method of Compliance: **Record keeping of total fuel oil to Boiler Nos. 1 through 5 as described in the current Title V permit.**	
6. Allowable Emissions Comment (Description of Operating Method): **Permit No. AC50-2047A dated 02/10/75 and Permit No. AC50-42476/PSD-FL-077 dated 10/28/81. See Attachment SCG-EU2-F8 for calculations.**	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE30**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **30** % Exceptional Conditions: **40** % Maximum Period of Excess Opacity Allowed: **2** min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Rule 62-296.410(1)(b)1, F.A.C.**	

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SCG-EU2-I1** ☐ Previously Submitted, Date ____

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SCG-EU2-I2** ☐ Previously Submitted, Date ____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☒ Attached, Document ID: **SCG-EU2-I3** ☐ Previously Submitted, Date ____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: ____ ☐ Previously Submitted, Date ____
   ☒ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: ____ ☐ Previously Submitted, Date ____
   ☒ Not Applicable

6. Compliance Demonstration Reports/Records
   ☐ Attached, Document ID: ____
   Test Date(s)/Pollutant(s) Tested: ____
   ____
   ☐ Previously Submitted, Date: ____
   Test Date(s)/Pollutant(s) Tested: ____
   ____
   ☐ To be Submitted, Date (if known):_____
   Test Date(s)/Pollutant(s) Tested: ____
   ____
   ☒ Not Applicable

   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute
   ☐ Attached, Document ID: ____ ☒ Not Applicable

EMISSIONS UNIT INFORMATION
Section [2] of [2]
Boiler No. 5

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID: _____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements
   ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Compliance Assurance Monitoring
   ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Alternative Methods of Operation
   ☐ Attached, Document ID: _____ ☐ Not Applicable
4. Alternative Modes of Operation (Emissions Trading)
   ☐ Attached, Document ID: _____ ☐ Not Applicable
5. Acid Rain Part Application
   ☐ Certificate of Representation (EPA Form No. 7610-1)
      ☐ Copy Attached, Document ID: _____
   ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
      ☐ Attached, Document ID: _____
      ☐ Previously Submitted, Date: _____
   ☐ Not Applicable

Additional Requirements Comment

ATTACHMENT SCG-EU2-F8

CALCULATION OF EMISSIONS

Attachment SCG-EU2-F8. SCGC Boiler No. 5 Maximum SO_2 Emissions Due to Bagasse/Residue and Fuel Oil Firing: 2.4% Sulfur Fuel Oil (11/11/2003)

	Boiler Design Rates				Steam Rate			Heat Input				SO_2 Emissions		
			Heat Input											
Boiler	Steam Rate (lb/hr)	Steam Enthalpy (Btu/lb)	Total (MMBtu/hr)	Oil Only (MMBtu/hr)	Total (lb/hr)	Bagasse or Residue (lb/hr)	Fuel Oil (lb/hr)	From Bagasse or Residue[a] (MMBtu/hr)	From Fuel Oil[b] (MMBtu/hr)	Fuel Oil Usage (gal/hr)	Bagasse or Residue Usage (lb/hr, dry)	Fuel Oil[b] (lb/hr)	Bagasse or Residue[c] (lb/hr)	Total (lb/hr)
					BAGASSE/OIL FIRING									
5	230,000	1,050	439.1	301.9	230,000	71,862	158,138	137.2	301.9	1,999.3	17,149	786.9	8.2	795.2
					RESIDUE/OIL FIRING									
5	230,000	1,050	386.4	301.9	230,000	50,298	179,702	84.5	301.9	1,999.3	9,494	786.9	57.0	843.9

(a) Based on 55% thermal efficiency for bagasse or bagasse/fuel oil firing, and 62.5% thermal efficiency for residue or residue/fuel oil firing.

(b) Assumes all sulfur in fuel oil is emitted out the stack.

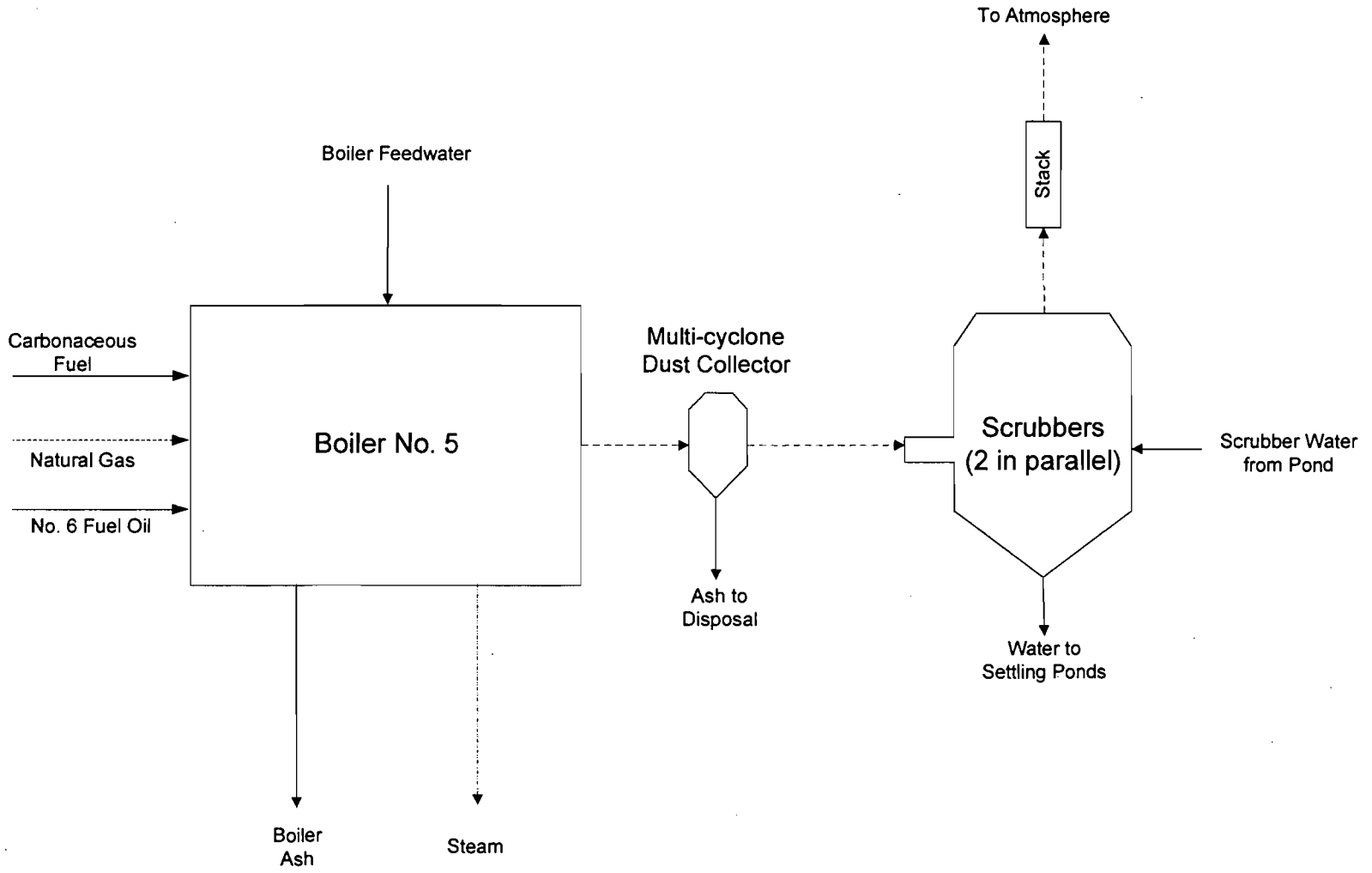
(c) Emission factor of 0.06 lb/MMBtu for SO_2 due to bagasse firing, based on industry test data. Sulfur content of residue assumed to be 0.5% (dry), with 40% removal in wet scrubbers.

Note: Fuel Oil- 2.4% Sulfur
18,415 Btu/lb; 151,000 Btu/gal
8.2 lb/gal
Bagasse - 8,000 Btu/lb (dry); 3,600 Btu/lb(wet)
Residue - 8,900 Btu/lb (dry)

ATTACHMENT SCG-EU2-I1

PROCESS FLOW DIAGRAM

11/25/03



Attachment SCG-EU2-I1
Process Flow Diagram

Source: Golder, 2003.

Process Area: Boiler No. 5

0237588/4/4.4/4.4.1 Boilers 4&5/SCG-EU2-I1.vsd

Latest Revision Date: 11/25/2003

Process Flow Legend:
Solid / Liquid
Gas
Steam

Golder Associates

ATTACHMENT SCG-EU2-I2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT SCG-EU2-I2

FUEL ANALYSIS AND SPECIFICATION

BOILER NO. 5

SUGAR CANE GROWERS COOPERATIVE OF FLORIDA

PARAMETER	BAGASSE*	RESIDUE*	NO. 6 FUEL OIL**
Dry Basis:			
Btu/lb	8,000	8,900	18,415
lb/gal	--	--	8.2
Btu/gal	--	--	151,000
AVERAGE ULTIMATE ANALYSIS: (Dry Basis %)			
			**
Carbon	49.5	51	87.3
Hydrogen	5.9	5	10.5
Nitrogen	0.35	0.4	0.28
Oxygen	42.4	35	0.64
Sulfur	0.06	0.4--0.6	2.4
Ash	1.74	1.9--8.0	0.1
Water	54	40	0.2

* Sources: Sugar Cane Growers Cooperative, 2003. 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 SCG-EU2-I3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

ATTACHMENT SCG-EU2-I3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

SUGAR CANE GROWERS COOPERATIVE OF FLORIDA

BOILER NO. 5

Control equipment: Multi-cyclone collector followed by two (2) Joy Turbulaire wet impingement scrubbers, custom design.

Scrubbing Liquid:	Water
Inlet Water Pressure (psi)	0-100
Pressure Drop Across Scrubber (Inches H_2O)	0-15

PART B

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, sugarcane is ground to remove the sugarcane 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.

Boiler Nos. 4 and 5 are currently operating under Title V Permit No. 0990026-004-AV. Boiler No. 4 has a maximum 24-hour average heat input rate of 572 million British thermal units per hour (MMBtu/hr). The total heat input can be supplied by firing solely bagasse, bagasse and residue, or a combination of bagasse and residue supplemented by firing No. 6 fuel oil. Boiler No. 4 currently has four (4) identical No. 6 fuel oil burners capable of providing a total of 393 MMBtu/hr of heat input.

Boiler No. 5 has a maximum 24-hour average heat input rate of 439 MMBtu/hr. The total heat input can be supplied by firing solely bagasse, bagasse and residue, or a combination of bagasse and residue supplemented by firing No. 6 fuel oil. Boiler No. 5 currently has three (3) identical No. 6 fuel oil burners with a maximum total heat input rate of 302 MMBtu/hr.

Due to cost considerations, fossil fuels are only fired in the boilers when bagasse, the primary fuel, is unavailable in sufficient quantity or quality to meet the steam requirements of the facility or during boiler start up. Note that the facility has not burned bagasse residue in several years, since the shutdown of the adjacent Great Lakes Chemical plant.

SCGCF is proposing to add the capability to fire natural gas as a substitute for No. 6 fuel oil in Boiler Nos. 4 and 5. SCGCF is proposing to modify one of the existing burners in Boiler No. 4 so that it can also fire natural gas at a maximum rate of 100 MMBtu/hr. For Boiler No. 5, SCGCF is proposing to modify all three existing burners to also fire natural gas at a total maximum heat input rate of 300 MMBtu/hr (i.e., three burners at 100 MMBtu/hr each). The current fuel oil firing capabilities of the existing burners will be retained after modification of the burners.

SCGCF is proposing to fire natural gas in each boiler up to an equivalent of 2,600 hours per year (hr/yr). This equates to a maximum of 260 MMscf/yr (260,000 MMBtu/yr) of gas in Boiler No. 4 and 780 MMscf/yr (780,000 MMBtu/yr) of gas in Boiler No. 5.

The proposed project can be completed without modification of the conditions in the existing Title V permit, except to include natural gas in the list of allowable fuels. Bagasse and residue firing rates, bagasse and residue heat input rates, and maximum steam rates for Boiler Nos. 4 and 5 will not change as a result of the proposed project. Since natural gas will only be used as a substitute for fuel oil, and fossil fuel is used as only a high-cost alternative to bagasse and residue, the annual heat input rate from firing fossil fuels will not increase as a result of the proposed project. SCGCF does not intend to burn any additional fossil fuels as a result of this project. Fossil fuel burning is currently minimized to the extent possible due to the high cost of such fuels and SCGCF is looking at ways to reduce fossil fuel firing. However, fossil fuels must be burned at times, such as during startup or to supplement the combustion process. The addition of natural gas burning capabilities will allow SCGCF the option of burning either oil, gas, or both when fossil fuels are needed.

Emission limits for those criteria pollutants regulated in the current Title V permit for Boiler Nos. 4 and 5 [particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO_2) through fuel sulfur content limits, and volatile organic compounds (VOCs)], will not increase above permitted levels as a result of firing natural gas as a substitute for No. 6 fuel oil. Based on the best available data, emissions of carbon monoxide (CO) may increase compared to fuel oil firing, but this increase will be less than the prevention of significant deterioration (PSD) significant emission rate for CO of 100 tons per year (TPY).

SCGCF is planning on implementing the proposed changes to the burners for Boiler Nos. 4 and 5 over the next 5 years.

2.0 AIR EMISSIONS

Hourly and annual emission estimates for firing natural gas in Boiler Nos. 4 and 5 are presented in Tables 1 and 2, respectively. These estimates are based on AP-42 emission factors for PM, SO_2, and VOCs, vendor performance data for NO_x and CO, and the equivalent of 2,600 hr/yr of firing natural gas in each boiler. The existing Title V permit specifically limits emissions of PM, NO_x, SO_2 (through limitations of the sulfur content of the fuel), and VOCs. Emissions of CO are not limited in the Title V Permit.

As shown in Table 3, emissions of PM, NO_x, and SO_2 from natural gas firing in Boiler Nos. 4 and 5 are significantly less than emissions from firing No. 6 fuel oil. Emissions of CO and VOC while

firing natural gas are greater than those for firing an equivalent amount of No. 6 fuel oil on a heat input basis.

3.0 REGULATORY APPLICABILITY

The following discussion pertains to the federal and state air regulatory requirements and their applicability to the proposed increase in fuel oil firing rate.

3.1 NEW SOURCE REVIEW

Under federal and State of Florida Prevention of Significant Deterioration (PSD) review requirements, all major new or modified sources of air pollutants regulated under the Clear Air Act (CAA) must be reviewed and a pre-construction permit issued. Florida's State Implementation Plan, which contains PSD regulations, has been approved by EPA; therefore, PSD approval authority has been granted to the Florida Department of Environmental Protection (FDEP).

A "major facility" is defined as any one of 28 named source categories that have the potential to emit 100 TPY or more or any other stationary facility that has the potential to emit 250 TPY or more of any pollutant regulated under CAA. "Potential to emit" means the capability, at maximum design capacity, to emit a pollutant after the application of control equipment. A "major modification" is defined under PSD regulations as a change at an existing major facility that increases actual emissions by greater than PSD significant emission rates.

SCGCF is an existing major facility, for purposes of new source review, since potential emissions of criteria pollutants from the facility are above major source thresholds. In order to determine the potential increase in actual emissions due to the proposed modification of the burners, maximum annual emission rates due to firing natural gas for an equivalent of 2,600 hr/yr in both Boiler Nos. 4 and 5 were calculated. These emission rates were compared to firing No. 6 fuel oil at the same equivalent heat input rates. This comparison was performed because natural gas will replace fuel oil on an equivalent heat input basis, and total fossil fuel firing will not increase as a result of this project.

As shown in Table 4, actual annual emissions of PM, SO_2, and NO_x will decrease as a result of the proposed project. Also as shown in Table 4, actual annual emissions of CO and VOCs are estimated to increase by 69.1 and 0.2 TPY, respectively, based on burning the maximum amount of natural gas. However, these increases in actual annual emissions are well below the PSD significant emission

rates for CO and VOC of 100 and 40 TPY, respectively. Therefore, PSD review does not apply to the proposed project.

3.2 NEW SOURCE PERFORMANCE STANDARDS

The New Source Performance Standards (NSPS) are a set of national emission standards that apply to specific categories of new sources. NSPS Subpart Db is applicable to each steam-generating unit for which construction, modification, or reconstruction is commenced after June 9, 1984, and that has a maximum design heat input rate of 100 MMBtu/hr or greater. Subpart Db regulates SO_2, NO_x and PM emissions from steam generating units.

Boiler Nos. 4 and 5 are "existing facilities" under the NSPS definitions, and are not currently subject to Subpart Db. To become subject to NSPS, the proposed changes to Boiler Nos. 4 and 5 would need to meet the definition of "modification" as defined by 40 CFR 60.2. Modification is defined as:

> "Any physical change in, or change in method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted."

The emission increase is based on hourly emissions. To determine if the proposed changes to Boiler No. 4 and 5 qualify as a modification, future hourly emissions due to natural gas burning were compared to current actual emissions due to No. 6 fuel oil firing for SO_2, NO_x and PM. These are the pollutants regulated under 40 CFR 60, Subpart Db. Since natural gas will only replace fuel oil burning, and the fossil fuel heat input rate is not increasing, this comparison was based on emission factors in terms of lb/MMBtu heat input. As shown in Table 5, future emission factors for PM, NO_x, or SO_2 while firing natural gas are less than current emission rates for these pollutants while firing No. 6 fuel oil. As a result, emissions of PM, NO_x, or SO_2 will not increase on an hourly basis due to natural gas firing. Therefore, the proposed changes to Boiler Nos. 4 and 5 will not result in a modification and will not trigger NSPS Subpart Db requirements.

Table 1. Calculation of Maximum Hourly and Annual Emission Rates from Firing 100 MMBtu/hr of Natural Gas in Boiler No. 4

Regulated Pollutant	Emission Factor ($lb/10^6$ scf)	Emission Factor (lb/MMBtu)	Activity Factor Hourly[a] (10^6 scf/hr)	Activity Factor Annual[b] (10^6 scf/yr)	Emission Rate (lb/hr)	Emission Rate (TPY)
Particulate Matter (PM)	7.6	0.0076	0.10	260	0.76	0.99
Sulfur Dioxide (SO_2)	0.6	0.00060	0.10	260	0.060	0.08
Nitrogen Oxides (NO_x)	200[c]	0.20	0.10	260	20.0	26.00
Carbon Monoxide (CO)	166[d]	0.166	0.10	260	16.6	21.58
Volatile Organic Compounds (VOC)	5.5	0.0055	0.10	260	0.55	0.72

Footnotes:

[a] Based on modification to the boiler to allow firing of 100 MMBtu/hr of natural gas and a heating value of 1,000 Btu/scf.

[b] Based on 260,000 MMBtu/yr of natural gas firing, equivalent to 2,600 hr/yr at maximum firing rate.

[c] Based on a 0.20 lb/MMBtu NO_x emission factor provided by Babcock Power Systems and a heating value of natural gas of 1,000 Btu/scf (0.20 lb/MMBtu x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf /10^6 scf = 200 lb/10^6 scf).

[d] Based on a vendor guarantee for CO of 200 ppm at 3% O_2, dry, and the following calculations:

Exhaust flow rate (20% excess air [equivalent to 3% O_2], standard conditions, dry) = 100 MMBtu/hr x 1 scf/1,000 Btu x 1x10^6 Btu/MMBtu x 11.442 ft^3 exhaust/ft^3 natural gas = 1,144,200 scf/hr.

CO Emissions (lb/hr) = 200/10^6 x 2116.8 lb_f/ft^2 x 1,144,200 scf/hr x 28/(1545.6 ft-lb_f/lb_m deg. R) x 1/528 deg. R = 16.6 lb/hr

CO Emissions (lb/10^6 ft^3 natural gas) = 16.6 lb/hr /100 MMBtu/hr x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf/10^6 scf = 166 lb/10^6 scf

Table 2. Calculation of Maximum Hourly and Annual Emission Rates from Firing 300 MMBtu/hr of Natural Gas in Boiler No. 5

Regulated Pollutant	Emission Factor		Activity Factor		Emission Rate	
			Hourly[a]	Annual[b]		
	(lb/10^6 scf)	(lb/MMBtu)	(10^6 scf/hr)	(10^6 scf/yr)	(lb/hr)	(TPY)
Particulate Matter (PM)	7.6	0.0076	0.30	780	2.28	2.96
Sulfur Dioxide (SO_2)	0.6	0.00060	0.30	780	0.18	0.23
Nitrogen Oxides (NO_x)	200[c]	0.20	0.30	780	60.00	78.00
Carbon Monoxide (CO)	166[d]	0.166	0.30	780	49.86	64.82
Volatile Organic Compounds (VOC)	5.5	0.0055	0.30	780	1.65	2.15

Footnotes:

[a] Based on modification to the boiler to allow firing of 300 MMBtu/hr of natural gas and a heating value of 1,000 Btu/scf.

[b] Based on 780,000 MMBtu/yr of natural gas firing, equivalent to 2,600 hr/yr at maximum firing rate.

[c] Based on a 0.20 lb/MMBtu NO_x emission factor provided by Babcock Power Systems and a heating value of natural gas of 1,000 Btu/scf (0.20 lb/MMBtu x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf /10^6 scf = 200 lb/10^6 scf).

[d] Based on a vendor guarantee for CO of 200 ppm at 3% O_2, dry, and the following calculations:

Exhaust flow rate (20% excess air [equivalent to 3% O_2], standard conditions, dry) = 300 MMBtu/hr x 1 scf/1,000 Btu x 1x10^6 Btu/MMBtu x 11.442 ft^3 exhaust/ft^3 natural gas = 3,432,600 scf/hr

CO Emissions (lb/hr) = 200/10^6 x 2116.8 lb_f/ft^2 x 3,432,600 scf/hr x 28/(1545.6 ft-lb_f/lb_m deg. R) x 1/528 deg. R = 49.86 lb/hr

CO Emissions (lb/10^6 ft^3 natural gas) = 49.86 lb/hr /300 MMBtu/hr x 1 MMBtu/10^6 Btu x 1,000 Btu/scf x 1,000,000 scf/10^6 scf = 166 lb/10^6 scf

Table 3. Comparison of Hourly and Annual Emission Rates from No. 6 Fuel Oil and Natural Gas Firing in Boiler Nos. 4 and 5 Assuming an Equivalent Heat Input Rate for Both Fuels

	No. 6 Fuel Oil				Natural Gas			
Regulated Pollutant	Emission Factor[a] ($lb/10^3$ gal.)	Activity Factor[b] (10^3 gal/hr)	Emission Rate lb/hr	Emission Rate TPY[h]	Emission Factor[c] ($lb/10^6$ scf)	Activity Factor[b] (10^6 scf/hr)	Emission Rate lb/hr	Emission Rate TPY[h]
			Boiler No. 4 @ 100 MMBtu/hr					
Particulate Matter (PM)	14.1[d]	0.662	9.3	12.1	7.6	0.10	0.76	0.99
Sulfur Dioxide (SO_2)	393.6[e]	0.662	260.6	338.7	0.6	0.10	0.06	0.078
Nitrogen Oxides (NO_x)	47	0.662	31.1	40.4	200[f]	0.10	20	26.0
Carbon Monoxide (CO)	5	0.662	3.3	4.30	166[g]	0.10	16.6	21.6
Volatile Organic Compounds (VOCs)	0.76	0.662	0.5	0.65	5.5	0.10	0.55	0.72
			Boiler No. 5 @ 300 MMBtu/hr					
Particulate Matter (PM)	14.1[d]	1.987	28.0	36.4	7.6	0.30	2.28	2.96
Sulfur Dioxide (SO_2)	393.6[e]	1.987	782.1	1,016.7	0.6	0.30	0.18	0.23
Nitrogen Oxides (NO_x)	47	1.987	93.4	121.4	200[f]	0.30	60.0	78.0
Carbon Monoxide (CO)	5	1.987	9.9	12.92	166[g]	0.30	49.8	64.7
Volatile Organic Compounds (VOCs)	0.76	1.987	1.5	1.96	5.5	0.30	1.65	2.15

Footnotes:

[a] These emission factors are from AP-42, Tables 1.3-1 and 1.3-3, unless otherwise noted.

[b] For Boiler No. 4, the equivalent heat input rate is generated by firing 662 gal./hr of No. 6 fuel oil (heating value of 151,000 Btu/gal) or 100,000 scf of Natural Gas (heat content of 1,000 Btu/scf). For Boiler No. 5, the equivalent heat input rate is generated by firing 1,987 gal./hr of No. 6 fuel oil or 300,000 scf/hr of natural gas.

[c] These emission factors are from AP-42, Tables 1.4-1 and 1.4-2, unless otherwise noted.

[d] Based on the current PM emission limit of 0.1 lb/MMbtu for firing No. 6 fuel oil in Boiler Nos. 4 and 5, instead of the AP-42 emission factor of 9.19(S) + 3.22, where S is the sulfur content of the fuel, in this case 2.4%, which yields an emission factor of 25.3 $lb/10^3$ gal. At a heat content for No. 6 fuel oil of 151,000 Btu/gal this emission factor is equivalent to 0.18 lb/MMBtu. Since the AP-42 emission factor is higher than the permit limit and is based on no control, the permit limit of 0.1 lb/MMBtu, which is equivalent to 14.1 $lb/10^3$ gal., was used for this comparison.

[e] Calculated stoichiometrically based on a No. 6 fuel oil density of 8.2 lb/gal. and a sulfur content of the oil of 2.4% by weight:

Emission Factor ($lb/10^3$ gal.) = 8.2 lb/gal x 2.4 lb S/100 lb oil x 2 lb SO_2/lb S x 1,000 gal./10^3 gal. = 393.6 $lb/10^3$ gal.

[f] See footnote c in Tables 1 and 2.

[g] See footnote d in Tables 1 and 2.

[h] Based on equivalent of 2,600 hr/yr of operation.

Table 4. Summary of the Increase in Annual Emission Due to the Project and Comparison with Significant Emission Rates

Regulated Pollutant	Annual Emissions for No. 6 Fuel Oil Firing[a] (TPY)			Annual Emissions for Natural Gas Firing[a] (TPY)			Net Change in Annual Emission (TPY)	PSD Significant Emission Rate (TPY)	PSD Review Triggered? (Yes/No)
	Boiler No. 4	Boiler No. 5	Total	Boiler No. 4	Boiler No. 5	Total			
Particulate Matter (TSP)	12.1	36.4	48.6	0.99	2.96	4.0	-44.6	25	No
Particulate Matter (PM_{10})	12.1	36.4	48.6	0.99	2.96	4.0	-44.6	15	No
Sulfur Dioxide (SO_2)	338.7	1,016.7	1,355.4	0.078	0.23	0.3	-1,355.1	40	No
Nitrogen Oxides (NO_x)	40.4	121.4	161.9	26.0	78.0	104.0	-57.9	40	No
Carbon Monoxide (CO)	4.30	12.92	17.2	21.6	64.7	86.3	69.1	100	No
Volatile Organic Compounds (VOCs)	0.65	1.96	2.6	0.72	2.15	2.9	0.2	40	No

Footnote:

[a] Based on an equivalent of 2,600 hr/yr of operation.

Table 5. Comparison of Hourly PM, SO_2, and NO_x Emission Rates From No. 6 Fuel Oil and Natural Gas Firing in Boiler Nos. 4 and 5

Regulated Pollutant	Emission Rate for No. 6 Fuel Oil Firing in Boilers Nos. 4 and 5 (lb/MMBtu)	Emission Rate for Natural Gas Firing in Boilers Nos. 4 and 5[d] (lb/MMBtu)
Particulate Matter (PM)	0.1[a]	0.0076
Sulfur Dioxide (SO_2)	2.61[b]	0.00060
Nitrogen Oxides (NO_x)	0.31[c]	0.20

Footnotes:

[a] See footnote d in Table 3.

[b] Calculated stoichiometrically based on a No. 6 fuel oil density of 8.2 lb/gal. and a sulfur content of the oil of 2.4% by weight:

Emission Factor (lb/MMBtu) = 8.2 lb/gal x 2.4 lb S/100 lb oil x 2 lb SO_2/lb S x 1 gal./151,000 Btu x 10^6 Btu/MMBtu = 2.61 lb/MMBtu

[c] Based on an AP-42 emission factor of 47 lb $NO_x/10^3$ gal. of No. 6 fuel oil fired and a heating value of No. 6 fuel oil of 151,000 Btu/gal., the emission factor is calculated as follows:

Emission Factor (lb/MMBtu) = 47 lb/10^3 gal. x 1 gal./151,000 Btu x 10^3 gal./1000 gal. x 10^6 Btu/MMBtu = 0.31 lb/MMBtu

[d] Refer to Tables 1 and 2.

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STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared **Wendy Elliott**, 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, **Notice** in the matter of **Air Construction Permit** was published in said newspaper in the issues of **August 7, 2004**. 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.

Wendy Elliott

Sworn to and subscribed before 9th day of August, A.D. 2004

Karen M McLinton

Personally known XX or Produced Identification_____
Type of Identification Produced_____

NOTARY PUBLIC STATE OF FLORIDA
KAREN M McLINTON
MY COMMISSION # CC 979669
EXPIRES: Nov 15, 2004
1-800-3-NOTARY FL Notary Service & Bonding, Inc.

RECEIVED
AUG 30 2004
BUREAU OF AIR REGULATION

NO. 1491558
PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Draft Air Permit No.: 0990026-008-AC
Sugar Cane Growers Cooperative of Florida
Glades Sugar House
Addition of Natural Gas to Existing Boilers 4 and 5

The Department of Environmental Protection (Department) gives notice if its intent to issue an air construction permit to Sugar Cane Growers Cooperative of Florida (applicant) to modify the existing oil burners in Boilers 4 and 5 to accommodate natural gas as an additional supplementary fuel. The existing sugar mill boilers operate at the Glades Sugar House, which is located on West Sugar Road, Belle Glade, Palm Beach County, Florida. The applicant's authorized representative is Mr. Jose F. Alvarez, Vice President Planning and Plant Operations. The applicant's mailing address is: Sugar Cane Growers Cooperative of Florida, Post Office Box 666, Belle Glade, Florida 33430-0666.

The applicant operates an existing sugar mill and boiling house where sugar cane is milled and pressed. The raw juice is clarified, crystallized, and centrifuges. Steam requirements are furnished by six boilder fhat fire bagasse as the primary fuel. Bagasse is the fibrous, vegetative material remaining after sugarcane is milled. Each boiler also fires No. 6 fuel oil as a startup and supplementary fuel. The combustion of fuels results in emissions of carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds. The applicant proposes to modify the existing oil burners for Boilers 4 and 5 to also accommodate natural gas as an additional startup and supplementary fuel.

Boilers 4 and 5 were originally constructed on the 1970s and are not curretly subject to Subpart Db of the federal New Source Performance Standards (NSPS). The burner project is not considered an NSPS modification because it will not increase the hourly emission rates of pullutants regulated by Subpart Db. In addition, the cost of the burner modification is well below 50% of the capital cost to replace a unit and is therefore not considered "reconstruction" as defined by the NSPS. Therefore, the project does not trigger the Subpart Db requirements.

The existing plant is a major facility in accordance Rule 62-212.400, F.A.C., the preconstruction review program for the Prevention of Significant Deterioration (PSD) of Air Quality. As restricted by the proposed conditions of the draft permit, all emissions increases from the project will be less than the PSD significant emissions rates and the project is not subject to PSD preconstruction review. Therefore, the burner modification will be authorized in a minor source air construction permit.

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 form 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 adminsitrative hearing is filed pursuant to Section 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 substanital interests are affected by the proposed permitting decision may petition for an adminsitrative proceeding (hearing) under Seotions 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 aplicant 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 unbder 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 and administrative determination (hearing) under Section 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 substanital 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 indicatd; (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 releif sought by the petitioner, stating precisely the action petitioners 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 petiton means that the Department's final action may be different from the position taken by it in this notice. Persons whose substanital 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, Ste 4)
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

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

Palm Beach County Health Department
Air Pollution Control Section
(901 Evernia Street)
P.O. Box 29
West Palm Beach, Florida 33402
Telephone: 561/355-3070

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
August 7, 2004

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

7001 0320 0001 3692 6686

OFFICIAL USE

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

Postmark Here

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

PS Form 3800, January 2001 — See Reverse for Instructions

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:
Jose F. Alvarez, Sr. Vice
resident - Planning Operations
ar Cane Growers Cooperative
f Florida
port Road
t Office Box 666
lle Glade, Florida 33430-0666

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) SONIA VASQUEZ C. Date of Delivery 7/26/04

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

Article Number (Transfer from service label) 7001 0320 0001 3692 6686
7001 0320 0001 3692 6686

PS Form 3811, August 2001 — Domestic Return Receipt — 102595-02-M-1540

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

RECEIVED
JUL 30 2014
BUREAU OF AIR REGULATION

• Sender: Please print your name, address, and ZIP+4 in this box •

Dept of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd , MS 5505
Tallahassee, FL 32399-2400

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

7000 0600 0026 4129 8825

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

Postmark Here

Recipient's Name *(Please Print Clearly) (to be completed by mailer)*
Mr. Jose Alvarez, Sugar Cane Growers
Street, Apt. No.; or PO Box No.
P.O. Box 666
City, State, ZIP+4
Belle Glade, FL 33430-0666

PS Form 3800, February 2000 — See Reverse for Instructions

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
Vice President Planning and
Plant Operations
Glades Sugar House
Sugar Cane Growers Cooperative
of Florida
P. O. 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: 3/11/04

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

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

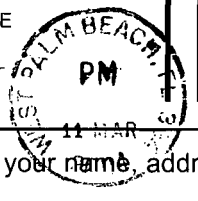
3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2 Article Number *(Copy from service label)*
7000 0600 0026 4129 8825

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

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

RECEIVED
MAR 15 2004
BUREAU OF AIR REGULATION

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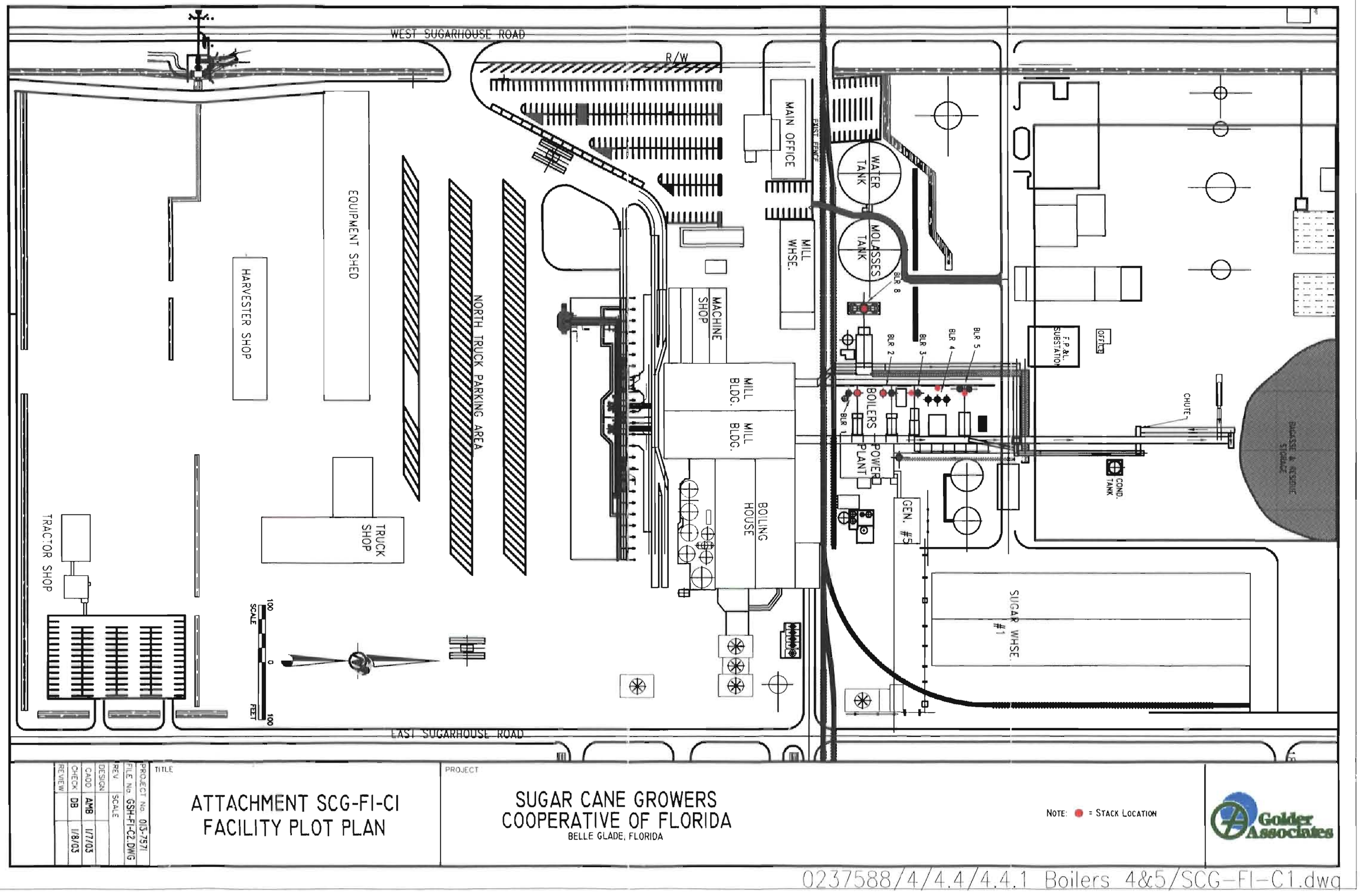

0237588/4/4.4/4.4.1 Boilers 4&5/SCG-FI-C1.dwg