

**Golder Associates Inc.**

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



September 2, 2003

0237588

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

RECEIVED

SEP 03 2003

Attention: Mr. A. A. Linero, P.E., New Source Review Section

BUREAU OF AIR REGULATION

RE: SUGAR CANE GROWERS COOPERATIVE OF FLORIDA  
FACILITY ID NO. 0990026  
REQUEST TO ADJUST OPERATING HOURS  
PERMIT NOS. 0990026-004-AV AND AC50-42467/PSD-FL-077  
*0990026-007-AC*

Dear Mr. Linero:

Sugar Cane Growers Cooperative of Florida, Inc. (SCGCF) operates a sugar mill located on West Sugar House Road in Belle Glade, Palm Beach County, Florida. At the mill, sugar cane is ground to remove the sugar cane juice. The remaining fibrous material, called bagasse, is burned as boiler fuel to provide steam and heating requirements for the mill. SCGCF operates six bagasse/residue/oil-fired boilers (Boiler Nos. 1, 2, 3, 4, 5, and 8), ranging in capacity from 125,000 to 300,000 pounds per hour (lb/hr) of steam production.

The current Title V Permit for the facility (Permit No. 0990026-004-AV) contains permit conditions for each boiler that limits annual operation to 7,296 hour per year (also refer to Permit No. AC50-42467/PSD-FL-007, December 1981). These boilers are permitted to operate during the crop season (October 12 through April 16) as well as during the off-season (April 16 to October 12). However, Common Condition H.1 of the Title V Permit further restricts the operation of Boiler Nos. 1, 2, 4, 5, and 8 during the off season to no more than three of these boilers, and for no more than 120 days (see also Permit No. AC50-42467/PSD-FL-007).

The purpose of this letter is to request that the referenced Title V and previous PSD permit be changed to reflect beginning and ending crop season dates of October 5<sup>th</sup> and June 1<sup>st</sup>, respectively. In addition, the allowable operating hours for each boiler would be reduced to 5,784 hr/yr (241 days x 24 hours per day), and boiler operation would be restricted to only the crop season. Suggested permit condition wording for each boiler is as follows:

Hours of Operation. The hours of operation for this emission unit shall not exceed 5,784 hours per year. The emission unit is restricted to operation during the crop season from October 5<sup>th</sup> to June 1<sup>st</sup>. (Applicant's request dated June 2003.)

The current off-season operation reflected in the Title V permit was for the purpose of supplying the adjacent Great Lakes Chemical facility with steam. However, this facility is no longer operational and, therefore, there is no need to operate the boilers past the end of the sugar cane processing season (crop season). The purpose for requesting the change to October 5<sup>th</sup> to June 1<sup>st</sup> as the crop season dates is to allow SCGCF to accommodate crop seasons that may start sooner or end later, due to

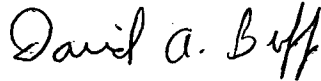
weather or other factors. Although such a situation has not yet occurred, during the past crop season (2002-2003), the April 16<sup>th</sup> date was approached. Also, in the 1990s tropical storms and other rainfall events have caused the shutdown of the mill for periods of a week or longer. Obviously, the crop season was extended by the same number of days, but the boilers were not operating during the shutdown. Therefore, there is a possibility in the future that the crop season could extend outside of the period October 12<sup>th</sup> through April 16<sup>th</sup> due to the size of the crop, weather conditions, equipment breakdown, or other factors. As described above, however, SCGCF has no further need at this time to operate the boilers beyond the crop season.

SCGCF's goal is always to process the sugar cane for the mill in the shortest amount of time, i.e., to minimize the length of the crop season. As the crop season lengthens, there is added wear and tear on equipment and personnel, as well as additional costs to operate the mill. Therefore, there is no incentive for SCGCF to make the crop season any longer than necessary. However, as described above, there are factors beyond SCGCF's control that may result in the crop season being extended.

If you have any questions concerning this request, please me at telephone number (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/nav

cc: J. Alvarez  
K. Lockhart

Y:\Projects\2002\0237588 SCGC - Glades\4\4.1\090203.doc

*G. Kanner*  
*M. Nassar, SD*  
*B. Worley, EPA*  
*G. Stimmer, PBCo.*

**Golder Associates Inc.**

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



**RECEIVED** 0437524

APR 30 2004

BUREAU OF AIR REGULATION

\* Project withdrawn in 2005

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

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

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

Dear Mr. Koerner:

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

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

“Boiler Operation – During the off-season (from end of the crop until the beginning of the next crop season), plant operations shall be restricted to.....”.

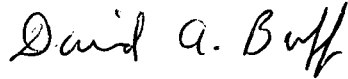
4. As stated in the response to Comment 2 above, SCGCF is willing to restrict crop season operation to a total of 4,512 operating hours per year, consistent with the current crop season operating window. Revised pages of the application form will be submitted, as necessary, along with the air modeling report.
5. An air modeling report addressing the Department's concerns is being prepared and will be submitted in the near future.

6. Facility-wide SO<sub>2</sub> emissions will be addressed in the air modeling report to be submitted in the near future. Revised conditions regarding the methods to comply with the new restrictions will be proposed in the report.

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

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/nav

Enclosure

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

RA1042904.doc

**Professional Engineer Certification**

1. Professional Engineer Name: **David A. Buff**  
Registration Number: **19011**

2. Professional Engineer Mailing Address...  
Organization/Firm: **Golder Associates Inc.\*\***  
Street Address: **6241 NW 23<sup>rd</sup> Street, Suite 500**  
City: **Gainesville** State: **FL** Zip Code: **32653-1500**

3. Professional Engineer Telephone Numbers...  
Telephone: **(352) 336 - 5600** ext. Fax: **(352) 336 - 6603**

4. Professional Engineer Email Address: **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*

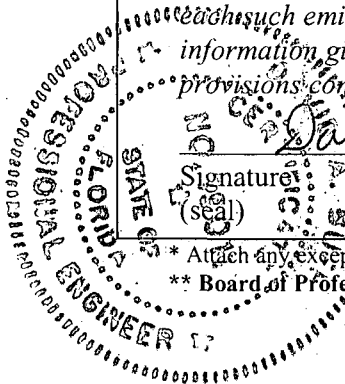
(2) *To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions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

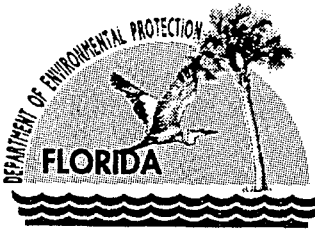
(4) *If the purpose of this application is to obtain an air construction permit (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further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

Signature: David A. Buff Date: 4/29/04



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



# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

April 9, 2004

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

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

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

Dear Mr. Alvarez:

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

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

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

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

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

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

Sincerely,

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

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

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

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SENDER: COMPLETE THIS SECTION:	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Addressee  <i>Evelyn B. Taylor</i></p> <p>B. Received by (Printed Name) <i>Evelyn B. Taylor</i></p> <p>C. Date of Delivery <i>4/12/04</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No          If YES, enter delivery address below:</p>
<p>1. Article Addressed to:          Mr. Jose F. Alvarez          Vice President Planning and Plant Operations          Sugar Cane Growers Cooperative of Florida          Glades Sugar House          Post Office Box 666          Belle Glade, Florida 33430-0666</p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input checked="" type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number <i>7001 1140 0002 1578 0904</i>          (Transfer from service label)</p>	<p><i>7001 1140 0002 1578 0904</i></p>

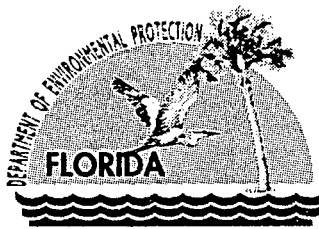
PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service <b>CERTIFIED MAIL RECEIPT</b> (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE Mr. Jose F. Alvarez, Vice President	
Postage \$  Certified Fee  Return Receipt Fee (Endorsement Required)  Restricted Delivery Fee (Endorsement Required)  Total Postage & Fees \$	Postmark Here
Sent To Mr. Jose F. Alvarez, Vice President Street, Apt. No.; or PO Box No. Post Office Box 666 City, State, ZIP+4 Belle Glade, Florida 33430-0666	
PS Form 3800, January 2001 See Reverse for Instructions	

7001 1140 0002 1578 0904



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

November 7, 2003

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. 0990026-009-AC  
Request for Additional Information - Reminder  
Sugar Cane Growers Cooperative of Florida, Glades Sugar House  
Request to Revise Operating Hours and Crop Season for Boilers 1-5 and 8

Dear Mr. Alvarez:

On September 3, 2003, the Department received your application and sufficient fee for an air construction permit to revise the operating hours and crop season for Boilers 1-5 and 8 at the existing Glades Sugar House. The application was incomplete. On September 26, 2003, the Department requested additional information that would allow continued processing of your application. To date, we have not received the requested additional information. Rule 62-4.055(1) of the Florida Administrative Code requires the following:

*"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department. If an applicant requires more than ninety days in which to respond to a request for additional information, the applicant may notify the Department in writing of the circumstances, at which time the application shall be held in active status for one additional period of up to ninety days. Additional extensions shall be granted for good cause shown by the applicant. A showing that the applicant is making a diligent effort to obtain the requested additional information shall constitute good cause. Failure of an applicant to provide the timely requested information by the applicable deadline shall result in denial of the application."*

It has been nearly 45 days since our request for additional information (copy attached). You are reminded that the permit processing time clock has stopped for this project and that we will not continue our review until we receive the additional information. If you require a period of time in addition to the 90 days allowed by rule, please submit a written request indicating the amount of time necessary. If you fail to provide the additional information or request additional time to submit the additional information, the Department will deny your application. 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

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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) <i>Evelyn B. Taylor</i> B. Date of Delivery <i>11/13/07</i></p> <p>C. Signature <i>X Evelyn B. Taylor</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr. Jose F. Alvarez Vice President Planning and Plant Operations Glades Sugar House Sugar Cane Growers Cooperative Post Office Box 666 Belle Glade, FL 33430-0666</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Copy from service label) 7000 2870 0000 7028 3468</p>	
<p>PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789</p>	

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

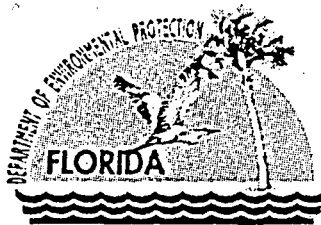
**OFFICIAL USE**

Postage	\$	Postmark Here
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Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	

7000 2870 0000 7028 3468

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

PS Form 3800, May 2000 See Reverse for Instructions



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

September 26, 2003

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. 0990026-009-AC  
Request for Additional Information  
Sugar Cane Growers Cooperative of Florida, Glades Sugar House  
Request to Revise Operating Hours and Crop Season for Boilers 1-5 and 8

Dear Mr. Alvarez:

On September 3, 2003, the Department received your letter requesting the following changes to permit conditions for existing Boilers 1 through 5 and 8 at the Glades Sugar House in Belle Glade, Florida:

- Revise the specified crop season from October 12 through April 16 to October 5 through June 1.
- Decrease potential boiler operation from 7296 hours per year to 5784 hours per year.
- Allow boilers to operate only during the proposed new crop season.

The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Submit the required revised pages of the Department's new application form, including the certification pages signed by the authorized representative and a Profession Engineer with Florida registration.
2. Is the proposed project expected increase annual emissions? Provide justification as to why the project is not subject to PSD preconstruction review or submit an appropriate application for a PSD preconstruction review permit.
3. Condition H.1. in the current Title V permit specifies the following, "*Boiler Operation - From 16 April through 12 October plant operations shall be restricted to no more than three boilers of unit numbers 1, 2, 4, 5, or 8 and to no more than 120 days. During this period of restricted operation, steam production shall not exceed a maximum daily average of 450,000 pounds per hour.*" The Department understands that this condition would be replaced with a requirement allowing operation of the boilers only during the proposed new crop season. Is this correct?
4. The Department understands the request for increasing the crop season "window" from 188 days (Oct. 12 to April 16) to 241 days (Oct. 5 to June 1), which will provide additional operating days that may be needed due to inclement weather. During these periods, the boilers cannot operate due to poor combustion properties, which extends the milling season. However, the maximum hours of operation for the currently permitted crop season is 4512 hours per year (188 days x 24 hours/day = 4512 hours per year). The maximum hours of operation for the proposed new crop season is 5784 hours per year (241 days x 24 hours/day = 5784 hours per year). The request appears to be an increase in the maximum hours of operation for processing sugarcane. As the previously permitted "off-season" operation was used to supply steam to the adjacent Great Lakes Chemical facility, it also appears that 4512 hours per year should provide more than sufficient boiler operation for purposes of processing the sugarcane. It is also noted that the highest reported hours of operation for any boiler in the last five years was 3800 hours for Boiler 1 in 1999. Please revise your request accordingly or explain why 5784 hours per year are being requested for each boiler, which is an additional 1272 hours

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of operation beyond the previous crop season. As currently proposed, the Department believes that the request may trigger PSD preconstruction review.

5. Please review the most recent PSD air quality modeling analysis for this facility. Discuss, compare, and contrast the emissions rates, operating limits, and seasonal operation used in the analysis with the current permits conditions and restricted operation of the plant. If the proposed changes result in a different set of input parameters than originally modeled, provide a new multi-source modeling analysis that demonstrates compliance with the ambient air quality standards. The analysis must incorporate the requested operating season, requested operating hours, potential emissions of the boilers, any new buildings or configurations, any previous permit modifications, and any physical changes that have occurred since the last modeling analysis. Detail the basis of the modeled input parameters including maximum emission rates and operational restrictions. Identify any new restrictions or emissions rates used in the modeling. These may become permit limitations. Please note that a new air quality analysis may also be required if the Department determines that the proposal triggers PSD preconstruction review.
6. Describe the methods used to comply with the oil-firing restrictions in the current Title V permit. Based on 2002 data, an example of the demonstration of compliance with each of the oil-firing conditions. For reference, the permit conditions are shown below.

*H.2. Facility Wide SO<sub>2</sub> Emissions Limit - The total emissions of SO<sub>2</sub> from all operating boilers shall not exceed 14 tons per day.*

*[Rule 62-212.400, F.A.C., (Prevention of Significant Deterioration (PSD) and Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81]*

*H.2.1. Fuel oil from the common storage tank to boilers 1, 2, 3, 4, and 5 shall be recorded every 8 hours and the total for the day shall be used in the scheme in Specific Condition H.2.2 to compute the total gallons of fuel oil burned facility wide and the total SO<sub>2</sub> emitted for the day.*

*[Rule 62-212.400, F.A.C., (Prevention of Significant Deterioration (PSD) and Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81]*

*H.2.2. The permittee shall meter daily oil consumption by Unit 8 individually. The total quantity of fuel oil consumed on a daily basis by Unit 8 shall be replaced by the addition to the system of an equal or greater amount of 1% or less sulfur fuel oil within 72 hours (excluding weekends). Record shall be retained for five years. The balance of the oil in the system should not exceed 2.4% sulfur. For the purpose of simplicity, the fuel purchase scheme above will be in compliance when the total plant wide fuel oil consumption does not exceed 31,500\* gallons per day. In the event that the daily consumption of oil exceeds 31,500 gallons, the permittee must demonstrate compliance with the 14 ton per day limit by providing the amounts of bagasse, residue, and oil combusted, and the sulfur content of the oil for each such day. The demonstration of compliance shall be based on the same assumptions used to derive the threshold oil consumption figure except that the actual sulfur content of the oil for each day shall be substituted for the 1.15% value.*

*{\*This threshold oil consumption figure is based upon the assumptions that the bagasse, residue and oil sulfur contents are 0.2%, 0.5% and 1.15%, respectively, and also SO<sub>2</sub> emissions from bagasse and residue are 40% below the amounts calculated stoichiometrically and all sulfur in fuel oil is emitted as SO<sub>2</sub>. If further tests show that the foregoing assumptions are significantly incorrect, the 31,500 gallons per day shall be adjusted accordingly.}*

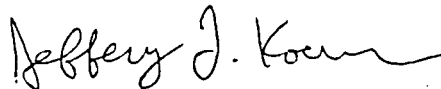
*[Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81]*

Because the furfural plant has been permanently shut down for more than 5 years and bagasse residue is no longer fired, consider simplifying the above conditions regarding fuel oil firing. Such simplified conditions may reduce record keeping requirements and provide a more straightforward air quality modeling analysis.

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.

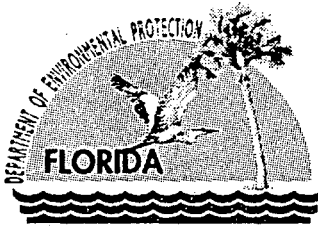
If you have any questions regarding this matter, please call me at 850/921-9536.

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



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

September 26, 2003

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. 0990026-00<sup>7</sup>-AC  
Request for Additional Information  
Sugar Cane Growers Cooperative of Florida, Glades Sugar House  
Request to Revise Operating Hours and Crop Season for Boilers 1-5 and 8

Dear Mr. Alvarez:

On September 3, 2003, the Department received your letter requesting the following changes to permit conditions for existing Boilers 1 through 5 and 8 at the Glades Sugar House in Belle Glade, Florida:

- Revise the specified crop season from October 12 through April 16 to October 5 through June 1.
- Decrease potential boiler operation from 7296 hours per year to 5784 hours per year.
- Allow boilers to operate only during the proposed new crop season.

The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Submit the required revised pages of the Department's new application form, including the certification pages signed by the authorized representative and a Profession Engineer with Florida registration.
2. Is the proposed project expected increase annual emissions? Provide justification as to why the project is not subject to PSD preconstruction review or submit an appropriate application for a PSD preconstruction review permit.
3. Condition H.1. in the current Title V permit specifies the following, "*Boiler Operation - From 16 April through 12 October plant operations shall be restricted to no more than three boilers of unit numbers 1, 2, 4, 5, or 8 and to no more than 120 days. During this period of restricted operation, steam production shall not exceed a maximum daily average of 450,000 pounds per hour.*" The Department understands that this condition would be replaced with a requirement allowing operation of the boilers only during the proposed new crop season. Is this correct?
4. The Department understands the request for increasing the crop season "window" from 188 days (Oct. 12 to April 16) to 241 days (Oct. 5 to June 1), which will provide additional operating days that may be needed due to inclement weather. During these periods, the boilers cannot operate due to poor combustion properties, which extends the milling season. However, the maximum hours of operation for the currently permitted crop season is 4512 hours per year (188 days x 24 hours/day = 4512 hours per year). The maximum hours of operation for the proposed new crop season is 5784 hours per year (241 days x 24 hours/day = 5784 hours per year). The request appears to be an increase in the maximum hours of operation for processing sugarcane. As the previously permitted "off-season" operation was used to supply steam to the adjacent Great Lakes Chemical facility, it also appears that 4512 hours per year should provide more than sufficient boiler operation for purposes of processing the sugarcane. It is also noted that the highest reported hours of operation for any boiler in the last five years was 3800 hours for Boiler 1 in 1999. Please revise your request accordingly or explain why 5784 hours per year are being requested for each boiler, which is an additional 1272 hours

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of operation beyond the previous crop season. As currently proposed, the Department believes that the request may trigger PSD preconstruction review.

5. Please review the most recent PSD air quality modeling analysis for this facility. Discuss, compare, and contrast the emissions rates, operating limits, and seasonal operation used in the analysis with the current permits conditions and restricted operation of the plant. If the proposed changes result in a different set of input parameters than originally modeled, provide a new multi-source modeling analysis that demonstrates compliance with the ambient air quality standards. The analysis must incorporate the requested operating season, requested operating hours, potential emissions of the boilers, any new buildings or configurations, any previous permit modifications, and any physical changes that have occurred since the last modeling analysis. Detail the basis of the modeled input parameters including maximum emission rates and operational restrictions. Identify any new restrictions or emissions rates used in the modeling. These may become permit limitations. Please note that a new air quality analysis may also be required if the Department determines that the proposal triggers PSD preconstruction review.
6. Describe the methods used to comply with the oil-firing restrictions in the current Title V permit. Based on 2002 data, an example of the demonstration of compliance with each of the oil-firing conditions. For reference, the permit conditions are shown below.

*H.2. Facility Wide SO<sub>2</sub> Emissions Limit - The total emissions of SO<sub>2</sub> from all operating boilers shall not exceed 14 tons per day.*

*[Rule 62-212.400, F.A.C., (Prevention of Significant Deterioration (PSD) and Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81]*

*H.2.1. Fuel oil from the common storage tank to boilers 1, 2, 3, 4, and 5 shall be recorded every 8 hours and the total for the day shall be used in the scheme in Specific Condition H.2.2 to compute the total gallons of fuel oil burned facility wide and the total SO<sub>2</sub> emitted for the day.*

*[Rule 62-212.400, F.A.C., (Prevention of Significant Deterioration (PSD) and Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81]*

*H.2.2. The permittee shall meter daily oil consumption by Unit 8 individually. The total quantity of fuel oil consumed on a daily basis by Unit 8 shall be replaced by the addition to the system of an equal or greater amount of 1% or less sulfur fuel oil within 72 hours (excluding weekends). Record shall be retained for five years. The balance of the oil in the system should not exceed 2.4% sulfur. For the purpose of simplicity, the fuel purchase scheme above will be in compliance when the total plant wide fuel oil consumption does not exceed 31,500\* gallons per day. In the event that the daily consumption of oil exceeds 31,500 gallons, the permittee must demonstrate compliance with the 14 ton per day limit by providing the amounts of bagasse, residue, and oil combusted, and the sulfur content of the oil for each such day. The demonstration of compliance shall be based on the same assumptions used to derive the threshold oil consumption figure except that the actual sulfur content of the oil for each day shall be substituted for the 1.15% value.*

*{\*This threshold oil consumption figure is based upon the assumptions that the bagasse, residue and oil sulfur contents are 0.2%, 0.5% and 1.15%, respectively, and also SO<sub>2</sub> emissions from bagasse and residue are 40% below the amounts calculated stoichiometrically and all sulfur in fuel oil is emitted as SO<sub>2</sub>. If further tests show that the foregoing assumptions are significantly incorrect, the 31,500 gallons per day shall be adjusted accordingly.}*

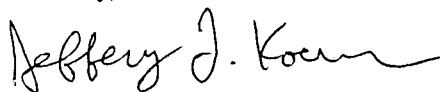
*[Construction Permit AC50-42476\PSD-FL-077 dated 10/28/81]*

Because the furfural plant has been permanently shut down for more than 5 years and bagasse residue is no longer fired, consider simplifying the above conditions regarding fuel oil firing. Such simplified conditions may reduce record keeping requirements and provide a more straightforward air quality modeling analysis.

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  
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Mr. Gregg Worley, EPA Region 4  
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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) <b>Roselyn B. Taylor</b> B. Date of Delivery <b>9/30/03</b></p> <p>C. Signature <b>X Roselyn B. Taylor</b> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p>Mr. Jose F. Alvarez V.P. Planning and Plant Ops. Glades Sugar House Sugar Cane Growers Coop. P. O. Box 666 Belle Glade, FL 33430-0666</p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article No. <b>7001 0320 0001 3692 6051</b></p>	

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

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Sent To **Mr. Jose Alvarez, Sugar Cane Grower**

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

City, State, ZIP+4 **Belle Glade, FL 33430-0666**

7001 0320 0001 3692 6051

PS Form 3800, January 2001 See Reverse for Instructions