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April 18, 2013

DIVISION OF AIR  
RESOURCE MANAGEMENT 133-87510B

Mr. Ajaya Satyal, P.E., Air Program Administrator  
Florida Department of Environmental Protection  
South District Office  
Post Office Box 2549  
Fort Myers, Florida 33902-2549

**RE: SUGAR CANE GROWERS COOPERATIVE OF FLORIDA  
PROJECT NO. 0990026-020-AC  
REPLACE WATERWALLS IN BOILER NOS. 1 AND 2  
RESPONSE TO RAI DATED APRIL 12, 2013**

Dear Mr. Satyal:

Sugar Cane Growers Cooperative of Florida (SCGCF) and Golder Associates Inc. (Golder) have received the Florida Department of Environmental Protection (FDEP) request for additional information (RAI) via email dated April 12, 2013, regarding the replacement of the existing tube and tile design waterwalls in Boiler Nos. 1 and 2 with modern membrane style panels. Each of FDEP's requests is answered below, in the same order as they appear in the RAI email.

**Comment 1. This is the third air construction request to modify emission units at the Sugarcane Growers Co-op facility received by the Department since November 2011. Please specify what are the short term (5-year) and the long term (10-year) plans for maintenance, repair and modifications to all permitted emission units at the facility.**

**Response:** SCGCF has not planned any modifications or other major repair or replacement projects in the short term (5-year) or the long term (10-year), other than projects which will be part of the facility's routine off-season maintenance, repair, and replacement operations.

**Comment 2. For determining actual emissions, the PSD applicability review used CO stack test emission data from boilers that were not part of this project and which may not represent the same operational and physical configuration as the emissions units that are the subject of this application. Please provide reasonable assurance that Boiler Nos. 1, 2, 3 and 8 are the same operational and physical configuration. Please explain how the stack test data from boilers not subject to this project are representative of CO emissions from Boiler Nos. 1 and 2. If needed, please resubmit the PSD applicability review using CO stack test data representative for Boiler Nos. 1 and 2 (their individual stack tests) or emission factors from AP-42.**

**Response:** Due to the limited amount of facility carbon monoxide (CO) stack test data, the average of all facility boilers for which there is CO data was used to determine CO emission factors for Boiler Nos. 1 and 2. The resulting CO emission factor was 2.95 pounds per million British thermal units (lb/MMBtu). This CO emission factor for years 2003 through 2011 was already established in the air construction permit application to burn natural gas in all SCGCF boilers (March 2012), and accepted by the Department. To establish the CO emission factor for calendar year 2012, the 2012-2013 crop season CO stack test from Boiler No. 8 was added to the facility-wide average, as this additional data has become available since the application to burn natural gas was submitted. This CO emission factor for 2012 was 2.84 lb/MMBtu.

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Golder Associates Inc.

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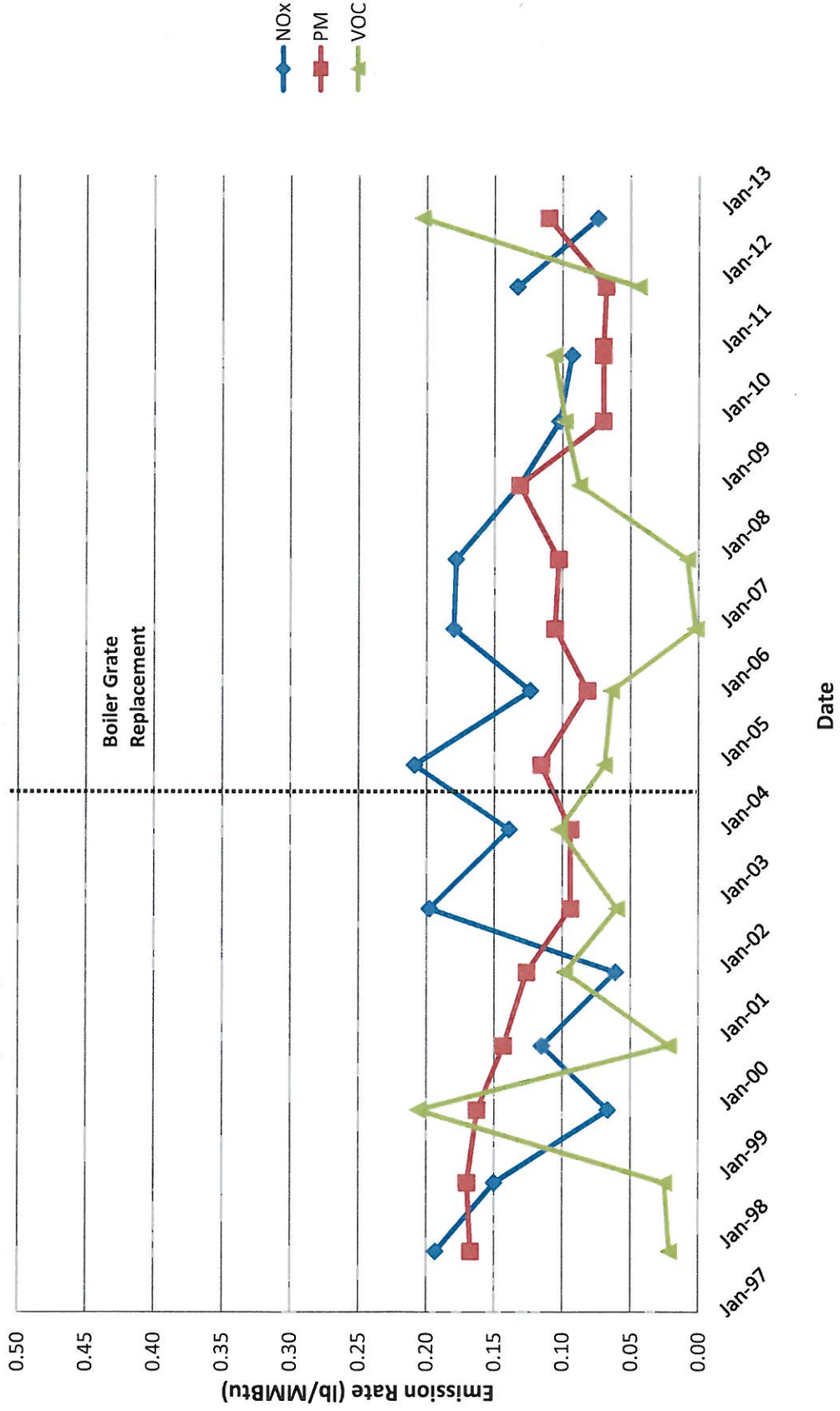
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### Figure 1 SCGCF Boiler No. 1 NOx, PM, VOC Emissions Rates From 1997 to 2012



### Figure 2 SCGCF Boiler No. 2 NOx, PM, VOC Emissions Rates From 2001 to 2012

