



FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

January 30, 2015

Sent by Electronic Mail – Received Receipt Requested

Matthew.Capone@floridacrystals.com

Matthew Capone, Director of Environmental Compliance
Osceola Farms Company
U.S. 98, East of Pahokee
Pahokee, Florida 33476

Re: Osceola Farms Company, Facility ID No. 0990019
Boiler Nos. 2 and 5 (Emissions Units 002 and 005)
Request for Boiler MACT Compliance Date Extension

Dear Mr. Capone:

On December 3, 2014, we received your request¹ for a one-year extension of the compliance date of the Boiler MACT Rule², to January 31, 2017, for Boiler Nos. 2 and 5. The federal regulations³ allow for up to a one year extension to comply with such standards for the installation of controls. The authority to grant such an extension is delegated to the Department, which operates an approved Title V air operation permit program.⁴

In the preamble to the final Boiler MACT Rule⁵, EPA recognized that some sources may need up to a one-year extension of the compliance date to install pollution control equipment. EPA also stated, *“In a case where pollution controls are being installed ... a determination that an extra year is necessary for compliance should be relatively straightforward. In order to install controls, companies are likely to undertake a number of steps relatively soon after the effective date of the rule, including obtaining necessary building and environmental permits and hiring contractors to perform the construction of the emission controls ... This should provide sufficient information for a permitting authority to determine that emission controls are being installed ...”*

On March 12, 2014, Osceola Farms obtained an air construction permit (No. 0990019-015-AC) authorizing the modification and installation of controls on its five sugar mill boilers to comply with the Boiler MACT Rule. The following summarizes the work to date:

- Osceola Farms finalized the engineering design for Boiler No. 6, placed orders for the equipment, and selected an engineering/construction firm to perform the upgrades. Most of the necessary equipment was installed during the 2014 off-season.⁶ The remainder of equipment needed, and some additional changes to the advanced over-fire air (OFA) system, will be installed during the 2015 off-season.
- For consistency, Osceola Farms plans to use the same engineering/construction firm for the work on the remaining four boilers. Osceola Farms negotiated a contract for the upgrades to Boiler Nos. 3 and 4, which are scheduled to be installed during the 2015 off-season. Upgrades to Boiler Nos. 2 and 5 will be completed during the 2016 off-season.

¹ Osceola Farms [extension request](#) dated 12/03/14.

² The Maximum Achievable Control Technology (MACT) standards are specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. See Title 40, Part 63, [Subpart DDDDD](#) of the Code of Federal Regulations, adopted and incorporated in Rule 62-204.800(11)(b)86., F.A.C.

³ See the NESHAP General Provisions at [40 CFR 63.6\(i\)](#), adopted and incorporated at Rule 62-204.800(11)(d)1., F.A.C.

⁴ See the NESHAP General Provisions at [40 CFR 63.6\(i\)\(4\)\(i\)\(A\)](#), adopted and incorporated at Rule 62-204.800(11)(d)1, F.A.C.

⁵ See pp. 7143 of the [Boiler MACT Preamble](#).

⁶ The sugarcane crop season generally runs from mid-October through mid- to late March.

Matthew Capone
Osceola Farms Company
Boiler MACT Extension, Boiler Nos. 2 and 5
Project No. 0990019-016-AV
Page 2 of 4

The extension request indicates that controls will be complete on three of the boilers (Boiler Nos. 3, 4 and 6) by the rule compliance date of January 31, 2016. However, Osceola Farms indicates that an additional year is needed to complete procurement, installation and operational tests for Boiler Nos. 2 and 5. A description of the planned controls and proposed work schedule is provided in Attachment A.

Given the above information, the request meets the criteria for obtaining an extension for Boiler Nos. 2 and 5. The Department will incorporate the extension, along with key milestones and the proposed conditions in Attachment B, into the Osceola Farms Title V air operation permit with a compliance date of January 31, 2017 for Boiler Nos. 2 and 5.

If you have any questions regarding this matter, please contact me at 850-717-9083.

Sincerely,

Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

cc:

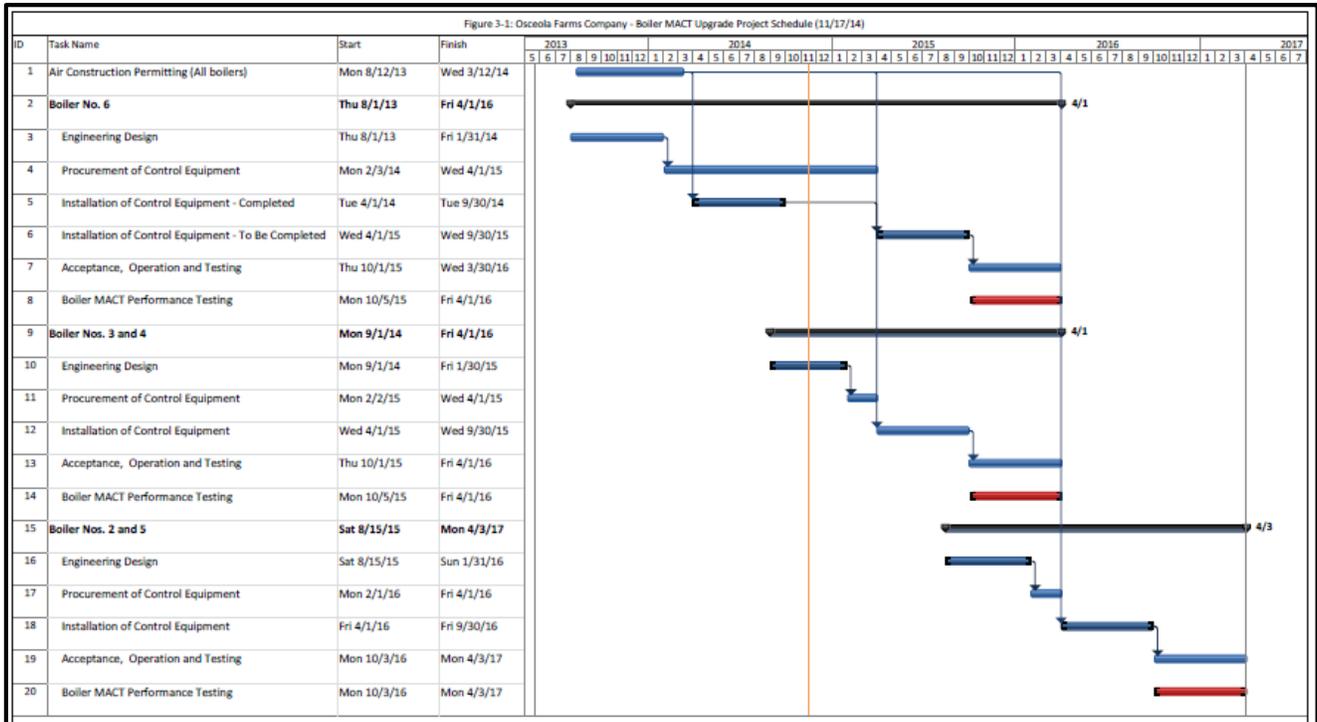
Matthew Capone, Osceola Farms (Matthew.Capone@floridacrystals.com)
David Buff, Golder Associates Inc. (dbuff@golder.com)
David Dee, Gardner, Bist, Wiener, Wadsworth, Bowden, Bush, Dee, LaVia & Wright, P.A. (ddee@gbwlegal.com)
Ajaya Satyal, DEP South District Office (Ajaya.Saty@dep.state.fl.us)
Laxmana Tallam, Palm Beach County Department of Health (Laxmana.Tallam@flhealth.gov)

ATTACHMENT A

Table 1. Proposed Boiler Control Equipment at Osceola Farms

Pollutant Controlled	Boiler No.	Air Emission Controls	
		Existing Controls	Potential Additional Controls
PM/TSM	2, 3, 4, 5 & 6	Wet Impingement Scrubber	None
CO	2, 3, & 6	Good Combustion Practices	<ul style="list-style-type: none"> Improved Over-fire Air System New Bagasse Feeder System New Ash Removal System
	4, 5	Good Combustion Practices	<ul style="list-style-type: none"> Convert to Inclined, Water-Cooled Pinhole Grate Improved Over-fire Air System New Bagasse Feeder System New Ash Removal System
Hg & HCl	2, 3, 4, 5, & 6	Wet Impingement Scrubber	None
HAPS	2, 3, 4, 5, & 6	Wet Impingement Scrubber	Use of Clean Fuels During Startup

Figure 1. Proposed Osceola Farms Boiler Pollution Controls Work Schedule



ATTACHMENT B
Proposed Conditions for Draft Title V Operation Permit

1. Compliance Date Extension: For Boiler Nos. 2 and 5, the Boiler MACT compliance date is extended from January 31, 2016 to January 31, 2017. For Boiler Nos. 3, 4 and 6, the Boiler MACT compliance date remains January 31, 2016. [40 CFR 63.6(i); and Rule 62-204.800(11)(d)1., F.A.C.]
2. Key Milestones: Unless the permittee notifies the Department in advance, the permittee shall meet the following schedule for completing the installation of the control equipment and demonstrating compliance with the Boiler MACT requirements for Boiler Nos. 2 and 5.

Key Milestones	Target Completion Date
Complete Engineering Design of Pollution Control Equipment <u>Boiler No. 2</u> <ul style="list-style-type: none"> • Improved Over-fire Air System • New Bagasse Feeder System • New Ash Removal System <u>Boiler No. 5</u> <ul style="list-style-type: none"> • Convert to Inclined, Water-Cooled Pinhole Grate • Improved Over-fire Air System • New Bagasse Feeder System • New Ash Removal System 	01/31/2016
Complete Procurement of Control Equipment	04/01/2016
Complete Installation of Control Equipment	09/30/2016
Complete Acceptance, and Operational Testing of Control Equipment	04/03/2017*
Complete Boiler MACT Performance Testing	04/03/2017*
Progress Reports	Quarterly

* *Note: Pursuant to §63.7510(e), the initial compliance demonstration must be made no later than 180 days after the compliance date.*

The permittee shall provide advance notice to the Division and the Compliance Authority if it is unable to meet a target in the above schedule and shall identify a new completion date. [40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]

3. Progress Reports: By January 31, 2016, the permittee shall provide a written report to the Division and the Compliance Authority that summarizes the work completed to date and the work remaining on Boiler Nos. 2 and 5. Thereafter, the permittee shall provide quarterly written progress reports within 30 days following each calendar quarter with an updated schedule, if necessary, to the Division and the Compliance Authority. [40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]
4. Boiler MACT Compliance: In accordance with 40 CFR §63.7510, the permittee shall demonstrate initial compliance for Boiler Nos. 2 and 5 with a compliance date of January 31, 2017. [40 CFR 63.7510]