Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Mr. Jose Gonzalez
Vice President of Industrial Operations
Osceola Farms Company
32298 State Road 700
Pahokee, Florida 33476

Re: Title V Air Operation Permit Revision
Proposed Permit No. 0990019-021-AV
Osceola Farms

Dear Mr. Jose Gonzalez:

One copy of the proposed permit determination for the revision of the Title V air operation permit for the Osceola Farms facility located at U.S. Route 98 and Hatton Highway, Palm Beach County, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. Interested persons may view the proposed permit by visiting the following website: https://fldep.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Lara Rabbath, at 850/717-9082.

Executed in Tallahassee, Florida.

David Lyle Read, P.E.
2016.06.22 08:44:23 -04'00'

For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr/lcr

Copies sent by electronic mail to the following:

Jose Gonzalez, Osceola Farms Company (Jose.Gonzalez@floridacrystals.com)
Matthew Capone, Osceola Farms Company (Matthew.Capone@floridacrystals.com)
David Buff, P.E., Golder Associates, Inc. (dbuff@golder.com)
Gary Maier, South District Office (Gary.Maier@dep.state.fl.us)
Air Program Administrator, Southeast District: (sed.air@dep.state.fl.us)
Laxmana Tallam, Palm Beach County Health Department (Laxmana.Tallam@flhealth.gov)
Lynn Scearce, DEP OPC: (lynn.scearce@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Lynn Scearce

2016.06.22
09:38:36 -04'00'

Permit No. 0990019-021-AV

I. Public Notice.

An Intent to Issue Air Permit issued to Osceola Farms Company for the Osceola Farms facility located at U.S. Route 98 and Hatton Highway, Palm Beach County, was clerked on May 5, 2016. The Public Notice of Intent to Issue Air Permit was published in The Palm Beach Post on May 20, 2016. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice of Intent to Issue Air Permit was received on May 25, 2016.

II. Public Comment(s).

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee by an email dated June 13, 2016. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Changes to the permit are highlighted in yellow, with additions to the permit indicated by double underline text and deletions from the permit indicated by ~~strike through~~ text.

E-mail from Mr. David Buff dated June 13th, 2016.

Comment 1. The Conclusion paragraph on page 4 of 4 in the Statement of Basis indicates that this permit revises existing TV permit 0990019-012-AV. This should indicate that this revises existing permit 0990019-016-AV

Response 1. The Department references the latest Title V renewal when issuing revisions. However, an additional note will be added to clarify that the latest renewal was previously revised on April 1, 2015.

Comment 2. The cover page of the Draft Permit indicate that this permit revises existing TV permit 0990019-012-AV. This should instead indicate this is a revision to existing permit 0990019-016-AV.

Response 2. The Department references the latest Title V renewal when issuing revisions. However, an additional note will be added to clarify that the latest renewal was previously revised by Permit No. 0990019-016-AV.

Comment 3. Pg. 6 of 21- Condition FW10.- item d. is redundant with item b. and should be removed.

Response 3. The Department agrees. The Specific Condition FW10.d. from the draft permit is deleted as follows:

> ~~d. The permittee shall monitor and record the daily steam production rates of the sugar mill boilers (24 hour block total, 8:00 a.m. to 8:00 a.m.) for each day of operation. [Rule 62-213.440(1)(b), F.A.C.]~~

Comment 4. Pg. 7 of 21, Condition FW 11.c, the second sentence is confusing and appears to suffer from a typo/error. Suggest the following wording: "The starting month for the rolling 12-month steam cap for the Osceola Farms boilers was May 2015."

Response 4. The Department agrees. Specific Condition FW11.c. is revised as follows:

> c. Total steam production from all boilers shall not exceed 2,626,560,000 pounds per consecutive 12-month period, rolled monthly. The starting month for the rolling 12-month ~~period~~ steam cap~~, the rolled monthly steam cap~~ for the Osceola Farms boilers began on May 2015. [Permit No. 0990019-020-AC; Rule 62-210.200(PTE), F.A.C.]

Comment 5. In December 2015, FDEP approved an Alternate Sampling Procedure for Bagasse for compliance with the Boiler MACT rule (attached). We ask that this approval be incorporated and attached to the Title V permit.

Response 5. The Department agrees. The approved Alternate Sampling Procedure for Bagasse is added to the appendices of the Title V permit package.

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit. The permitting authority will issue the proposed permit No. 0990019-021-AV, with the changes noted above.