

Florida Department of  
Environmental Protection

Memorandum

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To: Joseph Kahn, Division of Air Resource Management  
Through: Trina Vielhauer, Bureau of Air Regulation *JK*  
From: Jeff Koerner, New Source Review Section *JK*  
Date: July 15, 2010  
Subject: Final Air Permit No. 0990005-016-AC  
Okeelanta Corporation, Okeelanta Sugar Mill and Refinery  
New Hope Power Company, Okeelanta Cogeneration Plant  
Miscellaneous Revisions

The final permit for this project is attached for your approval and signature. The permit is being processed concurrently with Title V air operation permit renewal (No. 0990005-017-AV) to make minor revisions to several underlying air construction permits. The existing facility is located in Palm Beach County at 21250 U.S. Highway 27 South, South Bay, Florida. The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

TLV/jfk

## FINAL DETERMINATION

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### PERMITTEE

Okeelanta Corporation  
New Hope Power Company  
21250 U.S. Highway 27 South  
South Bay, Florida 33493

### PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)  
Division of Air Resource Management  
Bureau of Air Regulation, New Source Review Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Permit No. 0990005-016-AC  
Okeelanta Sugar Mill and Refinery  
Okeelanta Cogeneration Plant

The permit revises: the most recent version of Permit No. PSD-FL-196 to clarify the use of supplemental fuels in the cogeneration boilers, startup of the electrostatic precipitator and the use of carbon dioxide monitor to determine the flue gas oxygen content; Permit No. 0990005-015-AC to clarify the specifications of the drive-through paint spray booth; and establishes a new permit condition to clarify that the fuel storage tanks are not subject to the New Source Performance Standards in Subpart Kb, Title 40, Part 60, of the Code of Federal Regulations. This minor source air construction permit revision was processed concurrently with Permit No. 0990005-017-AV, which revises and renews the Title V air operation permit.

### NOTICE AND PUBLICATION

The Department distributed a Draft/Proposed Title V Air Operation Permit Renewal package on April 19, 2010. The applicant published the Public Notice of Intent to Issue a Title V Air Operation Permit Renewal in The Palm Beach Post on May 23, 2010. The Department received the proof of publication on May 26, 2010.

### COMMENTS

No comments on the Draft Permit were received from the public, the Palm Beach County Health Department or the EPA Region 4 Office. On June 23<sup>rd</sup>, the applicant provided the following minor comment.

1. *Comment:* For the requirements regarding the Continuous Emissions Monitoring Systems specified in Appendix E, Section IV, the draft permit revised the specified diluent monitor from oxygen (O<sub>2</sub>) to carbon dioxide (CO<sub>2</sub>) as requested. Revise Condition 6 of the permit to identify a diluent CO<sub>2</sub> monitor for consistency. *Response:* When oxygen is required as a diluent gas, monitoring for either O<sub>2</sub> or CO<sub>2</sub> is typically acceptable. Condition 6 will be revised to be consistent with Appendix E of the permit.
2. *Comment:* Under "Major Regulatory Classifications" it states that the boilers were initially subject to NESHAP Subpart DDDDD. However, only Boiler 16 was subject to this rule; the cogeneration boilers are considered electric utility boilers. Please correct. *Response:* The statement was clarified by identifying that no units are currently subject to NESHAP Subpart DDDDD.

The Department also added the cogeneration boilers as affected units identified in the emissions summary table in Section I, General Information.

### CONCLUSION

The final action of the Department is to issue the permit with the minor changes, corrections and clarifications as described above.



# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## PERMITTEE

Okeelanta Corporation  
New Hope Power Company  
21250 U.S. Highway 27 South  
South Bay, Florida 33493

Authorized Representative:

Mr. Ricardo Lima, Vice President and General Manager

Permit No. 0990005-016-AC

Okeelanta Sugar Mill and Refinery  
Facility ID No. 0990005  
Okeelanta Cogeneration Plant  
Facility ID No. 0990332

Palm Beach County, Florida

## FACILITY AND PROJECT DESCRIPTION

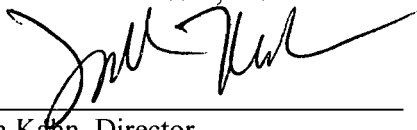
This is the final air construction permit revision for the Okeelanta Corporation's existing sugar mill and sugar refinery and the New Hope Power Company's existing cogeneration plant. The existing facility is located in Palm Beach County at 21250 U.S. Highway 27 South, South Bay, Florida. The final permit revises: the most recent version of Permit No. PSD-FL-196 to clarify the use of supplemental fuels in the cogeneration boilers, startup of the electrostatic precipitator and the use of carbon dioxide monitor to determine the flue gas oxygen content; and Permit No. 0990005-015-AC to clarify the specifications of the drive-through paint spray booth. This final permit also establishes a new permit condition to clarify that the fuel storage tanks are not subject to the New Source Performance Standards in Subpart Kb, Title 40, Part 60, of the Code of Federal Regulations. This minor source air construction permit revision was processed concurrently with Permit No. 0990005-017-AV, which revises and renews the Title V air operation permit. This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

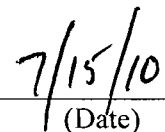
## STATEMENT OF BASIS

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.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, 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 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

  
\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

  
\_\_\_\_\_  
(Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 7/15/10 to the persons listed below.

- Mr. Ricardo Lima, Okeelanta Corporation (ricardo\_lima@floridacrystals.com)
- Mr. Matthew Capone, Florida Crystals (matthew\_capone@floridacrystals.com)
- Mr. David Buff, Golder Associates (dbuff@golder.com)
- Mr. Ajaya Satyal, DEP South District Office (ajaya.satyal@dep.state.fl.us)
- Mr. James Stormer, Palm Beach County Health Department (james\_stormer@doh.state.fl.us)
- Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms. Barbara Friday, DEP BAR for posting with U.S. EPA Region 4 (barbara.friday@dep.state.fl.us)
- Ms. Victoria Gibson, DEP BAR for Reading File (victoria.gibson@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.

  
\_\_\_\_\_  
(Clerk)

7/15/10  
(Date)

## SECTION 1. GENERAL INFORMATION

### FACILITY DESCRIPTION

The existing facility is located in Palm Beach County at 21250 U.S. Highway 27 South, South Bay, Florida. The map coordinates are UTM Zone 17, 524.90 km East and 2940.10 km North. The facility consists of two adjacent plants. Okeelanta Corporation (ARMS ID No. 0990005) operates an existing sugar mill (Standard Industrial Classification (SIC) No. 2061) and sugar refinery (SIC No. 2062) including sugar packaging and transshipment activities. New Hope Power Company (ARMS ID No. 0990332) operates an existing cogeneration plant that provides process steam for the sugar mill and refinery operations as well as generating electricity for sale to the power grid (SIC No. 4911). The adjacent plants are considered a single facility for purposes of the Prevention of Significant Deterioration (PSD) of Air Quality and Title V regulatory permitting programs. The primary sources of air pollution include: three biomass-fired cogeneration boilers; one limited use industrial boiler firing natural gas and distillate oil; the transfer and storage of wood chip and bagasse fuels; distillate oil storage tanks; the transfer and storage of sugar (sugar refinery and transshipment facility); and a paint spray booth. The facility includes other miscellaneous unregulated and insignificant activities.

### MAJOR REGULATORY CLASSIFICATIONS

- The facility is a major source of hazardous air pollutants.
- The facility does not operate any units subject to the Title IV acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source of air pollution in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility is subject to Chapter 62-17, F.A.C. for power plant site certification because it produces more than 75 megawatts (MW) of steam-generated electrical power. [Site Certification No. PA 04-46]
- Existing units are subject to applicable portions of the following NSPS provisions: Subpart A (General Provisions), Subpart Db (Industrial-Commercial-Institutional Steam Generating Units) and Subpart Dc (Small Industrial-Commercial-Institutional Steam Generating Units).
- No units are currently subject to any National Emissions Standards for Hazardous Air Pollutant (NESHAP) in 40 CFR 63.

### EMISSIONS UNITS

This permit affects the following emissions units.

ARMS ID No. 0990005 – Okeelanta Corporation, Sugar Mill and Refinery

EU No.	Emissions Unit Description	Process Area
015	Distillate Oil Storage Tank (29,500 gallons)	Sugar Mill and Refinery
016	Distillate Oil Storage Tank, (29,500 gallons)	Sugar Mill and Refinery
017	Distillate Oil Storage Tank (29,500 gallons)	Sugar Mill and Refinery
040	Fuel Farm	Sugar Mill
048	Paint Booth	Okeelanta Shop

ARMS ID No. 0990332 – New Hope Power Company, Okeelanta Cogeneration Plant

EU No.	Emissions Unit Description	Process Area
001	Cogeneration Boiler A	Cogeneration Plant
002	Cogeneration Boiler B	Cogeneration Plant
003	Cogeneration Boiler C	Cogeneration Plant
005	Cogeneration Plant – Miscellaneous Support Equipment	Cogeneration Plant

## SECTION 2. REVISED PERMIT CONDITIONS

### Revision of Permit No. 0990332-017-AC (PSD-FL-196Q)

#### Section III, Subsection A, Cogeneration Boilers A (EU-001), B (EU-002) and C (EU-003)

2. Auxiliary Fuel: The cogeneration boilers shall fire only distillate oil and pipeline natural gas as auxiliary fuels. Distillate oil shall be new No. 2 oil with a maximum sulfur content of 0.05 percent sulfur by weight as determined by the appropriate test method listed in 40 CFR 60.17. "New" oil is oil that has been refined from crude oil and that has not been used in any manner that may contaminate it. In addition to the primary authorized fuels, Each boiler may startup solely on pipeline natural gas or distillate oil.
6. Continuous Monitors: For each cogeneration boiler, the permittee shall install, calibrate, maintain, and operate continuous emissions monitoring systems (CEMS) and continuous opacity monitoring systems (COMS) to measure and record emissions of carbon monoxide (CO), nitrogen oxides (NOx), opacity, ~~oxygen~~ carbon dioxide (CO<sub>2</sub>), and sulfur dioxide (SO<sub>2</sub>) in a manner sufficient to demonstrate compliance with the standards of this permit. The opacity monitor shall be placed in the ductwork between the electrostatic precipitator and the stack or in the stack. Appendix E identifies minimum requirements for monitoring systems.
18. c. 1) Natural gas or distillate oil shall be fired during startup prior to energizing the electrostatic precipitator (ESP). The ESP shall be placed on line at the earliest possible time during the startup period, consistent with the manufacturer's recommendations, operating experience and safety practices. Once the operating temperature recommended by the ESP manufacturer is maintained (approximately 340° F to 350° F), it shall be Once the ESP is placed on line, and the boiler shall comply with the opacity standard specified in Condition No. 16. The ESP shall be on line and functioning properly before firing any biomass. The opacity limit does not apply when the ESP is off line due to warm startup, cold startup, or shutdown. No more than twenty 6-minute block averages of opacity monitoring data shall be excluded in a 24-hour period due to documented malfunctions.

#### Section IV, Appendix E

2. a. (3) CO<sub>2</sub> CEMS shall comply with Performance Specification 3 in Appendix B of 40 CFR 60. The CO<sub>2</sub> reference method for the annual RATA shall be EPA Method 3A Appendix A of 40 CFR 60.

### Revision of Permit No. 0990005-015-AC

For the drive-through paint spray booth (EU-048) in the agriculture shop at the Okeelanta Sugar Mill, Condition No. 2 of this permit is revised as follows:

"Method of Operation. Paint shall only be applied to agricultural equipment, trailers, and other vehicles or facility equipment. Paint will shall be applied by one of two methods, compressed air spray gun, or an airless paint sprayer or other equipment with equivalent transfer efficiency. The eCompressed air systems spray gun will typically use house air within a pressure range of approximately 60 to 80 pounds per square inch (psi). The aAirless systems paint sprayer will typically operate at a pressure of approximately 3,200 psi. There are two exhaust stacks for the paint spray booth. Both are 25.7 feet tall with a 4-foot diameter and have a flow rate of 45,500 actual cubic feet per minute (acfm).

[Construction Permit 0990005-010-AC, dated August 22, 2001 Permit Nos. 0990005-015-AC and 0990005-016-AC]"

### Permit No. 0990005-016-AC, New Permit Condition

Several previous permits indicated that NSPS Subpart Kb in 40 CFR 60 applied to fuel and oil storage tanks operated by Okeelanta Sugar Mill and Refinery (EU-015, 016 and 017) and at the New Hope Power Cogeneration Plant (EU-005). The following new permit condition supersedes any previous conditions related to NSPS Subpart Kb for these units:

1. Fuel and oil tanks with a storage capacity of 19,813 gallons or less are not subject to NSPS Subpart Kb provisions. Fuel and oil tanks with a storage capacity between 19,813 gallons and 39,890 gallons shall

## SECTION 2. REVISED PERMIT CONDITIONS

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store only volatile organic liquids with a maximum true vapor pressure of less than 15.0 kilopascals (kPa) or 2.17 pounds per square inch, absolute (psia). Fuel and oil tanks with a storage capacity of 39,890 gallons or more shall store only volatile organic liquids with a maximum true vapor pressure of less than 3.5 kPa (0.51 psia). Otherwise, the tanks shall have a capacity of less than 19,813 gallons or predate the NSPS Subpart Kb provisions. This condition ensures that the storage tanks are not subject to the NSPS Subpart Kb provisions in 40 CFR 60. [NSPS Subpart Kb, §60.110b]”

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Thursday, July 15, 2010 4:41 PM  
**To:** 'ricardo\_lima@floridacrystals.com'  
**Cc:** 'matthew\_capone@floridacrystals.com'; 'dbuff@golder.com'; 'ajaya.satyal@dep.state.fl.us'; 'james\_stormer@doh.state.fl.us'; 'mike.halpin@dep.state.fl.us'; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; 'barbara.friday@dep.state.fl.us'; 'victoria.gibson@dep.state.fl.us'; 'jeff.koerner@dep.state.fl.us'; 'elizabeth.walker@dep.state.fl.us'  
**Subject:** Okeelanta Corporation - Okeelanta Sugar Mill and Refinery; 0990005-016-AC  
**Attachments:** 0990005-016-AC\_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

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**Owner/Company Name:** OKEELANTA CORP  
**Facility Name:** OKEELANTA SUGAR REFINERY  
**Project Number:** 0990005-016-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION  
**Facility County:** PALM BEACH  
**Processor:** Jeff Koerner

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Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9561  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)



## Livingston, Sylvia

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**From:** Matthew Capone [Matthew\_Capone@floridacrystals.com]  
**Sent:** Thursday, July 15, 2010 5:09 PM  
**To:** Livingston, Sylvia  
**Cc:** Ricardo Lima  
**Subject:** RE: Okeelanta Corporation - Okeelanta Sugar Mill and Refinery; 0990005-016-AC

This reply confirms receipt and viewing of permit documents.

Matthew Capone  
Okeelanta Cogeneration Plant  
New Hope Power Company  
(561)993-1658

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Thursday, July 15, 2010 4:41 PM  
**To:** Ricardo Lima  
**Cc:** Matthew Capone; dbuff@golder.com; Satyal, Ajaya; james\_stormer@doh.state.fl.us; Halpin, Mike; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; Friday, Barbara; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Okeelanta Corporation - Okeelanta Sugar Mill and Refinery; 0990005-016-AC

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**Owner/Company Name:** OKEELANTA CORP  
**Facility Name:** OKEELANTA SUGAR REFINERY  
**Project Number:** 0990005-016-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION  
**Facility County:** PALM BEACH  
**Processor:** Jeff Koerner

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## Livingston, Sylvia

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**From:** Satyal, Ajaya  
**Sent:** Thursday, July 15, 2010 4:42 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Okeelanta Corporation - Okeelanta Sugar Mill and Refinery; 0990005-016-AC

Thanks Sylvia.

AJ Satyal

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**From:** Livingston, Sylvia  
**Sent:** Thursday, July 15, 2010 4:41 PM  
**To:** ricardo\_lima@floridacrystals.com  
**Cc:** matthew\_capone@floridacrystals.com; dbuff@golder.com; Satyal, Ajaya; james\_stormer@doh.state.fl.us; Halpin, Mike; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; Friday, Barbara; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Okeelanta Corporation - Okeelanta Sugar Mill and Refinery; 0990005-016-AC

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**Owner/Company Name:** OKEELANTA CORP  
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