DRAFT PERMIT

PERMITTEE

United States Sugar Corporation
111 Ponce De Leon Avenue
Clewiston, FL 33440

Authorized Representative:
Neil Smith, Vice President and General Manager

Air Permit No. 0510003-048-AC
PSD-FL-415
Expires: Date
U.S. Sugar Clewiston Mill and Refinery
Facility ID No. 0510003
H_2S Degasification Systems

PROJECT

This is the final air construction permit, which authorizes the construction and operation of five water wells and two H_2S degasification systems. The proposed work will be conducted at the existing U.S. Sugar Clewiston Facility, which is categorized under the Standard Industrial Classification of Cane Sugar, Except Refining (No. 2061) and Cane Sugar Refining (No. 2062). The existing facility is located in Hendry County at the intersection of W.C. Owens Avenue and State Road 832 in Clewiston, Florida. The UTM coordinates are Zone 17, 506.1 kilometers East, and 2956.9 kilometers North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. 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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Executed in Tallahassee, Florida

For the Division of Air Resource Management

(DRAFT)

_____ _____
(Signature) (Date)

_____
(Printed Name of Above Designee)

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 with Appendices) 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 _____(DRAFT)_____ to the persons listed below.

Mr. Neil Smith, U.S. Sugar Corporation (nsmith@ussugar.com)
Mr. Keith Tingberg, U.S. Sugar Corporation (ktingberg@ussugar.com)
Mr. David Buff, P.E., Golder Associates, Inc. (dbuff@golder.com)
Mr. Ajaya Satyal, South District Office (ajaya.satyal@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. Vickie Gibson, DEP BAR 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.

(DRAFT)

_____ _____
(Clerk) (Date)

FACILITY DESCRIPTION

U.S. Sugar operates a sugar mill and refinery in Hendry County located at the intersection of W.C. Owens Avenue and State Road 832 in Clewiston, Florida. The UTM coordinates are Zone 17, 506.1 kilometers East, and 2956.9 kilometers North. Sugarcane is harvested from nearby fields and transported to the mills by train. In the mill, sugarcane is cut into small pieces and processed in a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery. Molasses is also produced as a byproduct. Molasses is stored and processed into an animal feed product for sale.

PROPOSED PROJECT

This project will add the following emissions unit.

EU No.	Description
036	Two Hydrogen Sulfide (H_2S) Degasification Systems

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the South District Office at: 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902-2549.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the South District Office at: 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902-2549.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Final BACT Determination).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Title V Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

B. Degasification Systems (EU-036)

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
036	Two Hydrogen Sulfide Degasification Systems

{Permitting Note: In accordance with Rule 62-212.400(PSD), F.A.C., the above emission unit is subject to a Best Available Control Technology (BACT) determination for hydrogen sulfide (H_2S). The final BACT determination is presented in Appendix D of this permit.

EQUIPMENT

1. Degasification Systems: The permittee is authorized to install and operate two H_2S degasification systems and the associated five water wells. [Application No. 0510003-048-AC]

2. Water Use: The permittee shall install, calibrate and operate flow meters (or equivalent devices) with integrators to monitor the flow rate to each from each degasification unit. [Rule 62-4.070(3) and 62-212.400(BACT), F.A.C.]

PERFORMANCE RESTRICTIONS

3. Hours of Operation: The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

4. Hydrogen Sulfide: The emissions of H_2S from the combined degasification systems shall not exceed 18.0 tons per consecutive 12-month rolling total based on monthly raw well water flow rates quarterly water sampling to determine the H_2S concentration in each of the water wells. If the facility receives valid odor complaints associated with the degasification systems as verified by the Compliance Authority, the permittee may be requested to revisit the determination of BACT for H_2S emissions from degasification systems. [Rule 62-212.400(BACT), F.A.C.]

5. Objectionable Odor Prohibited: No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An "objectionable odor" is defined as any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance." The draft permit will also include a requirement to revisit BACT should the facility receive valid odor complaints from the degasification systems. [Rule 62-296.320(2), F.A.C.]

MONITORING AND RECORD KEEPING REQUIREMENTS

6. Water Wells Sampling/Analysis: On at least a quarterly basis, the permittee shall obtain representative samples of water from each well. The samples shall be taken no earlier than 90 days apart. Each sample shall have an analysis conducted to determine the H_2S concentration. [Rule 62-4.070(3) and 62-212.400(BACT), F.A.C.]

7. Monthly Records: Within ten calendar days following each month, the permittee shall observe and record the total monthly water pumped from the water wells to each degasification unit. This information shall be used in conjunction with the measured H_2S concentration for the given quarter to determine the H_2S emissions for the month and the previous 12 months, rolling total. [Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]