



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

January 15, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David A. Buff, P.E.
Golder Associates Inc.
6241 Northwest 23rd Street
Suite 500
Gainesville, Florida 32653-1500

Re: U. S. Sugar Corporation, Clewiston Boiler No. 4
AC 26-248009, PSD-FL-217

Dear Mr. Buff:

The Department has reviewed the January 9, 1997, proposed Operation and Maintenance (O&M) plan to control carbon monoxide, nitrogen oxides, and volatile organic compound emissions from the referenced boiler. EPA's Compliance Assurance Monitoring (CAM) regulation may require additional monitoring of this boiler that was not addressed in the O&M plan.

The Department is approving your January 1997 O&M plan for boiler No. 4 with the additional condition that U. S. Sugar record the periodic oxygen readings on the operator's log and implement any part of the CAM plan that applies to good combustion practices for this boiler.

If you have any questions on this matter, please contact Willard Hanks at 904/488-1344.

Sincerely,

A. A. Linero, P.E. Administrator
New Source Review Section

AAL/wh/t

cc: Mr. David Knowles, SD
Mr. Don Griffin, U. S. Sugar

P 265 659 147

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PS Form 3800, April 1995

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David A. Buff PE
Golden Assoc.
6241 NW 23rd St - Suite 500
Gainesville, FL
32653-1500

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P265 659 147

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Thank you for using Return Receipt Service.

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



January 9, 1997

Mr. A. A. Linero, P.E.
Administrator, New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Fl 32399-2400

RECEIVED
JAN 13 1997
BUREAU OF
AIR REGULATION

RE: U.S. Sugar Corporation
Clewiston Boiler No. 4
DEP File No. AC26-248809; PSD-FL-217
Update of Operation and Maintenance Plan

Dear Mr. Linero:

I have received the Department's letter dated November 20, 1996, regarding the Operation and Maintenance (O&M) Plan for Boiler 4 at U.S. Sugar Corporation's Clewiston sugar mill. In the letter, the Department discusses the relationship between excess air and CO/VOC emissions. The Department points to data from U.S. Sugar and other companies which indicates that sufficient excess air minimizes CO/VOC emissions without necessarily increasing emissions of other pollutants. The Department believes that the best way to insure that CO and VOC emissions are minimized is to operate under sufficient excess air conditions. Concern is expressed that no instrumentation is proposed by U.S. Sugar to insure that the boiler is operated whenever feasible under conditions of sufficient excess air.

In response to the Department's concerns, U.S. Sugar agrees to install an oxygen analyzer on Boiler No. 4. The instrument readout will be located in the boiler room. The boiler operators will periodically observe the oxygen analyzer readings and use the analyzer as a guide in insuring that the boiler is operated whenever feasible under conditions of sufficient excess air. An updated O&M plan which incorporates appropriate wording to implement the additional oxygen monitoring recommended by the Department is attached.

After careful review of the current construction permit for Boiler No. 4, as well as all past construction and operating permits, it is our conclusion that an O&M plan for particulate matter (PM) is not required. There is no specific condition of the current permit which requires that an O&M plan for the scrubber be submitted. Specific Conditions 6, 7, and 8, however, address requirements for operation of the scrubber, and sets limits on pH and pressure drop. These conditions ensure that the scrubber is adequately maintained and operated. Therefore, we have deleted the scrubber operation from the O&M plan.

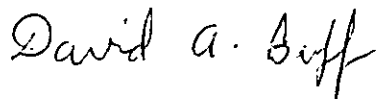
16101A/14

A.A. Linero
Page 3
January 9, 1997

In addition, Specific Condition 19 of the permit provides that an O&M plan that optimizes nitrogen oxides (NO_x) emissions may be submitted in lieu of performing annual compliance testing for NO_x. U.S. Sugar desires to submit an O&M plan for NO_x in lieu of annual compliance testing. Therefore, NO_x emissions have been addressed in the O&M plan.

If you have any comments or questions concerning this updated O&M Plan, please call or write.

Sincerely,



David A. Buff, P.E.
Principal Engineer
Florida P.E. # 19011
SEAL

DB/arz

Enclosures

cc: Murray Brinson
Don Griffin
Lisa Gefen
Peter Oppenheimer
David Knowles
File (2)

16101A/14

**UNITED STATES SUGAR CORPORATION
CLEWISTON MILL**

**OPERATION AND MAINTENANCE PLAN FOR
CO, VOC and NO_x EMISSIONS FROM BOILER NO. 4**

(January 1997)

PURPOSE OF O&M PLAN

An air construction permit was issued by the Florida Department of Environmental Protection (FDEP) for Clewiston Boiler No. 4 on August 8, 1995 (AC26-248809; PSD-FL-217). Specific Condition 17 of this permit requires that the emissions of carbon monoxide (CO) and volatile organic compounds (VOC) be maintained at the lowest possible level through the implementation of an Operation & Maintenance (O&M) plan that has been approved by the FDEP. In addition, Specific Condition 19 allows the substitution of an O&M plan that optimizes emissions of nitrogen oxides (NO_x) in lieu of annual compliance testing. The O&M plan presents operating procedures and guidelines for the minimization of CO and VOC emissions, and for the optimization of NO_x emissions, consistent with good combustion practices.

PREPARATION FOR OPERATIONS

1. Prior to each harvest season, the boiler proper, its air duct work, air heaters and scrubber are properly cleaned, inspected and repaired.
2. All refractory and boiler casing will be inspected and repaired where needed.
3. Outside of boiler tubes will have loose scale removed and boiler will be cleaned of loose scale, sand and other debris.
4. Boiler grates will be inspected and cleaned as well as being checked for mechanical operation.
5. All fans and fan drives will be inspected and repaired as needed.
6. All pumps and pump drives will be inspected and repaired as needed.
7. All oil burners will be cleaned and inspected as well as related oil piping, atomizing steam and air registers.
8. Prior to each harvest season, the skirt level of the scrubber is identified and marked on the outside so that a permanent reference is available.
9. Operational sight glasses are maintained on the scrubber so accurate water level readings can be obtained at all times to ensure that the water level is maintained at the level necessary to allow optimum scrubber efficiency.

10. Prior to each harvest season, all instruments for boiler operation and control are inspected, repaired and calibrated as required. This is recorded by the instrument shop in its repair log.

BOILER OPERATION AND CONTROLS

The senior most experienced boiler supervisor instructs other boiler room supervisors, boiler operators, and other appropriate personnel in proper boiler and scrubber operations so as to minimize stack emissions of CO and VOC, and so as to optimize stack emissions of NO_x. This instructional program is presented prior to each harvest season and is included in the orientation and training provided to new boiler room employees. The training will impress upon supervisors and operators the importance of proper boiler operation in order to minimize emissions.

CO AND VOC CONTROLS

CO emissions are to be minimized by the proper application of Good Combustion Practices (GCP). To provide reasonable assurance that GCP are being employed:

- A. The boiler operator will maintain steam rate at optimal or desired rate by controlling feed of bagasse fuel into the boiler. Combustion air to the boiler will be maintained at the highest possible level (resulting in sufficient excess air whenever feasible) in order to promote good combustion.
- B. The boiler operator will periodically (at least once per hour) view the stack video monitor to visually confirm that good combustion is taking place. (Individual stack plumes are monitored continuously through a closed circuit television system.) If an abnormal plume is observed, the operator will immediately take corrective action. The boiler operator will log the occurrence and duration of all such events in the boiler operation log, along with the corrective action taken. These records will be kept for a period of at least two years.
- C. Bagasse moisture content will be maintained at or below 55%.
- D. A flue gas oxygen meter will be installed on the boiler in order to measure flue gas oxygen concentration. The instrument readout will be located in the boiler control room to provide real time data to the boiler operator. The boiler operators will be instructed in the use of the flue gas oxygen meter for combustion control, and in the procedures necessary to maintain sufficient excess air levels. The boiler operators will periodically observe the oxygen meter and, to the extent practical, maintain sufficient excess air in the boiler, consistent with good combustion practices and meeting of steam demands.

NO_x CONTROLS

NO_x emissions are to be optimized by the proper application of Good Combustion Practices (GCP). However, in general the application of GCP to minimize CO and VOC emissions will result in increased NO_x emissions. This is because factors which promote good combustion and result in lower CO and VOC emissions, such as higher excess air and higher combustion temperatures, result in higher NO_x emissions. This is the nature of the combustion process. It is

also recognized that NO_x emissions from bagasse-fired boilers are low, and that the primary concern related to stack emissions is in the minimization of CO and VOC emissions to the extent practical. Therefore, GCP to optimize NO_x emissions is considered to be the same practices used to minimize CO and VOC emissions, as described above.

MISCELLANEOUS

1. Several times per shift, the boiler grates and feeders are examined for proper distribution and any necessary operational changes are made. Any unusual observations are logged once per shift.
2. Once per day, on the day shift, the boiler will be given a walk-around inspection with the following items being checked and repaired as needed and in coordination with the production schedule.
 - A. Fans
 - B. Pumps
 - C. Casing
 - D. Ducting
 - E. Scrubber
3. On every shift burners are inspected and cleaned if dirty.
4. On every shift, precautions will be taken as necessary to control visible emissions of fugitive matter (dust and bagasse, etc.)
5. Boiler stack emissions compliance testing is conducted once per harvest season and is to be completed prior to March 1.

REVISED 1/97

cc: W. Hanko, BAK



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 20, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David A. Buff, P.E.
KBN Engineering and Applied Sciences
6241 Northwest 23rd Street, Suite 500
Gainesville, Florida

Re: U. S. Sugar Corp., Clewiston Boiler 4
AC 26-248809, PSD-FL-217

Dear Mr. Buff:

The Department has reviewed the proposed updated Operation and Maintenance (O&M) plan submitted in May, 1996. The purpose of the updated O&M plan is to insure that Good Combustion Practices (GCP) are followed. This is required by the recent Best Available Control Technology determination made for the subject unit.

The update to the O&M plan is necessary to minimize the very large apparent increase in carbon monoxide emissions resulting from corrections to both the emissions estimating and testing procedures for bagasse boilers. Instead of requiring pollution control equipment, the Department accepted U.S. Sugar's BACT proposal of GCP and required that the O&M plan be updated accordingly to indicate precisely how CO emissions would be minimized.

Based on our review of data provided by U.S. Sugar and other companies, we have determined that the optimum control is achieved by running the units with sufficient excess air to minimize CO emissions. We found that it is possible to do so without necessarily increasing emissions of other pollutants such as nitrogen oxides (NO_x). Operating under excess air conditions is the best way to insure that carbon monoxide and volatile organic compounds (VOC) emissions are minimized without directly having to control these pollutants.

The O&M plan submitted does not mention any instrumentation to insure the unit is operated whenever feasible under conditions of sufficient excess air. A process monitor for excess air (such as for oxygen or carbon dioxide) will suffice without the need to install expensive air pollution monitoring equipment. We recommend that you update the O&M plan accordingly. We do not believe that these recommended efforts to provide the minimum process instrumentation consistent with the BACT Determination will conflict with the CAM rule.

Sincerely,

C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/aal/l

cc: David Knowles, SD
Don Griffin, U.S. Sugar

P 339 251 181

US Postal Service

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PS Form 3800, April 1995

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 David A. Buff, P.E.
 KBN Engineering + A.S.
 6241 NW 23rd St, Suite 500
 Gainesville, FL 32653-1500

4a. Article Number
 P 339 251 181

4b. Service Type
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5. Signature (Addressee)
 David A. Buff

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 [Signature]

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November 22, 1996

Mr. A. A. Linero, P.E.
Administrator, New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Date ?
*COPY FOR
BOILER NO. 4
FILE*

Re: US Sugar Corporation
Clewiston Boiler No. 7
DEP File No. AC26-238006; PSD-FL-208
Boiler Operation and Maintenance Plan

Dear Mr. Linero:

The purpose of this letter is to submit for approval an Operation & Maintenance (O&M) plan to minimize CO and VOC emissions from United States Sugar Corporation's Clewiston Boiler No. 7. The O&M plan is required by Specific Condition 22 of the above referenced air construction permit. US Sugar will implement the O&M plan for VOC and CO emissions upon approval by the Department. If you have any comments or questions concerning this proposed O&M plan, or desire additional information, please contact me directly.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer
Florida P.E. # 19011
SEAL

cc: W. Hanks, BAR

DB/arz

cc: Murray Brinson
Don Griffin
Lisa Gefen
Peter Oppenheimer
David Knowles

16101A/11

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1801 Clint Moore Road
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7785 Baymeadows Way
Suite 105
Jacksonville, Florida 32256
904-739-5600 FAX 904-739-7777

1616 P Street NW
Suite 350
Washington, DC 20036
202-462-1100 FAX 202-462-2270

**UNITED STATES SUGAR CORPORATION
CLEWISTON MILL BOILER NO. 7
OPERATION AND MAINTENANCE GUIDELINES
FOR
CO AND VOC EMISSIONS**

PURPOSE OF O&M PLAN

An air construction permit was issued by the Florida Department of Environmental Protection (FDEP) for Clewiston Boiler No. 7 on January 31, 1995 (AC26-238006; PSD-FL-208). Specific Condition No. 22 of this permit requires that carbon monoxide (CO) and volatile organic compound (VOC) emissions from Boiler No. 7 be maintained at the lowest possible level through implementation of an Operation and Maintenance (O&M) plan that has been approved by the Department. The O&M plan presents operating procedures and guidelines for the minimization of CO and VOC emissions, consistent with good combustion practices and the pollution control equipment installed on the boiler.

PREPARATION FOR OPERATION

1. The boiler, air ductwork, and air heaters will be properly cleaned, inspected and repaired during routine boiler maintenance.
2. All refractory and boiler casing will be inspected and repaired where needed.
3. Outside of boiler tubes will have loose scale removed and boiler will be cleaned of loose scale, sand and other debris.
4. Boiler grates will be inspected and cleaned as well as being checked for proper mechanical operation.
5. All fans and fan drives will be inspected and repaired as needed.
6. All pumps and pump drives will be inspected and repaired as needed.
7. All oil burners will be cleaned and inspected as well as related oil piping, atomizing steam and air registers.
8. The settings of the combustion controls and linkages to fuel feeders, forced draft fan, and overfire air fan will be checked during routine boiler maintenance.
9. All instruments for boiler operation and control will be inspected, repaired and calibrated as required during routine boiler maintenance. These activities will be recorded by the instrument shop in its repair log.

BOILER OPERATION AND CONTROLS

The senior most experienced boiler supervisor instructs other boiler room supervisors, boiler operators, and other appropriate personnel in proper boiler operations so as to minimize emissions of CO and VOC. This instructional program is included in the orientation and training provided to new boiler room employees. The training will impress upon supervisors and operators the importance of proper boiler operation in order to minimize emissions of CO and VOC.

CO AND VOC CONTROLS

CO emissions are to be minimized by the proper application of Good Combustion Practices (GCP). To provide reasonable assurance that GCP are being employed, the following procedures will be implemented:

Startup Procedures

1. During startup of the boiler, the fuel feed and combustion air are gradually increased. Care is taken not to overload the fuel bed, until a clean, brisk fire is obtained over the entire grate area. If excessive smoking is observed during the start-up period, the amount of fuel being fed to the grates is reduced until the condition is corrected.
2. After a good burning fuel bed is established over the entire grate, the fuel bed is checked for proper distribution by observing through the observation sight glasses in the side walls.
3. During the start-up period, all of the stoker control components are normally operated on manual, and the maximum stoker operation is limited to about 40% of rated capacity.
4. All fuel feed and air control linkages are adjusted prior to switching the stoker over to the automatic control mode. During this adjustment, the settings are made at minimum fuel feed, maximum fuel feed, and several points between.

Normal Operation

1. Reasonably clean settling chambers are maintained in the furnace, breaching and heat traps, where cinders can accumulate.
2. The combustion control system is kept in proper adjustment and working freely.
3. The fans and fan blades are periodically cleaned, and any blades that may have become loose or damaged are repaired.
4. The grates are examined periodically to be certain that all air holes are open.
5. The fuel and air are maintained in proper proportion to the extent practicable so that fuel burns cleanly and the amount of smoke is minimized.
6. Ash present in the ash pits is removed as necessary in order to minimize any furnace draft upsets.

7. At one week intervals, or as operating experience indicates, the stoker and forced draft fan are stopped to clean out the siftings chamber(s).
8. After the siftings chambers have been cleaned, all access doors and ash pit doors are tightly closed and sealed to minimize air leakage.
9. At regular intervals, checks are made to identify air leaks at all air swept fuel distributor spout joints and between spout and mounting plate. If any leaks are detected, the joint is repaired with furnace cement as necessary.
10. At regular intervals, checks are made for air leaks between the air supply duct, damper housing and fuel distributor spouts. If any leaks are detected, the leaks are repaired with furnace cement.
11. Several times per shift, the boiler grates and feeders are examined for proper distribution and any necessary operational changes are made. Any unusual observations are logged once per shift.
12. Once per day, on the day shift, the boiler is given a walk-around inspection with the following items being checked and repaired as needed and in coordination with the production schedule:
 - A. Fans
 - B. Pumps
 - C. Casing
 - D. Ducting
 - E. Electrostatic precipitator
13. On every shift, burners are inspected and cleaned if dirty.
14. On every shift, precautions are taken as necessary to control visible emissions of fugitive particulate matter (dust, bagasse, etc.)
15. The boiler operator will maintain steam rate at the desired rate by controlling feed of bagasse fuel into the boiler. Combustion air to the boiler will be maintained at the highest possible level (resulting in the highest possible excess air) in order to promote good combustion.
16. The boiler operator will periodically (at least once per hour) view the stack video monitor to visually confirm that good combustion is taking place. (Individual stack plumes are monitored continuously through a closed circuit television system.) If an abnormal plume is observed, the operator will immediately take corrective action. The boiler operator will log the occurrence and duration of all such events in the boiler operation log, along with the corrective action taken. These records will be kept for a period of at least two years.
17. Bagasse moisture content will be maintained at or below 55%.

Shutdown of Boiler

1. When the furnace has cooled, the interior components of the stoker are inspected, and any slag or other obstructions to the air openings of the grates, rear tuyeres and apron tuyeres are removed.
2. Any slag formation on the front wall is removed and refractory under apron tuyeres are checked.
3. The boiler is inspected to identify any air leaks that may have developed between the grates and the walls of the boiler. Repair as needed.
4. The internal lower surfaces (removable wear liner) of the air swept fuel distributor spouts are inspected to determine wear rates. This will determine need for replacement during a scheduled outage.



September 12, 1996

Mr. A. A. Linero, P.E.
Administrator, New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
SEP 16 1996
BUREAU OF
AIR REGULATION

Re: U. S. Sugar Corporation
Clewiston Boiler No. 4, DEP File No. AC26-248809; PSD-FL-217

Dear Mr. Linero:

To follow up on my conversation with Willard Hanks last week, I would like to present additional information related to the updated Operation & Maintenance (O&M) Plan for Boiler No. 4 at U.S. Sugar's Clewiston mill. The updated O&M plan was submitted to the Department for approval in May 1996. Mr. Hanks had inquired as to whether U.S. Sugar was ever required to install, or has ever installed, an oxygen meter on Boiler No. 4. Boiler No. 4 currently does not have an oxygen meter, nor has U.S. Sugar ever installed an oxygen meter on the boiler. Our review of the initial construction permit (AC26-80930, issued January 11, 1985) and initial operating permit (AO26-115292, issued May 19, 1986) for Boiler No. 4 revealed that the boiler was not required to have an oxygen meter installed. Accordingly, such instrumentation has never been installed on the boiler.

Based on this information, it is requested that the Department approve the updated O&M plan presented to the Department by letter dated May 16, 1996. This updated plan takes advantage of the existing instrumentation and practices employed on Boiler No. 4, as required by the Department's letter to U.S. Sugar dated January 31, 1996.

It is noted that additional monitoring, recordkeeping and/or reporting regarding CO emissions from Boiler No. 4 may be required once EPA finalizes the compliance assurance monitoring (CAM) rule currently under development. Promulgation of this rule is expected no later than July 1997, based on the notice which appeared in the August 13, 1996, Federal Register. To avoid duplicative and unnecessary monitoring, or monitoring that may be inconsistent with the CAM rule, it is recommended that the Department await promulgation of the CAM rule before considering any additional measures.

U.S. Sugar will implement the additional O&M measures for CO and VOC emissions contained in the May 1996 plan upon approval by the Department. If you have any comments or questions concerning this information, or the proposed measures to expand the updated O&M Plan in the areas of CO and VOC control, please contact me.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer
Florida P.E. # 19011

*cc: Willard Hanks, BAR
Marty Costello, BAR*

SEAL

DB/arz

cc: Murray Brinson
Don Griffin
Lisa Gefen
Peter Oppenheimer
David Knowles
File (2)

16101A/9

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BRYAN CAVE LLP

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ROBERT F. VAN VOORHEES

DIRECT DIAL NUMBER

(202) 508-6014

May 20, 1996

RECEIVED

MAY 24 1996

BUREAU OF
AIR REGULATION

Mr. A. A. Linero, P.E.
Administrator
New Source Review Section
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 33440

**Re: DEP File No. AC26-248809/PSD-FL-217
PSD Construction Permit Modification
Clewiston Boiler No. 4
United States Sugar Corporation**

Dear Mr. Linero:

On behalf of U.S. Sugar Corporation, we would like to thank the Department for issuing a PSD construction permit modification for Clewiston Boiler No. 4 that successfully resolves all outstanding issues to the mutual satisfaction of DEP and U.S. Sugar. We appreciate the substantial time that you and your staff have devoted to evaluating and responding to our comments. In particular, we would like to recognize the efforts of Mr. Willard Hanks.

In its notice of INTENT TO ISSUE PERMIT AMENDMENT, dated May 1, 1996, the Department reserved its position that burning fuel at a rate in excess of permit limits is not authorized by Rule 62-210.700, F.A.C. We fully understand the Department's position and believe that the Department understands the view that we have previously advanced. It is also our understanding that the Department's position has not been incorporated into the PSD permit modification for Boiler No. 4.

At present, we have no reason to believe that U.S. Sugar will ever need to avail itself of the provisions contained in Rule 62-210.700, F.A.C., for Boiler No. 4. Accordingly, we see no need to press this issue to resolution at this time. In the event that these provisions do become pertinent, we trust that the Department will concur that our disagreement with the

BRYAN CAVE LLP

Mr. A. A. Linero, P.E.
May 20, 1996
Page 2

Department over the applicability of this provision has been preserved for resolution at such later time.

One final housekeeping note: proposed specific condition 1 requires Boilers No. 1, 2, 3, and 4 to comply with the stack sampling facility requirements of Rule 62-297.345, F.A.C. This rule was repealed as of March 13, 1996. The relevant requirements have been moved to Rule 62-297.310(6)(g)1.a.-c., F.A.C.

Thank you again for working with us to issue a PSD construction permit modification to Boiler No. 4.

Very truly yours,



Robert F. Van Voorhees

cc: David Knowles, DEP
Lisa Gefen, U.S. Sugar
Peter Briggs, U.S. Sugar
Don Griffin, U.S. Sugar
David Buff, KBN

140773.01

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