

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

NOTICE OF ADMINISTRATIVE PERMIT CORRECTION

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William A. Raiola, V.P. of Sugar Processing Operations
United States Sugar Corporation
111 Ponce DeLeon Avenue
Clewiston, FL 33440

Re: U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery
Air Permit No. 0510003-018-AC
Boilers 4/7, Modified Oil Firing Systems
Administrative Permit Correction

Dear Mr. Raiola:

On June 6, 2003, the Department issued an air construction permit authorizing an upgrade to the oil firing systems for Boilers 4 and 7. On June 19, 2003, the Department received a letter from the engineer of record, David Buff, requesting an amendment of this permit. The final permit specifies the maximum oil firing rate for Boiler 7 as 2311 gallons per hour, which is consistent with the original application. However, U.S. Sugar later modified this information in a letter dated December 18, 2002. The correct maximum oil firing rate for Boiler 7 should be the same as Boiler 4, which is 2417 gallons per hour. The Department reviewed the file and agrees that the permit should be amended to reflect the slightly higher oil firing rate. Permit No. 0510003-018-AC is hereby amended as follows:

Final Permit, Page 7 of 9, Performance Restrictions:

4. **Oil Firing Restrictions:** No more than ~~2417-2311~~ gallons of distillate oil shall be fired per hour and no more than 4,500,000 gallons of distillate oil shall be fired during any consecutive 12-month period. The permittee shall install, calibrate, operate, and maintain an individual fuel oil flow meter with integrator. *{Permitting Note: The annual oil firing limit ensures that the annual capacity factor (as defined in 40 CFR 60.41b) remains below 10% and avoids applicability of the NOx standard in accordance with 40 CFR 60.44b(l)(1). The hourly firing rate was amended from 2311 to 2417 gallons per hour on June 20, 2003.}* [Design; Permit No. PSD-FL-208; Rule 62-212.400, F.A.C.; and 40 CFR 60.44b(l)(1)]

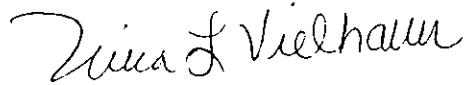
The change is considered a correction that is necessary to properly reflect information provided during the application process. In accordance with Rule 62-210.360, F.A.C., the Department determines that an administrative permit correction is appropriate. Also attached is a revised Page 7 that incorporates the amendment. Please replace the original page in your final permit with the corrected version. If you have any questions regarding this matter, please contact Jeff Koerner at 850/921-9536.

Any party to this order (permit correction) 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 thirty days after this order is filed with the clerk of the Department.

"More Protection, Less Process"

Printed on recycled paper.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

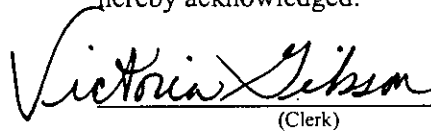
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administrative Permit Correction was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 6/23/03 to the persons listed:

- Mr. William A. Raiola, USSC*
- Mr. David Buff, Golder Associates Inc.
- Mr. Ron Blackburn, SD Office
- Mr. Gregg Worley, EPA Region 4
- Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 June 23, 2003
(Clerk) (Date)

Enclosures

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. William A. Raiola
 V.P. of Sugar Processing Operations
 United States Sugar Corporation
 111 Ponce DeLeon Avenue
 Clewiston, FL 33440

2. 7001 0320 0001 3692 5702**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

A. SOCIS 6-25-03

C. Signature

Andrew Socis Agent
 Addressee

D. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 5702

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To

William A. Raiola
 Street, Apt. No.
 or P.O. Box Ponce DeLeon Avenue
 City, State, ZIP+4
 Clewiston, FL 33440

PS Form 3800, January 2001

See Reverse for Instructions

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Boiler No. 7

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
014	Boiler 7 is an Alpha Conal Model No. ATT-203-18 spreader-stoker, vibrating-grate boiler with a maximum 1-hour steam production rate of 385,000 pounds per hour at 750° F and 600 psig. It fires primarily bagasse with distillate oil as a supplemental and alternate fuel. Particulate matter emissions are controlled by a wet sand separator followed by an ABB electrostatic precipitator. Exhaust gases exit a 225 feet tall stack at 335° F with an average flow rate of 355,000 acfm.

EQUIPMENT

5. **Oil Firing Upgrade:** The permittee is authorized to modify the existing oil firing system as follows: modify existing oil burners and configure as multi-stage combustion low-NOx burners; modify the fuel/steam valve train to incorporate a constant differential pressure valve; and replace two existing oil pumps. [Design]

PERFORMANCE RESTRICTIONS

6. **Oil Specification:** Any fuel oil fired in this boiler shall be No. 2 distillate oil (or a superior grade) containing no more than 0.05% sulfur by weight as determined by ASTM Methods D-129, D-1552, D-2622, D-4294, or equivalent methods approved by the Department. The nitrogen content of the distillate oil shall not exceed 0.015% nitrogen by weight as determined by ASTM Method D4629 or equivalent methods approved by the Department. [Permit No. PSD-FL-208; Rules 62-212.400 and 62-296.405, F.A.C.; and 40 CFR 60.42b(j)]
7. **Permitted Capacity, Oil Firing:** The maximum heat input rate is 326 MMBtu per hour of heat input from distillate oil firing. *{Permitting Note: The maximum steam production rate from firing 100% distillate oil is approximately 225,000 lb/hour.}* [Design; Rule 62-120.200(PTE), F.A.C.]
8. **Oil Firing Restrictions:** No more than 2417 gallons of distillate oil shall be fired per hour and no more than 4,500,000 gallons of distillate oil shall be fired during any consecutive 12-month period. The permittee shall install, calibrate, operate, and maintain an individual fuel oil flow meter with integrator. *{Permitting Note: The annual oil firing limit ensures that the annual capacity factor (as defined in 40 CFR 60.41b) remains below 10% and avoids applicability of the NOx standard in accordance with 40 CFR 60.44b(l)(1). The hourly firing rate was amended from 2311 to 2417 gallons per hour on June 20, 2003.}* [Design; Permit No. PSD-FL-208; Rule 62-212.400, F.A.C.; and 40 CFR 60.44b(l)(1)]

EMISSIONS STANDARDS

9. **PM Emissions:** Emissions of particulate matter (PM) shall not exceed 0.03 lb/MMBtu of heat input from the firing of distillate oil as determined by EPA Methods 5 or 17. [Permit No. PSD-FL-208(BACT); Rules 62-296.405, and 62-296.410, F.A.C.]
10. **Visible Emissions:** When firing distillate oil, visible emissions shall not exceed 20% opacity based on a 6-minute average except for one 6-minute period per hour that shall not exceed 27% opacity, as determined by EPA Method 9. [40 CFR 60.43b(f); Permit No. PSD-FL-208(BACT)]
11. **NOx Emissions:** Emissions of nitrogen oxides shall not exceed 0.20 lb/MMBtu of heat input from the firing of distillate oil as determined by EPA Method 7E. *{Note: Compliance with the standard ensures that the project does not result in a PSD significant increase for NOx emissions.}* [Rule 62-4.070(3), F.A.C.; Permit No. PSD-FL-208(BACT)]

{Permitting Note: The following table summarizes revised maximum emission rates based on the original BACT determinations of Permit No. PSD-FL-208, the limits of this permit, and a heating value of 135,000 Btu per gallon of distillate oil.}

Golder Associates Inc.

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



JUN 19 2003

June 16, 2003

0337546

BUREAU OF AIR REGULATION

Florida Department of Environmental Protection
Department of Air Resources Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Attention : Mr. Jeffery Koerner, P. E.

RE: United States Sugar Corporation (U.S. Sugar) – Clewiston Mill
Boiler No. 4 and Boiler No. 7 Fuel Oil Burning Increase
Air Permit No. 0510003-018-AC

Dear Mr. Koerner:

U.S. Sugar is in receipt of the Department's final permit for the above-referenced project. Our review of the final permit revealed there may have been a minor typographical error regarding Boiler No. 7. In Section 3.B., Condition 4, it is stated that the maximum oil firing rate shall be no more than 2,311 gallons per hour (gal/hr). In the original application for Boiler No. 7, this was the correct figure. However, in Golder's letter to the Department dated December 18, 2002, the oil usage figure was revised to 2,416.7 gal/hr. This corresponded to a maximum heat input rate of 326 million British thermal units per hour (MMBtu/hr). This maximum heat input rate is correctly reflected in the final permit, but it appears that the maximum oil usage rate was not updated.

We request that a minor amendment to the construction permit be issued to address this request. Please call or e-mail me if you have any questions concerning this request.

Sincerely,

GOLDER ASSOCIATES INC.

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

DB/nav

cc: Don Griffin
Ron Blackburn, DEP

L061603

Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, BAR
THRU: Al Linero, NSR
FROM: Jeff Koerner, NSR
DATE: June 20, 2003
SUBJECT: Final Air Permit No. 0510003-018-AC
U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery
Boilers 4/7, Modified Oil Firing Systems
Administrative Permit Correction

On June 6, 2003, the Department issued an air construction permit authorizing an upgrade to the oil firing systems for Boilers 4 and 7. On June 19, 2003, the Department received a letter from the engineer of record, David Buff, requesting an amendment of this permit. The final permit specifies the maximum oil firing rate for Boiler 7 as 2311 gallons per hour, which is consistent with the original application. However, U.S. Sugar later modified this information in a letter dated December 18, 2002. The correct maximum oil firing rate for Boiler 7 should be the same as Boiler 4, which is 2417 gallons per hour. The Department reviewed the file and agrees that the permit should be amended to reflect the slightly higher oil firing rate. The change is considered a correction that is necessary to properly reflect information provided during the application process. In accordance with Rule 62-210.360, F.A.C., an administrative permit correction is appropriate.

I recommend your approval of the attached Administrative Permit Correction.

Attachments