

# Florida Department of Environmental Protection

## Memorandum

TO: Joseph Kahn, Division of Air Resource Management  
THRU: Trina Vielhauer, Bureau of Air Regulation  
FROM: Jeff Koerner, Air Permitting North Program  
DATE: July 28, 2006  
SUBJECT: Project No. 0510003-036-AC  
U. S. Sugar Corporation – Clewiston Sugar Mill  
Boilers 1 and 2, Oil Burner Modifications

In February of 2005, the Department issued air construction Permit No. 0510003-027-AC, which authorized modification of the oil firing systems on Boilers 1 and 2 to accommodate the use of distillate oil. The original permit authorized the installation of two low-NOx (0.15 lb/MMBtu) burners per boiler with a maximum heat input rate of 104 MMBtu per hour per burner. However, only one burner was installed in each boiler with a maximum heat input rate of 130 MMBtu per hour per burner. Subsequent testing indicated NOx emissions ranging from 0.14 to 0.17 lb/MMBtu. The original air construction permit was revised to: identify installation of only one Peabody-type multi-stage combustion (MSC) burner on each boiler; specify the maximum burner capacity as 130 MMBtu/hour (963 gallons per hour); identify the maximum NOx emissions rate of 0.17 lb/MMBtu; reduce the annual distillate oil firing rate for each boiler from 3.5 to 3.0 million gallons per year; and, for operational flexibility, cap the combined fuel firing of Boilers 1 and 2 to 6.0 million gallons per year instead of 3.0 million gallons per year per boiler.

The Department distributed an "Intent to Issue Permit" package on June 16, 2006. The applicant published the "Public Notice of Intent to Issue" in The Clewiston News on June 29, 2006. The Department received the proof of publication on July 19, 2006. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed. No comments were received.

Day #90 is October 5, 2006. I recommend your approval of the attached Final Permit for this project.

Attachments

① were to install 2 burners but  
only did 1. wanted a test to  
validate emission factor. Not PSD.  
Was to develop emission  
factor. Don't normally burn  
just oil (maybe if run out of  
bagasse in off-season).