



CC: Carter Endsley  
CBE  
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Jeff Kaerner  
cast

November 23, 2009

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Mr. Al Linero, Chief, Air Permitting South  
Florida Department of Environmental Protection  
Department of Air Resources Management  
2600 Blair Stone Road, MS 5500  
Tallahassee, FL 32399-2400

DEC 15 2009

BUREAU OF AIR REGULATION

**RE: UNITED STATES SUGAR CORPORATION, CLEWISTON MILL  
3-YEAR BOILER MAINTENANCE PROJECT  
PERMIT NO. 0510003-022-AC  
2009 OFF-SEASON REPAIRS AND PLANNED REPAIRS FOR THE 2010 OFF-SEASON**

Dear Mr. Linero:

United States Sugar Corporation (US Sugar) was issued Air Construction Permit No. 0510003-022-AC on June 3, 2003. This permit authorized a 3-year boiler maintenance project at the existing Clewiston Sugar Mill and Refinery located in Hendry County, Florida for the 2003 through 2005 off-seasons. Because all the repairs were not completed during the specified time, US Sugar requested an extension to the air permit to include the 2006 through 2008 off-seasons. Due to the pending Title V renewal permit application, the Florida Department of Environmental Protection (FDEP) chose to not extend Permit No. 0510003-022-AC, and the permit has since expired. However, US Sugar is continuing to summarize the maintenance activities conducted on the boilers during the previous off-season and provide advance notice of planned maintenance for the upcoming off-season.

The purpose of this correspondence is to provide the list of maintenance and repair activities at the Clewiston Mill conducted during the 2009 off-season, and the repairs planned on the boilers for the upcoming 2010 off-season. Condition 4 of the Emissions Unit Specific Conditions of Permit No. 0510003-022-AC requires US Sugar to submit a "Maintenance Summary Report" within 60 days of the beginning of each cane milling season. The condition requires that the permittee summarize the following information:

- General description of the work performed on each boiler during the previous off-season
- Summary of the off-season maintenance inspections
- Revised schedule of maintenance and repair activities for the next off-season

The current US Sugar crop season began October 1, 2009. The maintenance and repair activities conducted during the 2009 off-season, and those planned for the 2010 off-season, are provided in the attached table.

In accordance with the construction permit, the replacements US Sugar is planning are all "functionally equivalent" to the existing components, and are intended to return the boilers to their current steam production capabilities. The maintenance activities will not increase the capacity of any boiler, nor change the basic design parameters, including fuel firing rates or heat input rates. The repairs will not increase the emission rates of any boiler, nor the cane milling capacity of the plant. As such, we believe these repairs are authorized activities under the air construction permit.

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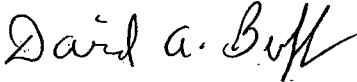
D.E.P. South District



Please call me at (352) 336-5600 or Keith Tingberg at (863) 902-3186 if you have any questions concerning this information, or need additional information.

Sincerely,

**GOLDER ASSOCIATES INC.**



David A. Buff, PE, QEP  
Principal Engineer

cc: Carter Endsley, FDEP  
Keith Tingberg, USSC  
Bret Nesbitt, USSC

Enclosures

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## CLEWISTON BOILER REPAIRS SUMMARY 2009 OFF-SEASON

Boiler repairs and maintenance conducted during the 2009 off-season are described below.

### Boiler No. 1

- Installed new steam drum internals
- Replaced roof tubes
- Basic refractory repairs

### Boiler No. 2

- Installed new steam drum internals
- Replaced roof tubes
- Basic refractory repairs

### Boiler No. 4

- Basic refractory repair

### Boiler No. 7

- Replaced roof refractory
- Installed new steam drum internals
- Performed general grate repairs
- Replaced two superheater elements
- Replaced three generating bank tubes
- Replaced first row of superheater loops
- Replaced field one collector plates and electrodes on electrostatic precipitator (ESP)

### Boiler No. 8

- Repaired roof refractory
- Performed general grate repairs

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**CLEWISTON BOILER MAINTENANCE INSPECTIONS  
2009 OFF-SEASON**

Boiler maintenance inspections performed during the 2009 off-season are described below.

**Boiler Nos. 7 and 8**

- ESP inspections by the original equipment manufacturer (OEM)

**Boiler Nos. 1, 2, 4, 7, and 8**

- Eddy current testing of all generating bank tubes
- Grate inspections by a qualified OEM inspector

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**CLEWISTON BOILER REPAIR PROJECTIONS  
2010 OFF-SEASON**

Boiler repairs projected to be accomplished during the 2010 off-season are described below.

**Boiler No. 1**

- Replace three rows of generating bank tubes

**Boiler No. 2**

- Replace three rows of generating bank tubes

**Boiler No. 4**

- Replace two rows of generating bank tubes

**Boiler No. 7**

- Repair rear wall tube stubs

**Boiler No. 8**

- Replace roof refractory
- Replace one field of collector plates and electrodes on ESP

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