

Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

July 19, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William A. Raiola, Sr. Vice President, Sugar Processing Operations
United States Sugar Corporation
111 Ponce de Leon Avenue
Clewiston, FL 33440

Re: Request for Additional Information
DEP File No. 0510003-031-AC, 0510003-032-A V
Clewiston and Bryant Mills

Dear Mr. Raiola:

On June 6, the Department received your application for a Title V permit revision, as well as revisions to PSD-FL-272 and PSD-FL-333. The information required below deals with the requested changes to the PSD permits. However, since the Title V permit cannot be revised until the issues related to the requested PSD changes are resolved, both applications are considered as incomplete. In order to continue processing your applications, the Department will need the additional information below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please provide support for U.S. Sugar's contention that the maximum true vapor pressure of the fuel oil storage tanks is less than 3.5 kilopascals, rendering inapplicable 40 CFR 60 Subpart Kb. Also, it is noted that existing PSD permit revisions are not prompted as a result of changes within affected NSPS Standards, whether such standards becoming more (or less) stringent.
2. The application requests removal of the condition within PSD-FL-333A, which requires (in part) VE compliance testing on the "B" Tandem conveyor transfer point from the C4 conveyor as well as the C1 to C2 conveyor transfer point. The application indicates that since these baghouses were located (and discharge) within the partially enclosed Boiler building, VE tests have become infeasible. Please provide suggestions for possible alternatives to the elimination of emissions testing; include any feasible hardware options, as well as potential process measurements for surrogates to VE testing.
3. U.S. Sugar requests that annual compliance testing for NO_x and VOC for boiler 4, and annual VOC testing for boiler 7 be reduced from annually to once every five years, or upon renewal of the Title V application. The rationale cited by the applicant is that the "emissions have historically tested well below the permit limits."
 - A) Please provide additional detail for the historical compliance test results. In particular, the Department is interested in reviewing each of the individual test runs, which comprised the several years' worth of lb/MMBtu emission results summarized within Tables 1 and 2 of the application.

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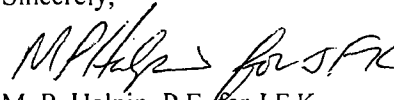
- B) Please submit a chronological summary of all changes which have occurred to boilers 4 and 7 since year 1998, whether such changes were physical in nature, or changes to the method of operation.
4. The Department is not inclined to authorize excess emissions during periods of startup and shutdown for longer than 2 hours (and up to 12 hours), based upon the timeframes required to start the units up as outlined within U.S. Sugar's procedures.
 5. The application states that the fuel oil nitrogen content limit for Boiler 7 is not considered necessary, and that a compliance determination method is not stated. However, according to Air Construction permit 0510003-018-AC, Condition B.2. "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." Please provide further justification for the elimination of the fuel oil nitrogen content requirement and identify alternatives which the applicant deems acceptable.
 6. No CAM Plan was included with the Title V application rendering the Title V application incomplete. The cover letter submitted with the application dated June 1st, indicated that the CAM Plan would be submitted "within the next few weeks".

We are still awaiting comments from the EPA and the National Park Service on the requested PSD revisions. We will forward them to you when received and they will comprise part of this completeness review.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."*

If you have any questions, please call Jeff Koerner, P.E. at 850/921-9536.

Sincerely,


M. P. Halpin, P.E. for J.F.K.
North Permitting Section

cc: Gregg Worley, EPA
John Bunyak, NPS
Ron Blackburn, SD
Jose Garcia, PBCH Unit
David Buff, Golder