

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL USA 32653  
Telephone (352) 336-5600  
Fax (352) 336-6603  
www.golder.com



February 15, 2006

0537541/0537540

Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED

FEB 16 2006

Attention: Mr. Jeff Koerner, P.E., Air Permitting South

RE: UNITED STATES SUGAR CORPORATION  
CLEWISTON AND BRYANT MILLS  
TITLE V RENEWAL APPLICATION  
PROJECT NOS. 0510003-031-AC AND 0510003-032-AV  
SECOND REQUEST FOR ADDITIONAL INFORMATION

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

United States Sugar Corporation (U.S. Sugar) has received the Department's second request for additional information (RAI) dated November 11, 2005, regarding the Title V renewal application. Each of the Department's requests is answered below, in the same order as they appear in the November 11 RAI letter.

**Comment 1.** The CAM Plan was not submitted with the initial application and is currently under review for completeness. We will request any additional information regarding the CAM Plan by 11/25/05 (60 days after receipt).

**Response:** Please note that we have no record of receiving any additional comments on the Compliance Assurance Monitoring (CAM) Plan, which was submitted September 22, 2005. Therefore, we assume that the Department has no further questions regarding the CAM Plan.

**Comment 2.** We will consider establishing periods of allowable excess emissions (if deemed necessary) contingent on the following:

- a. Each pollutant must be considered separately as well as the control method. For example, it is possible that excess opacity could be observed during a startup if the control equipment cannot be placed in operation prior to startup for some reason. This is determined on a case-by-case basis.

**Response:** The Department's comment is acknowledged. Excess emissions may occur even though the control equipment is in operation. The current Title V permit (0510003-017-AV) recognizes U.S. Sugar's cold startup procedures (reference condition A.11), and the potential for excess emissions during such periods. The Startup/Shutdown



procedures for U.S. Sugar's boilers identify the point in the process for excess emissions during such periods. The Startup/Shutdown procedures for U.S. Sugar's boilers identify the point in the process that the control equipment is activated. Although the control equipment may be activated, combustion conditions in the boilers during startup/shutdown may still result in excess emissions. For example, PM emissions and opacity potentially may exceed the allowable limits even if the control device is operating. Some pollutants do not have control devices (i.e., CO, VOC, NO<sub>x</sub>) and therefore excess emissions of these pollutants may also occur.

- b. **The compliance status of a pollutant must be readily verifiable during the startup or shutdown (i.e., opacity observations, CEMS, etc.). For example, particulate matter emissions during a startup are not generally verifiable because EPA Method 5 is typically valid only during steady-state operation (excluding startups, shutdowns, and malfunctions). However, opacity observations may be made by a certified observer at any time.**

**Response:** The compliance status of each pollutant for which emission limits have been set is readily verifiable using the test methods specified in the permit. If there is no allowance for excess emissions, then the Department or EPA could require compliance testing during startup/shutdown conditions because legally the emissions limits must be met at all times unless the permit specifically authorizes such excess emissions. This is why U.S. Sugar is requesting additional time for startup/shutdown.

- c. **The duration and nature of the event as well as the duration and maximum level of emissions must be identified for consideration. For example, although a full boiler startup may take 6-12 hours, it may be possible to place the ESP in operation after the first hour of startup. If necessary and supported by actual data, an alternate opacity standard could be considered for the first hour of a startup. Steps to minimize emissions should be identified as well as expected maximum emission levels. This is determined on a case-by-case basis.**

**Response:** As discussed above, excess emissions of PM and opacity are still possible after the control device has been placed in operation, due to boiler operation. It is possible, although not likely, that excess emissions could occur for the full duration of startup or shutdown. Actual opacity data is not available for startup/shutdown conditions. Such data could be obtained by U.S. Sugar's certified VE readers, although startups occur infrequently and normally such personnel are performing other duties during a startup. Steps U.S. Sugar takes to minimize emissions are contained in the procedures for startup and shutdown contained in the Title V application.

- d. **For units with CEMS, the underlying air construction permits may already provide allowable periods of excess emissions. Otherwise, emissions data collected during startups could be used to identify the duration of excess emissions or possibly alternate standards that reflect appropriate procedures are being taken to minimize excess emissions for the startup.**

**Response:** Excess emissions during startup/shutdown for CO and NO<sub>x</sub> from Boiler No. 8 are covered under the permit and the CEMS requirements.

**Comment 3.** We are also processing a separate application to revise the PSD permit for the recently installed Boiler 8. The revisions include: incorporate NEHSAP Subpart DDDDD requirements for industrial boilers (with alternate pH monitoring procedures); revise the CO standard; add wood chips as an authorized fuel; and revise the ammonia slip standard. Please comment on whether you request that we hold the Title V renewal application "incomplete" while we process and finalize the revisions of the Boiler 8 PSD permit.

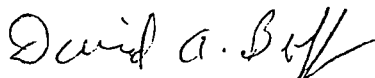
**Response:** We have received a draft air construction permit for Boiler No. 8. We request that the Department hold the Title V application incomplete until the Boiler No. 8 permit is finalized.

In the original Title V renewal application, we had requested that the restrictions on fuel oil burning be relaxed, due to the switch to No. 2 fuel oil in all the boilers at the Clewiston Mill. Please find enclosed a report entitled "Sulfur Dioxide Modeling Analysis for the Clewiston Mill" to support the request for relaxing the fuel burning restrictions. As stated in the Title V renewal application, the new restrictions we are requesting are based on the maximum fuel oil firing capability of the burners on each boiler.

Thank you for consideration of this information. If you have any questions, please do not hesitate to call me at (352)336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.  
Principal Engineer

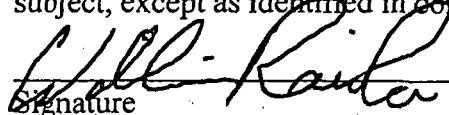
Enclosures

DB/all

cc: Don Griffin  
Peter Briggs  
Jose Garcia, Palm Beach County Health Unit  
Ron Blackburn, FDEP Fort Meyers

**Application Responsible Official Certification**

Complete if applying for an initial/revise/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: <b>William A. Raiola, Senior Vice President, Sugar Processing Operations</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>United States Sugar Corporation</b> Street Address: <b>111 Ponce de Leon Ave.</b> City: <b>Clewiston</b> State: <b>Florida</b> Zip Code: <b>33440</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(863)902-2703</b> ext. Fax: <b>(863)902-2729</b>
5. Application Responsible Official Email Address: <b>braiola@ussugar.com</b>
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.   Signature  <u>February 15, 2006</u> Date

# APPLICATION INFORMATION

## Professional Engineer Certification

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates Inc.**</b> Street Address: <b>6241 NW 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653-1500</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 336-5600</b> ext. <b>545</b> Fax: <b>(352) 336-6603</b>
4. Professional Engineer Email Address: <b>dbuff@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i>  (1) <i>To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i>  (2) <i>To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i>  (3) <i>If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i>  (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i>  (5) <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  <u>David A. Buff</u> Signature  <u>2/15/06</u> Date  (seal)

\* Attach any exception to certification statement.

\*\* Board of Professional Engineers Certificate of Authorization #00001670