
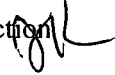


Florida Department of  
Environmental Protection

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**Memorandum**

To: Joseph Kahn, Division of Air Resource Management  
Through: Trina Vielhauer, Bureau of Air Regulation   
From: Jeff Koerner, New Source Review Section   
Date: August 9, 2010  
Subject: Final Air Permit No. 0510003-031-AC  
United States Sugar Corporation, Clewiston Sugar Mill and Refinery  
Miscellaneous Permit Revisions

The final permit for this project is attached for your approval and signature. The Clewiston Sugar Mill and Refinery is located in Hendry County at the intersection of W.C. Owens Avenue and State Road 832 in Clewiston, Florida. The project revises requirements in several underlying air construction permits and was processed concurrently with Project 0510003-032-AV to renew the Title V air operation permit. The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

TLV/jfk

## FINAL DETERMINATION

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### PERMITTEE

United States Sugar Corporation  
111 Ponce de Leon Avenue  
Clewiston, FL 33440

### PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)  
Division of Air Resource Management  
Bureau of Air Regulation  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Permit No. 0510003-031-AC  
United States Sugar Corporation  
Clewiston Sugar Mill and Refinery

The purpose of this project is to revise and renew the Title V air operation permit for the above referenced facility.

### NOTICE AND PUBLICATION

The Department distributed a draft air construction permit package on February 8, 2010. The applicant published the Public Notice of intent to issue an air construction permit in both The Glades County Democrat and The Clewiston News on July 1, 2010. The Department received the proof of publication on August 2, 2010.

### COMMENTS

No comments on the draft air construction permit were received from the applicant, the EPA Region 4 Office or the public.

### CONCLUSION

The final action of the Department is to issue the permit as drafted.



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## PERMITTEE

United States Sugar Corporation  
111 Ponce de Leon Avenue  
Clewiston, FL 33440

### Authorized Representative:

Mr. Neil Smith, Vice President and General Manager  
Sugar Processing Operations

Permit No. 0510003-031-AC  
Clewiston Sugar Mill and Refinery  
ARMS ID No. 0510003  
Miscellaneous Permit Revisions  
Hendry County, Florida

## PROJECT AND LOCATION

Enclosed is the final air construction permit revision processed concurrently with renewal Title V Permit 0510003-032-AV to revise specific conditions in the following air construction permits: PSD-FL-208, PSD-FL-272A, PSD-FL-333C, 0510003-029-AC and 0510003-034-AC. This permit revision shall be filed with each of the referenced permits and shall become part of those permits. The affected emissions units operate at the existing Clewiston Sugar Mill and Refinery (SIC Nos. 2061 and 2062), which is located in Hendry County at the intersection of W.C. Owens Avenue and State Road 832 in Clewiston, Florida. The UTM map coordinates are Zone 17, 506.1 East and 2956.9 North. This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions).

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order 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 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

Joseph Kahn, Director  
Division of Air Resource Management

8/9/10

(Date)

**FINAL PERMIT REVISION**

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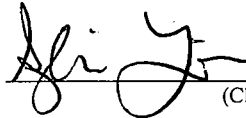
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 8/9/10 to the persons listed below.

- Mr. Neil Smith, U.S. Sugar (nsmith@ussugar.com)
- Mr. Keith Tingberg, U.S. Sugar (ktingberg@ussugar.com)
- Mr. David Buff, Golder Associates (dbuff@golder.com)
- Mr. Ajaya Satyal, SD Office (ajaya.satyal@dep.state.fl.us)
- Ms. Kathleen Forney (forney.kathleen@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)
- Ms. Barbara Friday, DEP BAR for posting (barbara.friday@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

8/9/10  
(Date)

## SECTION 1. GENERAL INFORMATION

### FACILITY DESCRIPTION

U.S. Sugar operates a sugar mill and refinery in Hendry County located at the intersection of W.C. Owens Avenue and State Road 832 in Clewiston, Florida. The UTM map coordinates are Zone 17, 506.1 East and 2956.9 North. Sugarcane is harvested from adjacent, neighboring and remote fields in Glades, Hendry, Martin and Palm Beach counties and transported to the mill by train. In the mill, sugarcane is cut into small pieces and processed in a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery. Molasses is also produced as a byproduct. Molasses is stored and processed into an animal feed product for sale.

### REGULATORY CATEGORIES

- The existing facility is a major source of hazardous air pollutants.
- The existing facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The existing facility is a major stationary source of air pollution in accordance with Rule 62-212.400(PSD), F.A.C.
- Existing units are subject to the following New Source Performance Standards (NSPS) in Part 60 of Title 40, the Code of Federal Regulations (CFR): Subpart A (General Provisions), Subpart Db (Industrial-Commercial-Institutional Steam Generating Units) and Subpart Dc (Small Industrial-Commercial-Institutional Steam Generating Units).
- No units are subject to any National Emissions Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 63. *{Permitting Note: Initially, the boilers were subject to Subpart DDDDD (Industrial Boilers); however, this regulation was vacated and remanded to EPA for reconsideration.}*

### SUMMARY OF AFFECTED EMISSIONS UNITS

EU No.	Emissions Unit Description
001	Boiler 1
002	Boiler 2
009	Boiler 4
014	Boiler 7
028	Boiler 8
031	Lime Storage and Truck/Rail Handling System

**SECTION 2. REVISED PERMIT CONDITIONS**

This permit revises several underlying conditions in previously issued air construction permits for the Clewiston Sugar Mill and Refinery. All construction is complete and no further construction is authorized by this action. Deletions are shown as ~~strikethrough~~ and additions with double underline. The permits and conditions are revised as follows. All other conditions are unchanged and the affected emissions units remain subject to the applicable requirements.

**PERMIT NO. PSD-FL-208A**

**Affected Emissions Unit:** Boiler 7 (EU-014)

22. Carbon monoxide and volatile organic compounds emissions shall be maintained at the lowest possible level through the implementation of an Operation and Maintenance plan that has been approved by the Department. Emissions of carbon monoxide shall not exceed 0.70 lb/million Btu as determined by EPA Method 10 and in accordance with 40 CFR 60, Appendix A. Emissions of non-methane volatile organic compounds shall not exceed ~~1.7 lb/ton of wet bagasse~~ or 0.212 lb/MMBtu as determined by EPA Method 25 or 25A in conjunction with EPA Method 18 and in accordance with 40 CFR 60, Appendix A.

**PERMIT REVISED: PERMIT NO. PSD-FL-272B**

**Subsection III.A. Boiler 4 (EU-009)**

**Affected Emissions Unit:** Boiler 4 (EU-009)

3. Permitted Capacity: Steam production, heat input, and bagasse firing shall not exceed the following limits.

Averaging Period	Steam Pressure <sup>a</sup>	Steam Temperature <sup>a</sup>	Steam Production (lb / hour)	Heat Input <sup>b</sup> (MMBtu/hour)	Wet Bagasse Firing <sup>b</sup> (tons/hour)
1-hour	600 psig	<del>750</del> <u>850</u> ° F	<del>300,000</del> <u>286,543</u>	633	88
24-hour	600 psig	<del>750</del> <u>850</u> ° F	<del>285,000</del> <u>271,604</u>	600	83

<sup>a</sup> Steam temperature and pressure are design parameters. Changes to these parameters resulting from boiler aging or modification shall be reported to the Department and may require a permit modification.

<sup>b</sup> Based on: 55% thermal efficiency of the boiler when firing bagasse; wet bagasse containing 55% moisture and a heat content of 3600 BTU/lb; and ~~4160~~ 1215 BTU (net) per pound of steam at 600 psig and ~~750~~ 850° F with standard feed water conditions of 900 psig and 250° F.

No more than 400,000 tons of bagasse shall be fired during any consecutive 12 months. In addition, the total heat input to this boiler shall not exceed 2,880,000 mmBTU during any consecutive 12 months. Compliance with the steam limits shall be determined by continuous monitoring of the steam temperature, steam pressure, and steam production rate. The heat input and bagasse consumption limits shall be calculated and recorded in accordance with the record keeping requirements of this permit. [Rule 62-210.200, F.A.C., Definitions – PTE; and Permit No. PSD-FL-272B]

8. Wet Scrubber: To control emissions of particulate matter, the permittee shall install, operate, and maintain a Type D, Size 200 Joy Turbulaire wet impingement scrubber. ~~To ensure the annular throttling gap is being properly maintained, this system shall provide constant make-up water overflow to the scrubber as indicated by the weir box.~~ The wet scrubber shall also be equipped with the following monitoring equipment.

a. A manometer (or equivalent) shall be installed to measure the scrubber pressure drop in inches of water column. ~~The pressure drop across the scrubber shall be maintained between 8 and 11 inches of water column.~~

**SECTION 2. REVISED PERMIT CONDITIONS**

~~b. A pressure gage shall be installed to monitor the water supply pressure to the scrubber nozzles. This pressure shall be maintained between 40 and 55 psi.~~

~~be. A flow meter shall be installed to measure the water flow rate to the scrubber spray nozzles. This flow rate shall be maintained above 375 gallons per minute, based on a 3 hour block average.~~

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations. The monitoring provisions for the minimum scrubber pressure differential and flow rate shall be established in the Title V air operation permit as part of the required CAM Plan for Boiler 4. ~~The permittee shall read and record each scrubber parameter once normal operations have been established after startup and at least once every 3 hours. Should any monitored parameter fall outside the specified operating range, the permittee shall investigate the cause and take corrective action to regain operation within the specified range. In addition, the permittee shall begin reading and recording all monitored parameters at 30 minute intervals until successive readings indicate operation within the specified range. The permittee may elect to install an automated recorder to satisfy the recording requirements. The permittee shall record any problems with operation of the wet scrubber and corrective actions taken in the Daily Operational Records required by this permit. Operation outside of the specified operating range for any monitored parameter is not a violation of this permit, in and of itself. However, continued operation outside of the specified operating range for any monitored parameter without corrective action may be considered circumvention of the air pollution control equipment. [Applicant Request; Rule 62-4.070(3); Rule 62-212.400 (BACT), F.A.C.; Permit No. PSD-FL-272B]~~

**Subsection III.B. Common Conditions for Boilers 1 - 7**

**Affected Emissions Units:** Boilers 1, 2, 4 and 7 (EU-001, 002, 009 and 014)

The emissions unit descriptions in this subsection are revised as follows.

EU No.	Emissions Unit Description
001	Bagasse Boiler No. 1 <del>with wet scrubber (255,000 pounds of steam per hour)</del>
002	Bagasse Boiler No. 2 <del>with wet scrubber (230,000 pounds of steam per hour)</del>
003	Bagasse Boiler No. 3 <u>(inactive, permanently shut down)</u> <del>with wet scrubber (130,000 pounds of steam per hour)</del>
004	Bagasse Boiler No. 5 (inactive, permanently shut down)
005	Bagasse Boiler No. 6 (inactive, permanently shut down)
009	Bagasse Boiler No. 4 <del>with wet scrubber (300,000 pounds of steam per hour)</del>
014	Bagasse Boiler No. 7 <del>with electrostatic precipitator (385,000 pounds of steam per hour)</del>

The 12 original conditions of this subsection are revised as follows.

- Permanent Shutdown: Boiler Nos. ~~3~~, 5 and 6 shall remain permanently shut down and rendered incapable of operation. These units are no longer available as "standby" units. Any proposed future operation of either boiler would require a preconstruction review permit as a "new" unit. [Applicant Request, Supporting Air Quality Analyses Analysis for Permit Nos. PSD-FL-272A and PSD-FL-333B]
- Modified Stack Heights: The stacks for Boiler Nos. 1, ~~and 2, and 3~~ shall be maintained at a minimum of 213 feet in height. [Design, Applicant Request, Supporting Air Quality Analyses Analysis for Permit Nos. PSD-FL-272A and PSD-FL-333B]
- Crop Season: For this facility, the sugarcane crop season is defined as October through April and the off-season is defined as May through September. [Applicant Request, Supporting Air Quality Analyses Analysis]

## SECTION 2. REVISED PERMIT CONDITIONS

for Permit Nos. PSD-FL-272A and PSD-FL-333B]

4. Capacities: For each boiler, the maximum ~~1-hour operating permitted~~ capacities are shall not exceed:
- a. Boiler No. 1: ~~255,000~~ 185,000 pounds of steam per hour, ~~495~~ 397 MMBtu per hour of total heat input, and 1500 gallons of oil per hour;
  - b. Boiler No. 2: ~~230,000~~ 185,000 pounds of steam per hour, ~~447~~ 397 MMBtu per hour of total heat input, and 1500 gallons of oil per hour;
  - e. ~~Boiler No. 3: 130,000 pounds of steam per hour, 265 MMBtu per hour of total heat input, and 900 gallons of oil per hour~~
  - d c. Boiler No. 4: ~~300,000~~ 271,604 pounds of steam per hour, ~~633~~ 600 MMBtu per hour of total heat input, and 1500 gallons of oil per hour; and
  - e d. Boiler No. 7: ~~385,000~~ 350,000 pounds of steam per hour, ~~812~~ 738 MMBtu per hour of total heat input, and 1839 gallons of oil per hour.

The maximum steam production rates and heat input rates are based on 24-hour averages. The maximum oil firing rates are 1-hour averages. {Permitting Note: No additional record keeping requirements are imposed by these conditions. The steam production chart records are sufficient to demonstrate compliance with these requirements.} [Design, Supporting Air Quality Analyses Analysis Permit Nos. for PSD-FL-272A and PSD-FL-333B]

5. Fuel Oil Sulfur Contents

- a. ~~Boiler Nos. 1-3, Crop Season: From October through April of each year, any fuel oil fired in Boiler Nos. 1-3 shall contain no more than 2.50% sulfur by weight.~~
- b. ~~Boiler Nos. 1-3, Off Season: From May through September of each year, any fuel oil fired in Boiler Nos. 1-3 shall contain no more than 1.60% sulfur by weight. In April of each year, a composite sample from the common tank shall be taken and analyzed for the sulfur content. Within 5 days of obtaining the results, a report of the fuel sulfur content shall be submitted to the Compliance Authority. If the sulfur content is higher than 1.60% sulfur by weight, the permittee shall purchase additional oil to blend down to the permit limit before any fuel from the common tank is authorized for firing during the off season. An additional composite sample shall be taken from the common tank after blending and analyzed for the fuel sulfur content. Within 5 days of obtaining the results, a report of the fuel sulfur content shall be submitted to the Compliance Authority. It is a violation of this permit to fire fuel from the common tank without filing a report with the Compliance Authority that demonstrates compliance with the lower fuel sulfur limit. Thereafter, only fuel oil containing no more than 1.60% sulfur by weight shall be purchased and added to the common tank during the off season. It is the permittee's responsibility to appropriately plan for and stage fuel purchases to comply with this condition.~~
- e. ~~Boiler No. 4: Any fuel oil fired in Boiler No. 4 shall contain no more than 0.70% sulfur by weight.~~
- d. ~~Boiler No. 7: Any distillate oil fired in Boiler No. 7 shall contain no more than 0.05% sulfur by weight.~~

~~The permittee shall maintain fuel records that indicate compliance with the above conditions for each fuel oil purchase at each tank. The sulfur content shall be determined by ASTM Methods D-129, D-1552, D-2622, D-4294, or equivalent methods approved by the Department. For each shipment, a certified analysis supplied by the fuel oil vendor is sufficient to demonstrate compliance. [Applicant Request, Supporting Air Quality Analysis for PSD-FL-272A]~~

6. Fuel Oil Consumption:



## SECTION 2. REVISED PERMIT CONDITIONS

~~a. Boiler Nos. 1-4, Crop Season: From October through April of each year, the total fuel oil consumption for Boiler Nos. 1-4 shall not exceed 16,200 gallons during any 3-hour period and 88,800 gallons during any 24-hour period.~~

~~b. Boiler Nos. 1-4, Off Season: From May through September of each year, the total fuel oil consumption for Boiler Nos. 1-4 shall not exceed 11,700 gallons during any 3-hour period and 54,000 gallons during any 24-hour period.~~

~~The permittee shall install, calibrate, operate, and maintain individual fuel oil flow meters with integrators. [Applicant Request, Supporting Air Quality Analysis for PSD-FL-272A]~~

### 57. Steam Production Off-Season (May through September)

#### ~~a. Crop Season and Off Season~~

~~(1) Boiler No. 4 shall not produce more than 6,840,000 pounds of steam during any 24-hour period.~~

~~(2) Boiler No. 7 shall not produce more than 8,400,000 pounds of steam during any 24-hour period.~~

#### ~~b. Off Season (May through September)~~

~~a. (1) During the off-season, Boiler Nos. 7 and 8 shall be operated as the primary unit to meet the steam demands of the refinery. As restricted by the conditions of this permit, other mill boilers may serve as backup units when Boiler No. 7 is these boilers are down for maintenance, repair or during periods of unusually low steam demand.~~

~~b. (2) For Boiler Nos. 1-4 1, 2 and 4, no more than three of these boilers shall may operate simultaneously.~~

~~c. (3) For Boiler Nos. 1-4 1, 2 and 4, the total steam production shall not exceed 1,845,000 pounds of steam during any 3-hour period.~~

~~d. (4) For Boiler Nos. 1-4 1, 2 and 4, the total steam production shall not exceed 10,800,000 pounds of steam during any 24-hour period.~~

~~The permittee shall install, calibrate, operate, and maintain equipment to continuously record the steam production rates. The permittee shall also install, calibrate, operate, and maintain a steam flow integrator to record the accumulated steam flow rate. [Applicant Request, Supporting Air Quality Analyses Analysis for Permit Nos. PSD-FL-272A and PSD-FL-333B]~~

68. Modifications: A request to modify any of these conditions shall be accompanied by a revised Air Quality Analysis that demonstrates compliance with the Ambient Air Quality Standards and PSD increments for the revised conditions. [Rule 62-4.070(3), F.A.C.]

~~9. SO<sub>2</sub> Tests: To validate the SO<sub>2</sub> emission factor for Boiler Nos. 1-3, the permittee shall conduct emissions performance tests in accordance with EPA Method 6 or 6C for at least one of these boilers when firing only bagasse. The initial test shall be conducted between October 1, 2000 and February 1, 2001. Thereafter, at least one of these boilers shall be tested within the 12-month period prior to renewal of the air operation permit. Tests need not be conducted on the same boiler. Based on the results of the performance tests, the Compliance Authority may require additional testing or an additional Air Quality Analysis.~~

~~{Permitting Note: The expected emission factor is 0.06 pounds of SO<sub>2</sub> per mMBTU when firing only bagasse. This is not a permit limit for Boiler Nos. 1-3. Performance tests, notifications, reports, etc., are subject to the requirements listed in Section III.G. of this permit.} [Supporting Air Quality Analysis for PSD-FL-272A]~~

### 740. Steam Production Off-Season:

## SECTION 2. REVISED PERMIT CONDITIONS

~~a. Crop Season and Off Season: For each 24-hour block of operation, the permittee shall record the total steam production rates (pounds, each) for Boiler Nos. 4 and 7 to demonstrate compliance with Condition No. 7 of this section.~~

~~b. Off Season:~~

~~a. (1) From May through September, the permittee shall record the individual and total steam production rates (pounds) for Boiler Nos. 1, 2 and 4 for each 3-hour block when three of the boilers are in operation.~~

~~b. (2) From May through September, the permittee shall record the individual and total steam production rates (pounds) for Boiler Nos. 1, 2 and 4 for each 24-hour block of operation.~~

[Rule 62-4.070(3), F.A.C.; and Permit No. PSD-FL-272B]

~~11. Fuel Oil Consumption: For Boiler Nos. 1-4, the permittee shall record the oil firing rates (gallons) for each 3-hour block of operation. From this data, the permittee shall calculate and record the combined oil firing rates (gallons) for each 3-hour and each 24-hour block of operation for Boiler Nos. 1-4. [Rule 62-4.070(3), F.A.C.]~~

~~12. Fuel Sulfur Content: For each fuel oil delivery, the permittee shall record and retain the following: the date, identification of the tank, the gallons of fuel delivered, the fuel oil analysis including the sulfur content in percent by weight, and the name of the test method used. A certified analysis supplied by the fuel oil vendor is acceptable. This condition applies to each tank supplying fuel to any boiler. [Rule 62-4.070(3), F.A.C.]~~

### Section IV. Appendix GCP. Good Combustion Practices Plan

**Affected Emissions Unit:** Boiler 4 (EU-009)

The following is added as the first sentence in Appendix GCP.

The good combustion practices and startup and shutdown procedures identified in this Appendix may be updated in subsequent Title V permits without revising this air construction permit. [Permit No. PSD-FL-272B]

### PERMIT NO. PSD-FL-333D

**Subsection 3A. Boiler 8 (EU-028)**

**Affected Emissions Unit:** Boiler 8 (EU-028)

14. Initial and Annual Stack Tests: In accordance with test methods specified in this permit, Boiler 8 shall be tested to demonstrate initial compliance with the emission standards for ammonia slip, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOC, and opacity. The tests shall be conducted within 60 days after achieving the maximum production rate, but not later than 180 days after the initial startup. Subsequent compliance stack tests for ammonia slip, PM, SO<sub>2</sub>, VOC, and opacity shall also be conducted during each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>). Subsequent compliance stack tests for SO<sub>2</sub> shall be conducted before renewal of the operation permit. Tests shall be conducted between 90% and 100% of the maximum 24-hour continuous heat input rate when firing only bagasse or bagasse with wood chips. CO CEMS data shall be reported for each run of the required tests for NO<sub>x</sub> and VOC emissions. NO<sub>x</sub> CEMS data shall be reported for each run of the required tests for ammonia slip. Also, CEMS data for NO<sub>x</sub> emissions may be used to demonstrate compliance with the initial stack test standards for this pollutant. The Department may require the permittee to repeat some or all of these initial stack tests after major replacement or major repair of any air pollution control or process equipment.

*The remainder of Condition 14 remains unchanged.*

## SECTION 2. REVISED PERMIT CONDITIONS

17. **Fuel Monitoring:** The permittee shall monitor each fuel in accordance with the following provisions. [Rules 62-4.070(3) and 62-212.400 (PSD), F.A.C.; and Permit No. PSD-FL-333D]
- a. *Distillate Oil:* In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate and maintain an oil flow meter with integrator. At the end of each day that oil is fired, the oil flow meter integrator shall be read and recorded in a written (or electronic) log. Initial compliance with the distillate oil sulfur limit shall be demonstrated by taking a sample, analyzing the sample for fuel sulfur, and reporting the results to the Compliance Authority. During each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>), the permittee shall take a sample from the storage tank and analyze for the fuel sulfur content. Sampling for the fuel oil sulfur content shall be conducted in accordance with ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM D129-91, ASTM D1552-90, ASTM D2622-94, or ASTM D4294-90 (or more recent versions when available). For each delivery of distillate oil, the permittee shall maintain a permanent record of each certified fuel sulfur analysis provided by the fuel vendor. Records shall specify the date of delivery, the gallons delivered, the fuel sulfur content and test method.
  - b. *Bagasse/Wood Chips:* Representative samples of bagasse and/or wood chips (~~if stored on site~~) shall be taken during each calendar quarter that a fuel is fired and analyzed for the following: heating value (Btu/lb, as fired and dry); moisture content (percent by weight); sulfur content (percent by weight, dry); and ash content (percent by weight, dry). Records of the results of these tests shall be maintained on site and made available upon request.
22. **Cyclones:** In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate and maintain the following equipment: flow meter to monitor the water flow rate (gph) for each wet cyclone and a manometer (or equivalent) to monitor the pressure drop (inches of water) across each cyclone. ~~At least once each 8-hour work shift,~~ During each stack test conducted, the flow rate and pressure drop shall be observed at 15-minute intervals and recorded in a written log. [Permit No. PSD-FL-333D]

### PERMIT PSD-FL-389A

#### Subsection 3A. Boiler 7 (EU-014)

**Affected Emissions Unit:** Boiler 7 (EU-014)

8. **Fuel Monitoring:** The permittee shall maintain the following records for wood chips.
- a. Representative samples of wood chips shall be taken each calendar quarter wood chips are fired and analyzed for the heating value (modified ASTM D3286 in Btu/lb as fired) and moisture content (ASTM D3173 in percent by weight). Analytical results shall be determined and available for review within 30 days of the end of each calendar quarter. ~~Such analysis is not required if no wood chips are stored on site~~ If no wood chips were fired during the calendar quarter, the report shall indicate that no wood chips were fired as boiler fuel during the given quarter.
  - b. For each 24-hour block of operation (midnight to midnight), the permittee shall maintain records of the amount of wood chips fired to demonstrate compliance with the heat input restrictions of this permit.
  - c. For each 24-hour block of operation (midnight to midnight), the permittee shall calculate and record the heat input rate from wood chips.

All records shall be maintained on site and made available upon request. [Rules 62-4.070(3) and 62-212.400(PSD), F.A.C. and Permit No. PSD-FL-389A]

10. **Monthly Operations Summary:** Within 7-10 calendar days following each month, the permittee shall

## SECTION 2. REVISED PERMIT CONDITIONS

calculate and record the amount of wood chips fired (tons) and the corresponding heat input rate (MMBtu) from firing wood chips for the previous month and the previous consecutive 12 months. Records shall be maintained on site and made available upon request. [Rule 62-4.070(3), F.A.C. and Permit No. PSD-FL-389A]

### PERMIT 0510003-029-AC

#### Subsection 3B. Boiler 7

**Affected Emissions Unit:** Boiler 7 (EU-014)

2. 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. 0510003-029-AC No. PSD-FL-208; Rules 62-212.400 and 62-296.405, F.A.C.; and 40 CFR 60.42b(j)]

### PERMIT 0510003-034-AC

#### Subsection 3A. Baghouses - Lime Silo Loading/Unloading (EU-031)

**Affected Emissions Unit:** Lime Storage and Truck/Rail Handling System (EU-031)

4. Compliance Tests: In accordance with EPA Method 9, each baghouse vent shall be tested to demonstrate compliance with the emissions standards specified. Initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. Subsequently, each baghouse vent shall be tested annually to demonstrate compliance with the opacity standards during each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>). The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. ~~Separate tests shall be conducted while unloading lime from a truck and unloading lime from a railcar unless these systems can be used simultaneously.~~ For the lime storage and handling system (EU-031), annual tests shall be conducted while unloading lime from a railcar. Prior to renewing the air operation permit, a test shall also be conducted while unloading lime from a truck (EU-031). Tests shall be conducted at a lime unloading rate representative of the typical operation used throughout the year. [Rule 62-297.310(7)(a), F.A.C.; and Permit No. 0510003-034-AC]

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Monday, August 09, 2010 2:09 PM  
**To:** nsmith@ussugar.com  
**Cc:** ktingberg@ussugar.com; dbuff@golder.com; ajaya.satyal@dep.state.fl.us; forney.kathleen@epa.gov; oquendo.ana@epa.gov; victoria.gibson@dep.state.fl.us; barbara.friday@dep.state.fl.us; jeff.koerner@dep.state.fl.us; elizabeth.walker@dep.state.fl.us  
**Subject:** U.S. Sugar Corporation - Clewiston Mill and Refinery; 0510003-031-AC  
**Attachments:** 0510003-031-AC\_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: **We must receive verification that you are able to access the documents.** Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0510003.031.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0510003.031.AC.F_pdf.zip)

**Owner/Company Name:** U.S. SUGAR CORP. CLEWISTON MILL  
**Facility Name:** U.S. SUGAR CLEWISTON MILL AND REFINERY  
**Project Number:** 0510003-031-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION  
**Facility County:** HENDRY  
**Processor:** Jeff Koerner

Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Neil Smith [nsmith@ussugar.com]  
**Sent:** Monday, August 09, 2010 4:45 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: U.S. Sugar Corporation - Clewiston Mill and Refinery; 0510003-031-AC

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, August 09, 2010 2:09 PM  
**To:** Neil Smith  
**Cc:** Keith Tingberg; dbuff@golder.com; Satyal, Ajaya; forney.kathleen@epa.gov; oquendo.ana@epa.gov; Gibson, Victoria; Friday, Barbara; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** U.S. Sugar Corporation - Clewiston Mill and Refinery; 0510003-031-AC

Dear Sir/ Madam:

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0510003.031.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0510003.031.AC.F_pdf.zip)

**Owner/Company Name:** U.S. SUGAR CORP. CLEWISTON MILL  
**Facility Name:** U.S. SUGAR CLEWISTON MILL AND REFINERY  
**Project Number:** 0510003-031-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION  
**Facility County:** HENDRY  
**Processor:** Jeff Koerner

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Sylvia Livingston

## Livingston, Sylvia

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**From:** Buff, Dave [DBuff@GOLDER.com]  
**To:** Livingston, Sylvia  
**Sent:** Monday, August 09, 2010 2:12 PM  
**Subject:** Read: U.S. Sugar Corporation - Clewiston Mill and Refinery; 0510003-031-AC

Your message was read on Monday, August 09, 2010 2:12:03 PM (GMT-05:00) Eastern Time (US & Canada).

## Livingston, Sylvia

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**From:** Satyal, Ajaya  
**Sent:** Monday, August 09, 2010 3:39 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: U.S. Sugar Corporation - Clewiston Mill and Refinery; 0510003-031-AC

Thanks Sylvia.

AJ Satyal

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**From:** Livingston, Sylvia  
**Sent:** Monday, August 09, 2010 2:09 PM  
**To:** nsmith@ussugar.com  
**Cc:** ktingberg@ussugar.com; dbuff@golder.com; Satyal, Ajaya; forney.kathleen@epa.gov; oquendo.ana@epa.gov; Gibson, Victoria; Friday, Barbara; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** U.S. Sugar Corporation - Clewiston Mill and Refinery; 0510003-031-AC

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**Owner/Company Name:** U.S. SUGAR CORP. CLEWISTON MILL  
**Facility Name:** U.S. SUGAR CLEWISTON MILL AND REFINERY  
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