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October 18, 2010

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

**RE: UNITED STATES SUGAR CORPORATION, CLEWISTON MILL
PERMIT NO. 0510003-032-AV
2010 OFF-SEASON REPAIRS AND PLANNED REPAIRS FOR THE 2011 OFF-SEASON**

Dear Mr. Linero:

United States Sugar Corporation (U.S. 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. Condition 4 of the Emissions Unit Specific Conditions of Permit No. 0510003-022-AC requires U.S. Sugar to submit a "Maintenance Summary Report" within 60 days of the beginning of each cane milling season.

Because all the repairs were not completed during the specified time, U.S. 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 not to extend Permit No. 0510003-022-AC, and the permit has since expired.

U.S. Sugar was issued Title V Air Operation Permit No. 0510003-032-AV on August 17, 2010. Requirement No. 2 of Appendix J of the new Title V operation permit includes the requirement for submission to FDEP an annual boiler maintenance and inspection report. Requirement No. 2 of Appendix J requires submission of the "Maintenance Summary Report" within 60 days of the beginning of each cane milling season. U.S. Sugar is required to 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 purpose of this correspondence is to provide the list of maintenance and repair activities at the Clewiston Mill conducted during the 2010 off-season, and the repairs planned on the boilers for the upcoming 2011 off-season.

The current U.S. Sugar crop season began October 2, 2010. The list of maintenance and repair activities conducted during the 2010 off-season, and those planned for the 2011 off-season, are attached.

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In accordance with the permit, the replacements U.S. Sugar are 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 construction permit.

If you have any questions concerning this correspondence, please contact me at 352-336-5600.

Sincerely

GOLDER ASSOCIATES INC.

David A. Buff

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

Jeremy D. Paul
Jeremy D. Paul, E.I.
Staff Engineer

cc: Keith Tingberg, U.S. Sugar
Bret Nesbitt, U.S. Sugar
Ajaya Satyal, FDEP

Attachments

DB/tlc

**BOILER MAINTENANCE ACTIVITIES
U.S. SUGAR CORPORATION
CLEWISTON, FLORIDA**

Clewiston Boiler Actual Repairs 2010 Off-Season:

Boiler No. 1

- Replace three rows of generating bank tubes
- Replaced the boiler outlet flue

Boiler No. 2

- Replace three rows of generating bank tubes
- Replaced the boiler outlet flue

Boiler No. 4

- Replace one row of generating bank tubes
- Replaced the boiler outlet flue

Boiler No. 7

- Repair rear wall tube stubs
- Replace 2nd field of collector plates and electrode on ESP
- Replace skin casing in 1st field of ESP

Boiler No. 8

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

Clewiston Boiler Projected Repairs 2011 Off-Season:

Boiler No. 1

- Replace one row of generating bank tubes
- Replace the under-grate air duct

Boiler No. 2

- Replace one row of generating bank tubes
- Replace the under-grate air duct

Boiler No. 4

- Replace the forced draft air duct

Boiler No. 7

- Replace 3rd field of collector plates and electrode on ESP
- Replace skin casing in 2nd and 3rd field of ESP

Boiler No. 8

- Replace 2nd field of collector plates and electrodes on ESP
- Replace inlet and outlet flue on ESP