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BUREAU OF AIR REGULATION

Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Attention: Mr. Jeff Koerner, P.E., Program Administrator

SUBJECT: UNITED STATES SUGAR CORPORATION CLEWISTON MILL  
COMMENTS ON DRAFT PERMIT NO. 0510003-048-AC  
H<sub>2</sub>S DEGASIFICATION PROJECT

Dear Mr. Koerner:

*Project 0510003-50-AC*

United States Sugar Corporation (U.S. Sugar) and Golder Associates Inc. (Golder) have received Draft Title V Permit No. 0510003-048-AC for the Clewiston mill, issued by the Department on June 27, 2011. Upon review of the draft permit, we have a few minor comments. Our comments are provided below.

**DRAFT PERMIT NO. 0510003-048-AC**

*administrative correction*

**Section 3. Emission Unit Specific Conditions  
Subsection B. Degasification Systems**

**Page 5 of 5, Condition B.2. Water Use**

It is requested that the condition be changed to clarify that the parameters to be monitored is the water flow rate to the degasification units. There are five water wells. The raw water from all the wells combine at a single header. U.S. Sugar does monitor the water flow rate from each well. However, the water flow rate to each degasification unit is not measured. The following wording is suggested:

The permittee shall install, calibrate and operate flow meters (or equivalent devices) with integrators to monitor the **water flow rate to each from each degasification unit water well.**

**Page 5 of 5, Condition B.4. Hydrogen Sulfide**

It is requested that the condition be changed to clarify that the parameter to be monitored is the H<sub>2</sub>S concentration in the raw water going to the degasification units. Since the water from all five wells is combined prior to entering the degasification units, there is no need to separately measure the H<sub>2</sub>S concentration in each of the water wells. The following wording is suggested:

The emissions of H<sub>2</sub>S from the combined degasification systems shall not exceed 18.0 tons per consecutive 12-month rolling total based on monthly raw well water flow rates **and** quarterly water sampling to determine the H<sub>2</sub>S concentration in ~~each of the water wells~~ the raw water entering the degasification units.

**Page 5 of 5, Condition B.6. Water Wells Sampling/Analysis:**

Consistent with the above comment, it is requested that the condition be changed to clarify that the parameter to be monitored is the H<sub>2</sub>S concentration in the raw water going to the degasification units. The following wording is suggested:



Golder Associates Inc.  
6026 NW 1st Place  
Gainesville, FL 32607 USA

Tel: (352) 336-5600 Fax: (352) 336-6603 www.golder.com



On at least a quarterly basis, the permittee shall obtain representative samples of the water from each well going to the degasification units. The samples shall be taken no earlier than 90 days apart. Each sample shall have an analysis conducted to determine the H<sub>2</sub>S concentration.

**Appendix D – Final BACT Determinations**

**Compliance Method** (in table): Consistent with comments above, we request the following changes:

Based on monthly raw well water flow rates and quarterly water sampling to determine the H<sub>2</sub>S concentration in ~~each of the water wells~~ going to the degasification units.

Thank you for your consideration of these comments. Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

*David A. Buff*

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

DB/

cc: Keith Tingberg

**ARMS Facility**  
POINT AIRS ID 0510003 STATUS A OFFICE SD Sth: FT MYERS  
SITE NAME U.S. SUGAR CLEWISTON MILL AND REFINERY COUNTY HENDRY  
OWNER/COMPANY U.S. SUGAR CORP. CLEWISTON MILL

**Project**  
AIR Permit # - - - Project # 050 CRA Reference #  
Permit Office TAL (HEADQUARTERS) Agency Action Pending OGC  
Project Name ADMINISTRATIVE CORRECTION Desc Minor changes  
Type/Sub/Des AC /20 Administrative Permit Correction Logged 08/19/2011  
Received 08/16/2011 Issued Expires Application Action MODIFICATION  
Fee 0.00 Fee Recd Dele Override NONE

**Related Party**  
Role APPLICANT Begin 08/19/2011 End  
Name SMITH, NEIL Company U.S. SUGAR CLEWISTON MILL  
Address 111 PONCE DE LEON AVE  
City CLEWISTON State FL Zip 33440 Country U.S.A.  
Phone 863-902-2703 Fax 863-902-2729

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