



March 9, 2010

093-87757

Mr. Jeff Koerner, P.E.  
Florida Department of Environmental Protection  
South District  
2295 Victoria Avenue  
Fort Myers, Florida 33901

RECEIVED

MAR 11 2010

BUREAU OF AIR REGULATION

RE: **UNITED STATES SUGAR CORPORATION  
CLEWISTON MILL (FACILITY NO. 0510003)  
CAPACITY REPORT AND EMISSIONS SUMMARY  
2009-2010 CROP SEASON**

Dear Mr. Koerner:

Please find enclosed two copies of the Capacity Report and Emissions Summary for the Clewiston Mill. This report was required under Permit No. 0510003-022-AC, issued June 3, 2003. If you have any questions regarding this report, please call me at (352) 336-5600, at your earliest convenience.

Sincerely,

**GOLDER ASSOCIATES INC.**

Handwritten signature of David A. Buff in black ink.

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

Handwritten signature of Jeremy D. Paul in black ink.

Jeremy D. Paul, E.I.  
Staff Engineer

cc: Keith Tingberg, USSC  
Bret Nesbitt, USSC  
Doug Neeley, EPA Region 4

Enclosures

DB/tic



TABLE 1  
CAPACITY REPORT AND EMISSIONS SUMMARY FOR U.S. SUGAR CLEWISTON MILL, 2009-2010 CROP SEASON

Boiler	Test Date	Permitted 24-Hour Average Steam Production Rate (lb/hr)	Tested Steam Production Rate (lb/hr)	% of Permitted Capacity (%)	Tested Heat Input Rate (lb/MMBtu)	Emission Test Results												
						PM		NO <sub>x</sub>		CO		Non-Methane VOC		SO <sub>2</sub>		Ammonia Slip		
						Emission Rate Units	Tested Emission Rate	Allowable Emissions <sup>b,i</sup>	Tested Emission Rate	Allowable Emissions <sup>i</sup>	Tested Emission Rate	Allowable Emissions <sup>i</sup>	Tested Emission Rate	Allowable Emissions <sup>b,i</sup>	Tested Emission Rate	Allowable Emissions <sup>b,i</sup>	Tested Emission Rate	Allowable Emissions <sup>i</sup>
1	11/10/2009	255,000 <sup>a</sup>	185,163	72.6%	371	(lb/MMBTU) (lb/hr)	0.15 55.1	0.23 84.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2	11/12/2009	230,000 <sup>a</sup>	172,283	74.9%	356	(lb/MMBTU) (lb/hr)	0.10 36.9	0.214 75.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
4	11/18/2009	285,000	262,071	92.0%	557	(lb/MMBTU) (lb/hr)	0.06 32.0	0.14 80.0	0.11 63.7	0.20 111.4	0.6 342.2	6.5 3,621.8	0.018 <sup>c</sup> 10.1 <sup>c</sup>	0.50 <sup>c</sup> 278.5 <sup>c</sup>	N/A	0.06 <sup>e</sup> 33.3 <sup>e</sup>	N/A	
7	11/20/2009	350,000 <sup>j</sup>	344,807	98.5%	719	(lb/MMBTU) (lb/hr)	0.004 2.9	0.03 21.6	0.23 164.2	0.25 179.7	0.17 124.4	0.70 503.2	0.008 <sup>c</sup> 5.9 <sup>c</sup>	0.212 <sup>c</sup> 152.4 <sup>c</sup>	N/A	0.17 <sup>e</sup> N/A	N/A	
8	11/2/2009-11/3/2009	575,000	507,810	88.3%	931	(lb/MMBTU) (lb/hr)	0.007 6.8	0.025 25.3	N/A	0.14 <sup>g</sup> 130.3	N/A	400 <sup>g</sup> N/A	N/A	0.05 <sup>c</sup> 46.5 <sup>c</sup>	0.060 55.7	0.06 55.9	N/A	20 <sup>f</sup>
	11/3/2009-11/4/2009	575,000	505,955	88.0%	928	(lb/MMBTU) (lb/hr)	N/A	0.025 25.3	N/A	0.14 <sup>g</sup> 130.0	N/A	400 <sup>g</sup> N/A	0.017 15.45	0.05 <sup>c</sup> 46.4 <sup>c</sup>	N/A	0.06 55.7	N/A	20 <sup>f</sup>
	11/2/2009-11/3/2009	575,000	501,847	87.3%	940	(lb/MMBTU) (lb/hr)	N/A	0.025 23.5	N/A	0.14 <sup>g</sup> 131.6	N/A	400 <sup>g</sup> N/A	N/A	0.05 <sup>c</sup> 47.0 <sup>c</sup>	N/A	0.06 56.2	8.9 <sup>f</sup>	20 <sup>f</sup>

<sup>a</sup> Maximum 1-hour permitted steam rate. Boiler does not have permitted 24-hour average steam rate.

<sup>b</sup> Allowable emissions based on burning combined bagasse and No. 2 fuel oil.

<sup>c</sup> Reported as propane.

<sup>d</sup> Reported as carbon.

<sup>e</sup> Only required during the federal fiscal year (October 1 to September 30) prior to renewal of the air operation permit.

<sup>f</sup> In units of ppmvd @ 7% oxygen.

<sup>g</sup> Based on CEMS data; 30-day rolling average. Annual RATA performed December 4 - 5, 2009.

<sup>h</sup> Based on an average of the CEMS data during the three runs.

<sup>i</sup> Based on Title V Permit No. 0510003-017-AV, 0510003-037-AC, and 0510003-039-AC.

<sup>j</sup> This capacity represents a 24-hour average capacity. The 3-hour average capacity limit is 385,000 lb/hr; therefore, the actual capacity is less than 100% of the 3-hour average capacity.

Note: All footnotes may not be applicable to every year of data.

Checked by: DB  
Reviewed by: DB

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