

Golder Associates Inc.

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DEC 04 2006

November 29, 2006

063-7591

BUREAU OF AIR REGULATION

Florida Department of Environmental Regulation
Air Permitting South Program
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400
Attention: Mr. Jeff Koerner, P.E.

**RE: DRAFT AIR PERMIT NO. 0510003-038-AC/PSD-FL-346A
U. S. SUGAR CORPORATION – CLEWISTON SUGAR MILL AND REFINERY
NEW WHITE SUGAR DRYER NO. 2**

Dear Mr. Koerner:

United States Sugar Corporation (U.S. Sugar) and Golder Associates Inc. have received the Department's Draft Air Construction Permit No. 0510003-038-AC/PSD-FL-346A, dated November 7, 2006. We have reviewed the draft permit and developed comments. The comments are presented below.

Technical Evaluation and Preliminary Determination

Page 2 of 9 – in the first paragraph under DEPARTMENT REVIEW, Original Project, 6th line down – reword “is transferred to storage” to “is transferred to **process**”.

Page 3 of 9 – under Subsequent Investigations, last sentence – a low process rate means that the sugar will move through the dryer at a slower rate. However, the bed of sugar will have the same depth in the dryer.

Page 7 of 9 – Process Flow Diagram – note that the test port location is actually located between the scrubber and the ID fan, not between the ID fan and the Silencer Duct.

Draft Permit

Placard page – Note that the PM₁₀ standard is not being revised; only the PM standard is being revised.

If you have any questions regarding this information, please call me at (352) 336-5600 or email me at dbuff@golder.com.

Sincerely,

GOLDER ASSOCIATES INC.

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

DB/all

cc: Mr. Don Griffin, USSC
Mr. Peter Briggs, USSC
Mr. Ron Blackburn, FDEP South District Office

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