

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL USA 32653
Telephone (352) 336-5600
Fax (352) 336-6603
www.golder.com



December 5, 2006

RECEIVED 043-7584

Florida Department of Environmental Protection
Department of Air Resources Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

DEC 06 2006

BUREAU OF AIR REGULATION

Attention: Mr. Jeffery Koerner, P. E.

**RE: UNITED STATES SUGAR CORPORATION (U.S. SUGAR)
PROJECT NOS. 0510003-031-AC AND 0510003-032-AV
CLEWISTON SUGAR MILL AND REFINERY / BRYANT SUGAR MILL
TITLE V RENEWAL PROJECTS**

Dear Mr. Koerner:

United States Sugar Corporation (U.S. Sugar) and Golder Associates Inc. have received the Florida Department of Environmental Protection (FDEP) request for additional information (RAI) dated October 4, 2006, regarding the above captioned projects for the renewal of the Title V operating permit for the Clewiston and Bryant Mills. Each of the FDEP's comments is addressed below, in the same order as they are listed in the RAI.

1. U.S. Sugar will not be complying with the industrial boiler maximum achievable control technology (MACT) limits for particulate matter (PM) for the existing source boilers (Boiler Nos. 1, 2, 4 and 7) at the mill. Instead, U.S. Sugar is choosing to comply with the MACT limits for total selected metals through fuel analysis, and by submitting an application for the health-based risk alternative for manganese (previously submitted to FDEP in September 2006). If this compliance option is approved, the existing PM limits the boilers have will continue to be in effect. That being the case, the industrial boiler MACT surrogate parameter monitoring requirements and requirements of setting minimum parameter levels will not apply. However, since such procedures (i.e., surrogate parameter value based on 90 percent of minimum test run value) are sufficient for compliance with the MACT PM limits, they should also be adequate for complying with the state-implementation plan (SIP) and/or best available control technology (BACT) limits the boilers have for PM emissions.

Please note that a few minor errors were found in the Compliance Assurance Monitoring Plan and in the Title V application form pages for Boiler No. 8 submitted to FDEP in September 2006. Please find attached replacement pages which have been corrected. Please insert these into the September 2006 submittal document.

2. Please find attached a modeling protocol, as requested.

Please call or e-mail me if you have any questions concerning this request.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/all

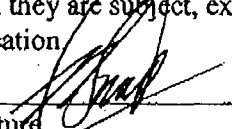
Enclosures

cc: Don Griffin, USS
Peter Briggs, USS
Ron Blackburn, FDEP
James Stormer, PBCHP

Y:\Projects\2004\0437584 U.S. Sugar Blr9\4\1\RAI113006-584.doc

APPLICATION INFORMATION**Application Responsible Official Certification**

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Neil Smith, Vice President and General Manager, Sugar Processing Operations
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: United States Sugar Corporation Street Address: 111 Ponce de Leon Avenue City: Clewiston State: Florida Zip Code: 33440
4. Application Responsible Official Telephone Numbers... Telephone: (863) 902-2703 ext. Fax: (863) 902-2729
5. Application Responsible Official Email Address: nsmith@ussugar.com
6. Application Responsible Official Certification: <p>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</p> <p>Signature  Date <u>12/1/06</u></p>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 545 Fax: (352) 336-6603
4. Professional Engineer Email Address: dbuff@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <i>David A. Buff</i> _____ Signature (seal) _____ Date 11/30/06

* Attach any exception to certification statement.

** Board of Professional Engineers Certificate of Authorization #00001670