



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

January 5, 2007

(SENT VIA ELECTRONIC MAIL – RECEIPT REQUESTED)

Mr. Neil Smith, Vice President of Sugar Processing Operations  
U.S. Sugar Corporation  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

Re: Request for Additional Information  
Project Nos. 0510003-031-AC and 0510003-032-AV  
Clewiston Sugar Mill and Refinery / Bryant Sugar Mill  
Title V Renewal Projects

Dear Mr. Smith:

The Department is currently processing your application for a permit to renew the Title V air operation permits for the Clewiston Sugar Mill and Refinery and the Bryant Sugar Mill. On December 6th, the Department received additional information from Golder Associates Inc. in response to its request dated October 4th. This information included a detailed modeling protocol for conducting an air quality analysis that will show the impacts related to moving Bryant Boiler 5 to the Clewiston Mill after all of the other Bryant boilers are shut down in 2007. As stated in the previous request, the application remains incomplete until the final modeling analysis is submitted.

Based on the recent submittal and discussions with the project meteorologist, the modeling protocol is acceptable. The Department is currently working with your consultant, Golder Associates Inc., to complete the required source inventory and meteorological data set for this area. For clarity, the following points summarize the unique project constraints:

- Prior to operating the relocated Bryant Boiler 5 at the Clewiston Mill, Bryant Boilers 1 – 3 will be permanently shut down. Emissions decreases from the shutdown of Bryant Boilers 1 – 3 will not be available for any future projects.
- The relocated Bryant Boiler 5 will fire only bagasse and distillate oil (0.05% sulfur by weight, max.).
- The relocated Bryant Boiler 5 will continue to comply with all current permit emissions limits and operational restrictions, including the limitations on steam production and hours of operation. However, based on a satisfactory modeling analysis, the unit will no longer be prohibited from operating during the crop off season (June 15<sup>th</sup> through September 30<sup>th</sup>).

Again, the application remains incomplete pending review of the final air quality modeling analysis. The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,

Jeffery F. Koerner, P.E.  
BAR - Air Permitting North

*"More Protection, Less Process"*

*Printed on recycled paper.*

On January 5, 2007, this request for additional information was sent by electronic mail to the following parties:

Mr. Neil Smith, U.S. Sugar Corporation ([NSMITH@USSUGAR.COM](mailto:NSMITH@USSUGAR.COM))  
Mr. Peter Briggs, U.S. Sugar Corporation ([PBRIGGS@USSUGAR.COM](mailto:PBRIGGS@USSUGAR.COM))  
Mr. Don Griffin, U.S. Sugar Corporation ([DGRIFFIN@USSUGAR.COM](mailto:DGRIFFIN@USSUGAR.COM))  
Mr. David Buff, Golder Associates Inc. ([DBUFF@GOLDER.COM](mailto:DBUFF@GOLDER.COM))  
Mr. Ron Blackburn, SD Office ([RON.BLACKBURN@DEP.STATE.FL.US](mailto:RON.BLACKBURN@DEP.STATE.FL.US))  
Mr. James Stormer, PBCHD ([JAMES\\_STORMER@DOH.STATE.FL.US](mailto:JAMES_STORMER@DOH.STATE.FL.US))  
Ms. Kathleen Forney, EPA Region 4 ([FORNEY.KATHLEEN@EPA.GOV](mailto:FORNEY.KATHLEEN@EPA.GOV))