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January 22, 2007

BUREAU OF AIR REGULATION

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

Attention: Mr. Jeffery Koerner, P. E.

RE: UNITED STATES SUGAR CORPORATION (U.S. SUGAR) – CLEWISTON MILL
BOILER NO. 8 CAPACITY INCREASE
PROJECT NO. 0510003-037-AC (PSD-FL-333C)

Dear Mr. Koerner:

United States Sugar Corporation (U.S. Sugar) and Golder Associates Inc. has received the Department's Intent to Issue and Draft Permit dated December 7, 2007, regarding Boiler No. 8 at the Clewiston Mill. The purpose of this correspondence is to provide comments on the draft permit. The comments are provided below.

Draft Permit

Section 3.A. Boiler 8 (EU-028)

Page 5 of 16, Emission Unit Description – In the paragraph titled “*Stack Parameters*”, the figure of 5.5% oxygen should be retained instead of changing it to 7% oxygen. The 5.5% is correct as the actual oxygen content of the flue gas.

Page 7 of 16, Specific Condition 7.e. – the correct mass emission rate is 29.6 pounds per hour, not 26.9 pounds per hour.

Section 3.B. Biomass Handling System (EU-027)

Page 16 of 16, Specific Conditions 2, 3 and 4 – the bagacillo cyclone is shown to be a regulated unit in this condition, with an opacity limit of 5% and requiring annual visible emissions testing. Currently, the bagacillo cyclone is an unregulated emissions unit contained in Appendix U-1 of the Title V permit. The Boiler No. 8 steam rate increase project does not affect the bagacillo cyclone operation in any manner. The steam increase does not increase the amount of bagacillo being separated from the bagasse stream, and therefore does not affect the emissions from the cyclone.

The bagacillo cyclone was installed previous to 1941 and has operated in its current mode since that time. It is also noted that U.S. Sugar is currently investigating the replacement of the existing bagacillo system. If U.S. Sugar proceeds with such replacement, an appropriate air construction permit application will be submitted. U.S. Sugar requests that the existing bagacillo system and cyclone remain as an “unregulated” emission unit in the Title V permit.

U.S. Sugar has not yet published the Public Notice for the draft permit. Pending your review of these comments, a revised draft may need to be issued. Thank you for consideration of these comments. Please call or e-mail me if you have any questions.

Sincerely,
GOLDER ASSOCIATES INC.

David A. Buff

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

DB/

cc: Don Griffin, USSC
Peter Briggs, USSC
Ron Blackburn, DEP

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