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March 13, 2007

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

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BUREAU OF AIR REGULATION

Attention: Mr. Jeffery Koerner, P. E.

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

Dear Mr. Koerner:

United States Sugar Corporation (U.S. Sugar) and Golder Associates Inc. (Golder) have received the Department's Intent to Issue and REVISED Draft Permit dated February 5, 2007, regarding Boiler No. 8 at the Clewiston Mill. The purpose of this correspondence is to provide comments on the revised draft permit. The comments are provided below.

Revised Draft Permit

Placard Page- page 1 – Note that Mr. Raiola is no longer the Authorized Representative. Mr. Neil Smith, Vice President and General Manager, Sugar Manufacturing, is now the Authorized Representative.

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

Page 16 of 16, Specific Condition 2 – The first and second sentences state the following:

“To minimize fugitive particulate matter, biomass conveyors shall be enclosed, new landing zones shall be installed on conveyor transfer points. The conveyor system will now be completely enclosed except for...”

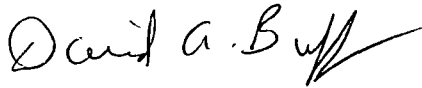
We believe the language used in the Technical Evaluation and Preliminary Determination, page 5 of 9 is more appropriate:

“To minimize fugitive particulate matter, biomass conveyors shall be covered and new landing zones shall be installed on conveyor transfer points. The existing dust collectors will be removed. The conveyor system will now be completely covered or enclosed except for ...

U.S. Sugar has published the Public Notice for the revised draft permit. Please incorporate these comments into the final permit. Thank you for consideration of these comments. Please call or email me if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/kjp

cc: Don Griffin
Peter Briggs
Ron Blackburn, DEP

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