



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

November 13, 2006

(Sent by Electronic Mail – Return Receipt Requested)

Mr. Neil Smith, V.P. of Sugar Processing Operations
United States Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, FL 33440

Re: **Request for Additional Information**
Project No. 0510003-040-AV
U.S. Sugar Clewiston Mill
Heath-Based Compliance Alternative Demonstration

Dear Mr. Smith:

The Department received the application to revise your Title V air operation permit with regard to the health-based compliance alternative (HBCA) demonstration as provided by the NEHSAP Subpart DDDDD provisions. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. EPA has given final approval to the AERMOD air quality model. The air quality modeling analysis provided with this project is based on the ISC-Prime model, which is no longer a guideline model. Please revise the analysis by using the AERMOD model. The Department reserves the right to ask additional questions regarding the revised analysis.
2. See Table 2-2, "Stack and operating Parameters Used in the HBCA Modeling Analysis". Boiler 4 is used as a backup boiler during the off-crop season. However, Boiler 4 is not identified in any of the scenarios for the off-crop season. Please explain.
3. Table 4-2 of the application (Maximum Annual HCl-Equivalent Emissions During the Crop Season) indicates that a factor of 7% was applied to Cl₂ emissions from Boilers 7 and 8 based on test data for Boiler 8, as summarized in Table A-4. Please provide all other Cl₂ and HCl test data available for Boilers 7 and 8. Were the cyclone pre-controls operated as wet cyclones or dry cyclones? Please identify the operating conditions for the controls.
4. Table 4-2 of the application (Maximum Annual HCl-Equivalent Emissions During the Crop Season) indicates that a factor of 15% was applied to Cl₂ emissions from Boilers 1, 2 and 4. Please provide the basis for the assumption of a 15% factor for Boilers 1, 2 and 4? Please provide all other Cl₂ and HCl test data available for Boilers 1, 2, and 4. The note in this table indicates that the factor will be verified by stack testing. Please identify the number of tests, the proposed EPA reference methods, and the expected timeframe during which the tests will be conducted.
5. When using fuel analyses in the HBCA, the NEHSAP Subpart DDDDD provisions in 4(a)(1) require you assume that any chlorine detected will be emitted as Cl₂, when using fuel analyses. Was this done? Please explain.
6. Please identify any specific deviations in the proposed fuel sampling and analysis protocol that differ from the NEHSAP Subpart DDDDD provisions.

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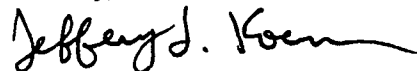
Request for Additional Information

7. See Table 4-6, "Maximum Predicted Manganese Impacts". Please identify the calculations for the Hazard Quotient for manganese. For the predicted maximum impacts identified in this table, please provide a map of the facility and surrounding areas (i.e., Figure 4-2) showing the points of maximum predicted impacts. On this map, also identify accessible public areas such as residences, schools, parks, etc.
8. See Table 4-7, "Maximum Predicted HCl-Equivalent Impacts". Please identify the calculations for the Hazard Quotients for Cl₂ and HCl as well as the overall Hazard Index. For the predicted maximum impacts identified in this table, please provide a map of the facility and surrounding areas (i.e., Figure 4-2) showing the points of maximum predicted impacts. On this map, also identify accessible public areas such as residences, schools, parks, etc.
9. Appendix A, 4(e), states, "During the emissions test, you must collect operating parameter monitoring system data at least every 15 minutes during the entire emissions test and establish the site-specific operating requirements in Tables 3 or 4, as appropriate, of subpart DDDDD using data from the monitoring system and the procedures specified in §63.7530 of subpart DDDDD." Please provide the monitoring data and specify the applicable operating limits.
10. In addition to the Title V permit parameters presented in Table 5-1, please include the following: emission release type, stack height, stack area, stack gas temperature, stack gas exit velocity, type of control devices, control equipment operating limits, and fuel mix (annual average). Identify any restrictions (and the boilers) for which the HBCA analysis was based on less than 100% operation.
11. Boilers 1, 2, 4, 7, and 8 are permitted to fire bagasse and distillate oil. Only Boiler 8 is permitted to fire wood. The addition of wood as a permitted fuel for other boilers would require a new HBCA analysis. Please comment.

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, Air Permitting North
Bureau of Air Regulation

This letter was mailed electronically to:

Mr. Neil Smith, U.S. Sugar (nsmith@ussugar.com)
Mr. Peter Briggs, U.S. Sugar (pbriggs@ussugar.com)
Mr. Don Griffin, U.S. Sugar (dgriffin@ussugar.com)
Mr. David Buff, Golder Associates (dave_buff@golder.com)
Mr. Ron Blackburn, SD Office (blackburn_r@dep.state.fl.us)
Mr. Gregg Worley, EPA Region 4 (worley.gregg@epamail.epa.gov)
Mr. Kenneth Mitchell, EPA Region 4 (mitchell.ken@epa.gov)

Friday, Barbara

From: Koerner, Jeff
Sent: Monday, November 13, 2006 11:50 AM
To: Friday, Barbara; Adams, Patty
Cc: Gibson, Victoria
Subject: Project No. 0510003-040-AV: US Sugar Clewiston, Request for Additional Information, HBCA

Attachments: 0510003-040-AV - RFI, HBCA.pdf

Barbara and Patty,

Attached is a signed request for additional information. I have included the email addresses at the end of the letter. For some reason, US Sugar cannot accept "zipped" files. Please just attach this PDF file.

This needs to be sent today.

If you have any questions, please let me know.

Thanks!

Jeff Koerner, BAR - Air Permitting North
Florida Department of Environmental Protection
850/921-9536



0510003-040-AV -
RFI, HBCA.pdf...

Friday, Barbara

From: Exchange Administrator
Sent: Monday, November 13, 2006 12:15 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT524410.txt; Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV



ATT524410.txt
(283 B)



Request for
Additional Informa...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

dbuff@golder.com

Friday, Barbara

From: System Administrator
To: Blackburn, Ron
Sent: Monday, November 13, 2006 12:15 PM
Subject: Delivered:Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV

Your message

To: 'nsmith@ussugar.com'; 'pbriggs@ussugar.com'; 'dgriffin@ussugar.com'; 'dbuff@golder.com'; Blackburn, Ron;
'worley.gregg@epamail.epa.gov'; 'mitchell.ken@epa.gov'
Cc: Koerner, Jeff
Subject: Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV
Sent: 11/13/2006 12:15 PM

was delivered to the following recipient(s):

Blackburn, Ron on 11/13/2006 12:15 PM

Friday, Barbara

From: EPA Postmaster automated message [postmaster@epamail.epa.gov]
Sent: Monday, November 13, 2006 12:16 PM
To: Friday, Barbara
Subject: Delivery Notification: Message successfully forwarded

Attachments: ATT525672.txt; ATT525673.txt



ATT525672.txt (626 B) ATT525673.txt (2 KB)

This report relates to a message you sent with the following header fields:

```
Message-id: <5280B20498F24C46A51A87E86A0C8F97038C83@tlhexsmb5.floridadep.net>
Date: Mon, 13.Nov 2006 12:15:17 -0500
From: "Friday, Barbara" <Barbara.Friday@dep.state.fl.us>
To: nsmith@ussugar.com, pbriggs@ussugar.com, dgriffin@ussugar.com,
    dbuff@golder.com, "Blackburn, Ron" <Ron.Blackburn@dep.state.fl.us>,
    worley.gregg@epamail.epa.gov, mitchell.ken@epamail.epa.gov
Subject: Request for Additional Information - U.S. Sugar Clewiston Mill
        #0510003-040-AV
```

Your message has been successfully relayed to the recipients

```
Recipient address: mitchell.ken@mseive.epa.gov
Original address: mitchell.ken@epa.gov
Reason: Message successfully relayed to a system that does not support receipts
Diagnostic code: dns;mseive01.rtp.epa.gov (TCP|134.67.208.33|3169|134.67.221.149|25)
(mseive01.rtp.epa.gov ESMTP Postfix) smtp;250 Ok
Remote system: dns;mseive01.rtp.epa.gov (TCP|134.67.208.33|3169|134.67.221.149|25)
(mseive01.rtp.epa.gov ESMTP Postfix)
```

on a remote system that does not support the generation of successful delivery receipts. This does NOT mean that your message has actually been placed in the recipients' mailboxes; merely that it has passed through a part of the message transport infrastructure. In the event of a nondelivery you should expect to receive a nondelivery notification; in the event of successful delivery, however, you are unlikely to receive a positive confirmation of delivery.

Friday, Barbara

From: EPA Postmaster automated message [postmaster@epamail.epa.gov]
Sent: Monday, November 13, 2006 12:16 PM
To: Friday, Barbara
Subject: Delivery Notification: Message successfully forwarded

Attachments: ATT525688.txt; ATT525689.txt



ATT525688.txt (634 B) ATT525689.txt (2 KB)

This report relates to a message you sent with the following header fields:

```
Message-id: <5280B20498F24C46A51A87E86A0C8F97038C83@tlhexsmb5.floridadep.net>
Date: Mon, 13 Nov 2006 12:15:17 -0500
From: "Friday, Barbara" <Barbara.Friday@dep.state.fl.us>
To: nsmith@ussugar.com, pbriggs@ussugar.com, dgriffin@ussugar.com,
    dbuff@golder.com, "Blackburn, Ron" <Ron.Blackburn@dep.state.fl.us>,
    worley.gregg@epamail.epa.gov, mitchell.ken@epamail.epa.gov
Subject: Request for Additional Information - U.S. Sugar Clewiston Mill
        #0510003-040-AV
```

Your message has been successfully relayed to the recipients

```
Recipient address: worley.gregg@mseive.epa.gov
Original address: worley.gregg@epamail.epa.gov
Reason: Message successfully relayed to a system that does not support receipts
Diagnostic code: dns;mseive01.rtp.epa.gov (TCP|134.67.208.33|3169|134.67.221.149|25)
(mseive01.rtp.epa.gov ESMTP Postfix) smtp;250 Ok
Remote system: dns;mseive01.rtp.epa.gov (TCP|134.67.208.33|3169|134.67.221.149|25)
(mseive01.rtp.epa.gov ESMTP Postfix)
```

on a remote system that does not support the generation of successful delivery receipts. This does NOT mean that your message has actually been placed in the recipients' mailboxes; merely that it has passed through a part of the message transport infrastructure. In the event of a nondelivery you should expect to receive a nondelivery notification; in the event of successful delivery, however, you are unlikely to receive a positive confirmation of delivery.

Friday, Barbara

From: Mitchell.Ken@epamail.epa.gov
Sent: Monday, November 13, 2006 12:28 PM
To: Friday, Barbara
Cc: Hirtz.James@epamail.epa.gov; Majumder.Joydeb@epamail.epa.gov
Subject: Re: Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV

Attachments: 0510003-040-AV - RFI HBCA.pdf



0510003-040-AV -
RFI HBCA.pdf ...

Barbara....I'm forwarding this to Jim Hirtz at OAQPS who needs a copy and Joydeb Majumder on my staff who oversees DDDDD for Region 4.

Kenneth L. Mitchell, Ph.D., Chief
Air Toxics Assessment and Implementation Section U.S. Environmental Protection Agency
61 Forsyth Street, SW
Atlanta, GA 30303
404-562-9065 (voice)
404-562-9095 (fax)
mitchell.ken@epa.gov

"Friday,
Barbara"
<Barbara.Friday@
dep.state.fl.us>

11/13/2006 12:15
PM

To
nsmith@ussugar.com,
pbriggs@ussugar.com,
dgriffin@ussugar.com,
dbuff@golder.com, "Blackburn,
Ron"
<Ron.Blackburn@dep.state.fl.us>,
Gregg Worley/R4/USEPA/US@EPA, Ken
Mitchell/R4/USEPA/US@EPA

cc

"Koerner, Jeff"
<Jeff.Koerner@dep.state.fl.us>
Subject

Request for Additional
Information - U.S. Sugar
Clewiston Mill #0510003-040-AV

(See attached file: 0510003-040-AV - RFI HBCA.pdf)

Friday, Barbara

From: Don Griffin [dgriffin@ussugar.com]
To: Friday, Barbara
Sent: Monday, November 13, 2006 12:58 PM
Subject: Read: Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV

Your message

To: dgriffin@ussugar.com
Subject:

was read on 11/13/2006 12:58 PM.

Friday, Barbara

From: Buff, Dave [DBuff@GOLDER.com]
Sent: Monday, November 13, 2006 12:47 PM
Subject: Read: Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV

Your message

To: DBuff@GOLDER.com
Subject:

was read on 11/13/2006 12:47 PM.

Friday, Barbara

From: Lisa Pickron [lpickron@ussugar.com]
To: Friday, Barbara
Sent: Monday, November 13, 2006 2:11 PM
Subject: Read: Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV

Your message

To: lpickron@ussugar.com
Subject:

was read on 11/13/2006 2:11 PM.

Friday, Barbara

From: Neil Smith [nsmith@ussugar.com]
To: Friday, Barbara
Sent: Monday, November 13, 2006 2:01 PM
Subject: Read: Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV

Your message

To: nsmith@ussugar.com
Subject:

was read on 11/13/2006 2:01 PM.

Friday, Barbara

From: Blackburn, Ron
To: Friday, Barbara
Sent: Tuesday, November 14, 2006 6:58 AM
Subject: Read: Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV

Your message

To: 'nsmith@ussugar.com'; 'pbriggs@ussugar.com'; 'dgriffin@ussugar.com'; 'dbuff@golder.com'; Blackburn, Ron; 'worley.gregg@epamail.epa.gov'; 'mitchell.ken@epa.gov'
Cc: Koerner, Jeff
Subject: Request for Additional Information - U.S. Sugar Clewiston Mill #0510003-040-AV
Sent: 11/13/2006 12:15 PM

was read on 11/14/2006 6:58 AM.