

Florida Department of Environmental Protection

Memorandum

TO: Joe Kahn, Acting Division Director

THROUGH: Trina Vielhauer, Chief - Bureau of Air Regulation

FROM: Jeff Koerner, Air Permitting North Program *JK*

DATE: June 16, 2006

SUBJECT: Final Air Permit No. 0510003-035-AC
U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery
New Dry Cyclone Collector for Boiler 8

Attached for your review are the final permit documents for the above referenced project. The Final Permit authorizes installation of a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on Boiler 8. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at W.C. Owens Avenue and S.R. 832 in Clewiston, Florida. We processed this application because it will be incorporated into the Title V renewal permit, which we are currently processing. Day #90 is July 29, 2006. I recommend your approval of the attached Final Permit for this project.

Attachments

FINAL DETERMINATION

PERMITTEE

United States Sugar Corporation
111 Ponce DeLeon Avenue
Clewiston, FL 33440

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation, Air Permitting North Program
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400

PROJECT

United States Sugar Corporation - Clewiston Sugar Mill and Refinery
Air Permit No. 0510003-035-AC
Boiler 8 – New Dry Cyclone Dust Collector

The Final Permit authorizes installation of a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on existing Boiler 8. The new equipment will be installed at the existing Clewiston Sugar Mill and Refinery, which is located in Hendry County at W.C. Owens Avenue and S.R. 832 in Clewiston, Florida.

NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on May 16, 2006. The applicant published the "Public Notice of Intent to Issue" in the Clewiston News on May 25, 2006. The Department received the proof of publication on June 14, 2006. No petitions for administrative hearings or extensions of time to petition for administrative hearing were filed.

COMMENTS

The Department received no comments on the Draft Permit.

CONCLUSION

The final action of the Department is to issue the Final Permit.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Clewiston Sugar Mill and Refinery
Air Permit No. 0510003-035-AC
Boiler 8 – Dry Cyclone Dust Collector

Authorized Representative:

Mr. Neil Smith, Vice President of Sugar Processing Operations

Enclosed is Final Air Permit No. 0510003-035-AC, which authorizes installation of a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on existing Boiler 8. The new equipment will be installed at the existing Clewiston Sugar Mill and Refinery, which is located in Hendry County at W.C. Owens Avenue and S.R. 832 in Clewiston, Florida. As noted in the attached Final Determination, only minor changes and clarifications were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

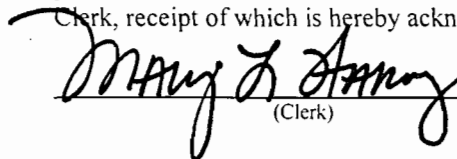
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 6/19/06 to the persons listed:

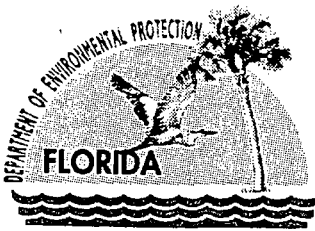
Mr. Neil Smith, U.S. Sugar*
Mr. Don Griffin, U.S. Sugar
Mr. David Buff, Golder Associates Inc.
Mr. Ron Blackburn, SD Office

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

6/19/06
(Date)



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

PERMITTEE:

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Authorized Representative:

Mr. Neil Smith
Vice President of Sugar Processing Operations

Clewiston Sugar Mill and Refinery
Air Permit No. 0510003-035-AC
Facility ID No. 0510003
SIC Nos. 2061, 2062
Permit Expires: June 1, 2008

PROJECT AND LOCATION

This permit authorizes installation of a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on Boiler 8. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at W.C. Owens Avenue and S.R. 832 in Clewiston, Florida. The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This permit supplements all other existing valid air construction and operation permits for this emissions unit.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

Joe Kahn, Acting Director
Division of Air Resource Management

6/16/2006

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

Boiler 8 (EU-028) is a spreader-stoker boiler with a maximum heat input rate of 1030 MMBtu per hour. It fires bagasse as the primary fuel and wood chips as an alternate or supplemental fuel. Distillate oil is fired as a restricted alternate fuel for startup and supplemental uses. Particulate matter emissions from the boiler are currently controlled by two wet cyclone dust collectors as pre-controls followed by an electrostatic precipitator (ESP) as the primary control device. The project authorizes the installation of a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system.

REGULATORY CLASSIFICATION

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to a New Source Performance Standard in 40 CFR 60.

NESHAP: The facility operates units subject to a National Emissions Standard for Hazardous Air Pollutants in 40 CFR 63.

RELEVANT DOCUMENTS

The permit application is not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department. Permit No. PSD-FL-333 (as modified) is also an important relevant document.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting Authority for this project is the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-3381.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); and Appendix B (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of an additional pre-control device for a permitted emissions unit. The installation of this equipment will not result in any substantive change to a Title V permit condition. The description of this new equipment will be included to the Title V renewal permit, which is currently under review by the Department. A separate Title V application is not required. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Boiler 8 (EU-028) - Dry Cyclone Collector

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description
028	Boiler 8 is a spreader-stoker boiler with a maximum heat input rate of 1030 MMBtu per hour. It fires bagasse as the primary fuel and wood chips as an alternate or supplemental fuel. Distillate oil is fired as a restricted alternate fuel for startup and supplemental uses. Particulate matter emissions from the boiler are currently controlled by two wet cyclone dust collectors as pre-controls followed by an electrostatic precipitator (ESP) as the primary control device. A dry cyclone collector will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and ESP.

EQUIPMENT

1. Dry Cyclone Collector: The permittee is authorized to install a dry multiclone sand separator, or equivalent equipment, with a design particulate collection efficiency of 84%. The new equipment will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and electrostatic precipitator (ESP). In general, the new control device will consist of approximately 40 individual centrifugal-type cyclone collectors arranged in a grid of 8 by 5. Each collector will be 1.26 feet in diameter and 2.70 feet in height. The design and equipment selection is based on the following: a design flue gas flow rate of 90,000 acfm; a flue gas inlet temperature of 385° F; a flue gas inlet moisture content of 24% by volume; and an inlet particulate matter loading of 10,000 mg/Nm³ (4.13 grains/dscf). The dry cyclone collector system will result in a pressure drop of approximately 3 inches, water column at the design flow rate. [Design; Rule 62-210.300, F.A.C.]
2. Records: The permittee shall notify the Compliance Authority within 15 days of completing construction. [Rule 62-4.070(3), F.A.C.]

SECTION 4. APPENDICES

CONTENTS

Appendix A. Citation Formats

Appendix B. General Conditions

SECTION 4. APPENDIX A
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

References to Previous Permitting Actions

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project

Rule Citation Formats

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and.
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX B
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
 - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

2. Article Number

(Transfer from service label)

7000 1670 0013 3110 0246

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Rochel Feltch

Agent

Addressee

B. Received by (Printed Name)

Rochel Feltch

C. Date of Delivery

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail

Registered Return Receipt for Merchandise

Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 1670 0013 3110 0246

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

Postmark
Here

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

See reverse for instructions

Published Weekly

Clewiston, Florida

AFFIDAVIT OF PUBLICATION

State of Florida
County of Hendry

Before the undersigned authority, personally appeared Jose Zaragoza, who on oath says he is Editor of the Clewiston News, a weekly newspaper published at Clewiston in Hendry County, Florida,

that the attached copy of advertisement being a notice.

in the matter U.S. Sugar Corporation Notice of Intent to Issue

in the 1st District court, was published in said newspaper in the issue(s)

of May 25, 2006

Affiant further says that the said Clewiston News is a newspaper published at Clewiston, in said Hendry County, continuously published in said Hendry County, Florida, each week, and has been entered as periodicals matter at the post office in Clewiston, in said Hendry County, Florida, for a period of one year next preceding the first publication says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Jose Zaragoza
Sworn to and subscribed before me this 17 day of JUNE, 2006

Ideybis Gonzalez
Notary Public



Ideybis Gonzalez
Commission #00041238
Expires Jul 26, 2008
Bonded Thru
Atlantic Bonding Co., Inc.

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Draft Air Permit No. 0510003-035
U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery
Hendry County, Florida

Applicant: The applicant for this project is the U.S. Sugar Corporation. The applicant's authorized representative and mailing address is: Mr. William A. Raiola, Vice President of Sugar Processing Operations, U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery, 111 Ponce DeLeon Avenue, Clewiston, Florida 33440.

Facility Location: U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

Project: The applicant proposes to install a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The cyclones act as pre-control devices for the I.D. fan and electrostatic precipitator (ESP). The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system. The project is expected to improve performance of the particulate matter control system for Boiler 6.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.
136577 CN 5/25/06

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. JEFF KOERNER - DARM
2. MAIL STATION 5500

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE: _____

ACTION/DISPOSITION:

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

COMMENTS:

U. S. SUGAR CORPORATION
CLEWISTON MILL
0510003-035-AC

RECEIVED

JUN 14 2006

BUREAU OF AIR REGULATION

FROM: Ronald Blackburn/South District Date: 06/12/06 Phone: SC 748-6975

Blackburn, Ron

From: Blackburn, Ron
Sent: Monday, June 12, 2006 12:47 PM
To: 'dgriffin@ussugar.com'
Cc: Koerner, Jeff; 'pbriggs@ussugar.com'
Subject: US Sugar Clewiston Mill 0510003-035 AC

Don:

Thanks again for meeting with us last week.

Received your notice of publication verification today for the referenced (published May 25, 2006). Will forward it to Jeff (thanks for your help Jeff). Found it interesting that the first permit in our data system was in August 1996. Since then 37 permitting actions have taken place - in ten years - and all you guys do is make sugar?

Take care.

Ron

Ron Blackburn

District Air Program Administrator
Department of Environmental Protection
South District Air Resources Management
Ft. Myers, FL. (239) 332-6975



UNITED STATES
SUGAR
CORPORATION

111 Ponce de Leon Ave.
Clewiston, Florida 33440
Telephone 863/902-8121
Fax 863/902-2729

SUGAR PROCESSING DEPARTMENT

June 8, 2006

Ron Blackburn, P.E.
Florida Dept. of Environmental Protection
P. O. Box 2549
Ft. Myers, Fl. 33902-2549

RE: Air Permit No. 0510003-035-AC
Clewiston Sugar Mill and Refinery
Dry Cyclone dust collector


Dear Mr. Blackburn:

We are enclosing Affidavit of Publication certifying that the "Public Notice of Intent to Issue Air Permit" was duly published in the legal section of the May 25, 2006 issue of "The Clewiston News" newspaper in Hendry County.

If you have any questions or need further information, please let me know.

Sincerely,

UNITED STATES SUGAR CORPORATION



Donald Griffin
Specialty Sugar Manager

DG:tkw
Enclosure

cc: Neil Smith
Peter Briggs

RECEIVED-DEP

JUN 12 2006

SECRET

Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Chief - Bureau of Air Regulation
FROM: Jeff Koerner, Air Permitting North Program
DATE: May 11, 2006
SUBJECT: Draft Air Permit No. 0510003-035-AC
U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery
New Dry Cyclone Collector for Boiler 8

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

The draft permit authorizes installation of a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on Boiler 8. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The P.E. certification briefly summarizes the proposed project. Day #90 is July 29, 2006. I recommend your approval of the attached Draft Permit for this project.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Air Permit No. 0510003-035-AC
New Dry Cyclone Collector for Boiler 8
Hendry County, Florida

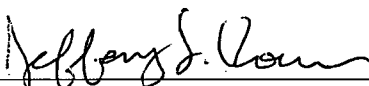
PROJECT DESCRIPTION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

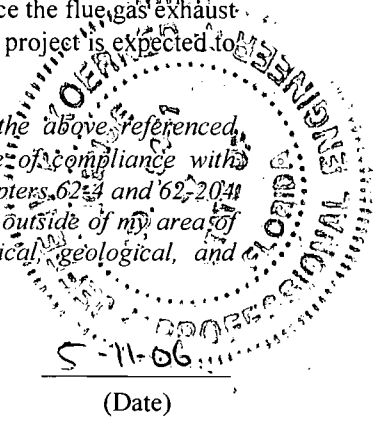
The applicant requests authorization to install a dry multiclone sand separator with a design particulate collection efficiency of 84%. The new equipment will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and electrostatic precipitator (ESP) for Boiler 8. In general, the new control device will consist of approximately 40 individual centrifugal-type cyclone collectors arranged in a grid of 8 by 5. Each collector will be 1.26 feet in diameter and 2.70 feet in height. The design and equipment selection is based on the following: a design flue gas flow rate of 90,000 acfm; a flue gas inlet temperature of 385° F; a flue gas inlet moisture content of 24% by volume; and an inlet particulate matter loading of 10,000 mg/Nm³ (4.13 grains/dscf). At the estimated design flow rate, the dry cyclone collector system will cause a pressure drop of approximately 3 inches, water column.

Installation of this new device in parallel with the two existing wet cyclone collectors will reduce the flue gas exhaust rate to the wet cyclone collectors and help prevent water carryover into the existing ESP. The project is expected to improve performance of the particulate matter control system.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration Number: 49441



DRAFT PERMIT

PERMITTEE:

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Authorized Representative:

Mr. William A. Raiola
Vice President of Sugar Processing Operations

Clewiston Sugar Mill and Refinery Air Permit No. 0510003-035-AC Facility ID No. 0510003 SIC Nos. 2061, 2062 Permit Expires: <i>{2 Years from Issuance}</i>
--

PROJECT AND LOCATION

This permit authorizes installation of a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on Boiler 8. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This permit supplements all other existing valid air construction and operation permits for this emissions unit.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

Michael G. Cooke, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

Boiler 8 (EU-028) is a spreader-stoker boiler with a maximum heat input rate of 1030 MMBtu per hour. It fires bagasse as the primary fuel and wood chips as an alternate or supplemental fuel. Distillate oil is fired as a restricted alternate fuel for startup and supplemental uses. Particulate matter emissions from the boiler are currently controlled by two wet cyclone dust collectors as pre-controls followed by an electrostatic precipitator (ESP) as the primary control device. The project authorizes the installation of a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system.

REGULATORY CLASSIFICATION

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to a New Source Performance Standard in 40 CFR 60.

NESHAP: The facility operates units subject to a National Emissions Standard for Hazardous Air Pollutants in 40 CFR 63.

RELEVANT DOCUMENTS

The permit application is not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department. Permit No. PSD-FL-333 (as modified) is also an important relevant document.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting Authority for this project is the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-3381.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); and Appendix B (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of an additional pre-control device for a permitted emissions unit. The installation of this equipment will not result in any substantive change to a Title V permit condition. The description of this new equipment will be included to the Title V renewal permit, which is currently under review by the Department. A separate Title V application is not required. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Boiler 8 (EU-028) - Dry Cyclone Collector

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description
028	Boiler 8 is a spreader-stoker boiler with a maximum heat input rate of 1030 MMBtu per hour. It fires bagasse as the primary fuel and wood chips as an alternate or supplemental fuel. Distillate oil is fired as a restricted alternate fuel for startup and supplemental uses. Particulate matter emissions from the boiler are currently controlled by two wet cyclone dust collectors as pre-controls followed by an electrostatic precipitator (ESP) as the primary control device. A dry cyclone collector will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and ESP.

EQUIPMENT

1. Dry Cyclone Collector: The permittee is authorized to install a dry multiclone sand separator, or equivalent equipment, with a design particulate collection efficiency of 84%. The new equipment will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and electrostatic precipitator (ESP). In general, the new control device will consist of approximately 40 individual centrifugal-type cyclone collectors arranged in a grid of 8 by 5. Each collector will be 1.26 feet in diameter and 2.70 feet in height. The design and equipment selection is based on the following: a design flue gas flow rate of 90,000 acfm; a flue gas inlet temperature of 385° F; a flue gas inlet moisture content of 24% by volume; and an inlet particulate matter loading of 10,000 mg/Nm³ (4.13 grains/dscf). The dry cyclone collector system will result in a pressure drop of approximately 3 inches, water column at the design flow rate. [Design; Rule 62-210.300, F.A.C.]
2. Records: The permittee shall notify the Compliance Authority within 15 days of completing construction. [Rule 62-4.070(3), F.A.C.]

SECTION 4. APPENDICES
CONTENTS

Appendix A. Citation Formats
Appendix B. General Conditions

SECTION 4. APPENDIX A
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

References to Previous Permitting Actions

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number
“001” identifies the specific permit project
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project

Rule Citation Formats

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX B
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
 - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Draft Air Construction Permit No. 0510003-035-AC
Addition of a Dry Cyclone Collector to Boiler 8

COUNTY

Hendry County, Florida

APPLICANT

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
ARMS Facility ID No. 0510003

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Air Permitting North Program



May 11, 2006

{Filename: TEPD - 0510003-035-AC}

1. GENERAL PROJECT INFORMATION

Facility Description and Location

U.S. Sugar operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. The Standard Industrial Classification Code for these activities are SIC Nos. 2061 (Sugarcane Milling) and 2062 (Sugarcane Refining). The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North. This site is located in an area that is in attainment with, or designated as unclassifiable for, each air pollutant subject to a National Ambient Air Quality Standard (NAAQS).

Regulatory Categories

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to a New Source Performance Standard in 40 CFR 60.

NESHAP: The facility operates units subject to a National Emissions Standard for Hazardous Air Pollutants in 40 CFR 63.

Project Description

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

Boiler 8 (EU-028) is a spreader-stoker boiler with a maximum heat input rate of 1030 MMBtu per hour. It fires bagasse as the primary fuel and wood chips as an alternate or supplemental fuel. Distillate oil is fired as a restricted alternate fuel for startup and supplemental uses. Particulate matter emissions from the boiler are currently controlled by two wet cyclone dust collectors as pre-controls followed by an electrostatic precipitator (ESP) as the primary control device. The applicant proposes to install a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system.

Processing Schedule

The Department received a complete application for an air construction permit on May 10, 2006.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code. 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER); 62-213 (Title V Air Operation Permits for Major Sources of Air Pollution); 62-296 (Emission Limiting Standards); 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures).

General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories defined in Rule 62-210.200, F.A.C.; or 5 tons per year of lead.

For new projects at existing PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

The Clewiston Mill and Refinery is an existing PSD-major facility located in Hendry County, which is an area that is currently in attainment with, or designated as "unclassifiable" for, each pollutant with a state or federal Ambient Air Quality Standard (AAQS). The applicant proposes to install a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system. The project is expected to improve performance of the particulate matter control system. Therefore, the project is not subject to PSD preconstruction review.

3. DEPARTMENT REVIEW

The applicant requests authorization to install a dry multiclone sand separator with a design particulate collection efficiency of 84%. The new equipment will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and electrostatic precipitator (ESP) for Boiler 8. In general, the new control device will consist of approximately 40 individual centrifugal-type cyclone collectors arranged in a grid of 8 by 5. Each collector will be 1.26 feet in diameter and 2.70 feet in height. The design and equipment selection is based on the following: a design flue gas flow rate of 90,000 acfm; a flue gas inlet temperature of 385° F; a flue gas inlet moisture content of 24% by volume; and an inlet particulate matter loading of 10,000 mg/Nm³, which is equivalent to:

$$PM_{inlet} = (10,000 \text{ mg/Nm}^3) (1 \text{ g}/1000 \text{ mg})(\text{lb}/453.6 \text{ g})((7000 \text{ grains}/\text{lb})(\text{Nm}^3)/37.33 \text{ scf}) = 4.13 \text{ grains/dscf}$$

At the estimated design flow rate, the dry cyclone collector system will cause a pressure drop of approximately 3 inches water column. Installation of this new device in parallel with the two existing wet cyclone collectors will reduce the flue gas exhaust rate to the wet cyclone collectors and help prevent water carryover into the existing ESP.

The draft permit will authorize the installation of this equipment or its equivalent. Because this is a pre-control device, no new emissions standards are imposed and no additional testing is required. The permittee will be required to notify the Compliance authority upon completion of construction.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

May 11, 2006

Mr. William A. Raiola, Vice President of Sugar Processing Operations
U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Re: Air Construction Permit No. 0510003-035-AC
Clewiston Sugar Mill and Refinery
New Dry Cyclone Collector for Boiler 8

Dear Mr. Raiola:

On May 10, 2006, you submitted an application requesting authorization to install a new dry cyclone collector for Boiler 8 to operate in parallel with the existing wet cyclone collectors. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Mr. William A. Raiola, V.P. of Sugar Processing Operations
U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Air Permit No. 0510003-035-AC
Facility ID No. 0510003
Clewiston Sugar Mill and Refinery
New Dry Cyclone Collector for Boiler 8
Hendry County, Florida

Facility Location: U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

Project: The applicant proposes to install a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on Boiler 8. Details of the project are provided in the application and the enclosed "Technical Evaluation and Preliminary Determination".

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

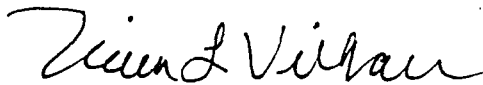
Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

Draft Air Permit No. 0510003-035

U.S. Sugar Corporation – Clewiston Sugar Mill and Refinery
Hendry County, Florida

Applicant: The applicant for this project is the U.S. Sugar Corporation. The applicant's authorized representative and mailing address is: Mr. William A. Raiola, Vice President of Sugar Processing Operations, U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery, 111 Ponce DeLeon Avenue, Clewiston, Florida 33440.

Facility Location: U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

Project: The applicant proposes to install a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The cyclones act as pre-control devices for the I.D. fan and electrostatic precipitator (ESP). The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system. The project is expected to improve performance of the particulate matter control system.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><i>Rachel Delta</i></p> <p>B. Received by (<i>Printed Name</i>) C. Date of Delivery</p> <p><i>Rachel Delta</i> <i>5-18-6</i></p>
<p>1. Article Addressed to:</p> <p>Mr. William A. Raiola, V.P. of Sugar Processing Operations Clewiston Sugar Mill and Refinery United States Sugar Corporation 111 Ponce DeLeon Avenue Clewiston, Florida 33440</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (<i>Extra Fee</i>) <input type="checkbox"/> Yes</p>
<p>2. Article Number (<i>Transfer from service label</i>)</p>	<p><i>7000 1670 0013 3110 1472</i></p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage \$		Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<p>7000 1670 0013 3110 1472</p>	<p>Mr. William A. Raiola, V.P. of Sugar Processing Operations Clewiston Sugar Mill and Refinery United States Sugar Corporation 111 Ponce DeLeon Avenue Clewiston, Florida 33440</p>	
<p>PS Form 3800, May 2000 See Reverse for Instructions</p>		

Golder Associates Inc.

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



April 28, 2006

RECEIVED

043-7615

MAY 01 2006

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

Attention: Mr. Jeffery Koerner, P. E.

RE: UNITED STATES SUGAR CORPORATION – CLEWISTON MILL
 BOILER NO. 8
 PERMIT NO. 0510003-030-AC (PSD-FL-333B)
 ADDITION OF CYCLONE DUST COLLECTOR

Dear Mr. Koerner:

United States Sugar Corporation (U.S. Sugar) was issued air construction Permit No. 0510003-030-AC/ PSD-FL-333B for Boiler No. 8 on April 7, 2006. This construction permit incorporated the final Boiler maximum achievable control technology (MACT) requirements, as well as some minor permit revisions. Boiler No. 8 started operation in early 2005, and initial compliance testing was conducted on March 25-26, 2005. A second annual compliance test was conducted on January 10-11, 2006.

Boiler No. 8 has two wet cyclones (wet scrubbers) which operate in parallel as primary control devices to remove particulate matter (PM) from the boiler exhaust gases. The main function of the wet cyclones is to protect the inside diameter (ID) fan from excessive wear and premature failure due to particle erosion. After exiting the wet cyclones and the ID fan, the Boiler No. 8 exhaust gases pass through an electrostatic precipitator (ESP) to further remove PM before exhausting to the atmosphere.

Through operating experience with the new Boiler No. 8, U.S. Sugar has become aware of a problem with the carryover of water and dust particles out of the wet cyclones and into the ESP. The water and moist dust particles act like a mud within the ESP, leading to fouling and plugging of the ESP plates, and plugging of the ash removal system. The problem has been linked to high velocities through the wet cyclone collectors. The high gas velocity results in carryover of water, which leads to the "mud" and the operating problems in the ESP.

To resolve this issue, U.S. Sugar is proposing to install a third mechanical cyclone to operate in parallel with the two existing cyclones (see attached flow diagram). The new cyclone will be designed to handle approximately 20 percent of the exhaust gases exiting Boiler No. 8. This will effectively reduce the gas flow rate through each of the existing two wet cyclones by approximately 20 percent, thereby reducing water carryover from the cyclones.

The new mechanical collector will be of the dry type, i.e., no water will be added in the cyclone (only for ash removal). Design specifications and a drawing of the new cyclone are attached. Also attached are applicable portions of the Application for Air Permit – Long Form.

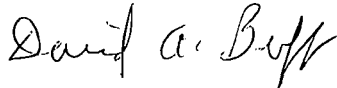


U.S. Sugar is planning on making this change to Boiler No. 8 during the current off-season. As such, we desire approval of this addition of air pollution control equipment as quickly as possible.

Thank you for consideration of this request. Please call or e-mail me if you have any questions concerning this information.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/kdk

Enclosures

cc: Don Griffin
Peter Briggs
Ron Blackburn, DEP

Y:\Projects\2004\0437615 US Sugar Blr8\Boiler #8 Dry Scrubber\4.1\042806.doc

APPLICATION PAGES



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revise/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: United States Sugar Corporation	
2. Site Name: Clewiston Mill	
3. Facility Identification Number: 0510003	
4. Facility Location...: Street Address or Other Locator: W.C. Owens Ave. and S.R. 832 City: Clewiston County: Hendry Zip Code: 33440	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: William A. Raiola, Sr. Vice President, Sugar Processing Operations	
2. Application Contact Mailing Address... Organization/Firm: United States Sugar Corporation Street Address: 111 Ponce de Leon Avenue City: Clewiston State: Florida Zip Code: 33440	
3. Application Contact Telephone Numbers... Telephone: (863) 983-8121 ext. Fax: (863) 902-2729	
4. Application Contact Email Address: braiola@ussugar.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 5-1-06	3. PSD Number (if applicable):
2. Project Number(s): 0510003-035-AC	4. Siting Number (if applicable):

FACILITY INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

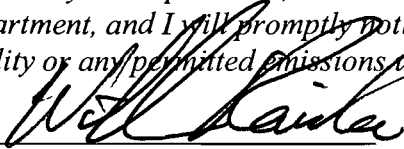
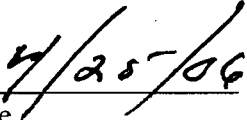
Application Comment

This application is to add a third cyclone to operate in parallel with the existing two cyclones to remove particulate matter prior to the boiler ID fan. No emissions or limits will change as a result of this action.

FACILITY INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : William A. Raiola, Senior Vice President, Sugar Processing Operations
2. Owner/Authorized Representative Mailing Address... Organization/Firm: United States Sugar Corporation Street Address: 111 Ponce de Leon Avenue City: Clewiston State: Florida Zip Code: 33440
3. Owner/Authorized Representative Telephone Numbers... Telephone: (863) 983-8121 ext. Fax: (863) 902-2729
4. Owner/Authorized Representative Email Address: braiola@ussugar.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility 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 requirements identified in this application to which the facility 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.</i>  Signature  Date

FACILITY INFORMATION

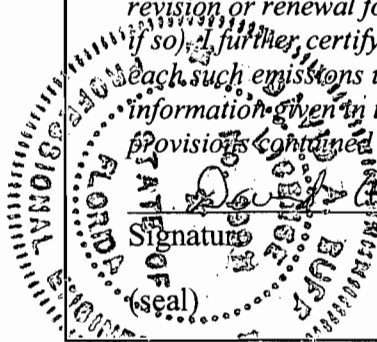
Application Responsible Official Certification

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:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input 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: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: 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. _____ Signature _____ Date

FACILITY 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> (1) <i>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> (2) <i>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> (3) <i>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> (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input checked="" 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 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> (5) <i>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> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;">  <p>Signature: <u>David A. Buff</u></p> </div> <div style="text-align: center;"> <p>Date: <u>4/27/06</u></p> </div> </div>

* Attach any exception to certification statement.

Board of Professional Engineers Certificate of Authorization #00001670

EMISSIONS UNIT INFORMATION

Section [1]
Boiler No. 8

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application – For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application – For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an “unregulated emissions unit” does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1]

Boiler No. 8

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Boiler No. 8

3. Emissions Unit Identification Number: **028**

4. Emissions Unit Status Code:
A

5. Commence Construction Date:
NOV 2003

6. Initial Startup Date:
MAR 2005

7. Emissions Unit Major Group SIC Code:
20

8. Acid Rain Unit?
 Yes
 No

9. Package Unit:

Manufacturer:

Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

Membrane wall, balanced-draft stoker boiler fired with carbonaceous fuel and distillate fuel oil (Grade No. 2) with a maximum sulfur content of 0.05 percent by weight. Fuel oil can include facility-generated, on-specification used oil.

EMISSIONS UNIT INFORMATION

Section [1]

Boiler No. 8

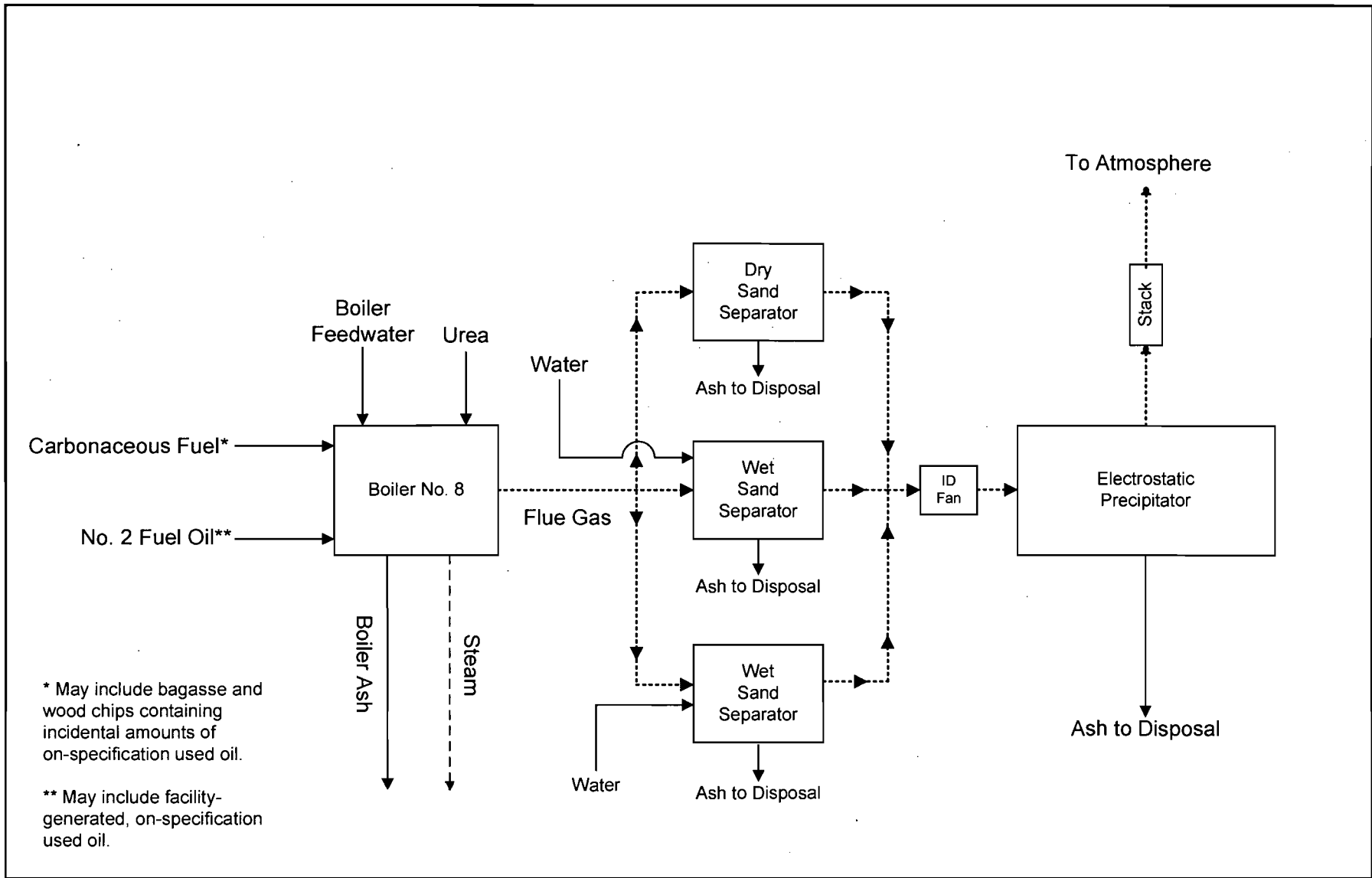
Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

**Electrostatic Precipitator
Wet Sand Separator
Selective Non-Catalytic Reduction System (SNCR)
Mechanical Dust Collector**

2. Control Device or Method Code(s): **010, 099, 107, 076**

FLOW DIAGRAM



Attachment USS-EU1-I1
 Boiler No. 8 Process Flow Diagram
 U.S. Sugar Corporation
 Clewiston Mill, Florida

Process Flow Legend
 Solid/Liquid ———>
 Gaseous - - - - ->
 Steam - - - - ->

File: 0437615/Boiler #8 Wet Scrubber/4.4/USS-EU1-I1.vsd
 Date: 4/28/06



ATTACHMENT USS-EU1-I3

**CONTROL EQUIPMENT PARAMETERS FOR BOILERS NO. 8
AT THE U.S. SUGAR CLEWISTON MILL**

ATTACHMENT USS-EU1-I3a
DESIGN CONTROL EQUIPMENT PARAMETERS FOR BOILER NO. 8
AT U.S. SUGAR CLEWISTON MILL

WET SAND SEPARATORS*

Control Device Type Manufacturer and Model No.	Wet Cyclone Thermal Energy Systems
Inlet Flue Gas Temp (°F)	400
Inlet Design Flue Gas Flow Rate (acfm)	230,000
Inlet Expected Flue Gas Flow Rate (acfm)	168,000
Inlet Moisture (% Volume)	24
Cyclone Diameter (ft)	22
Cyclone Height (ft)	35
No. of Spray Nozzles (Cyclone)	5
No. of Spray Nozzles (Inlet Duct)	9
Total Water Flow to Nozzles (gpm)	713
Pressure Drop (in H ₂ O)	4
Overall PM Collection Efficiency (%)	80

*There are two identical units operating in parallel; data is for each unit.

ATTACHMENT USS-EU1-I3b
DESIGN CONTROL EQUIPMENT PARAMETERS FOR BOILER NO. 8
U.S. SUGAR CLEWISTON MILL
ELECTROSTATIC PRECIPITATOR

Manufacturer and Model No.	PPC Industries Model No. 41R-1536-5712P		
Inlet Flue Gas Temp (°F)	335		
Inlet Design Flue Gas Flow Rate (acfm)	432,500		
Moisture (% Volume)	20		
No. of Precipitators	1		
Precipitation Type	Rigid Electrode		
Total Number of Fields	5		
Total Installed Collection Area (ft ²)	154,360		
Gas Velocity (ft/s)	3.25		
Specific Collection Area (ft ² /1,000 acfm)	356		
Power Consumption (KW)	250		
Pressure Drop (in H ₂ O)	1		
Pollutants	Inlet Loading (lb/hr)	Outlet Loading (lb/hr)	Control Efficiency %
Particulate Matter	5,346	25.8	99.5

Design Inlet loading calculation:

Uncontrolled: 5.19 lb/MMBtu x 1,030 MMBtu/hr = 5,346 lb/hr

ESP outlet loading (max) = 25.75 lb/hr (based on 0.025 lb/MMBtu)

ESP efficiency (min) = (5,346 - 25.75) / 5,346 = 99.5%

ATTACHMENT USS-EU1-I3c

**DESIGN CONTROL EQUIPMENT PARAMETERS FOR BOILER NO. 8
AT U.S. SUGAR CLEWISTON MILL**

DRY SAND SEPARATOR*

Control Device Type	Dry Multiclone
Manufacturer and Model No.	Howden Energy Systems
Inlet Flue Gas Temp (°F)	385
Inlet Design Flue Gas Flow Rate (acfm)	90,000
Inlet Moisture (% Volume)	24
No. of Cyclones	40
Cyclone Diameter (ft)	1.26
Cyclone Height (ft)	2.70
Pressure Drop (in H ₂ O)	3
Overall PM Collection Efficiency (%)	83

*There is one dry sand separator (multiclone).

**DESIGN SPECIFICATIONS AND
DRAWING OF DRY MULTICLONE**



Howden

Howden Energy Systems

1a Boyesens Road
Boyesens 2081
Johannesburg

P O Box 9501
Johannesburg 2000

Tel: +27 11 240 4000
Fac: +27 11 493 3861
web: www.howden.co.za

January 27, 2006

Thermal Energy Systems CC
Lagoon Beach Office Park,
Block C Ground Floor,
Cnr Marine Drive & Boundary Road,
Milnerton
7441

Fax No 021 552 2611

ATTENTION: MR BEN MISPLON

Dear Sirs,

GRIT ARRESTER FOR EXPORT
HES REF. NO. T9982/47/06

We thank you for the above enquiry and have pleasure in submitting our proposal for your consideration.

Design Parameters Given

Application:	Bagasse/LFO Fired Boiler
Altitude:	Sea level
Design gas flow: Am ³ /s	± 42.4 (40 cells @ 1.06 Am ³ /s per cell)
Density: kg/Am ³	0.70
Gas temperature: °C	196
Required pressure drop Pa	750 -
Inlet burden mg/Nm ³	10 000
Particle size distribution	100% < 500 µm
	92% < 150
	73% < 80
	60% < 60
	48% < 50
	37% < 40
	25% < 30
	15% < 20
	5% < 10
	3% < 5
	1% < 1
SG of dust	2.0

Equipment Offered

For this application we would offer the Howden IR Multivortex low energy grit arrester.

No of cells:	8 x 5 = 40
Inlet size:	3 300 w x 2 050 h
Hopper:	Trough with water sluicing
Seal:	Swinging bucket
Mass:	3 100 kg
Pressure drop:	750 Pa
Collection efficiency:	83%

We have offered the basic construction with mild steel cells electroless nickel plated.

Prices

Grit arrester c/w mild steel cells: R 324 310.00 ex works excluding VAT

Conditions of Tender

Prices tendered are fixed and firm for the validity of this tender.

Validity

30 days, thereafter subject to confirmation

Delivery

A general arrangement drawing could be provided within 1 - 2 working weeks of an order and delivery ex works could be effected in typically 10 to 12 working weeks after approval but may be negotiated.

Exclusions

In arriving at the above prices we have excluded the following:

1. Supporting steelwork
2. Thermal insulation
3. Container or shipping

Terms of Payment

The prices tendered are based on payment in South African Rands, payable within 30 days of invoices as follows:

- 15% on submission of certified arrangement drawing
- 85 % of contract price on despatch of equipment.

Consequential Loss

Notwithstanding any of the conditions specified or tendered, Howden Energy Systems specifically reject any liability for any form of consequential loss of any description arising from any cause whatsoever during the execution of this contract.

Howden 305 I.R. Multivortex Collector

General Description

The Howden I.R. Collector is a centrifugal type dust collector designed to give a high efficiency and occupy a small space. The collector is the straight through type consisting of a number of cells arranged horizontally and operating in parallel.

The Cell

Each cell would be as shown on the attached sketch. As can be seen the cell consists of four main parts:

- a) The inlet tube
- b) The cell body
- c) The inlet vane assembly
- d) The outlet tube

The cell body is a parallel tube and the vane assembly consists of carefully designed and pressed blades welded to a central boss. The outlet and inlet tubes are short parallel tubes of slightly smaller diameter than the cell body.

The Operation

The dust laden gas having entered the inlet tube is set into a whirling motion by the vane assembly. The dust particles by virtue of the centrifugal force are thus thrown to the inside circumference of the cell body, passing out through the narrow opening formed between the body and the outlet tube and discharge into the collection hopper below. The cleaned gas then passes out through the discharge tube.

The relatively high efficiency achieved from this collector without a secondary collection system is obtained by inducing a secondary flow through the annular space where the dust has to pass. This is achieved by means of the ejector principle i.e. the gas passing through the inlet tube and thence the vane ring induces a flow through the annular space between the inlet tube and the cell body.

This causes a depression in the hopper and thus induces a secondary flow between the cell body and outlet tube.

Construction

The cells, inlet and discharge tubes are manufactured from standard mild steel tubing. The inlet vanes and bosses are pressed from mild steel plate. The casing in which the cells are housed and the dust hoppers are constructed generally in 6 mm mild steel plate adequately stiffened.

Partial List of References

Royal Swazi Sugar Estates – Swaziland
Usutu Pulp - Swaziland
Hippo Valley – Zimbabwe
Triangle Sugar - Zimbabwe
Mon Tresor - Mauritius

HOWDEN ENERGY SYSTEMS

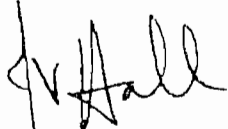
Howden Energy Systems is an operating division of Howden Africa, a company listed on the Johannesburg Stock Exchange

The focal areas of Howden Energy Systems are Gas Cleaning, Combustion and Industrial Furnace Systems. Also marketed is a full range of heat exchanger technology.

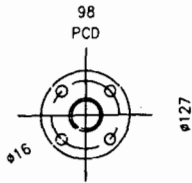
Howden Energy Systems are listed by SABS to ISO 9001.2000 for quality management Systems. This followed a Howden Group South Africa policy of obtaining listing for all operating companies. Howden Energy Systems were in fact one of the first true project management companies to obtain the SABS listing.

We trust that this is in line with your requirements. Should you have any further queries, please do not hesitate to contact us.

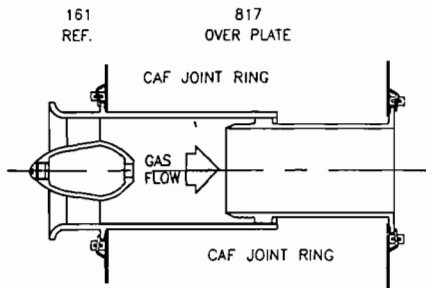
Yours faithfully,
For HOWDEN ENERGY SYSTEMS


J V HALL
APPLICATIONS – GAS CLEANING

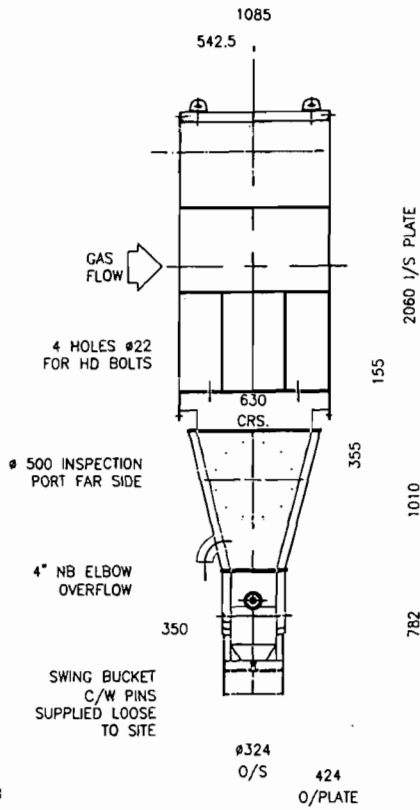
I BLASKO
GENERAL MANAGER



SLUICE WASHING FLANGE 1 1/2"NB
ANSI B16.5 150# S.O.F.F.
SCALE 1:5



ASSEMBLY OF CELL
SCALE 1:10

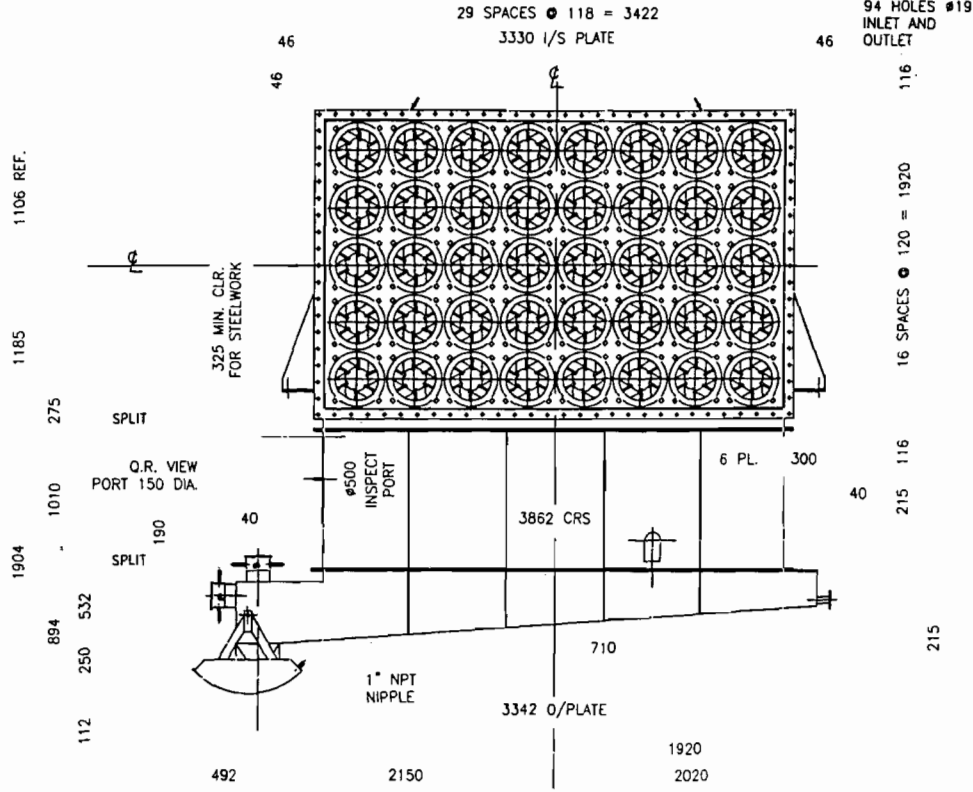


4 HOLES #22 FOR HD BOLTS

4" NB ELBOW OVERFLOW

SWING BUCKET C/W PINS SUPPLIED LOOSE TO SITE

8 CLIP AND WEDGES PER CELL ASSEMBLY



CASING DESIGN PRESSURE: 35"wg
DESIGN TEMPERATURE: 570°F

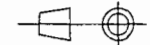
GRIT COLLECTOR DEAD MASS: 7761 kg
OPERATING MASS: 8200 kg
CHOKED MASS: 15400 kg

DATE	CHK. BY	DESIGNED	APPROVED
12/03/08	ERL	MK	WHW
06/03/06	ERL		
FIRST ISSUE			
CHANGES AS PER T.E.S. MARK-UP 06/03/06			

GENERAL TOLERANCES			
MACH#	ABOVE	INCL.	FABR#
0.1	0.5	6	0.25
0.2	6	30	
0.5	30	120	0.5
0.8	315	1000	
1.2	1000	2000	1.5
2	2000	4000	
3	4000	8000	3
4	8000	12000	
5	12000	18000	6
6	18000	20000	

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1 ST ANGLE PROJECTION



ENGINEERING DRAWING PRACTICE IS 305: PARTS 1, 2 & 3 (LATEST)

WELDING TERMS & SYMBOLS IS 499: PART 2 (LATEST)

SCALE 1:25 A2

DRAWN BY	ERL
DATE	02/03/08
CHK'D BY	MK
APPROVED	
WHW	
PROG. ENG.	

CLIENT U.S. SUGAR CORPORATION
SITE USSC CLEWISTON MILL

GENERAL ARRANGEMENT OF
40 CELL IR MVX GRIT COLLECTOR
(8Wx5H)

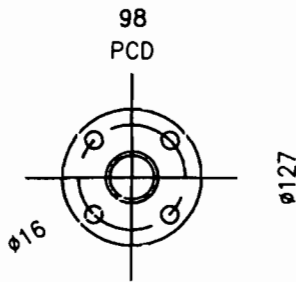
DRAWING NO.

06 C 47365 001

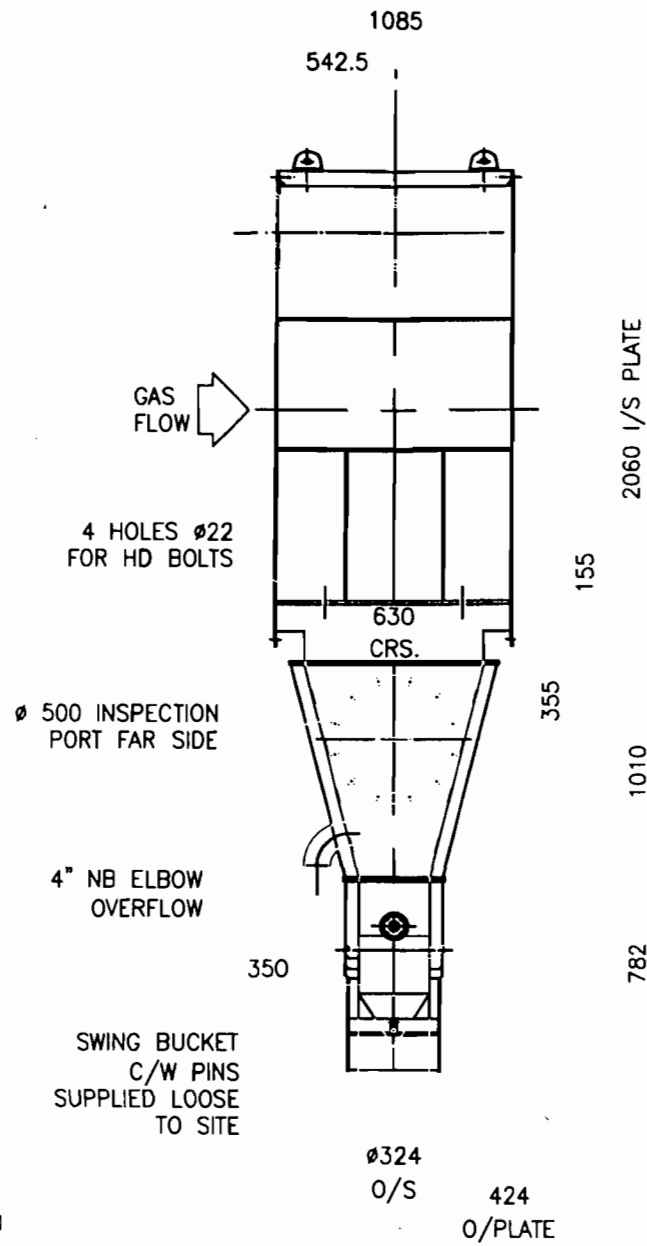
MOD. A B

HOWDEN ENERGY SYSTEMS : JOHANNESBURG

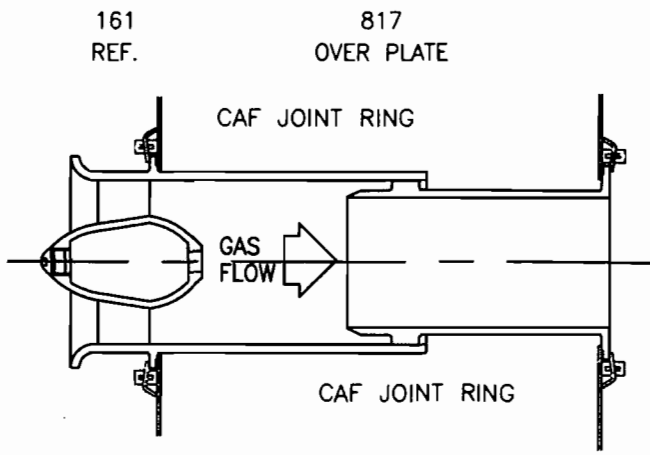




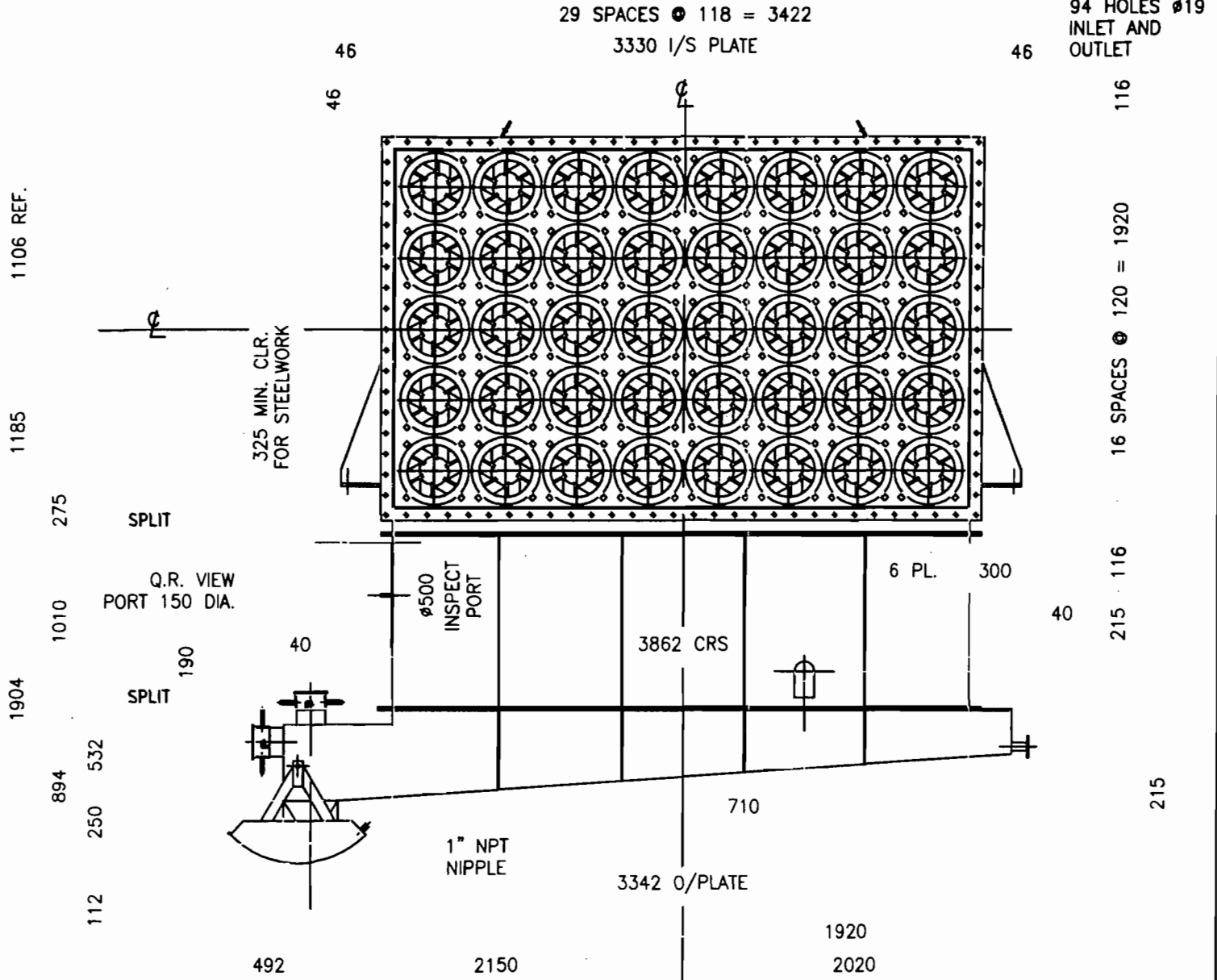
SLUICE WASHING FLANGE 1 1/2" NB
ANSI B16.5 150# S.O.F.F.
SCALE 1:5



8 CLIP AND WEDGES
PER CELL ASSEMBLY



ASSEMBLY OF CELL
SCALE 1:10



CASING DESIGN PRESSURE: 35"wg
DESIGN TEMPERATURE: 570°F

GRIT COLLECTOR DEAD MASS: 7761 kg
OPERATING MASS: 8200 kg
CHOKED MASS: 15400 kg

GENERAL TOLERANCES			
MACH±	ABOVE	INCL.	FABR±
0.1	0.5	6	0.25
0.2	6	30	
0.3	30	120	0.5
0.5	120	315	
0.8	315	1000	1.5
1.2	1000	2000	
2	2000	4000	3
3	4000	8000	
4	8000	12000	6
5	12000	16000	
6	16000	20000	

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1 ST ANGLE PROJECTION

ENGINEERING DRAWING PRACTICE
BS 308: PARTS 1, 2 & 3 (LATEST)

WELDING TERMS & SYMBOLS
BS 499: PART 2 (LATEST)

SCALE 1:25 A2

DRAWN BY ERL	CLIENT U.S. SUGAR CORPORATION
DATE 02/03/06	SITE USSC CLEWISTON MILL
CHK'D BY MK	
APPROVED WHW	
PROC. ENG.	

GENERAL ARRANGEMENT OF
40 CELL IR MXV GRIT COLLECTOR
(8Wx5H)

HOWDEN ENERGY SYSTEMS : JOHANNESBURG

DRAWING NO.		
06 C	47365	001
MOD.	A B	

APPROVED	CHECKED	DATE	ISSUE	CHANGES AS PER T.I.E.S 'MARK-UP' 06/03/06
WHW	MK		B	
ERL	ERL	06/03/06	A	
02/03/06				

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p>Mr. William A. Raiola, V.P. of Sugar Processing Operations Clewiston Sugar Mill and Refinery United States Sugar Corporation 111 Ponce DeLeon Avenue Clewiston, Florida 33440</p>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee <i>Rachel Delta</i></p> <p>B. Received by (Printed Name) <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Rachel Delta</i></p> <p>C. Date of Delivery <i>5-18-6</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) <i>7000 1670 0013 3110 1472</i></p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

Mr. William A. Raiola, V.P. of Sugar Processing Operations
 Clewiston Sugar Mill and Refinery
 United States Sugar Corporation
 111 Ponce DeLeon Avenue
 Clewiston, Florida 33440

PS Form 3800, May 2000 See Reverse for Instructions

2471 0171 0100 0291 0007

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

- 1. JEFF KOERNER - DARM
- 2. MAIL STATION 5500

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE: _____

ACTION/DISPOSITION:

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

COMMENTS:

U. S. SUGAR CORPORATION
CLEWISTON MILL
0510003-035-AC

RECEIVED

JUN 14 2006

BUREAU OF AIR REGULATION

FROM: Ronald Blackburn/South District Date: 06/12/06 Phone: SC 748-6975

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Draft Air Permit No. 0518003-035
U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery
Hendry County, Florida

Applicant: The applicant for this project is the U.S. Sugar Corporation. The applicant's authorized representative and mailing address is: Mr. William A. Raiola, Vice President of Sugar Processing Operations, U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery, 111 Ponce DeLeon Avenue, Clewiston, Florida 33440.

Facility Location: U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

Project: The applicant proposes to install a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The cyclones act as pre-control devices for the I.D. fan and electrostatic precipitator (ESP). The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system. The project is expected to improve performance of the particulate matter control system for Boiler 8.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

The Clewiston News

Published Weekly

Clewiston, Florida

AFFIDAVIT OF PUBLICATION

State of Florida
County of Hendry

Before the undersigned authority, personally appeared Jose Zaragoza, who on oath says he is Editor of the Clewiston News, a weekly newspaper published at Clewiston in Hendry County, Florida,

that the attached copy of advertisement being a Notice
in the matter U.S. Sugar Corporation Notice of Intent to Issue
in the Air Permitt court, was published in said newspaper in the issue(s)
of May 25, 2006

RECEIVED-D.E.P.
JUN 12 2006
SOUND BRIDGE

Affiant further says that the said Clewiston News is a newspaper published at Clewiston, in said Hendry County, continuously published in said Hendry County, Florida, each week, and has been entered as periodicals matter at the post office in Clewiston, in said Hendry County, Florida, for a period of one year next preceding the first publication says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Jose Zaragoza
Sworn to and subscribed before me this 7 day of June, 2006

Ideybis Gonzalez
Notary Public



Ideybis Gonzalez
Commission #DD341238
Expires: Jul 26, 2008
Bonded Thru
Atlantic Bonding Co., Inc.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p>Mr. Neil Smith, V.P. of Sugar Processing Operations Clewiston Sugar Mill and Refinery United States Sugar Corporation 111 Ponce DeLeon Avenue Clewiston, Florida 33440</p>	<p>A. Signature <input type="checkbox"/> Agent <i>Rachul Feltan</i> <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery <i>Rachul Feltan</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p><i>7000 1670 0013 3110 0246</i></p>

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

Postmark
Here

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

See Reverse for Instructions

7000 1670 0013 3110 0246