

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL 32653-1500  
Telephone (352) 336-5600  
Fax (352) 336-6603



RECEIVED

May 8, 2002

MAY 15 2002

0137629

Ms. Cindy Phillips, P.E.  
FDEP Bureau of Air Regulation  
MS5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

RE: CLEAN AIR ACT SECTION 112(j) NOTIFICATION INFORMATION  
UNITED STATES SUGAR CORPORATION, CLEWISTON MILL  
TITLE V PERMIT NO. 0510003-014-AV

SD

Dear Ms. Phillips:

On behalf of United States Sugar Corporation (U.S. Sugar), Golder Associates Inc. is providing the information necessary to satisfy the provisions of Section 112(j) of the Clean Air Act as amended in 1990, which pertains to the development of Maximum Achievable Control Technology (MACT) standards. Final regulations that revised the Section 112(j) rules were promulgated by the U. S. Environmental Protection Agency (USEPA) on April 5, 2002. The final regulations affect owners or operators of a major source of hazardous air pollutants (HAPs) that include one or more sources in a category or subcategory for which EPA has failed to promulgate an emission standard before the applicable 112(j) deadline. According to Section 63.52(a)(1) of Title 40 of the Code of Federal Regulations (40 CFR), such owners or operators must submit a Part 1 application by May 15, 2002. The following information must be contained in the Part 1 application [40 CFR 63.53(a)]:

1. The name, address (physical location), and brief description of the major source (facility);
2. An identification of the relevant industry type source category(ies);
3. A list of the emission units belonging to the relevant industry type source category(ies); and
4. An identification of any affected sources for which a Section 112(g) MACT determination has been made.

The required information for each item is provided below:

1. **Name:** United States Sugar Corporation, Clewiston Mill  
**Address:** W.C. Owens Avenue and S.R. 832, Clewiston, Florida 33440  
**Source Description:** The existing facility consists of a sugar mill, sugar refinery and a boiling house. Sugar cane from nearby fields is brought on-site to be processed. The sugar cane is pressed, and then the resulting raw juice is clarified, crystallized and then centrifuged to produce raw sugar. The raw sugar is processed into refined sugar in the refinery. The refined sugar is then packaged or stored in silos until shipment off-site.

A co-product resulting from the process is bagasse, which is the fibrous material remaining from the sugar cane stalk. Bagasse is used as fuel in the on-site steam boilers. Five bagasse/oil-fired boilers provide steam for the processing operations. In addition to the boilers, there are two diesel electric generators and other miscellaneous unregulated/insignificant emission sources existing at the facility.

2. **Relevant Industry Type Source Categories:** Depending on the applicability of the final MACT standards for individual source categories, the following source categories may be applicable to sources at the facility:
  - Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
  - Miscellaneous Metal Parts and Products (surface coating)
  - Reciprocating Internal Combustion Engines
  - Paint Stripping Operations

3. **List of the Emission Units Belonging to the Relevant Industry Type Source Categories:** This list is dependent on the applicability final the MACT standard for each category.

Facility Emission Source	Emission Unit ID	Potentially Relevant Industry Type Source Category
Boiler No. 1	001	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Boiler No. 2	002	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Boiler No. 3	003	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Boiler No. 4	009	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Boiler No. 7	014	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Diesel Generator No. 1	005	Reciprocating Internal Combustion Engines
Diesel Generator No. 2	006	Reciprocating Internal Combustion Engines
Paint Booth/Painting Operations	--	Misc. Metal Parts and Products (Surface Coating); Paint Stripping Operations
Other Stationary Internal Combustion Engines	--	Reciprocating Internal Combustion Engines
Propane-fired Water Heater	--	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters
Agricultural Diesel Field Engines and Cane Elevators	--	Reciprocating Internal Combustion Engines
Hot Water Tank Heater	--	Industrial, Commercial, and Industrial Boilers and Indirect-fired Process Heaters

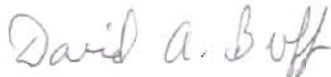
4. **Previous Section 112(g) MACT Determinations:** There have been no previous determinations for sources at the facility under Section 112(g).

Based on the information available to us at the time of this application, we believe that the sources identified above may be subject to Section 112(j) of the Clean Air Act. We reserve the right, however, to amend or withdraw this application should we obtain new or different information regarding our status.

Attached is the Responsible Official's signature form. If you have any questions concerning the information provided, please contact Mr. Donald Griffin, Manager, Specialty Sugars at (863) 902-2711.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q. E. P.  
Principal Engineer  
Florida P.E. #19011

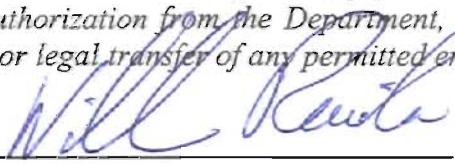
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Enclosure



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**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>William A. Raiola, Vice President – Sugar Processing</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <b>United States Sugar Corporation</b> Street Address: <b>1731 South W.C. Owen Avenue</b> City: <b>Clewiston</b> State: <b>Florida</b> Zip Code: <b>33440</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>( 863 ) 902 – 2703</b> Fax: <b>( 863 ) 902 – 2729</b>
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.</i>   Signature _____ Date <u>5/9/02</u>

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address: Organization/Firm: <b>Golder Associates Inc.</b> Street Address: <b>6241 NW 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>( 352 ) 336 - 5600</b> Fax: <b>( 352 ) 336 – 6603</b>



Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

May 23, 2002

Mr. David A. Buff, P.E., Q.E.P.  
Principal Engineer  
Golder Associates Inc.  
6241 NW 23<sup>rd</sup> Street, Suite 500  
Gainesville, FL 32653-1500

Re: 112(j) Notification Information Submittal  
United States Sugar Corporation, Clewiston Mill  
Facility ID 0510003

Dear Mr. Buff:

Thank you for submitting the referenced information in your letter received May 15, 2002. The information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter refers to a "Part 1 application," and the "Owner/Authorized Representative or Responsible Official" signature page from DEP Form No. 62-210.900(1) is used, the Department does not recognize this submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

Cindy L. Phillips, P.E.  
Bureau of Air Regulation

*"More Protection, Less Process"*

*Printed on recycled paper.*