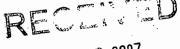
Golder Associates Inc.

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





FEB 0"7 2001

063-7591

Florida Department of Environmental Regulation Air Permitting South Program 2600 Blair Stone Road, MS #5505 Tallahassee, Florida 32399-2400 BUREAU OF AIR REGULATION

Attention: Mr. Jeff Koerner, P.E.

Re: Permit No. 0510003-038-AC/PSD-FL-346A

U. S. Sugar Corporation - Clewiston Sugar Mill and Refinery

New White Sugar Dryer No. 2

Dear Mr. Koerner:

February 6, 2007

United States Sugar Corporation (U.S. Sugar) was issued Air Construction Permit No. 0510003-038-AC/PSD-FL-346A, on December 22, 2006. Specific Condition 13 in Section 3 of the permit requires that an additional report be submitted to the Florida Department of Environmental Protection (FDEP). The condition requires that the permittee provide individual cost estimates based on bids and a detailed description of the necessary work for the following:

- 1. Redesigning and modifying the cyclone system (possibly adding a cyclone) to accept all of the dryer exhaust;
- 2. Moving the I.D. fan from after the scrubber to between the cyclones and the scrubber; and
- 3. Removing the mitered elbow and installing a properly sized vertical duct at the scrubber outlet.

Each of the items is addressed below.

Cyclone System

A quotation from CMN Steel Fabricators, Inc. (CMN) to modify the cyclones to accommodate all of the dryer exhaust is provided in Attachment A. Also included are detailed drawings of the modifications. The current problem is that velocity through the cyclone is too high, causing a higher than normal pressure drop across the cyclones. This modification would increase the size of the outlet duct within the cyclone from 2.5 feet to 3.0 feet, thus reducing the gas velocity and, theoretically, the pressure drop. The cost is approximately \$50,000.

It is noted that both the cyclone manufacturer and dryer manufacturer recommended changing the cyclone outlet tube only to correct the high pressure drop problem. Therefore, U.S. Sugar did not obtain a quote to modify the inlet and outlet manifolds.

It is also noted that Mr. Taub's report, submitted to the FDEP in September, stated that bypassing the cyclones with a portion of the flow should have no effect on the overall particulate removal or meeting the PM emission standards, since the wet scrubber has a higher removal efficiency than the cyclones. Therefore, even if these modifications were made at a cost of more than \$50,000, there is no indication that this would solve the current problems with the PM emissions.

As noted in U.S. Sugar's September submittal, the plan view of the scrubbing system submitted with the 2004 application shows that the cyclones are positioned in a corner of the building. There is no physical room to add another cyclone, unless the actual refinery building was modified (i.e., extended outward). This would be at considerable expense, since the cyclones sit about six stories above ground level.

Moving ID Fan and Mitered Elbow

A quotation from CMN to move the I.D. fan from after the scrubber to between the cyclones and scrubber, as well as removing the mitered elbow and installing a vertical duct at the scrubber outlet, is provided in Attachment B. There are two options:

Option 1 involves leaving the location of the ID fan and scrubber intact intact, and rerouting the ductwork only.

Option 2 involves moving the location of the ID fan and scrubber to implement the change. For this option, the scrubber outlet duct and stack would be routed vertically through the roof instead of horizontally out the side of the building.

Also in Attachment B are engineering drawings showing the equipment that would be demolished and the new ducting/equipment to be constructed for these options.

The price quote from CMN is for the first option. The total cost of the project, enumerated in the spreadsheet titled "Option 1", is estimated at \$487,500. The estimated cost of the second option, which involves additional work to relocate the scrubber and fan, is \$1,007,500 (see "Option 2" spreadsheet).

Obviously, these are very high costs for these modifications, and are due to the limited space and configuration of the existing equipment.

The final permit also contains two other conditions, which required U.S. Sugar to take action within 30 days of issuance of the final permit. Condition 11 requires that a drain be installed in the ductwork of the silencer vanes to remove collected water. The drain has been successfully installed by U.S. Sugar.

Condition 12 of the final permit requires U.S. Sugar to operate the wet scrubber system such that sufficient fresh water makeup is added to maintain the sugar content of the recirculating water at 15 brix or less. U.S. Sugar has taken measures to implement this requirement. U.S. Sugar also monitors and records the brix content of the recirculating water in the scrubber system.

The remaining item to be completed under the construction permit is the conducting of stack tests for PM/PM₁₀. These tests have now been scheduled for February 20-21, 2007.

If you have any questions regarding this information, please call me at (352)336-5600 or email me at dbuff@golder.com.

Sincerely,

GOLDER, ASSOCIATES INC

David A. Euff, P.E., Q.E.P

Bringipal Engineer

BB/all

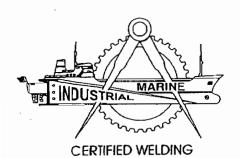
ER.

cc: Mr. Don Griffin, USSC Mr. Peter Briggs, USSC

Mr. Ron Blackburn, DEP South District Office

Y:\Projects\2006\0637591 USSC White Sugar Dryer RAI\4.1\L020607\L020607-591

ATTACHMENT A



CMN STEEL FABRICATORS, INC. 7993 NW 60th Street • Miami, FL 33166

August 16th, 2006

To: Mr. Bob Lofgren - Valley Engineering

Subject: Quotation for Materials, Fabrication, Installation Cyclones Modification

Quotation Number: Q06-080

Dear Mr. Lofgren,

CMN Steel Fabricators, Inc. is pleased to quote the fabrication, delivery and modification and installation work at the 4 Cyclones in the US Sugar plant in Clewiston, Florida. Listed below is our best pricing to supply all the materials fabricated and rolled to meet the specifications of your supplied prints and work scope. Also included in the pricing is the modification to existing ducts and installation of internal duct piping within each of the 4 Cyclones. CMN shall provide all manpower, supervision and tooling needed along with safety equipment, per diems, hotels and travel to complete this job.

Our best price for providing all needed materials and fabrication to specifications plus delivery to your plant is: \$9,295.00 plus tax

Our best price to supply manpower, supervision, tooling, cutting and welding equipment as well as hotel costs, travel and per diems to complete the modifications and installation work on all 4 Cyclones is: \$41,585.00

Grand Total:

\$50,880.00

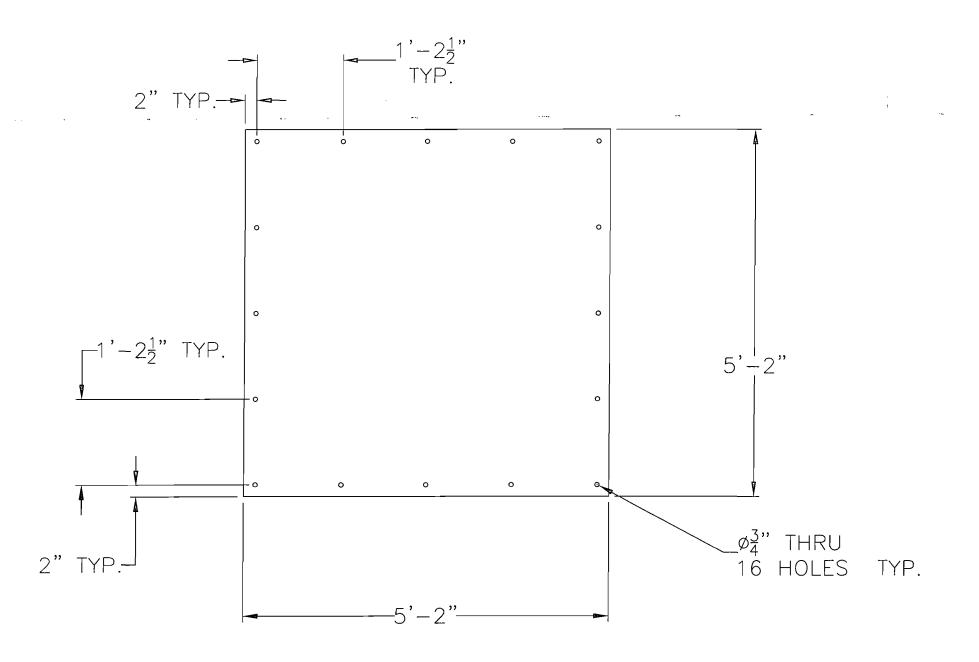
Please contact me with any questions you may have at 305-970-0482.

Sincerely,

CMN Steel Fabricators, Inc.

Brice Miller

General Manager



DET-13

NAME: BLANK OFF PLATE MATERIAL: 12 GA. 316L SS

QTY: 1 REQU'D

Title BY PASS DUCTING

CYCLONES TO SCRUBBER

BLANK OFF PLATE

Customer US SUGAR Location CLEWISTON Date 10/07/2005 Cnkd By RJL Dwg By TP

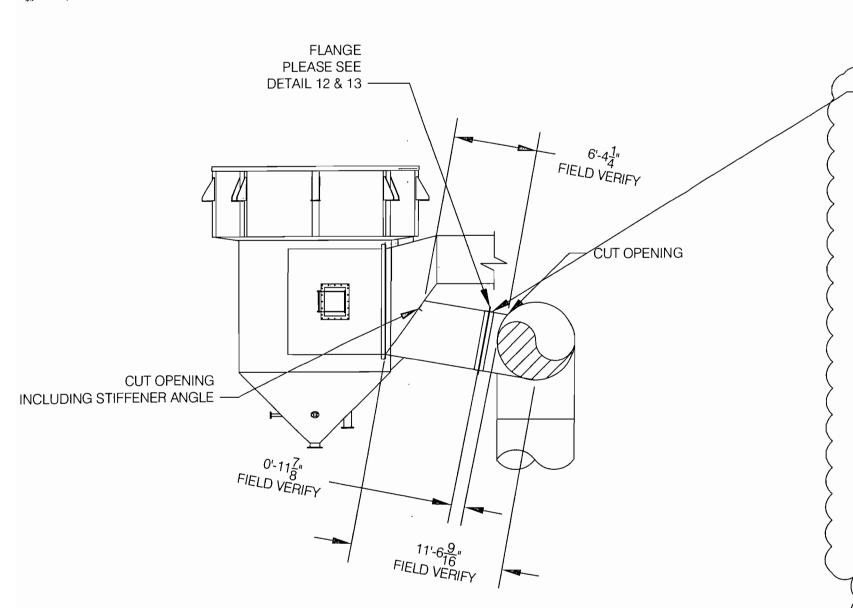
VALLEY ENGINEERING, inc.

WES Their Reliable programs. Page 10/197/2005

Walley Engineering som

No. Date By Revision Ad. No.



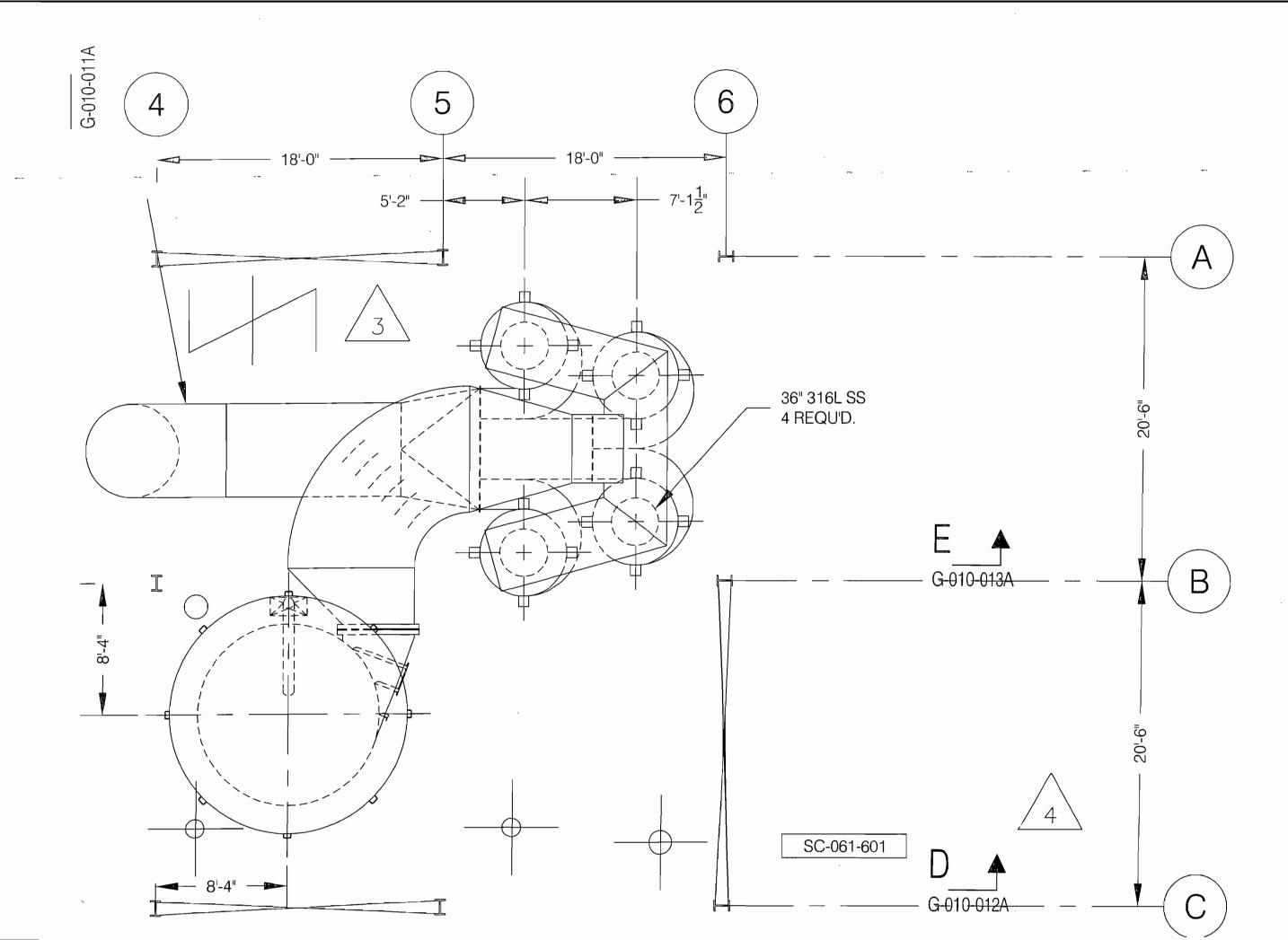


CONSTRUCTION NOTES:

- 1. CONTRACTOR TO REMOVE EXISTING RESTRICTION PLATE ON BY-PASS DUCT.
- 2. CONTRACTOR SHALL SUPPLY AND INSTALL BLANK OFF PLATE BETWEEN THE FLANGE ON BY-PASS DUCT.
- 3. REFER TO DET-13.DWG DRAWING FOR DETAILED ARRANGEMENT OF BLANK OFF PLATE BOLT HOLES PATTERN.

DUCTWORK NOTES AND MATERIAL SPECIFICATIONS:

- A) ALL DUCTWORK UPSTREAM OF SCRUBBER TO BE 12 GAUGE 316L STAINLESS STEEL.
- B) ALL DUCTWORK DOWNSTREAM OF SCRUBBER TO BE 12 GAUGE CARBON STEEL.
- C) ALL FLANGES, STIFFENERS AND DUCT SUPPORTS TO BE A-36 CARBON STEEL.
- D) CENTERLINE RADIUS OF ALL ELBOWS TO BE AS INDICATED ON THE DRAWINGS.
- E) ALL DUCTWORK TO BE WELDED FABRICATION.
- F) ALL WELDS ON DUCTWORK TO BE CONTINUOUS AND AIR TIGHT.
- G) FABRICATOR TO PROVIDE ANGLE IRON COMPANION FLANGES.
- H) ALL FITTINGS TO BE SUPPLIED WITH ONE WELDED FLANGE AND ONE LOOSE FLANGE.
- I) CAULK ALL FLANGES WITH FDA APPROVED SILICONE CAULK.
- J) DUCT DIMENSIONS ON DRAWINGS INDICATE OUTSIDE DIMENSIONS.
- K) ALL PIECE AND DRAWING NUMBERS ARE TO BE STENCILED ON OUTSIDE OF EACH PIECE.
- L) PAINT ALL CARBON STEEL MATERIAL AS PER OWNER'S SPECIFICATIONS.
- M) ALL DUCTING CONSTRUCTION, BRACING, REINFORCEMENT AND SUPPORTS SHALL BE IN ACCORDANCE WITH SMACNA DUCT MANUALS. REINFORCEMENT SHALL BE GALVANIZED ANGLE IRON.
- N) DUCT HANGERS AND SUPPORTS SHALL BE GALVANIZED STEEL ANGLE WITH HANGER RODS FOR VERTICALLY SUPPORTED DUCTS, GALVANIZED STEEL ANGLE BRACKETS FOR WALL SUPPORTED DUCTS ANDGALVANIZED STEEL ANGLE FOR VERTICALLY SUPPORTED DUCTS THROUGH FLOORS OR ROOFS.

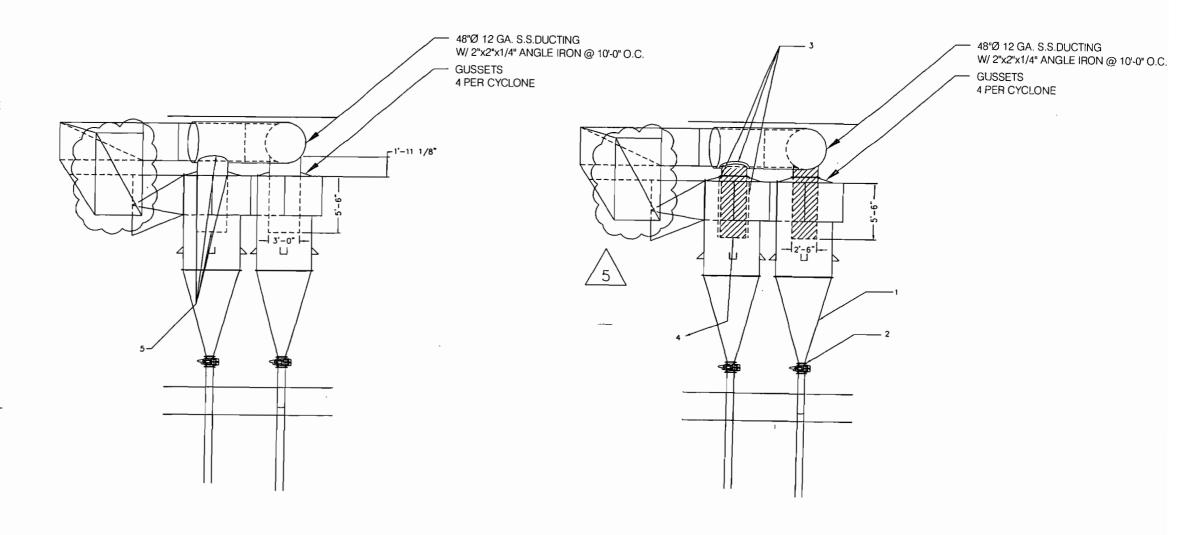


CONSTRUCTION NOTES:

- CONTRACTOR TO REMOVE 4 CONES LOCATED AT THE BOTTOM OF THE CYCLONES.
- 2. CONTRACTOR TO TEMPORARILY BLANK OFF 4 AIRLOCK VALVES AFTER THE REMOVAL OF 4 CONES.
- 3. CONTRACTOR TO CUT 36" PERIMETER OF THE 30" PIPE AND GUSSET. CONTRACTOR TO REMOVE THE INNER TUBINGS THRU THE BOTTOM OF THE CYCLONES.
- THE REMOVAL OF EXISTING TUBING AND PIPING TO BE DONE 2 DIAGONAL CYCLONES AT A TIME.
- 5. CONTRACTOR SHALL SUPPLY AND INSTALL NEW 36" 12 GA 316L SS DUCTING. THE NEW DUCTWORK SHALL BE INSTALLED FROM THE BOTTOM UP. WELD IN PLACE AT 48" 12 GA DUCT, WELD GUSSETS BACK TO NEW 36" DUCT FOR SUPPORT.
- 7. REFER TO G-01-04A DRAWINGS FOR DETAILED ARRANGEMENT OF CYCLONES.
- 8. CONTRACTOR SHALL REMOVE ALL DEBRIS ASSOCIATED WITH THE WORK.

DUCTWORK NOTES AND MATERIAL SPECIFICATIONS:

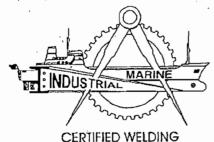
- A) ALL DUCTWORK ON CYCLONE TO BE 12 GAUGE 316L STAINLESS STEEL.
- B) ALL FLANGES, STIFFENERS AND DUCT SUPPORTS TO BE A-36 CARBON STEEL.
- C) CENTERLINE RADIUS OF ALL ELBOWS TO BE AS INDICATED ON THE DRAWINGS.
- D) ALL DUCTWORK TO BE WELDED FABRICATION.
- E) ALL WELDS ON DUCTWORK TO BE CONTINUOUS AND AIR TIGHT.
- F) FABRICATOR TO PROVIDE ANGLE IRON COMPANION FLANGES.
- G) ALL FITTINGS TO BE SUPPLIED WITH ONE WELDED FLANGE AND ONE LOOSE FLANGE.
- H) CAULK ALL FLANGES WITH FDA APPROVED SILICONE CAULK.
- I) DUCT DIMENSIONS ON DRAWINGS INDICATE OUTSIDE DIMENSIONS.
- J) ALL PIECE AND DRAWING NUMBERS ARE TO BE STENCILED ON OUTSIDE OF EACH PIECE.
- K) PAINT ALL CARBON STEEL MATERIAL AS PER OWNER'S SPECIFICATIONS.
- L) ALL DUCTING CONSTRUCTION, BRACING, REINFORCEMENT AND SUPPORTS SHALL BE IN ACCORDANCE WITH SMACNA DUCT MANUALS. REINFORCEMENT SHALL BE GALVANIZED ANGLE IRON.
- M) DUCT HANGERS AND SUPPORTS SHALL BE GALVANIZED STEEL ANGLE WITH HANGER RODS FOR VERTICALLY SUPPORTED DUCTS, GALVANIZED STEEL ANGLE BRACKETS FOR WALL SUPPORTED DUCTS AND GALVANIZED STEEL ANGLE FOR VERTICALLY SUPPORTED DUCTS THROUGH FLOORS OR ROOFS.



AFTER

BEFORE

ATTACHMENT B



CMN STEEL

FABRICATORS, INC. 7993 NW 60th Street • Miami, FL 33166

January 12, 2007

To: Mr. Bob Lofgren - US Sugar

Subject: Budgetary Quotation for Duct Modification On ID Fan, Scrubber and Cyclone Areas

Quotation Number: O07-034

Dear Mr. Lofgren,

As per our conversation today, CMN Steel Fabricators, Inc. was able to utilize your provided prints and information from my visit to the site and submit to you a preliminary budget quotation for the modification work needed to the Ductwork at the Scrubber, ID Fan and Cyclones for the Sugar Processing area of the plant. This work shall involve demolition, fabrication, deliveries and installation. CMN shall provide all labor to fabricate new ductwork as well as the demolition of selected ducts and the installation of the new. Also provided is our Supervision, tooling, mobile equipment such as Forklift, crane and operator, (with at least 200' of boom extension) along with any cutting, welding and safety equipment needed to perform this work. Also included within this quotation will be our CMN Shop Drawings and Engineering to complete this job. We realize these drawings are conceptual and vague. Future US Sugar finalized drawings will enable CMN to be more precise to the fabrication and job scope along with our rendering of our own shop drawings. Listed below is an all inclusive budget price to complete all the work involved in this project.

Our pricing to complete this above listed work is: \$375,000.00 plus applicable taxes Our terms are net 30, and payments received beyond terms shall have a 1.5% per month interest until paid in full. If any additional paper work is required besides the invoice from our company, please let us know and once again we appreciate your business.

In order for work to commence we need this quotation signed, and returned to us by fax at 305 592-9789. Also please submit the purchase order number when issued. You may contact me with any additional questions you may have at 305-970-0482. CMN and I look forward to assisting US Sugar in the future.

Print name_	 		
Signature	 	 	

Sincerely,

CMN Steel Fabricators, Inc.

Brice Miller General Manager

WHITE SUGAR DRYER #1 - ADDITIONAL REQUIREMENTS - PM/PM10 REVISION

SCOPE OF WORK:

OPTION 1 – Moving the ID fan from after the scrubber to between the cyclones and the scrubber by rerouting ductwork only (including removing the mitered elbow and installing a vertical duct and the scrubber outlet):

- 1. Demolish all existing ducting from cyclones to scrubber.
- 2. Demolish all existing ducting from scrubber to ID fan.
- 3. Demolish all existing ducting from ID fan to atmosphere.
- 4. Close opening in wall where ducting from ID fan was demolished.
- 5. Fabricate and install new ducting from cyclones to ID fan.
- 6. Fabricate and install new ducting from ID fan to scrubber.
- 7. Fabricate and install new ducting from scrubber to atmosphere (through roof).
- 8. Cut opening for ducting through roof and make repair to roof after installation (flashing, etc.).
- 9. Cut openings as required for new ductwork through floors.
- 10. Fabricate and install all necessary duct supports.

OPTION 2 – Moving the ID fan from after the scrubber to between the cyclones and the scrubber by rerouting ductwork as described in items 1 through 10 above and physically moving the ID fan and scrubber

USSC Scrubber Ductwork Modification OPTION 1

Level 1 PROJECT #E04026

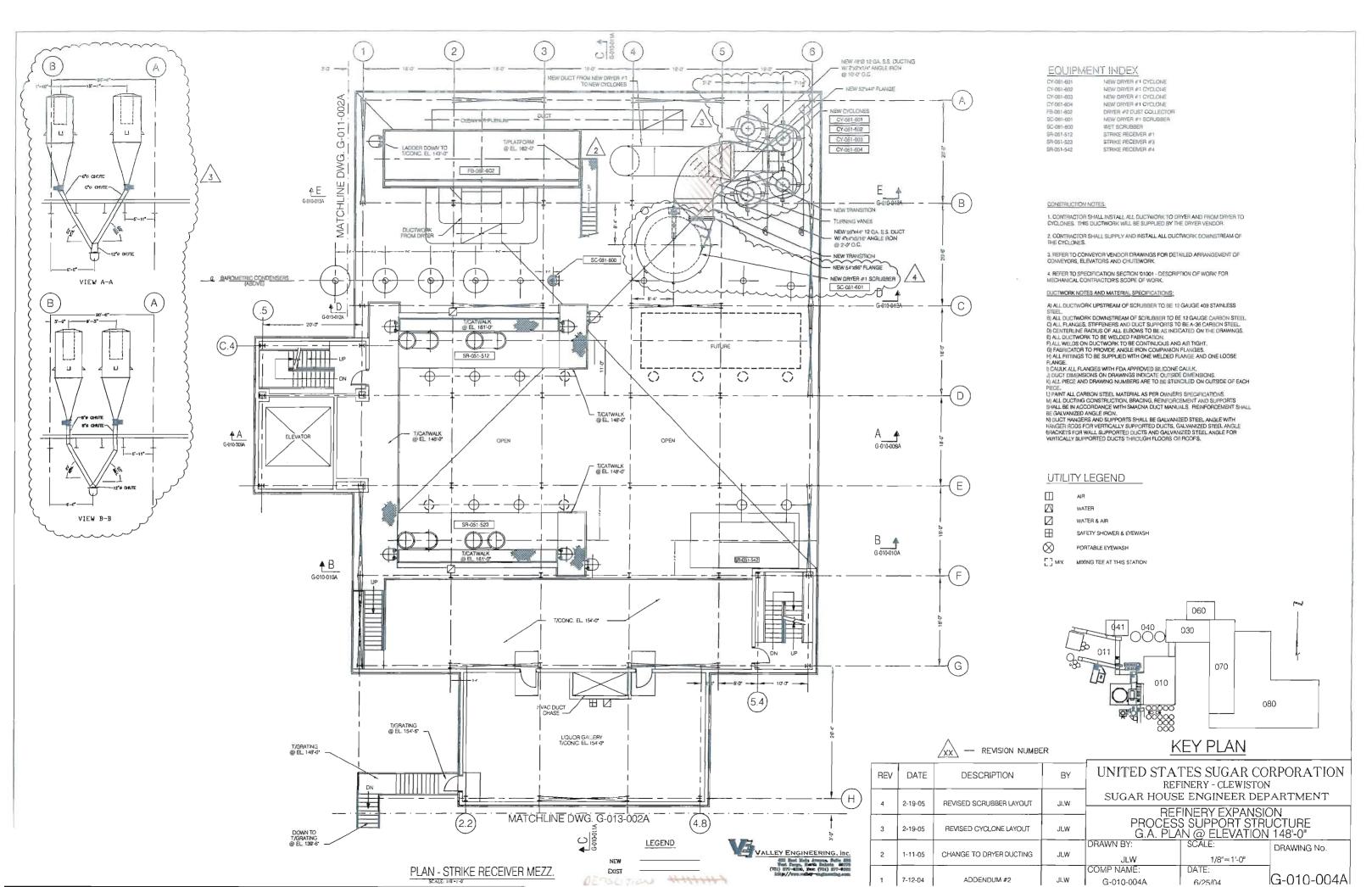
Level II	Level III	Level IV	Level V			Cost	6% Tax	Freight	Total Cost
CATEG	AREA	DISCIPLINE	ITEM	EQUIPMENT/MATERIALS		\$	\$	\$	Containment Wall
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BLD		В	100	Duct modifications to the ID Fan, Scrubber, and Cyclone Areas	CMN Quotation	375,000			375,000
BLD		В	101						0
BLD		В	102						0
				Sub-Total		375,000	0	0	375,000
				Mechanical					
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_				Electrical					
BLD		D	300						0
BLD		D	301						0
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				Sub-Total		0	0	0	0
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				Sub-Total Before Other Items		375,000	0	0	375,000
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				OTHER ITEMS					
					Sub-Total Before Other	 			
UNA		F	400	Castingana, (458/)	Items*0.15	, ,			56,250
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				TOTAL		375,000	0	0	487,500

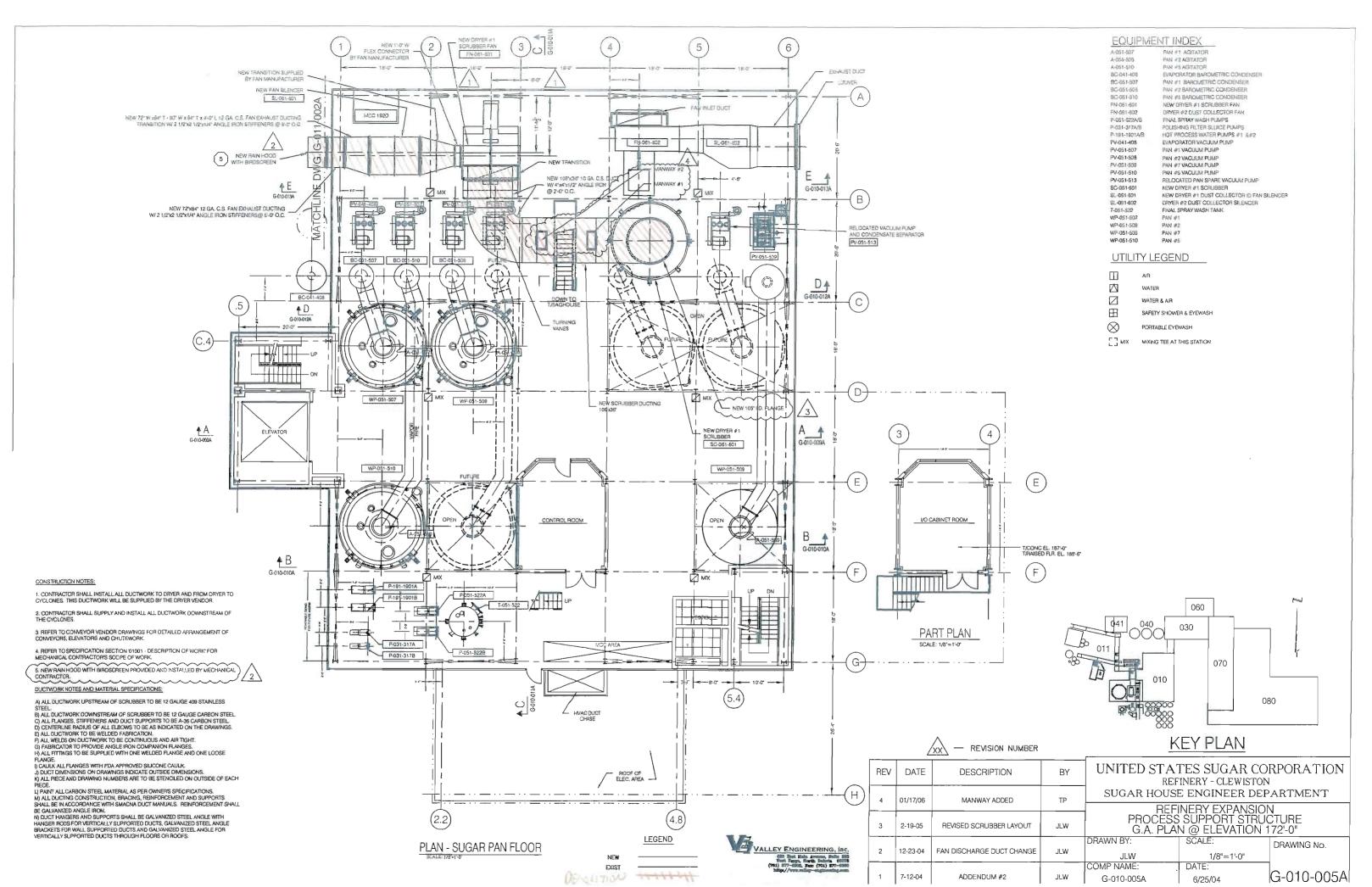
USSC Scrubber Ductwork Modification OPTION 2

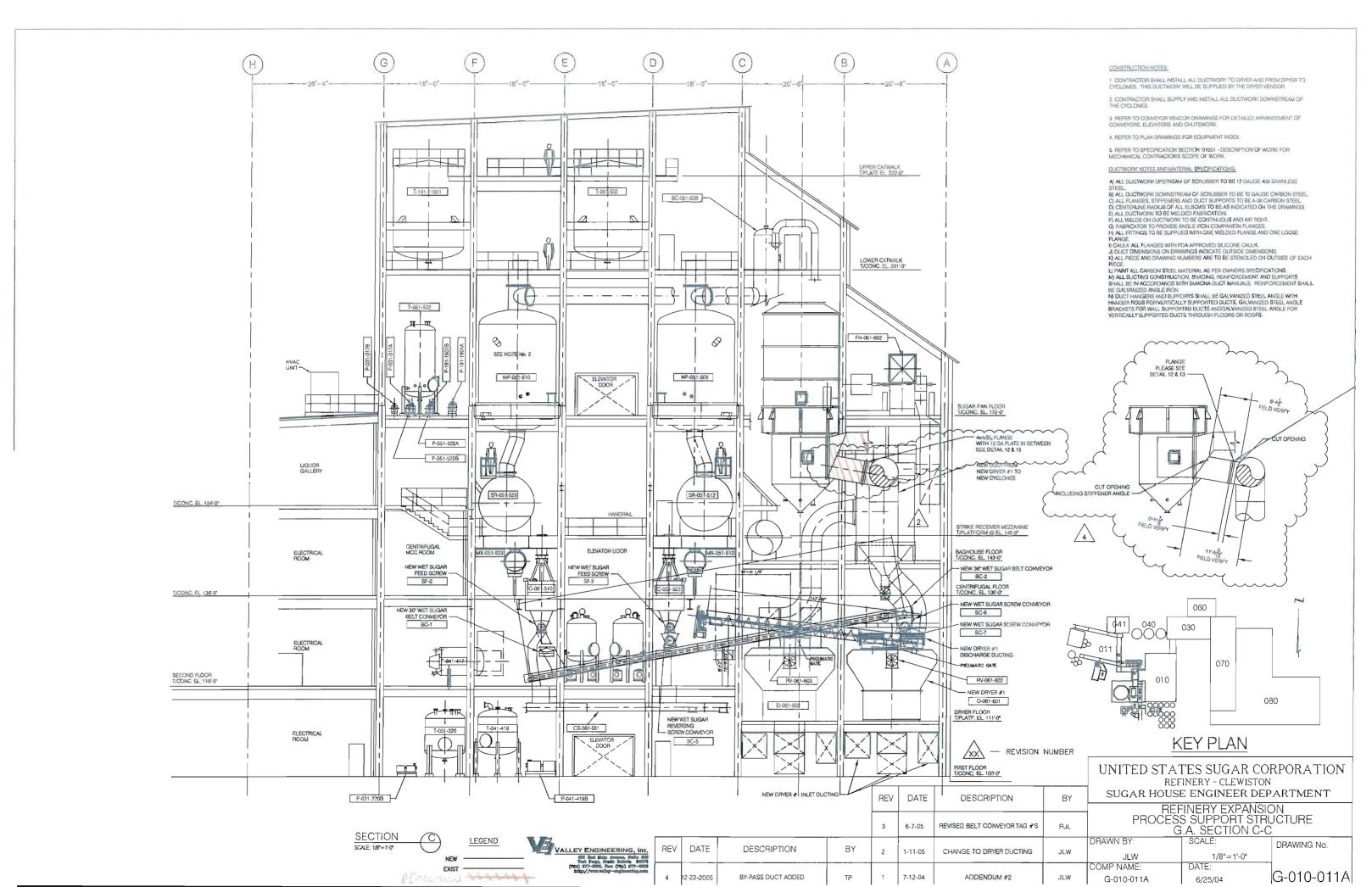
Level I PROJECT #E04026

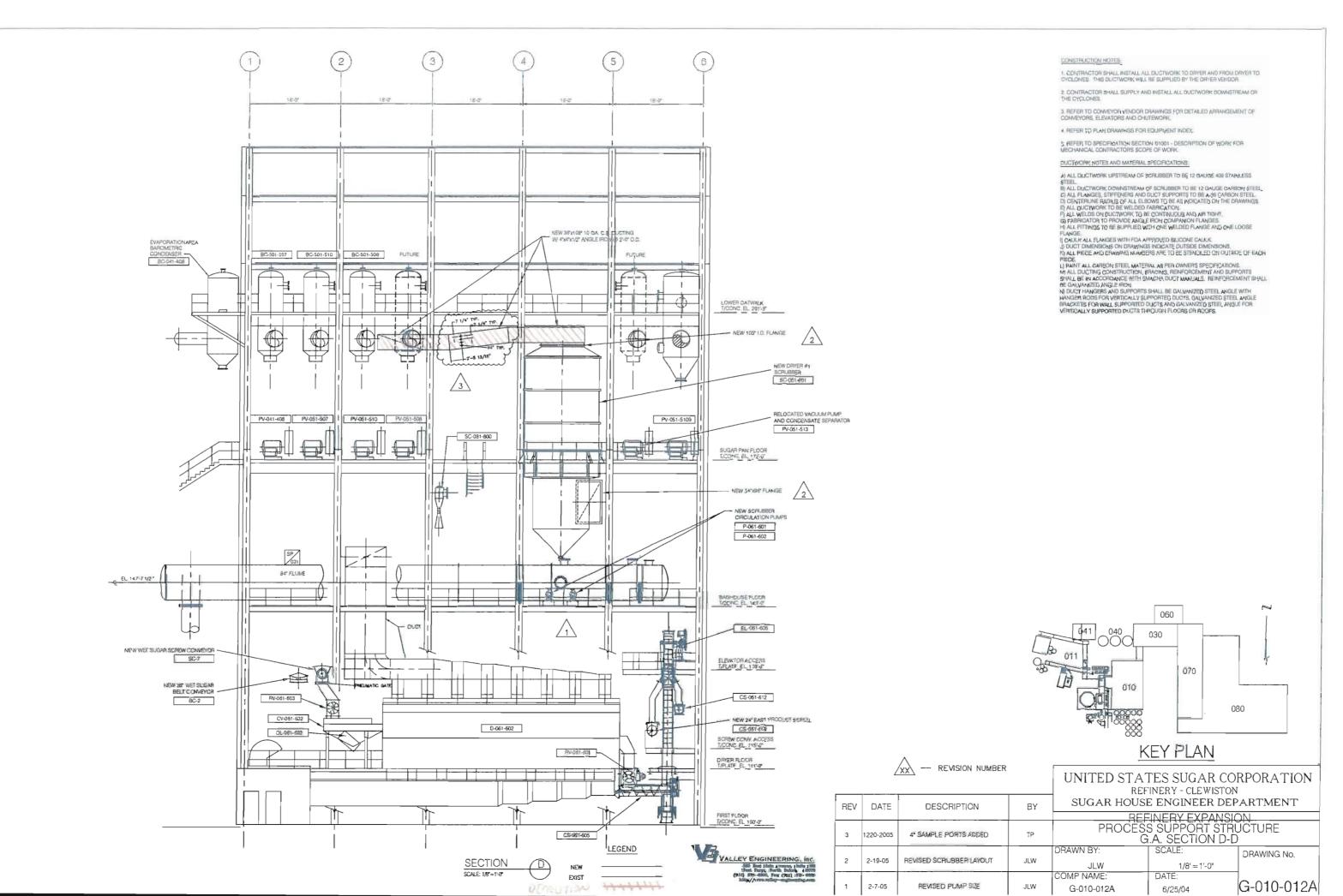
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Level II	Level III	Level (V	Level V			Cost	6% Tax	Freight	Total Cost
CATEG	AREA	DISCIPLINE	ITEM	EQUIPMENT/MATERIALS		\$	\$	\$	Containment Wall
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				Sub-Total		0	0	ō	0
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				CONSTRUCTION					
				Civil/Structural/Architectural					
BLD		В	100	Duct modifications to the ID Fan, Scrubber, and Cyclone Areas	CMN Quotation	375,000			375,000
BLD		8	101	Remove and relocate ID fan including steel and concrete	Estimate	150,000			150,000
BLD		В		Remove and relocate scrubber and scrubber pumps including steel and concrete	Estimate	200,000			200,000
				Sub-Total		725,000	0	0	725,000
		Ĭ I		Mechanical					
BLD		С	200	New scubber recirculation piping		25,000			25,000
BLD		С	201		_				.0
BLD		С	202						0
				Sub-Total		25,000	0	0	25,000
					-				
				Electrical					
BLD		D	300	Conduit and wire for ID Fan		15,000			15,000
BLD		D	301	Conduit and wire for Scrubber Pumps		10,000			10,000
BLD		D .	302						0
				Sub-Total		25,000	0	0	25,000
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i					Sub-Total Before Other		l V	ľ	
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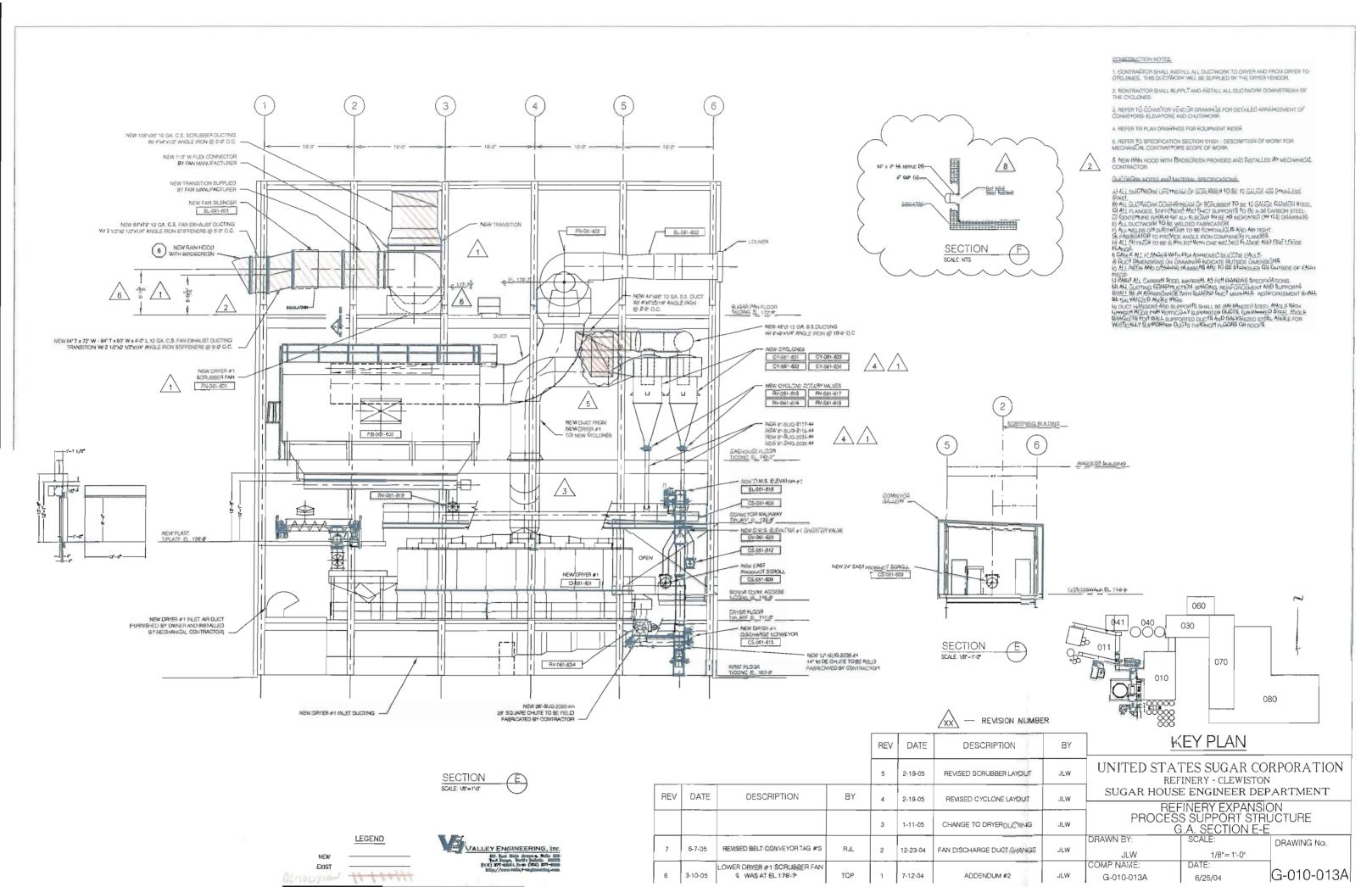
DRAWINGS-OPTION 1

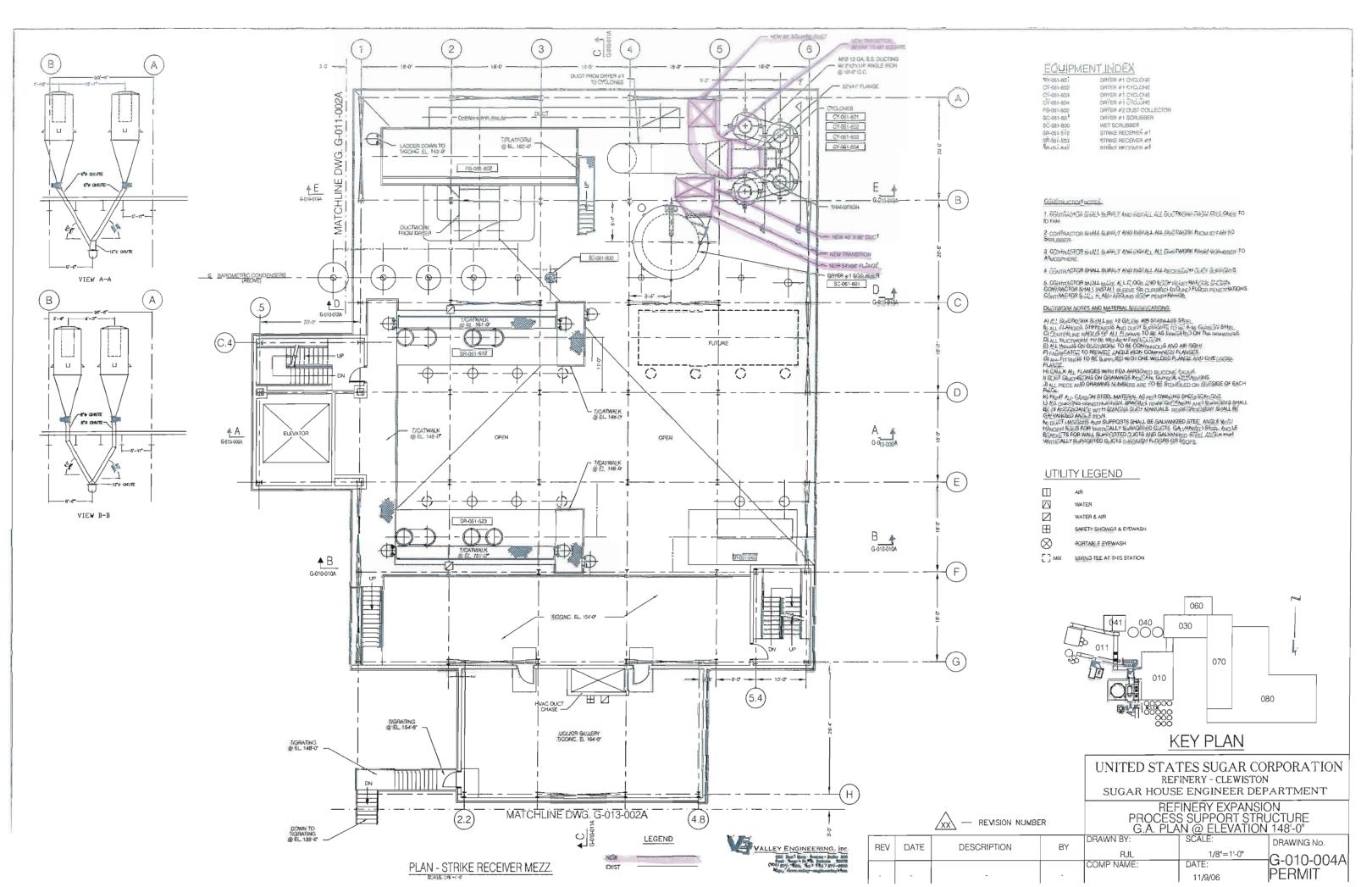


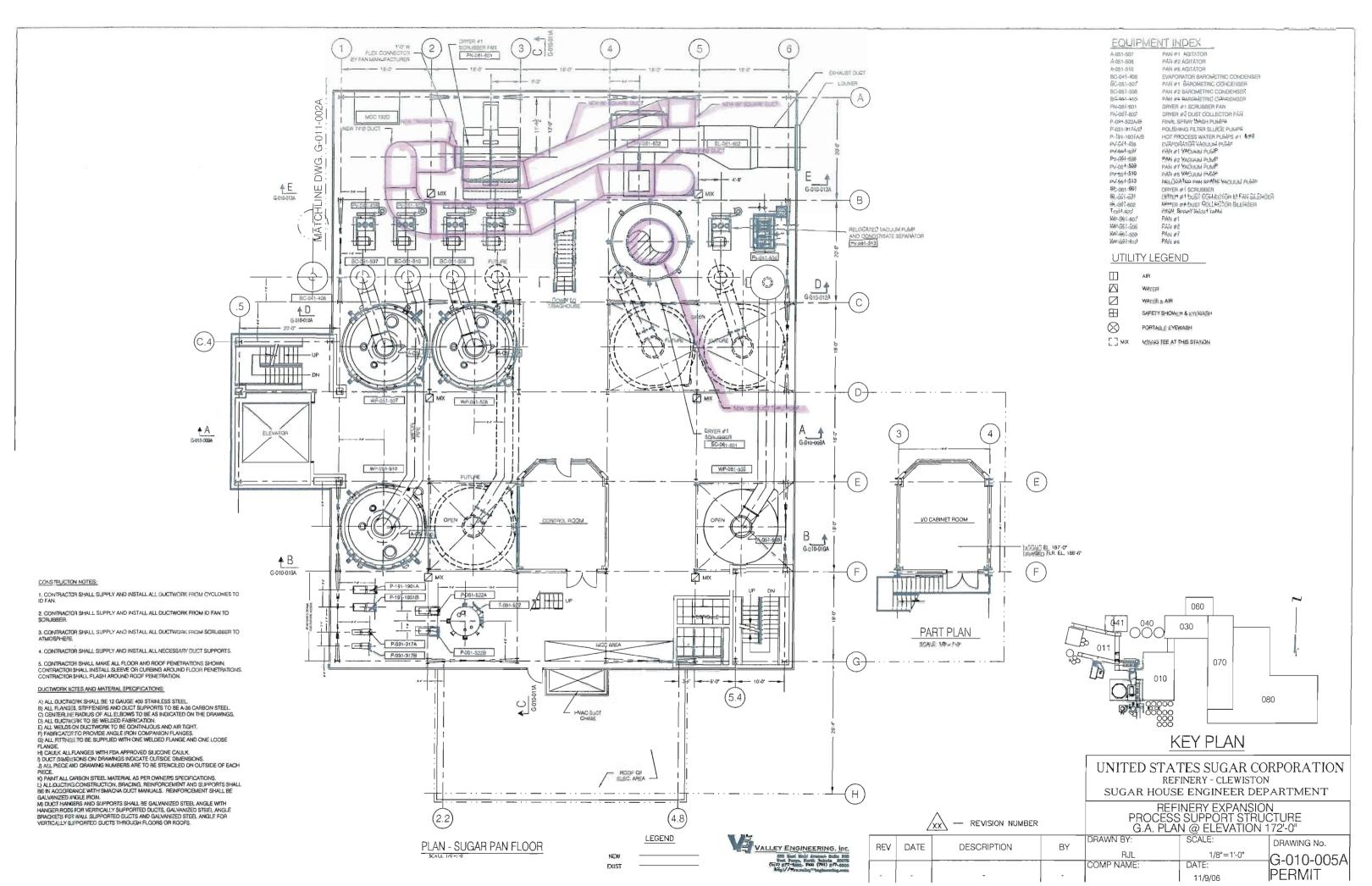


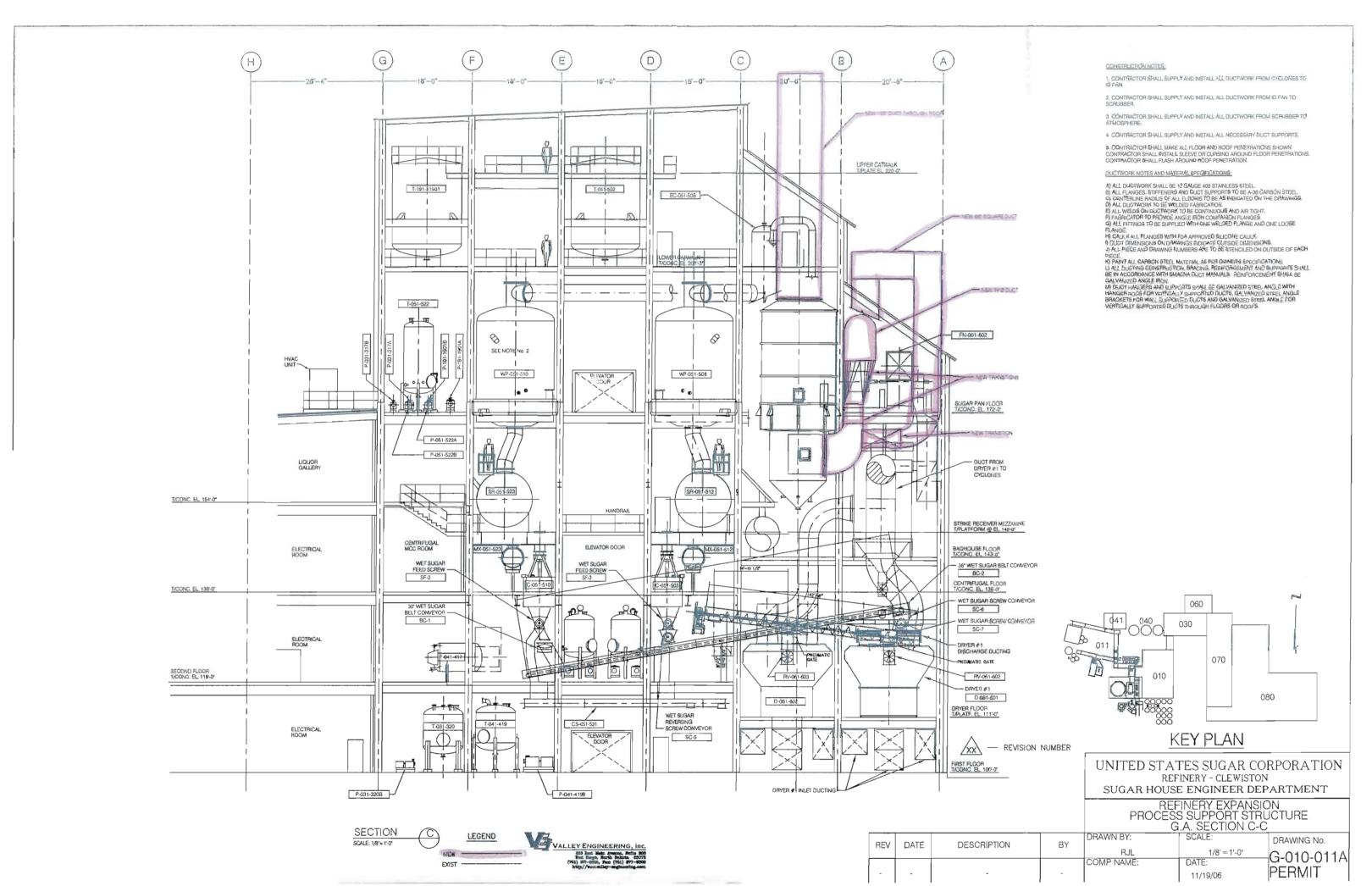


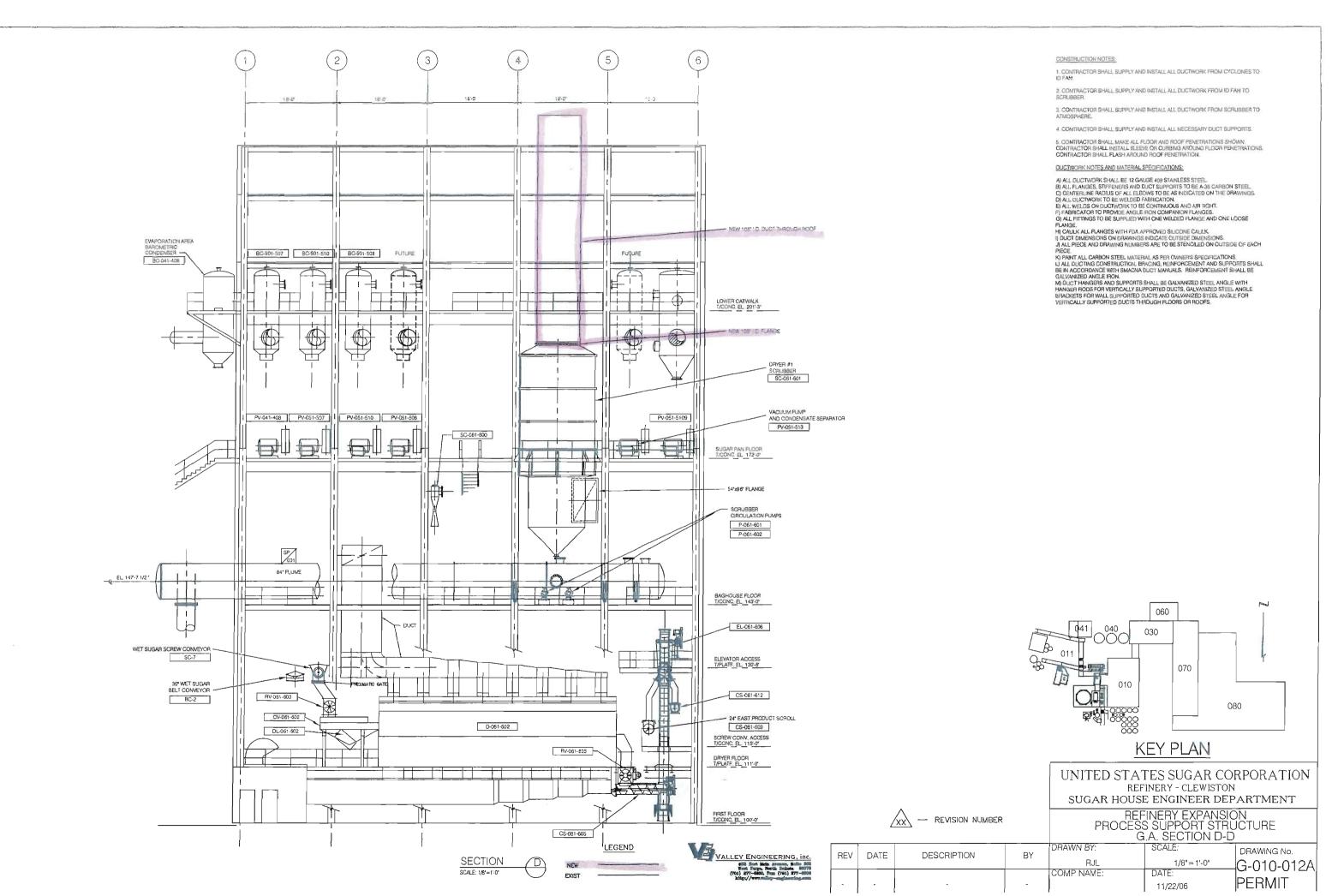












DRAWINGS-OPTION 2

