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1. Article Addressed to:

Mr. William A. Raiola, V.P.
United States Sugar Corp.
111 Ponce DeLeon Ave.
Clewiston, FL 33440

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery 5-21-01

C. Signature
X [signature] ☐ Agent ☐ Addressee

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PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

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Mr. William A. Raiola, VP
Street, Apt. No.; or PO Box No.
111 Ponce DeLeon Ave.
City, State, ZIP+4
Clewiston, FL 33440

PS Form 3800, February 2000 See Reverse for Instructions

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

May 15, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

William A. Raiola, Vice President
United States Sugar Corporation
111 Ponce DeLeon Avenue
Clewiston, FL 33440

Minor Revisions
Air Permit No. PSD-FL-272A
Boiler No. 4/Refinery Expansion
Palm Beach County, Florida

Re: U.S. Sugar's Clewiston Sugar Mill and Refinery
Boiler No. 4 and Refinery Expansion
Minor Revisions to Air Permit No. PSD-FL-272A

Dear Mr. Raiola:

On April 26, 2001, the Department received a request from Golder Associates on behalf of U.S. Sugar to make minor revisions to Air Permit No. PSD-FL-272A for boiler No. 4 at the Clewiston sugar mill and refinery. The Department disagrees that it is burdensome and impractical to sample and analyze the fuel oil for sulfur content prior to off-season operation. This condition was not changed. In response to the request, the Department corrected a typographical error on page 10 of the permit and made minor revisions to Appendix GCP regarding the startup and shutdown procedures. These revisions are considered minor and no public notice is required. The revisions are attached and can be inserted directly into the original permit.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. 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 public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department 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 of the Florida Administrative Code (F.A.C.)

A petition that disputes the material facts on which the Department'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 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 indicate; (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 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 Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing

of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

Howard L. Rhodes, Director
Division of Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5/18/01 to the person(s) listed:

Mr. William A. Raiola, USSC*
Mr. Dave Buff, Golder Associates
Mr. Ron Blackburn, SD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

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.

Charlotte J. Hayes (Clerk) 5/18/01 (Date)

a. **Startup and Shutdown**: The permittee shall record the time and date the boiler undergoes startup, shutdown, or malfunction. The permittee shall also log the time the boiler has achieved or regained normal operation.

b. **Steam Parameters**: The steam pressure (psig), steam temperature (°F), and steam production rate (pounds per hour) shall be continuously recorded with a chart recorder. *{Revised May 2001}*

c. **Combustion Parameters**: The permittee shall record the oxygen and carbon monoxide contents of flue gas once normal operation is established after startup and at least once per hour of operation. Alternatively, the permittee may install an automated device to record these parameters.

d. **Wet Scrubber Parameters**: The permittee shall record the following information once normal operation is established after startup and at least once every 3 hours: pressure drop across wet scrubber (inches of water column), scrubber spray nozzle pressure (psi), wet scrubber liquid flow rate (gpm). Alternatively, the permittee may install an automated device to record these parameters.

e. **Oil Firing**: The permittee shall record the oil-firing rate (gallons) for each 3-hour block of operation. In addition, the permittee shall calculate and record the oil-firing rate (gallons) for each 24-hour block of operation. Oil firing rates may be observed and recorded by hand or automated monitoring equipment.

f. **Oil Delivery**: For each fuel oil delivery, the permittee shall record and retain the following: the date, the gallons of fuel delivered, and a fuel oil analysis (including the heat content in mmBTU per gallon, the density in pounds per gallon, the sulfur content in percent by weight, and the name of the test method used). A certified analysis supplied by the fuel oil vendor is acceptable.

g. **Monitoring Equipment**: In accordance with the manufacturer's recommendations, the permittee shall install, calibrate, operate, and maintain all monitoring equipment including steam flow meters, steam integrators, strip chart recorders, pressure gages, manometers, scrubber water flow meters, fuel oil flow meters, and all other monitoring devices used to demonstrate compliance with the conditions of this permit. Each device shall be calibrated at least annually. All calibrations and repairs shall be recorded as part of the Daily Operational Records.

h. **Daily Summary**: For each day of operation, the permittee shall calculate and record the following by the end of the next workday.

- Hours of operation for the day
- Steam production rate: pounds per day and pounds per hour (daily average)
- Heat input: mmBTU per day and mmBTU per hour (daily average)
- Total oil fired for Boiler No. 4: gallons per day (as determined by data collected from the oil flow meter)

All records shall indicate the date and time the information was recorded, and in the case of manual recordings, the name of the person who recorded the information. For data that indicates operation outside of the specified permitted levels of the above parameters, the permittee shall record a summary of the incident and any corrective actions taken to regain proper operation, if any. [Rules 62-212.400 (BACT) and 62-4.070(3), F.A.C.]

23. Monthly Operations Summary: To demonstrate compliance with the performance requirements of this permit, the permittee shall calculate and record the following within 10 calendar days of the end of the month.

GOOD COMBUSTION PRACTICES

The following procedures are based upon U.S. Sugar's most recent submittal received by the Department in January of 2001.

Purpose of GCP Plan

The determination of Best Available Control Technology for CO, NOx, and VOC emissions from Boiler No. 4 (EU-009) relied on "good combustion practices". The purpose of this document is to summarize the operational, maintenance, and monitoring procedures that will lead to the minimization of CO and VOC emissions and the optimization of NOx emissions, consistent with good combustion practices.

Preparation for Operations

1. Prior to each harvest season, the boiler proper, its air ductwork, air heaters and scrubber are properly cleaned, inspected and repaired.
2. All refractory and boiler casing will be inspected and repaired where needed.
3. Outside of boiler tubes will have loose scale removed and boiler will be cleaned of loose scale, sand and other debris.
4. Boiler grates will be inspected and cleaned as well as being checked for mechanical operation.
5. All fans and fan drives will be inspected and repaired as needed.
6. All pumps and pump drives will be inspected and repaired as needed.
7. All oil burners will be cleaned and inspected as well as related oil piping, atomizing steam and air registers.
8. Prior to each harvest season, the skirt level of the scrubber is identified and marked on the outside so that a permanent reference is available.
9. Prior to each harvest season, all instruments for boiler operation and control (including oxygen and carbon monoxide process monitors) are inspected, repaired and calibrated as required. This is recorded by the instrument shop in its repair log.

Boiler Operation and Controls

The senior most experienced boiler supervisor instructs other boiler room supervisors, boiler operators, and other appropriate personnel in proper boiler and scrubber operations so as to minimize stack emissions of CO and VOC, and so as to optimize stack emissions of NOx. This includes instruction for observing the oxygen and carbon monoxide process monitors to promote good combustion as well as adjusting operations in response to an alarm condition. This instructional program is presented prior to each harvest season and is included in the orientation and training provided to new boiler room employees. The training will impress upon supervisors and operators the importance of proper boiler operation in order to minimize emissions.

CO and VOC Controls

CO emissions are to be minimized by the proper application of Good Combustion Practices (GCP). To provide reasonable assurance that GCP are being employed:

1. The boiler operator will maintain steam rate at optimal or desired rate by controlling feed of bagasse fuel into the boiler. Combustion air to the boiler will be maintained at the highest possible level (resulting in sufficient excess air whenever feasible) in order to promote good combustion.
2. The boiler operator will periodically (at least once per hour) view the stack video monitor to visually confirm that good combustion is taking place. (Individual stack plumes are monitored continuously through a closed circuit television system.) If an abnormal plume is observed, the operator will immediately take

corrective action. The boiler operator will log the occurrence and duration of all such events in the boiler operation log, along with the corrective action taken. These records will be kept for a period of at least two years.

3. Process monitors will be installed to monitor the oxygen (O2) content and the carbon monoxide (CO) content of the boiler flue gas. The instrument readouts will be located in the boiler control room to provide real time data to the boiler operator. The boiler operators will be instructed in the use of the O2 and CO flue gas process monitors for combustion control and to ensure sufficient excess air levels. The boiler operators shall periodically observe each process monitor and adjust the boiler operation, consistent with good combustion practices. The oxygen process monitor will include an alarm with a set point at 1.5% (minimum) flue gas oxygen content based on a 1-hour block average. The CO process monitor will include an alarm with a set point at 3000 ppm (maximum) flue gas CO concentration based on a 1-hour block average. Each monitor will display both the instantaneous and the 1-hour block average. If the alarm is tripped for either process monitor (low oxygen content or high CO concentration), the boiler operator shall take corrective actions consistent with good combustion practices. Corrective actions may include, but are not limited to, adjusting the air-to-fuel ratio, adjusting the ratio of under-fire air to over-fire air, firing some fuel oil in place of bagasse. For each such incident, the operator will summarize the corrective actions taken and the approximate time when operation within the target parameter(s) was regained.

NOx Controls

NOx emissions are to be optimized by the proper application of Good Combustion Practices (GCP). However, the application of GCP to minimize CO and VOC emissions may result in increased NOx emissions. This is because factors that promote good combustion and result in lower CO and VOC emissions (such as higher excess air and higher combustion temperatures) typically result in higher NOx emissions. This is the nature of the combustion process for these boilers. Therefore, GCP to optimize NOx emissions is considered to be the same practices used to minimize CO and VOC emissions, as described above.

Miscellaneous

1. Several times per shift, the boiler grates and feeders are examined for proper distribution and any necessary operational changes are made. Any unusual observations are logged once per shift.
2. Once per day, on the day shift, the boiler will be given a walk-around inspection with the following items being checked and repaired as needed and in coordination with the production schedule: Fans, pumps, casing, ducting, and scrubber.
3. On every shift burners are inspected and cleaned if dirty.
4. On every shift, precautions will be taken as necessary to control visible emissions of fugitive matter (dust and bagasse, etc.)

STARTUP AND SHUTDOWN PROCEDURES *(Revised May 2001)*

U.S. Sugar submitted the following procedures in April of 2001 to supplement the original PSD application for this project.

During startup and shutdown of the boilers, excess CO, PM, NOx, and VOC emissions for more than 2 hours in a 24-hour period are possible. Pursuant to Rule 62-210.700(1), F.A.C., the following procedures and precautions shall be taken to minimize the magnitude and duration of excess emissions during startup and shutdown of Boiler No. 4. The boiler room foreman and operating personnel shall receive proper training on emissions control procedures at least once per year.

Cold Startup

1. Turn on water valves to scrubber spray nozzles to start scrubber.

2. Feed solid fuel into boiler combustion chamber.
3. Start fire in combustion chamber using a propane torch designed for that purpose.
4. As boiler heats up and starts to make steam, continuously observe the boiler and scrubber water levels, and stack plume.
5. Light a fuel oil burner at the lowest rate, continue to observe the stack plume and adjust, if necessary, by adjusting fuel, atomizing steam, and air to obtain proper combustion.
6. Feed carbonaceous fuel from the mill to the boiler slowly at first. As the furnace gets hotter and the carbonaceous fuel is burning better, decrease fuel oil flow until burners can be turned off.
7. Continue to observe the stack plume, the scrubber water level, and the carbonaceous fuel level, making adjustments to drafts, fuel, and scrubber to maintain the optimum operating conditions.
8. A cold startup is a startup after the boiler has been down for more than 4 or 5 hours. Typically, a cold startup will require 6 to 12 hours from the first fire to normal working pressure. There may be 10 cold startups per crop season (more or less) depending on excessive rain and mechanical breakdowns.

Hot Startup

1. This type of startup is applicable when the boiler has been shutdown for a short period of time and is still hot.
2. Turn on water valves to scrubber spray nozzles to start scrubber.
3. Check the boiler and scrubber water levels, circulating pump and spray nozzles, and make sure they are functioning properly.
4. Light a burner. Continue to observe the stack plume, water levels, and burners.
5. As the carbonaceous fuel fire gets hot enough to meet demand, reduce the burner fuel until it can be turned off. Adjust the dampers to get optimum carbonaceous fuel firing.
6. Continue to observe the stack plume, scrubber water level, and carbonaceous fuel level, making adjustments to drafts, fuel, and scrubber to maintain the optimum operating conditions.
7. A warm startup is a startup after the boiler has been down for less than 5 hours. Usually, the longer the boiler is down means a longer period will be needed for warm startup. Typically, a warm startup requires 1 to 5 hours depending on boiler operating conditions. There may be 5 cold startups per crop season (more or less) depending on mechanical breakdowns mill interruptions.

Shutdown

1. Stop fuel flow to the boiler. Reduce the forced draft, distributor air, overfire air, and induced forced draft.
2. Continue to observe the stack plume and water levels and make adjustments to maintain safe and optimum operating conditions.
3. The scrubber is turned off after the fire in the boiler is extinguished.

Memorandum

Florida Department of
Environmental Protection

BAR

TO: Howard Rhodes

THRU: ~~Clair Fancy~~ by way
Al Linero

FROM: Jeff Koerner JK

DATE: May 15, 2001

SUBJECT: Minor Revisions to Air Permit PSD-FL-272A
U.S. Sugar Corporation – Clewiston Sugar Mill and Refinery
Original Project to Expand Operation of Boiler No. 4 and Refinery

Attached for your approval and signature are minor revisions to the previously issued PSD permit to expand operation of Boiler No. 4 and the refinery at U.S. Sugar's Clewiston sugar mill located in Hendry County. U.S. Sugar requested three changes: correction of a typographical error; minor revisions to the startup and shutdown procedures listed in Appendix GCP; and removal of the requirement to sample and analyze the fuel oil for Boiler No. 4 prior to the off-season. The first two requested changes were approved, but the third was denied. U.S. Sugar believes that it is burdensome and impractical to perform the required fuel sulfur analysis once per year. This requirement was included because U.S. Sugar opted to reduce the maximum sulfur content of the fuel oil from 2.5% sulfur by weight (crop season) to 1.6% sulfur by weight (off-season) due to problems with modeled SO_2 ambient impacts during the off-season. I believe that the fuel sulfur analysis is reasonable and necessary to ensure compliance.

I recommend your approval and signature.

Attachments

CHF/AAL/jfk

Florida Department of Environmental Protection

Memorandum

BAR

TO: Howard Rhodes

THRU: Clair Fancy
Al Linero

FROM: Jeff Koerner

DATE: March 6, 2001

SUBJECT: Final Permit No. 0510003-010-AC (PSD-FL-272A)
U.S. Sugar Corporation – Clewiston Sugar Mill and Refinery
Boiler No. 4 Modification (ISC Prime)

The Final Permit is attached for your approval and signature to modify operations of U.S. Sugar's Boiler No. 4 at the existing Clewiston sugar mill and refinery located in Hendry County. The purpose of this modification is to regain authorization for Boiler Nos. 1- 3 to fire fuel oil containing up to 2.50% sulfur by weight. This authorization was removed in Permit No. PSD-FL-272 because the applicant based the Air Quality Analysis on a lower sulfur content and increased stack heights. These constraints were necessary because of modeled potential adverse impacts related to downwash from the refinery buildings. However, the PSD permit allowed future modification to regain the higher sulfur fuel for Boiler Nos. 1- 3 based on a revised Air Quality Analysis.

During the summer of 2000, construction was completed that raised the stacks for Boiler Nos. 1 – 3 to 213 feet in height. The applicant provided an Air Quality Analysis based on the ISC PRIME model that demonstrates compliance with the Ambient Air Quality Standards and PSD increments. The Air Quality Analysis did include several constraints on boiler operation, fuel oil consumption, fuel oil sulfur content, and steam production. These constraints were included in this permit modification as specific conditions. No new BACT determinations were made as a result of this project.

The Public Notice of Intent to Issue was published in The Clewiston News on December 27, 2000 and proof of publication provided to the Department on January 4, 2001. No comments on the Draft Permit were received from the public, the South District Office, EPA Region 4, or the NPS. The applicant submitted comments that resulted in minor changes to the Final Permit, as summarized in the attached Final Determination. In addition, the applicant requested clarification on two issues related to the Clewiston facility: finishing the installation of previously permitted vacuum pan No. 7; and specific alarm set points for minimum flue gas oxygen content and maximum flue gas carbon monoxide content based on recent test data. After much discussion, agreement was reached and minor changes were also included in the final permit. Resolution of these two issues delayed issuance of the final permit.

Day 90 for this project is April 8, 2001. I recommend your approval and signature.

Attachments

CHF/AAL/jfk

Golder Associates Inc.

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

April 25, 2001

0037629

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL

Attention : Jeffery Koerner, P.E.

RE: UNITED STATES SUGAR CORPORATION (U.S. SUGAR) – PSD PERMIT APPLICATION FOR BOILER NO. 4 AND THE SUGAR REFINERY AT THE CLEWISTON MILL
FINAL PERMIT NO. 0510003-010-AC; PSD-FL-272A

Dear Mr. Koerner:

In follow-up to our recent telephone conversations, United States Sugar Corporation (U.S. Sugar) is requesting some revisions to the final air construction permit for Boiler No. 4, which was issued on March 8, 2001. The requested revisions are described below.

Page 10 of 25
Condition 22.b. Please revise the first occurrence of "steam temperature" to "steam pressure (psig)".

Page 13 of 25
Condition 5.b. U. S. Sugar considers this condition to be very burdensome and may prove to be unworkable. It requires a fuel oil sample to be taken each April, analyzed, and the results reported within 5 days to FDEP. If the sulfur content exceeds 1.6%, U. S. Sugar must order additional lower sulfur oil and add it to the tank prior to the off-season operation. U. S. Sugar must therefore try to estimate the amount of lower sulfur oil required in order to render the blended fuel no more than 1.6% sulfur. A second sample must then be taken and analyzed, and more lower sulfur fuel added if the blended fuel is still above 1.6% sulfur. This process would go on until the sulfur content is less than 1.6%. This all must be done prior to firing any fuel from the tank in the off-season.

Due to the burdensome and impractical nature of this requirement, U. S. Sugar desires the option to burn 1.6% sulfur (max) year-around, in order to avoid the sampling and analysis requirements. Under this option, an initial fuel oil sample will be obtained which demonstrates that the tank currently contains less than 1.6% sulfur fuel oil. Subsequent to this demonstration, U. S. Sugar would purchase only fuel oil for the tank which contains no more than 1.6% sulfur, and fuel receipts would be used to demonstrate compliance on an on-going basis. If fuel oil with greater than 1.6% sulfur is purchased for the tank, then the requirement as currently written will be complied with. It is noted that currently, compliance with all fuel oil sulfur content limits at the Clewiston mill is demonstrated through fuel oil receipts. Suggested wording for the revised condition is as follows:

> **Boiler Nos. 1 - 3, Off-Season**:
>
> From May through September of each year, any fuel oil fired in Boiler Nos. 1 - 3 shall contain no more than 1.60% sulfur by weight.

(1) During any crop season (October through April of any year), if the permittee elects to fire fuel oil in Boiler Nos. 1-3 containing more than 1.6% sulfur, the following requirements will apply. In April of each year, a composite sample from the common tank shall be taken and analyzed for sulfur content. Within 5 days of obtaining the results, a report of the fuel sulfur content shall be submitted to the Compliance Authority. If the sulfur content is higher than 1.60% sulfur by weight, the permittee shall purchase additional oil to blend down to the permit limit before any fuel from the common tank is authorized for firing during the off-season. An additional composite sample shall be taken from the common tank after blending and analyzed for the fuel sulfur content. Within 5 days of obtaining the results, a report of the fuel sulfur content shall be submitted to the Compliance Authority. It is a violation of this permit to fire fuel from the common tank without filing a report with the Compliance Authority that demonstrates compliance with the lower fuel sulfur limit. Thereafter, only fuel oil containing no more than 1.60% sulfur by weight shall be purchased and added to the common tank during the off-season. It is the permittee's responsibility to appropriately plan for and stage fuel purchases to comply with this condition.

(2) If the permittee elects to fire only fuel oil in Boiler Nos. 1-3 containing a maximum of 1.6% sulfur throughout the entire year, the following requirements will apply. The permittee must obtain an initial composite sample from the common tank and analyze the sample for sulfur content. The results must demonstrate that the tank contains fuel oil with no greater than 1.6% sulfur. Within 5 days of obtaining the results of the fuel analysis, a report of the fuel sulfur content shall be submitted to the Compliance Authority. Thereafter, no further sampling and analysis of the common tank is required, provided the permittee maintains fuel oil receipts to demonstrate compliance with the 1.6% sulfur limitation.

Appendix GCP
As previously discussed, the final Title V permit for Clewiston dated February 19, 2001, incorporates revised Boiler No. 4 startup procedures (dated 8/25/00). Attached is a slightly corrected version that identifies when the wet scrubber is turned on. Please incorporate these into the new Boiler No. 4 permit.

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

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

DB/jkw
Attachments
cc: Don Griffin

CLEWISTON BOILER NO. 4

PROCEDURES FOR STARTUP AND SHUTDOWN

(Revised 01/31/01)

Pursuant to Rule 62-210.700(1), F.A.C., the following procedures and precautions are taken to minimize the magnitude and duration of excess emissions during startup and shutdown of Boiler No. 4. Boiler room foreman and operating personnel have received proper training on emissions control procedures.

Cold Startup (approximately 6 to 12 hours)

1. Turn on water valves to scrubber spray nozzles to start scrubber.
2. Feed solid fuel into boiler combustion chamber.
3. Start fire in combustion chamber using a propane torch designed for that purpose.
4. As boiler heats up and starts to make steam, continuously observe the boiler and scrubber water levels, and stack plume.
5. Light a fuel oil burner at the lowest rate, continue to observe the stack plume and adjust if necessary, by adjusting fuel, atomizing steam, and air to obtain proper combustion.
6. Feed carbonaceous fuel from the mill to the boiler slowly at first; as the furnace gets hotter and the carbonaceous fuel is burning better, decrease fuel oil until burners can be turned off.
7. Continue to observe the stack plume, the scrubber water level, and the carbonaceous fuel level, making adjustments to drafts, fuel, and scrubber to maintain optimum operating conditions.
8. Normally, a cold startup will require 6 to 12 hours from the first fire to normal working pressure.

Hot Startup (approximately 1 to 5 hours)

1. This type of startup is applicable when the boiler has been shutdown for a short period of time and is still hot.
2. Turn on water valves to scrubber spray nozzles to start scrubber.
3. Check the boiler and scrubber water levels, circulating pump and spray nozzles, and make sure they are functioning properly.

4. Light a burner, continue to observe the stack plume, water levels, and burners.

5. As the carbonaceous fuel fire gets hot enough to meet steam demand, reduce the burner fuel until it can be turned off. Adjust the dampers to get optimum carbonaceous fuel firing.

6. Continue to observe the stack plume, scrubber water level, and carbonaceous fuel level, making adjustments to drafts, fuel, and scrubber to maintain optimum operating conditions.

7. Normally, a warm startup requires 1 to 5 hours, depending on boiler operating conditions.

Shutdown

1. Stop fuel flow to the boiler, reduce forced draft, distributor air, overfire air, and induced draft.

2. Continue to observe the stack plume and water levels and make adjustments to maintain safe and optimum operating conditions.

3. The scrubber is turned off after the fire in the boiler is extinguished.