

UNITED STATES SUGAR CORPORATION

Post Office Box 1207 • Clewiston, Florida 33440-1207
Telephone 941/983-8121

February 15, 1996

RECEIVED
FEB 19 1996
BUREAU OF
AIR REGULATION

Mr. A. A. Linero, P.E.
Administrator
Florida Department of Environmental Protection
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

RE: United States Sugar Corp.
Clewiston Boiler No. 4
DEP File No. AC26-248809/PSD FL-217

Dear Mr. Linero:

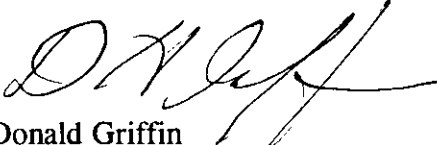
We have reviewed the Department's letter, dated January 31, 1996, with its suggestions for expanding the CO and VOC control portions of our recently updated Operation and Maintenance (O&M) Plan for Clewiston Boiler No. 4.

In light of the Department's letter, we are re-evaluating the updated O&M Plan to see how best to expand it while taking advantage of existing instruments and operation practices.

As soon as we have completed this process, we will apprise the Department. In the meantime, if you have any questions, please do not hesitate to contact me.

Very truly yours,

UNITED STATES SUGAR CORPORATION


Donald Griffin
Project Manager, Specialty Sugar

DG:jt

cc: Mr. M. T. Brinson
Mr. W. A. Raiola
Mr. Peter Oppenheimer
Mr. David Buff

cc: W. Hanks, BAR
D. Knowles, SFD



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 31, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Donald Griffin, Project Manager
United States Sugar Corporation
Post Office Box 1207
Clewiston, Florida 33440-1207

Dear Mr. Griffin:

Re: U. S. Sugar Corp.
Clewiston Boiler No. 4
DEP File No. AC 26-248809 - PSD-FL-217

The Department has reviewed your updated Operation and Maintenance (O&M) plan dated January 16, 1996, for the No. 4 bagasse/fuel oil-fired boiler at the Clewiston sugar mill. We have concluded it is acceptable for the operation of the scrubber and the control of particulate matter emissions.

However, the plan needs to be expanded in the area of carbon monoxide (CO) and volatile organic compounds (VOC) control. The plan should specify what parameters (oxygen, carbon monoxide, and/or carbon dioxide concentration(s)) will be monitored, the operational ranges of these parameters, and when it may be necessary to depart from those ranges in order to provide reasonable assurance that Good Combustion Practices (GCP) are being employed. Such an O&M plan needs to be source-specific to take advantage of the existing instruments and operation practices.

Please expand on the CO and VOC part of your O&M plan. We look forward to reviewing your amendment to this plan. If you have any questions, please call Willard Hanks at (904)488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/wh/t

cc: David Knowles, SD
David Buff, KBN

old at the top of envelope to

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3. Article Addressed to:
 Donald Griffin, Proj. Mgr.
 U.S. Sugar Corp.
 P.O. Box 1207
 Clewiston, FL
 33440-1207

4a. Article Number
 Z 127 633 157

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
 2-2-94

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
 [Signature]

PS Form 3811, December 1991 *U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

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Delivered to	Donald Griffin
Street and No.	U.S. Sugar Corp
P.O. State and ZIP Code	Clewiston, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	1-31-96
	AC26-248809
	PSD-F1217

PS Form 3800, March 1993

UNITED STATES SUGAR CORPORATION

Post Office Box 1207 • Clewiston, Florida 33440-1207
Telephone 941/983-8121

Willard Harts

RECEIVED
JAN 22 1996
BUREAU OF
AIR REGULATION
January 6, 1996

Ms. ~~Theresa~~ Heron
Florida Department of Environmental Protection
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

RE: United States Sugar Corp.
Clewiston Boiler No. 4
DEP File No. AC26-248809/PSD FL-217

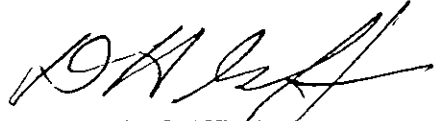
Dear Ms. Heron:

Enclosed please find a copy of the Operation and Maintenance Plan for Clewiston Boiler No. 4 as required by Specific Condition No. 17 of the Construction Permit.

If you have any questions, please call.

Very truly yours,

UNITED STATES SUGAR CORPORATION



Donald Griffin
Project Manager, Specialty Sugar

DG:jt

Enclosures: 1

cc: Mr. M. T. Brinson
Mr. W. A. Raiola
Mr. Robert Van Voorhees
Mr. David Buff

cc: S.F. District
EPA
NPS

UNITED STATES SUGAR CORPORATION
CLEWISTON MILL
OPERATION AND MAINTENANCE GUIDELINES
FOR
BOILER NO. 4 AND EMISSIONS CONTROLS

PREPARATION FOR OPERATIONS

1. Prior to each harvest season, the boiler proper, its air duct work, 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. Operational sight glasses are maintained on the scrubber so accurate water level readings can be obtained at all times to ensure that the water level is maintained at the level necessary to allow optimum scrubber efficiency.

10. Prior to each harvest season, all instruments for boiler operation and control are inspected, repaired and calibrated as required. This is recorded by the instrument shop in its repair log.

BOILER OPERATION AND CONTROLS

This manual is to be used as a maintenance and operations log for the boiler and scrubber for the purpose of monitoring and periodically recording certain specific parameters as set forth by the Florida Department of Environmental Protection in Permit No. AC26-248809 and in these operation and maintenance guidelines.

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, including carbon monoxide (CO), particulate matter (PM), nitrogen oxides (NO₂), sulfur dioxide (SO₂) and volatile organic compounds (VOCs). 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.

SCRUBBER (PARTICULATE CONTROL)

The boiler is equipped with one Joy type turbulaire water impingement scrubber with water spray nozzles operating in an internal atmosphere of negative draft gas flow. The normal operating control parameters for the scrubber should be maintained and the pressure drop should be operated at 90% or above (and not less than 75%) of that used in the most recent compliance test for particulate matter emissions.

1. The static pressure drop of the scrubber is monitored in inches of water, using provided manometers, and is logged once per shift (every 8 hours). Readings are also reported on the appropriate daily report, which is signed and filed in the superintendents office. (All instruments are

checked and cleaned before readings are taken, and any problems are reported to the supervisor and corrected.)

2. The scrubber is equipped with quick disconnect couplings on the nozzles.
 - A. All scrubber nozzles are visually checked for plugging and the water flow is verified once per week.
 - B. Any plugged or defective nozzles are cleaned or replaced within 24 hours of discovery.
 - C. Nozzle conditions, (plugged, clean or replaced) and time of inspection are logged by location.
3. The scrubber has a primary and a secondary water pumping system. Both systems are monitored at least once per day and any unusual findings are logged and problems are corrected.
4. Scrubber water supply strainers are backwashed twice per shift and the time and any observations are logged.
5. Once per shift, near mid-shift, scrubber water supply requirements are verified, and the scrubber water supply pressure and flow are recorded in a log book which is kept in the Boiler Room Office.
6. All scrubber equipment (water control instruments, circulating pumps, monitoring gauges, piping and valves, etc.) are properly maintained and inspected each shift. Times, dates and any unusual observations are logged.
7. The "pH" level of the scrubber discharge effluent is checked twice per shift by the water plant operator. Findings are recorded on the daily report and filed on a daily basis.
8. Records of the scrubber pressure drop readings and of the "pH" measurement of the scrubber discharge effluent will be retained for 5 years.

CO AND VOC CONTROLS

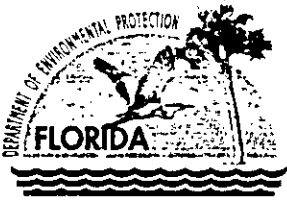
CO emissions are to be minimized by the proper application of Good Combustion Practices (GCP), maintenance of bagasse moisture content below 55% and vigilant observation of stack video monitors. Individual stack plumes are monitored continuously through a closed circuit television system. Operating parameters are adjusted as necessary to maintain control of visible emissions.

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.
 - A. Fans
 - B. Pumps
 - C. Casing
 - D. Ducting
 - E. 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.)
5. Boiler stack emissions compliance testing is conducted once per harvest season and is to be completed prior to March 1.

REVISED 1/96

0129462.02



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 26, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David A. Buff
KBN Engineering and Applied Sciences, Inc.
6241 N.W. 23rd Street, Suite 500
Gainesville, Florida 32653

Dear Mr. Buff:

Re: U. S. Sugar Corporation
Clewiston Boiler No. 4

The Bureau has reviewed the attachments to Bryan Cave LLP's October 6, 1995, letter concerning the ambient air impact of the sulfur dioxide emissions from the referenced facility. Mr. Oppenheimer, Bryan Cave LLP, said we should contact you if there were additional questions on this matter.

Our position remains that the fuel burning rate is a separate issue from excess emissions. A permittee cannot burn fuel at a rate greater than is allowed by the permit.

The Department will consider modifying permit No. AC 26-248808/PSD-FL-217 to allow a higher fuel burning rate for these boilers if requested to do so by the permittee. To support such a request, the permittee must supply the maximum fuel burning rate for the time periods and modeling results for the scenario that would produce the maximum ambient air impact. For U. S. Sugar's Clewiston mill, the fuel oil to all but Boiler No. 7 could contain up to 2.5 percent sulfur. The modeling results in the attachments did not use the maximum sulfur content of the fuel oil or the proposed maximum fuel oil burning rate. Please revise the calculations to show the maximum sulfur dioxide concentration in the ambient air for the 3 and 24-hour periods based on this scenario.

If you have any questions on this matter, please call Willard Hanks at (904) 488-1344.

Sincerely,

A. A. Linero 10/26

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/wh/h

cc: Jeff Braswell, OGC
David Knowles, SFD
Peter Oppenheimer, Bryan Cave LLP

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3. Article Addressed to:
 David A Buff, PE
 KBN Eng. + Applied Sciences
 6241 NW 23rd St, 5th Fl
 Gainesville, FL 32653-1520

4a. Article Number
 Z 127 632 560

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 10-30-95

5. Signature (Addressee)
 [Signature]

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
 [Signature]

PS Form 3811, December 1991 *U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

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PS Form 3800, March 1993

To: David Buff	
Street: KBN	
State and ZIP Code: Gainesville, FL	
Postage:	\$
Origin: US Susan Corp	
Special Delivery Fee:	(New Boiler #4)
Restricted Delivery Fee:	
Return Receipt Showing to Whom & Date Delivered:	
Return Receipt Showing to Whom, Date, and Addressee's Address:	
TOTAL Postage & Fees:	\$
Postmark or Date:	10-27-95



October 19, 1995

Mr. Jefferson Braswell
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, FL 32399-2400

RECEIVED
OCT 23 1995
BUREAU OF
AIR REGULATION

Re: DEP File No. AC26-248808/PSD-FL-217
PSD Construction Permit Modification
Clewiston Boiler No. 4
U.S. Sugar Corporation

Dear Mr. Braswell:

On behalf of U.S. Sugar Corporation (U.S. Sugar), this letter responds to the concerns you raised in your September 27, 1995, telephone conversation with Peter Oppenheimer of Bryan Cave, LLP, with respect to the validity of the CO emissions tests performed by U.S. Sugar for Clewiston Boiler No. 4.

Between February 20, 1990, and March 4, 1994, U.S. Sugar conducted 65 CO emissions test runs on Boiler No. 4 (see attached Table 1). The CO emissions ranged from 1.53 lb/MMBtu to 17.49 lb/MMBtu. These tests were performed to establish an appropriate permitted CO emission limit for this boiler using EPA Method 10. Based on these tests, along with CO emissions data for other similar bagasse-fired boilers, the Department established BACT as Good Combustion Practices (GCP) with emissions not to exceed 6.5 lb CO/MMBtu. This conclusion is set forth in the Department's Technical Evaluation and Preliminary Determination for Clewiston Boiler No. 4 dated February 7, 1995. On page 3 of this determination, the Department states "it has no information to suggest that this boiler is designed significantly differently from other bagasse boilers that were given this standard."

The CO emissions database for Clewiston Boiler No. 4 was developed while the boiler was operated according to GCP. This is demonstrated by examining the results of annual PM and visible emission compliance tests conducted on the same day as many of the CO emissions tests. The results of annual PM and visible emission compliance tests and CO emissions tests performed concurrently are summarized in Table 2. The permitted PM emission limit is 0.15 lb/MMBtu, and the permitted visible emission limit is 20 percent opacity. Compliance with the PM and visible emission limits indicates that the boiler is employing GCP. Since all of the CO tests summarized in Table 2 were performed concurrently with the PM and visible emission testing and under similar boiler operating parameters, it follows that the CO tests were also performed while employing GCP.

Rule 62-297.340, F.A.C. and Specific Condition 9 of Boiler No. 4's previous operating permit (AO26-144701) require U.S. Sugar to notify the Department 15 days prior to any formal compliance test to allow witnessing. The required notice was given, and, to the best of our knowledge, the Department was present during the operation of Boiler No. 4 for the sixteen CO emission test runs which were conducted concurrently with six formal PM compliance tests (see Table 2). Since PM compliance test results witnessed

15006A/10

PERI ENGINEERING AND APPLIED SCIENCES, INC.

3241 Northwest 23rd Street,
Suite 500
Clemensville, Florida 32004-1504
Tel: (904) 669-1000 Fax: (904) 669-1001

221 E. 1st Street,
Suite 118
Tallahassee, Florida 32301
Tel: (904) 487-1111 Fax: (904) 487-1110

1401 Glen Morris Road, Suite 101
Boca Raton, Florida 33432
Tel: (561) 993-0000 Fax: (561) 993-0001

7757 Southwinds Way,
Suite 105
Lake Wales, Florida 33853
Tel: (888) 221-1111 Fax: (888) 221-1111

1210 P. O. Box 100, Suite 200
Winter Haven, Florida 32909
Tel: (888) 221-1111 Fax: (888) 221-1111



by DEP demonstrate that Boiler No. 4 complied with its PM emission limit of 0.15 lb/MMBtu and visible emission limit of 20 percent opacity, and compliance with the PM and visible emission limits demonstrates that GCP were being employed, the Department has witnessed CO emission tests when the boiler was employing GCP.

Emissions results of the sixteen CO test runs conducted while the Department was observing operation of Boiler No. 4 range from 2.24 lb/MMBtu to 14.90 lb/MMBtu, with an average of 6.16 lb/MMBtu. These tests runs, which include approximately 20 percent of the 65 CO tests relied upon by the Department in establishing the BACT limit, are statistically representative of the larger database (i.e., essentially same range and same average CO emission rate).

There is no reason to believe that a lower CO emissions limit is warranted for Clewiston Boiler No. 4 in light of the validity and reliability of the existing CO emissions database and U.S. Sugar's extensive experience operating and maintaining the boiler. Accordingly, U.S. Sugar requests that the Department delete the language contained in Specific Conditions 17 and 21 that allows DEP to revise the BACT-determined CO limit of 6.5 lb/MMBtu. Appropriate language to accomplish this revision is provided in Attachment A.

Thank you for your consideration of his matter. Do not hesitate to contact me if you have any questions.

Sincerely,

David A. Buff

David A. Buff, P.E.
Florida P.E. #19011

S E A L

DB/arz

cc: A. A. Linero, DEP
Willard Hanks, DEP
David Knowles, DEP South District
Peter Briggs, U.S. Sugar
Don Griffin, U.S. Sugar
Peter Oppenheimer, Bryan Cave
File (2)

EPA

NPS

D. Buff, KBN

J. Brown, BAR

Table 1. Summary of CO Emission Tests Performed on Clewiston Boiler No. 4 Using EPA Method 10

Unit	Boiler Type	Date	Steam Rate (lb/hr)	Heat Input (MMBtu/hr)	Bagasse Firing Rate (a) (TPH wet)	CO Emissions			CO Emissions Compliance Average (lb/MMBtu)
						lb/hr	lb/MMBtu	lb/ton,wet	
Boiler 4	Traveling Gate	02/20/90	308,636	691.7	96.07	1,940	2.79	20.19	2.75
Boiler 4	Traveling Gate	02/20/90	306,666	690.3	95.87	1,520	2.24	15.85	
Boiler 4	Traveling Gate	02/20/90	310,298	698.8	97.06	2,240	3.23	23.08	
Boiler 4	Traveling Gate	02/15/91	289,091	624.9	86.79	4,760	7.62	54.84	5.27
Boiler 4	Traveling Gate	02/15/91	291,200	629.5	87.43	2,710	4.30	31.00	
Boiler 4	Traveling Gate	02/15/91					3.90		3.78
Boiler 4	Traveling Gate	02/18/91	288,358	622.8	86.50	2,430	3.90	28.09	
Boiler 4	Traveling Gate	02/18/91	285,224	616.4	85.61	2,640	4.28	30.84	
Boiler 4	Traveling Gate	02/18/91	302,647	653.3	90.74	2,060	3.16	22.70	5.43
Boiler 4	Traveling Gate	02/19/91	290,769	627.9	87.21	4,430	7.05	50.80	
Boiler 4	Traveling Gate	02/19/91	294,583	637.1	88.49	3,400	5.33	38.42	
Boiler 4	Traveling Gate	02/19/91	293,382	633.5	87.99	2,480	3.92	28.19	11.23
Boiler 4	Traveling Gate	02/22/91	300,000	647.9	89.99	4,900	7.56	54.45	
Boiler 4	Traveling Gate	02/22/91	293,382	634.2	88.08	9,450	14.90	107.28	
Boiler 4	Traveling Gate	01/07/92	293,425	613.6	85.22	3,200	5.22	37.55	7.91
Boiler 4	Traveling Gate	01/07/92	282,800	591.3	82.12	6,270	10.60	76.35	
Boiler 4	Traveling Gate	01/08/92	299,178	623.2	86.56	2,030	3.26	23.45	4.66
Boiler 4	Traveling Gate	01/08/92	297,973	621.5	86.32	3,160	5.09	36.61	
Boiler 4	Traveling Gate	01/08/92	300,811	627.4	87.14	3,540	5.64	40.62	4.40
Boiler 4	Traveling Gate	01/09/92	302,055	630.0	87.50	2,770	4.40	31.66	
Boiler 4	Traveling Gate	01/09/92	295,135	615.8	85.53	2,710	4.40	31.69	
Boiler 4	Traveling Gate	01/13/93	279,114	594.46	82.56	4,460	7.50	54.02	8.03
Boiler 4	Traveling Gate	01/13/93	280,000	609.43	84.64	5,240	8.59	61.91	
Boiler 4	Traveling Gate	01/13/93	280,986	602.13	83.63	4,810	7.99	57.52	11.48
Boiler 4	Traveling Gate	01/14/93	271,463	588.53	81.74	8,830	15.00	108.03	
Boiler 4	Traveling Gate	01/14/93	292,297	632.11	87.79	5,030	7.95	57.29	
Boiler 4	Traveling Gate	02/02/93	286,364	624.01	86.67	4,490	7.19	51.81	7.94
Boiler 4	Traveling Gate	02/02/93	281,918	614.84	85.39	4,130	6.71	48.36	
Boiler 4	Traveling Gate	02/02/93	291,667	633.45	87.98	6,280	9.92	71.38	7.64
Boiler 4	Traveling Gate	02/04/93	295,135	635.29	88.23	4,310	6.78	48.85	
Boiler 4	Traveling Gate	02/04/93	286,662	616.39	85.61	5,630	9.13	65.76	
Boiler 4	Traveling Gate	02/04/93	294,000	633.92	88.04	4,440	7.01	50.43	7.37
Boiler 4	Traveling Gate	01/13/94	290,132	628.52	87.29	3,490	5.55	39.98	
Boiler 4	Traveling Gate	01/13/94	283,500	614.06	85.29	3,230	5.26	37.87	
Boiler 4	Traveling Gate	01/13/94	283,784	615.24	85.45	6,960	11.31	81.45	9.59
Boiler 4	Traveling Gate	01/14/94	294,583	639.11	88.77	3,310	5.18	37.29	
Boiler 4	Traveling Gate	01/14/94	290,548	629.38	87.41	3,850	6.11	44.04	
Boiler 4	Traveling Gate	01/14/94	293,425	635.50	88.26	11,110	17.49	125.87	5.22
Boiler 4	Traveling Gate	02/01/94	272,113	592.17	82.25	1,090	1.84	13.25	
Boiler 4	Traveling Gate	02/01/94	271,250	595.17	82.66	5,110	8.59	61.82	
Boiler 4	Traveling Gate	02/07/94	269,434	587.52	81.60	2,730	4.65	33.46	7.53

Table 1. Summary of CO Emission Tests Performed on Clewiston Boiler No. 4 Using EPA Method 10

Unit	Boiler Type	Date	Steam Rate (lb/hr)	Heat Input (MMBtu/hr)	Bagasse Firing Rate (a) (TPH wet)	CO Emissions			CO Emissions Compliance Average (lb/MMBtu)
						lb/hr	lb/MMBtu	lb/ton,wet	
Boiler 4	Traveling Gate	02/07/94	274,909	599.46	83.26	3,280	5.47	39.40	
Boiler 4	Traveling Gate	02/07/94	266,538	582.08	80.84	7,580	13.03	93.76	
Boiler 4	Traveling Gate	02/07/94	268,333	586.88	81.51	4,090	6.97	50.18	
Boiler 4	Traveling Gate	02/09/94	283,994	620.29	86.15	4,340	6.99	50.38	6.99
Boiler 4	Traveling Gate	02/11/94	285,000	622.97	86.52	3,600	5.78	41.61	4.43
Boiler 4	Traveling Gate	02/11/94	267,273	580.67	80.65	890	1.53	11.04	
Boiler 4	Traveling Gate	02/11/94	288,358	625.28	86.84	4,930	7.89	56.77	
Boiler 4	Traveling Gate	02/11/94	294,000	644.24	89.48	1,620	2.51	18.11	
Boiler 4	Traveling Gate	02/17/94	280,000	608.74	84.55	5,760	9.47	68.13	6.95
Boiler 4	Traveling Gate	02/17/94	268,500	584.52	81.18	2,840	4.86	34.98	
Boiler 4	Traveling Gate	02/17/94	285,600	623.65	86.62	4,170	6.68	48.14	
Boiler 4	Traveling Gate	02/17/94	289,800	631.71	87.74	4,280	6.78	48.78	
Boiler 4	Traveling Gate	02/22/94	285,600	625.33	86.85	4,680	7.48	53.89	7.70
Boiler 4	Traveling Gate	02/22/94	289,800	633.82	88.03	4,680	7.38	53.16	
Boiler 4	Traveling Gate	02/22/94	282,692	616.86	85.68	4,680	7.58	54.63	
Boiler 4	Traveling Gate	02/22/94	268,800	585.45	81.31	4,680	7.99	57.56	
Boiler 4	Traveling Gate	02/22/94	266,667	580.29	80.60	4,680	8.06	58.07	
Boiler 4	Traveling Gate	02/23/94	283,043	616.93	85.68	2,460	3.99	28.71	5.48
Boiler 4	Traveling Gate	02/23/94	290,769	633.14	87.94	3,840	6.07	43.67	
Boiler 4	Traveling Gate	02/23/94	284,308	617.98	85.83	3,950	6.39	46.02	
Boiler 4	Traveling Gate	03/04/94	289,655	636.45	88.40	1,920	3.02	21.72	3.99
Boiler 4	Traveling Gate	03/04/94	278,793	614.71	85.38	1,440	2.34	16.87	
Boiler 4	Traveling Gate	03/04/94	271,552	598.50	83.13	2,520	4.21	30.32	
Boiler 4	Traveling Gate	03/04/94	283,889	625.69	86.90	3,990	6.38	45.91	
						Max. =	17.49	125.87	11.48
						Avg. =	6.48	46.97	6.63
						Min =	1.53	11.04	2.75

Note: lb/hr = pounds per hour.
 lb/MMBtu = pounds per million British thermal units.
 lb/ton = pounds per ton.
 MMBtu/hr = million British thermal units per hour.
 NA = not available.
 TPH = tons per hour.

(a) Calculated from reported heat input rate, assumed 3,600 Btu/lb average heat content for wet bagasse.

Table 2. Summary of Concurrent PM and CO Emission Tests Performed on U.S. Sugar Corporation Clewiston Boiler No. 4

Unit	Boiler Type	Date	Steam Rate (lb/hr)	Heat Input (MMBtu/hr)	Bagasse Firing Rate (a) (TPH wet)	PM Emissions (lb/MMBtu)	PM Emissions Compliance Test Average (lb/MMBtu)	Visible Emission Test Results(b) (% opacity)	CO Emissions			CO Emissions Compliance Test Average (lb/MMBtu)
									lb/hr	lb/MMBtu	lb/ton,wet	
Boiler 4	Traveling Gate	02/20/90	308,636	691.7	96.07	0.132	0.122	—	1,940	2.79	20.19	2.75
Boiler 4	Traveling Gate	02/20/90	306,666	690.3	95.88	0.130			1,520	2.24	15.85	
Boiler 4	Traveling Gate	02/20/90	310,298	698.8	97.06	0.103			2,240	3.23	23.08	
Boiler 4	Traveling Gate	02/22/91	300,000	647.9	89.99	0.124	0.131	15.00	4,900	7.56	54.45	11.23
Boiler 4	Traveling Gate	02/22/91	293,382	634.2	88.08	0.131			9,450	14.90	107.28	
Boiler 4	Traveling Gate	02/22/91	293,382	634.2	88.08	0.137						
Boiler 4	Traveling Gate	01/09/92	302,055	630.0	87.50	0.093	0.096	14.79	2,770	4.40	31.66	4.40
Boiler 4	Traveling Gate	01/09/92	295,135	615.8	85.53	0.128			2,710	4.40	31.69	
Boiler 4	Traveling Gate	01/09/92	295,135	615.8	85.53	0.066						
Boiler 4	Traveling Gate	02/04/93	295,135	635.3	88.24	0.124	0.122	18.96	4,310	6.78	48.85	7.64
Boiler 4	Traveling Gate	02/04/93	286,662	616.4	85.61	0.141			5,630	9.13	65.76	
Boiler 4	Traveling Gate	02/04/93	294,000	633.9	88.04	0.101			4,440	7.01	50.43	
Boiler 4	Traveling Gate	02/23/94	283,043	616.9	85.68	0.152	0.133	5.21	2,460	3.99	28.71	5.48
Boiler 4	Traveling Gate	02/23/94	290,769	633.1	87.93	0.116			3,840	6.07	43.67	
Boiler 4	Traveling Gate	02/23/94	284,308	618.0	85.83	0.132			3,950	6.39	46.02	
Boiler 4	Traveling Gate	12/30/94	288,750	626.8	87.06	0.142	0.125	15.00	4,890	7.81	56.17	6.55
Boiler 4	Traveling Gate	12/30/94	280,986	609.4	84.64	0.115			3,250	5.33	38.40	
Boiler 4	Traveling Gate	12/30/94	281,918	614.3	85.32	0.119			4,000	6.51	46.88	
					Ma	0.152	0.133	18.96	Max. =	14.90		11.23
					Avg	0.121	0.121	11.49	Avg. =	6.16		6.34
					Min	0.066	0.096	5.21	Min. =	2.24		2.75

Note: lb/hr = pounds per hour.
 lb/MMBtu = pounds per million British thermal units.
 lb/ton = pounds per ton.
 MMBtu/hr = million British thermal units per hour.
 NA = not available.
 TPH = tons per hour.

(a) Calculated from reported heat input rate, assumed 3,600 Btu/lb average heat content for wet bagasse.

(b) Average opacity for highest 6-minute period

ATTACHMENT A

17. Emissions of carbon monoxide and volatile organic compounds shall be maintained at the lowest possible level through the implementation of an Operation and Maintenance plan that is approved by the Department's Bureau of Air Regulation (BAR). The permittee shall update and resubmit the Operation and Maintenance plan for Boiler No. 4 with detailed information on minimizing carbon monoxide emissions prior to June 1, 1996. The Department will incorporate the plan into the air operation permit for this facility. Emissions of carbon monoxide (1-hour average) shall be minimized through Good Combustion Practice (GCP) and shall not exceed 6.5 lb/MMBtu, 5,502 lb/hr and 8,818 tons during any calendar year. ~~During the 1995-1996 sugar cane season, the permittee shall conduct a minimum of three tests for CO on this unit using EPA Method 10 (Rule 62-297.401(10), F.A.C.), while employing GCP as described in the Operation and Maintenance plan. The Department may revise the carbon monoxide emission standard and the permit if the tests show lower carbon monoxide emissions can be achieved by this boiler.~~ Emissions of volatile organic compounds shall not exceed 1.7 lb/ton of wet bagasse as determined by EPA Method 25 or 25A in conjunction with EPA Method 18. These test methods are described in 40 CFR 60, Appendix A. Compliance tests for these pollutants will not be required if the visible emissions from Boiler No. 4 are below 20 percent opacity and acceptable emission factors have been established for this pollutant.

21. Compliance tests for all emission standards listed in Specific Conditions No. 14, 15, and 17 for Boiler No. 4 shall be conducted once each Federal fiscal year and reported to the Department's South District office within 45 days of completion of the last test run. ~~During the 1995-1996 sugar cane season, the permittee shall make a minimum of three tests for carbon monoxide on Boiler No. 4 using EPA Method 10 (Rule 62-297.401(10), F.A.C.), while employing GCP as described in the Operation and Maintenance plan. The Department shall revise the carbon monoxide emission standard and this permit if the tests show lower carbon monoxide emissions can be achieved by this boiler.~~

BRYAN CAVE LLP

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IRVINE, CALIFORNIA

LONDON, ENGLAND
FRANKFURT AM MAIN, GERMANY
RIYADH, SAUDI ARABIA
KUWAIT CITY, KUWAIT
DUBAI, UNITED ARAB EMIRATES
HONG KONG
AFFILIATED OFFICE IN BEIJING

PETER H. OPPENHEIMER
DIRECT DIAL NUMBER
(202) 508-6067

October 10, 1995

VIA FEDERAL EXPRESS

Virginia B. Wetherell, Secretary
c/o Office of General Counsel
Florida Department of Environmental
Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

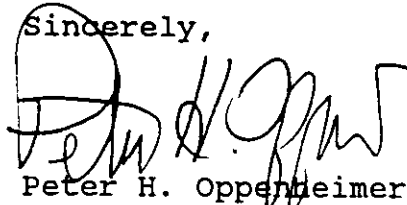
RECEIVED
OCT 14 1995
BUREAU OF
AIR REGULATION

Re: U.S. Sugar Corporation
Clewiston Boiler No. 4
DEP File No. AC 26-248809
Hendry County

Dear Secretary Wetherell:

Enclosed for filing in conjunction with the above-referenced case is a Request for Extension of Time in which to File Petition For Hearing.

Sincerely,



Peter H. Oppenheimer

Enclosures

cc: Kenneth J. Plante, Esq., General Counsel, DEP
Jefferson M. Braswell, Esq., Assistant General Counsel, DEP
Al Linero, DEP, Tallahassee
David Knowles, DEP, Fort Myers Office
Jewell Harper, U.S. EPA Region IV
John Bunyak, National Park Service
Peter B. Briggs, U.S. Sugar Corporation
Don Griffin, U.S. Sugar Corporation
David A. Buff, P.E., KBN

0116259.02

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

U.S. SUGAR CORPORATION
CLEWISTON MILL BOILER NO. 4,
DEP File No. AC 26-248809 (PSD-FL-217)
Hendry County

Petitioner,

vs.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**REQUEST FOR SECOND EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

On August 11, 1995, U.S. Sugar Corporation (U.S. Sugar) received by certified mail the Department of Environmental Protection's "NOTICE OF PERMIT" for Clewiston Mill Boiler No. 4, DEP File No. AC 26-248809.

On August 17, 1995, U.S. Sugar filed, and the Department subsequently granted, a request for an extension of time to and including October 13, 1995 in which to file a petition for administrative hearing.

Counsel for the Petitioner is writing to request a second extension of time to and including Friday, January 12, 1996 in which to file a petition for administrative proceeding regarding the construction permit modification. This request is made pursuant to Rule 62-103.070, F.A.C. As good cause for

granting the requested extension of time for filing, U.S. Sugar would show the following:

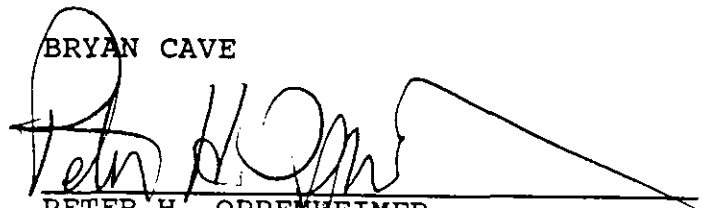
1. U.S. Sugar has been working with the Department to resolve its concerns regarding the CO testing requirement for the 1995-1996 sugar cane season imposed by specific conditions 17 and 21 and the provision for adjustment of the CO emission level. Having made a BACT determination, the Department may not reserve the authority to adjust the CO limit of 6.5 lbs/MMBtu established by that BACT determination (dated July 27, 1995).
2. It is important that specific condition 12 reflect its intent and function as an SO₂ emissions limitation, and correspondingly be amended to reflect the excess emissions language contained in Rule 62-210.700, F.A.C. U.S. Sugar and the Department have not yet reached an understanding on this point.
3. This extension will terminate as soon as these issues are resolved to the mutual satisfaction of the Department and U.S. Sugar.
4. This request is filed as a protective measure to avoid waiver of U.S. Sugar's rights to challenge or request an administrative hearing on any provision of the proposed permit. Grant of this request will allow the parties the opportunity to discuss and resolve these issues so that the Department can then issue a final amended construction permit modification that achieves

a mutually acceptable resolution of U.S. Sugar's concerns without the need for initiation of formal administrative proceedings.

We advised the Department's assistant general counsel, Jefferson M. Braswell, Esq., of this request on October 10, 1995. Accordingly, Counsel for the Petitioner respectfully requests that an extension of time be granted for the filing of a petition for administrative proceedings in regard of the Department's "NOTICE OF PERMIT" for Clewiston Mill Boiler No. 4, DEP File No. AC 26-248809, to and including Friday, January 12, 1996.

If the requested extension of time is not granted for any reason, then this pleading shall constitute a petition filed pursuant to Rule 62-103.155, F.A.C. for an administrative hearing on specific permit conditions numbers 12, 17 and 21 of the construction permit modification for Clewiston Mill Boiler No. 4.

BRYAN CAVE



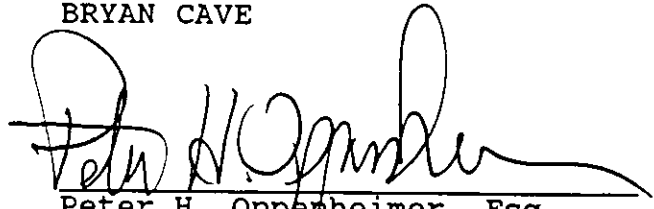
PETER H. OPPENHEIMER
COUNSEL FOR U.S. SUGAR CORPORATION

700 13th Street, N.W., Suite 700
Washington, D.C. 20005-3960
Telephone: (202) 508-6067

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Federal Express overnight delivery to Jefferson M. Braswell, Esquire, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, on this 10 day of October, 1995.

BRYAN CAVE



Peter H. Oppenheimer, Esq.

BRYAN CAVE LLP

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HONG KONG
AFFILIATED OFFICE IN BEIJING

RECEIVED
SEP 25 1995

Bureau of
Air Regulation

ROBERT F. VAN VOORHEES
DIRECT DIAL NUMBER
(202) 508-6014

September 20, 1995

BY FEDERAL EXPRESS

Mr. Jefferson Braswell
Florida Department of Env. Protection
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, FL 32399-2400

Re: DEP File No. AC 26-248809/PSD-FL-217
PSD Construction Permit Modification
Clewiston Boiler No. 4
U.S. Sugar Corporation

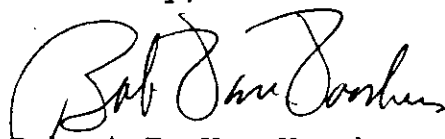
Dear Mr. Braswell:

Enclosed is a copy of a letter, dated September 15, 1995, from U.S. Sugar Corporation's environmental consultant, KBN Engineering, to the Department's Mr. Willard Hanks, requesting a number of minor technical amendments to the Clewiston Boiler 4 Construction Permit Modification.

If convenient, we request that these proposed technical amendments be reviewed in conjunction with the administrative procedure initiated by our letter to the Department, dated August 31, 1995, seeking to resolve a number of legal concerns regarding the above-referenced Permit.

Please call me or Mr. David Buff of KBN Engineering (800/333-4526) if you have any questions about the proposed technical amendments or if you need any additional information. Thank you for your assistance.

Sincerely,


Robert F. Van Voorhees

Enclosure

BRYAN CAVE LLP

Mr. Jefferson Braswell
September 20, 1995
Page 2

cc: A. A. Linero, DEP
Willard Hanks, DEP
David Knowles, DEP South District
Peter Briggs, U.S. Sugar
Don Griffin, U.S. Sugar
David Buff, KBN

0118951.01

cc: NPS
EPA
a. Linero
S. Arif



September 15, 1995

Mr. Willard Hanks
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
SEP 19 1995
Bureau of
Air Regulation

Re: United States Sugar Corporation- Clewiston Boiler No. 4
AC26-248809; PSD-FL-217

Dear Mr. Hanks:

The Florida Department of Environmental Protection (FDEP) issued a final determination and prevention of significant deterioration (PSD) construction permit modification to U.S. Sugar Corporation for Boiler No. 4 on August 9, 1995. On behalf of U.S. Sugar Corporation, I am requesting several minor technical amendments to the construction permit modification. The requested amendments are as follows:

Specific Condition 5

In the table of operating parameters, under the column titled "Avg. time", the "Max." averaging time is not specified. Since this could be construed to be an instantaneous limit, it is requested that the "***" footnote be added to the column title, to clarify that this is the limit for a 1-hour averaging time. This was noted in the previous Boiler No. 4 permit (AC26-126965).

Specific Condition 17

Specific Condition 17 specifies that compliance tests for volatile organic compounds (VOC) will not be required if the visible emissions from Boiler No. 4 are less than 20 percent and acceptable emission factors have been established for VOC. U.S. Sugar conducted a VOC stack test on Boiler No. 4 in 1985, under its original construction permit. The VOC emissions from burning bagasse averaged 1.32 lb/ton wet bagasse during the test. The test result is below the current allowable limit of 1.7 lb/ton of wet bagasse. Therefore, this previous testing demonstrates the acceptability of the permitted emission factor for VOC, and additional testing should not be required. The 1985 stack test results are attached.

Specific Condition 24

This condition provides that the particulate matter (PM) compliance tests be calculated by utilizing the "F" factor, unless the permittee has provided a report demonstrating that an F factor is not valid for a bagasse boiler. In 1985, the sugar industry conducted a study concerning the F factor. The study was submitted to FDEP in 1986. This study found that the F factor was highly variable for bagasse, due to the variability of the fuel, and this variability precluded the establishment of an F factor for bagasse. A table from this report (Table 3-5), which summarizes the F factor result for 155 individual samples, is attached. As shown, the F factor (FD) ranged from 8,442 to 9,889 dscf/MMBtu. This data demonstrates that a single F factor could not be established for bagasse fuel.

KBN ENGINEERING AND APPLIED SCIENCES, INC.

15006A/6

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Suite 500
Gainesville, Florida 32653-1500
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5405 West Cypress Street,
Suite 215
Tampa, Florida 33607
813-287-1717 FAX 813-287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, Florida 33487
407-994-9910
FAX 407-994-9393

7785 Baymeadows Way,
Suite 105
Jacksonville, Florida 32256
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1616 'P' Street N.W., Suite 450
Washington, D.C. 20036
202-462-1100
FAX 202-462-2270



In addition to the above amendment requests, we wish to clarify with FDEP that compliance testing for SO₂ is not required under the modified permit. Specific Condition 16 contains emission limits for SO₂, as well as the test methods and reporting requirements for any SO₂ compliance tests. However, Specific Condition 21 does not require SO₂ compliance tests. We believe that additional compliance testing for SO₂ is not necessary, in view of the low emission limit, and since compliance with the SO₂ limit has been previously demonstrated. U.S. Sugar conducted an SO₂ stack test in 1985 under its original construction permit (AC26-80930). The SO₂ emissions from burning bagasse averaged 0.0016 lb/MMBtu during the test (see attached test data). The test result is a factor of 100 below the allowable limit of 0.166 lb/MMBtu.

Please consider this amendment request and call if you have any questions. Thank you for your cooperation in this matter.

Sincerely,

David A. Buff

David A. Buff, P.E.
Florida Registration 19011

SEAL

DAB/lcb

cc: Don Griffin
Peter Briggs
Bob Van Vorhees
David Knowles
File (2)

cc: W. Hanks, BAR
EPA
NPS
D. Buff, KBN
A. Linero, BAR

DESCRIPTIVE STATISTICS OF ULTIMATE ANALYSIS OF BAGASSE
 UNITS: ALL IN % EXCEPT BTU AND FD (DSCF/MILLION BTU)

PROCESSING SEASON	VARIABLE	MEAN	STANDARD DEVIATION	NUMBER OF OBSERVATIONS	MINIMUM VALUE	MAXIMUM VALUE
1978/79	ASH	1.08	0.937	56	0.20	5.40
	BTU	8133.21	147.526	56	7520.00	8365.00
	O2	44.13	0.810	56	41.88	47.18
	S	0.15	0.075	56	0.03	0.40
	N2	0.31	0.054	56	0.10	0.43
	H2	5.99	0.117	56	5.60	6.30
	FD	9297.45	183.272	56	8442.00	9664.00
	C	48.34	0.725	56	46.00	49.60
1984/85	ASH	1.71	1.387	67	0.65	8.58
	BTU	8187.51	113.827	67	7775.00	8585.00
	O2	43.32	1.066	67	37.45	44.67
	S	0.06	0.053	67	0.01	0.28
	N2	0.34	0.120	67	0.06	0.93
	H2	6.00	0.111	67	5.50	6.16
	FD	9321.21	120.907	67	8885.00	9516.00
	C	48.56	0.553	67	46.48	49.26
1985/86	ASH	1.49	0.742	32	0.66	3.82
	BTU	8093.39	172.536	32	7635.00	8345.00
	O2	43.52	0.577	32	42.55	44.76
	S	0.09	0.092	32	0.01	0.37
	N2	0.32	0.033	32	0.28	0.39
	H2	6.04	0.156	32	5.60	6.40
	FD	9433.19	214.515	32	8802.00	9889.00
	C	48.54	0.487	32	47.40	49.30
TOTAL	ASH	1.44	1.153	155	0.20	8.58
	BTU	8148.46	143.862	155	7520.00	8585.00
	O2	43.65	0.961	155	37.45	47.18
	S	0.10	0.080	155	0.01	0.40
	N2	0.33	0.087	155	0.06	0.93
	H2	6.01	0.124	155	5.50	6.40
	FD	9335.74	173.558	155	8442.00	9889.00
	C	48.48	0.614	155	46.00	49.60

Table 3-5. Descriptive Statistics of Ultimate Analysis of Bagasse.



UNITED STATES SUGAR CORPORATION

BOILER No. 4 - CLEWISTON

STACK TESTS FOR PARTICULATE, SO₂, NO_x, CO AND VOC EMISSIONS

REPORT 859-S

DECEMBER 23, 1985

INTRODUCTION

The United States Sugar Corporation operates a raw sugar mill located near the intersection of W.C. Owens Avenue and Clewiston Street in Clewiston, Hendry County, Florida.

On December 23, 1985, tests for Carbon Monoxide, Oxides of Nitrogen, Particulate, Sulfur Dioxide and Total Gaseous Nonmethane Organic Emissions were performed on the exhaust stack servicing Boiler No. 4.

The tests were performed in order to comply with permit operating conditions set forth in Florida Department of Environmental Regulation Permit No. AC26-80930, and to determine compliance with Chapter 17-02 of the Florida Administrative Code.

A visible emission test was not performed because the plume from Boiler No. 4 was intermingled with the plumes from surrounding boilers, an accurate reading was not possible.

During the testing period, records of the boiler data were maintained by plant personnel, and are presented in the Appendix.

The tests were observed by Mr. Mirza Baig of the Florida Department of Environmental Regulation, Fort Myers office.

The results of these tests verify compliance with the Florida Department of Environmental Regulation Permit No. AC26-80930 and Chapter 17-02 of the Florida Administrative Code.

SOUTH FLORIDA ENVIRONMENTAL SERVICES, INC.

STACK TESTS FOR PARTICULATE, SO₂, NO_X, CO, AND VOC EMISSIONS

United States Sugar Corporation
Post Office Drawer 1207
Clewiston, Florida 33440

Clewiston Mill

Type Process - Sugar Manufacturing

Boiler No. 4

Abatement Device - Turbulaire Impingement Scrubber

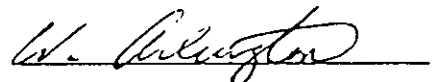
Compliance Stack Test

Report 859-S

December 23, 1985

All testing and analysis was performed in accordance with the Florida Department of Environmental Regulation, Florida Administrative Code, Chapter 17-2.

I hereby certify that to my knowledge all data submitted in this report is true and correct.



William D. Arlington
Project Director

SUMMARY OF RESULTS
 UNITED STATES SUGAR CORPORATION
 BOILER NO. 4 - CLEWISTON

PARTICULATE

RUN	EMISSIONS LBS./HR.	ALLOWABLE LBS./HR.	EMISSIONS LBS./MM BTU	ALLOWABLE LBS./MM BTU	EMISSIONS F-FACTOR	LB./MM BTU BY ASME EFFICIENCY
1	71.36	94.21	.127	.150	.1605	.141
2	94.76	84.40	.151	.150	.1837	.163
3	87.86	79.85	.165	.150	.1919	.184
AVERAGE	81.33	82.82	.148	.150	.1787	.164

MMBTU/Kg
 561.40
 563.67
 532.33
 552.47

SULFUR DIOXIDE

RUN	ACTUAL EMISSIONS LBS./MM BTU	ALLOWABLE RATE LBS./MM BTU	EMISSIONS F-FACTOR LB/MM BTU	LB/MM BTU BY ASME EFFICIENCY
1	.0022	.25	.00234	.00250
2	.0014	.25	.00179	.00164
3	.0014	.25	.00181	.00173
AVERAGE	.0016	.25	.00215	.00196

OXIDES OF NITROGEN

RUN	ACTUAL EMISSIONS LBS./HR.	ALLOWABLE RATE LBS./HR.
1	92.92	135.8
2	70.41	136.8
3	53.17	136.8
AVERAGE	73.83	135.8

Because of the
 (4/2/78) *
 80.21
 80.45
 70.85

CARBON MONOXIDE

RUN	ACTUAL EMISSIONS	ALLOWABLE RATE LB./MM BTU
1	0	.25
2	0	.25
3	0	.25
AVERAGE	0	.25

VOLATILE ORGANIC COMPOUNDS

RUN	ACTUAL EMISSIONS LB./TON WET BAGASSE	ALLOWABLE RATE LB./TON WET BAGASSE
1	1.37	1.7
2	.93	1.7
3	1.66	1.7
AVERAGE	1.32	1.7

BRYAN CAVE LLP

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PETER H. OPPENHEIMER
DIRECT DIAL NUMBER
(202) 508-6067

August 17, 1995

VIA FEDERAL EXPRESS

Virginia B. Wetherell, Secretary
c/o Office of General Counsel
Florida Department of Environmental
Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

AUG 21 1995

Bureau of
Air Regulation

Re: U.S. Sugar Corporation
Clewiston Boiler No. 4
DEP File No. AC 26-248809
Hendry County

Dear Secretary Wetherell:

Enclosed for filing in conjunction with the above-referenced case is a Request for Extension of Time in which to File Petition For Hearing.

Sincerely,



Peter H. Oppenheimer

Enclosures

cc: Kenneth J. Plante, Esq., General Counsel, DEP
Jefferson M. Braswell, Esq., Assistant General Counsel, DEP
Al Linero, DEP, Tallahassee
David Knowles, DEP, Fort Myers Office
Jewell Harper, U.S. EPA Region IV
John Bunyak, National Park Service
Peter B. Briggs, U.S. Sugar Corporation
Don Griffin, U.S. Sugar Corporation
David A. Buff, P.E., KBN

0116259.01

cc: W. Hanks
A. Linero

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

U.S. SUGAR CORPORATION
CLEWISTON MILL BOILER NO. 4,
DEP File No. AC 26-248809 (PSD-FL-217)
Hendry County

Petitioner,

vs.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

**REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

On August 11, 1995, U.S. Sugar Corporation (U.S. Sugar) received by certified mail the Department of Environmental Protection's "NOTICE OF PERMIT" for Clewiston Mill Boiler No. 4, DEP File No. AC 26-248809.

Counsel for the Petitioner is writing to request an extension of time to and including Friday, October 13, 1995 in which to file a petition for administrative proceeding regarding the construction permit modification. This request is made pursuant to Florida Administrative Code Rule 62-103.070. As good cause for granting the requested extension of time for filing, U.S. Sugar would show the following:

1. U.S. Sugar has been working with the Department to resolve its concerns regarding the CO testing requirement for the 1995-1996 sugar cane season imposed

by specific conditions 17 and 21 and the provision for adjustment of the CO emission level. Having made a BACT determination, the Department may not reserve the authority to adjust the CO limit of 6.5 lbs/MMBtu established by that BACT determination (dated July 27, 1995).


2. It is important that specific condition 12 reflect its intent and function as an SO₂ emissions limitation, and correspondingly be amended to reflect the excess emissions language contained in Rule 62-210.700, F.A.C. U.S. Sugar and the Department have not yet reached an understanding on this point.
3. As this seasonally-operated boiler will not resume operation until mid-October, grant of this extension will have no impact on ambient air quality.
4. This request is filed as a protective measure to avoid waiver of U.S. Sugar's rights to challenge or request an administrative hearing on any provision of the proposed permit. Grant of this request will allow the parties the opportunity to discuss and resolve these issues so that the Department can then issue a final amended construction permit modification that achieves a mutually acceptable resolution of U.S. Sugar's concerns without the need for initiation of formal administrative proceedings.

We advised the Department's assistant general counsel, Jefferson M. Braswell, Esq., of this request on August 14, 1995.

Accordingly, Counsel for the Petitioner respectfully requests that an extension of time be granted for the filing of a petition for administrative proceedings in regard of the Department's "NOTICE OF PERMIT" for Clewiston Mill Boiler No. 4, DEP File No. AC 26-248809, to and including Friday, October 13, 1995.

If the requested extension of time is not granted for any reason, then this pleading shall constitute a petition filed pursuant to Florida Administrative Code Rule 62-103.155 for an administrative hearing on specific permit conditions numbers 12, 17 and 21 of the construction permit modification for Clewiston Mill Boiler No. 4.

BRYAN CAVE




ROBERT F. VAN VOORHEES
PETER H. OPPENHEIMER
COUNSEL FOR U.S. SUGAR CORPORATION

700 13th Street, N.W., Suite 700
Washington, D.C. 20005-3960
Telephone: (202) 508-6067

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Federal Express overnight delivery to Jefferson M. Braswell, Esquire, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, on this 17 day of August, 1995.

BRYAN CAVE



Peter H. Oppenheimer, Esq.