UNITED STATES SUGAR CORPORATION
Post Office Drawer 1207 Clewiston, Florida 33440
Telephone: (813) 983-8121 Telex: 510-952-7753

June 27, 1994

John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fl. 32399-2400

RE: Hendry County AP - Clewiston Mill Boiler No. 4
DEP File No. AO26-223258

Dear Mr. Brown:

This letter provides responses of the United States Sugar Corporation (U. S. Sugar) to the Department's April 26, 1994 request for additional information relating to the pending application for a modification of the PSD permit for Clewiston Boiler No. 4.

Answers to the Department's questions are as follows:

1. *[Please provide] The PSD application processing fee of $7,500 and seven additional copies of the Application. You may credit your previously submitted $250. to the application fee.*

RESPONSE TO QUESTION 1:

Enclosed is a check in the amount of $7,250 and seven additional copies of the application to modify the PSD permit for Clewiston Boiler No. 4. (Attachments A and B).

2. *[Please provide] A Best Available Control Technology determination. The "top-down" determination should include the use of oxidation catalyst, modification of the fuel/combustion air fuel system, and any other equipment or method that has the potential to significantly reduce the CO emissions.*

RESPONSE TO QUESTION 2:

Enclosed is a Best Available Control Technology (BACT) determination prepared by David Buff, P.E. of KBN Engineering and Applied Sciences, Inc. (Attachment C). The "top-down" determination evaluates the use of combustion controls, catalytic oxidation and flue gas recirculation, and selects good combustion practices as BACT to control CO emissions.

3. *[Please provide] The PSD modeling analysis for CO. The estimated CO emissions, based on your tests, from the bagasse boilers at the sugar mills shall be used in this analysis. Modeling is needed to insure that this large emissions increase of CO by the industry will not cause an exceedance of the ambient air quality standards of 10,000 ug/m3 (8 hr. avg.) or 40,000 ug/m3 (1 hr. avg.).*

RESPONSE TO ITEM 3:

The requested PSD modeling analysis for CO was conducted as part of the modeling for the proposed Clewiston Boiler No. 7, and was submitted to the Department on April 7, 1994 as an attachment to the application for modification of Clewiston Boiler No. 4's PSD permit. It has been our understanding that this modeling would satisfy the Department's information request because it includes modeling for Clewiston Boiler No. 4 at the proposed CO emissions level of 9.0 lbs/MMBtu. We have reviewed this modeling in light of our further discussions with the Department and are still satisfied that it provides the information necessary for the Department's review and approval of the PSD permit modification application.

These responses should provide all of the remaining information necessary to complete your review and approval of the PSD permit modification application for Clewiston Boiler No. 4.

Sincerely,

UNITED STATES SUGAR CORPORATION

Murray T. Brinson

Murray T. Brinson
Vice President
Sugar Processing

MTB:jt
Enclosures

cc: David Knowles, FDEP, Ft. Myers
Jeff Koerner, FDEP, Tallahassee
Gary Maier, FDEP, Ft. Myers
Teresa Heron, FDEP, Tallahassee
David Buff, KBN Engineering
Robert F. Van Voorhees, Esq., Bryan Cave
Peter Briggs, USSC
Peter Barquin, USSC
Donald Griffin, USSC

EVALUATION OF ALTERNATIVE CO CONTROL TECHNOLOGIES FOR U.S. SUGAR CORPORATION CLEWISTON BOILER NO. 4

BACKGROUND

U.S. Sugar Corporation received a state construction permit and federal prevention of significant deterioration (PSD) construction permit for Boiler No. 4 in 1985. This permit included an emission limit for carbon monoxide (CO) of 0.25 pounds per million British thermal units (lb/MMBtu) heat input. This emission limit was based on the U.S. Environmental Protection Agency (EPA) emission factor for bagasse combustion of 2 pounds per ton (lb/ton) contained in the publication "AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants." This factor of 2 lb/ton today remains listed in the latest version of this document (reference attached copy).

With the requirement for using EPA Method 10 incorporated into the Boiler No. 4 permit, the original basis for the CO emission limit was determined to be invalid. The actual CO emissions from bagasse-fired boilers, based on EPA Method 10, have been found to vary widely, ranging from approximately 3 lb/MMBtu up to 10 lb/MMBtu.

Since this finding, several other companies have requested modifications of their existing PSD permits to allow for a more appropriate CO emission limit. CO emission limits within the range of 3 to 10 lb/MMBtu have been approved by FDEP in these instances. Osceola Farms received revised limits for Boilers 3 and 6 in 1988. The limits for both boilers was initially revised to 4.8 lb/MMBtu, but after further testing the Boiler 3 limit was revised to 3.5 lb/MMBtu, and Boiler 6 was revised to 6.5 lb/MMBtu. Atlantic Sugar received revised CO limits for Boiler 5 in 1992. The limit was revised from 0.27 lb/MMBtu to 6.5 lb/MMBtu. In each of these cases, the control technology of good combustion practices was determined to be BACT.

The revised CO emission limit proposed for Boiler No. 4 is 9.0 lb/MMBtu heat input and is based on a maximum CO emission rate developed from statistical analysis of actual test data using EPA Method 10. These data are presented in Table 1, and are also presented graphically in a frequency distribution plot in Figure 1. The proposed maximum emission rate is based on a

potential frequency of exceedance of about 15 percent, based upon a compliance test average emission rate (i.e., the average of three individual test runs).

It is noted that the average CO emissions, as reflected in Table 1, are considerably lower than the proposed CO emission limit. The average CO emissions based on the average of all test data for Boiler No. 4 is approximately 6.7 lb/MMBtu.

Good combustion techniques are proposed as the control technology to achieve this emission limit. Presented below is a discussion of alternative control techniques which could potentially result in lower CO emissions.

EMISSION CONTROL HIERARCHY

Emission control techniques available for bagasse boilers consist of combustion controls, flue gas recirculation (FGR), and catalytic oxidation. Each of these control techniques are described below.

CO emissions are a result of incomplete combustion of carbon in the fuel. Historically, combustion control has been used exclusively for controlling CO emissions from bagasse boilers. While good combustion practices can reduce CO formation, the variable nature of bagasse fuel, coupled with the high moisture content (average of 50% moisture), results in certain limitations in controlling CO emissions through combustion practices. The fuel characteristics and the combustion practices result in CO emissions that are high relative to fossil-fuel fired boilers. This is shown by the variability in the test data for Boiler No. 4, which range from 3.2 to 17.5 lb/MMBtu, with an average emission rate of 6.7 lb/MMBTU.

Flue gas recirculation (FGR) is an NO_x control technique where a portion of the flue gas is recirculated back to the combustion zone. FGR has not been used to control CO emissions from bagasse-fired boilers. This is because CO controls have not been identified as necessary for bagasse boilers, even for new boilers which have undergone PSD review, and the severe operating and economic impacts that would result from use of FGR.

Catalytic oxidation has been used to reduce CO emissions primarily from natural gas fired boilers and gas-fired combustion turbines. This is a post-combustion control that has been employed in

CO nonattainment areas where regulations require the installation of lowest achievable emission rate (LAER). Catalytic oxidation has not been applied to bagasse fired boilers.

TECHNOLOGY DESCRIPTION

1) Combustion Controls

Combustion controls involve operating the boiler within the manufacturer's specifications and may include the control of excess air, fuel firing rate, and furnace temperature. U.S. Sugar operators are trained to operate Boiler No. 4 within the design parameters and document this operation in a boiler log.

Of the combustion modification techniques, only overfire air is currently used for bagasse boilers, and is integral to the design of the boilers. This technology is one of the likely reasons for the relatively low NO_x and VOC emissions exhibited from these boilers (in the range of 0.2 to 0.3 lb/MMBtu). In general, the boilers are already operated using the optimum amount of overfire air possible to promote complete combustion. Additional overfire air would not likely reduce CO emissions significantly from current levels.

2) Flue Gas Recirculation

FGR involves recycling a portion of the flue gas back into the primary combustion zone of the boiler. A portion of the CO in the flue gas could theoretically be combusted as long as the flue gases were injected into a temperature zone that would promote CO combustion. On oil and gas-fired boilers, 15 to 20 percent of the flue gas can be recirculated, based on flame stability considerations. The CO reduction achievable is in the range of 15 to 20 percent.

However, FGR has not been employed as a CO control technique for boilers in general, nor for bagasse-fired boilers specifically. In regards to bagasse boilers, the amount of flue gases that could be successfully recirculated is not known, nor is the CO emission reduction known. The extremely high particulate loading in the combustion gases and the abrasive nature of the flyash would make FGR very unreliable by greatly increasing wear on the fans and ductwork. This would lead to increased maintenance costs. In addition, FGR would substantially affect the boiler efficiency by lowering fuel efficiency and increasing the required fan power. A reduction in steam production would result, which is not acceptable based on mill operational considerations (i.e., either sugar

production would have to be reduced, or additional boiler capacity installed to replace the lost steam due to FGR).

FGR is recognized as being appropriate for new boilers, but has not generally been used for retrofit applications, in part due to the difficulty in retrofit applications. Depending upon the configuration of the boiler and available space, retrofitting with FGR may be impractical. In addition, the cost of the duct work, fans, redesign and installation and operating costs would make this alternative uneconomical.

An economic analysis of FGR was presented in the U.S. Sugar Clewiston Boiler No. 7 permit application. This analysis showed that FGR would cost upwards of $900,000 in both capital and annual operating costs. The capital costs of a retrofit application are 1.5 times greater than a new installation. These economic impacts would be prohibitive, especially considering that the achievable CO reduction, if any, is not known.

3) Catalytic Oxidation

Catalytic oxidation involves the installation of a precious metal catalyst operating in a temperature range between 600 and 800°F in the boiler. CO emissions are reduced by allowing the unburned CO to react with O_2 at the catalyst surface. While combustion of CO starts at approximately 300°F, efficiencies above 90 percent are achieved when the catalyst is operated at temperatures above 600°F.

Oxidation catalysts are subject to contamination from a variety of sources including halogens, sulfur compounds, zinc, arsenic, lead, mercury and particulates. The presence of these contaminants in the flue gas stream will over time render the catalyst ineffective. The length of time that the catalyst remains effective depends upon the specific contaminants present and the concentration of the contaminants in the gas stream. The success of oxidation catalysts with natural gas firing is a direct result of the absence of contaminating materials in the combustion gases.

Flue gases from bagasse-fired units such as Boiler No. 4 contain substantial amounts of particulate matter (PM), some of which is relatively large (> 100 microns). Based upon the AP-42 emission factor for uncontrolled PM emissions from bagasse boilers (15.6 lb/ton), PM in the flue gas stream for Boiler No. 4 would be 1,576 lb/hr. This emission rate is a direct result of the fibrous nature of bagasse and variability of this fuel. Such a high particulate loading can de-activate catalyst sites

because of their size. In addition, a build up of such particles on the catalyst can cause excessive heat due to continued combustion and result in the catalyst being irreparably damaged. Accordingly, the use of catalytic oxidation is not deemed to be technically feasible for a bagasse boiler. Even if technically feasible, the installation of an oxidation catalyst would require retrofit, including duct work modifications and installation of soot blowers, and would incur considerable costs.

CONCLUSION

The evaluation of alternative CO control technologies for U. S. Sugar Corporation Boiler No. 4 demonstrates that combustion controls are the only feasible and economical methods for minimizing CO emissions from a bagasse-fired boiler. It should be noted that the requested emission limit reflects statistical uncertainty that must be accounted for when the method of compliance is an individual stack test. On average, the CO emissions will be approximately 30 percent lower than the proposed emission limit.

In requesting that the CO emission limit for Boiler No. 4 be revised, U.S. Sugar is not requesting any modification to the existing control technology or requirements. CO emissions will continue to be controlled to the extent possible by the implementation of good combustion practices.

All previous BACT determinations for CO emissions from bagasse boilers have been based upon the use of good combustion practices, rather than add-on control systems. This includes BACT determinations for CO issued in 1988 and 1992. U.S. Sugar's proposed technology is consistent with all previous determinations. To require add-on control technology or other costly alternatives would be unduly burdensome and unfair to U.S. Sugar.

In conclusion, good combustion practices are proposed as BACT for CO emissions for Clewiston Boiler No. 4 when firing bagasse or oil. Because of its ability to reduce both NO_x and VOC emissions, along with its success record in the sugar industry, overfire air, high excess air rates, and good combustion practices are proposed as BACT for CO emissions from Clewiston Boiler No. 4, with a maximum CO emission rate of 9.0 lb/MMBtu.

Table B1. 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 lb/hr	CO Emissions lb/MMBtu	CO Emissions lb/ton,wet	CO Emissions Compliance Average lb/MMBTU
U.S. Sugar - Clewiston									
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		
Boiler 4	Traveling Gate	02/18/91	288,358	622.8	86.50	2,430	3.90	28.09	3.78
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	
Boiler 4	Traveling Gate	02/19/91	290,769	627.9	87.21	4,430	7.05	50.80	5.43
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	
Boiler 4	Traveling Gate	02/22/91	300,000	647.9	89.99	4,900	7.56	54.45	11.23
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	
Boiler 4	Traveling Gate	01/09/91	302,055	630.0	87.50	2,770	4.40	31.66	4.40
Boiler 4	Traveling Gate	01/09/91	295,135	615.8	85.53	2,710	4.40	31.69	
Boiler 4	Traveling Gate	01/13/93					7.50		8.03
Boiler 4	Traveling Gate	01/13/93					8.59		
Boiler 4	Traveling Gate	01/13/93					7.99		
Boiler 4	Traveling Gate	01/14/93					15.00		11.48
Boiler 4	Traveling Gate	01/14/93					7.95		
Boiler 4	Traveling Gate	02/02/93					7.19		7.94
Boiler 4	Traveling Gate	02/02/93					6.71		
Boiler 4	Traveling Gate	02/02/93					9.92		
Boiler 4	Traveling Gate	02/04/93					6.78		7.64
Boiler 4	Traveling Gate	02/04/93					9.13		
Boiler 4	Traveling Gate	02/04/93					7.01		
Boiler 4	Traveling Gate	01/13/94		628.52			5.55		7.37
Boiler 4	Traveling Gate	01/13/94		614.06			5.26		
Boiler 4	Traveling Gate	01/13/94		615.24			11.31		
Boiler 4	Traveling Gate	01/14/94		639.11			5.18		9.59
Boiler 4	Traveling Gate	01/14/94		629.38			6.11		
Boiler 4	Traveling Gate	01/14/94		635.50			17.49		
Boiler 4	Traveling Gate	02/01/94		592.17			1.84		5.22
Boiler 4	Traveling Gate	02/01/94		595.17			8.59		
Boiler 4	Traveling Gate	02/07/94		587.52			4.65		7.53
Boiler 4	Traveling Gate	02/07/94		599.46			5.47		
Boiler 4	Traveling Gate	02/07/94		582.08			13.03		
Boiler 4	Traveling Gate	02/07/94		586.88			6.97		
Boiler 4	Traveling Gate	02/09/94		620.29			6.99		6.99
Boiler 4	Traveling Gate	02/11/94		622.97			5.78		4.43
Boiler 4	Traveling Gate	02/11/94		580.67			1.53		
Boiler 4	Traveling Gate	02/11/94		625.28			7.89		
Boiler 4	Traveling Gate	02/11/94		644.24			2.51		
Boiler 4	Traveling Gate	02/17/94		608.74			9.47		6.95
Boiler 4	Traveling Gate	02/17/94		584.52			4.86		

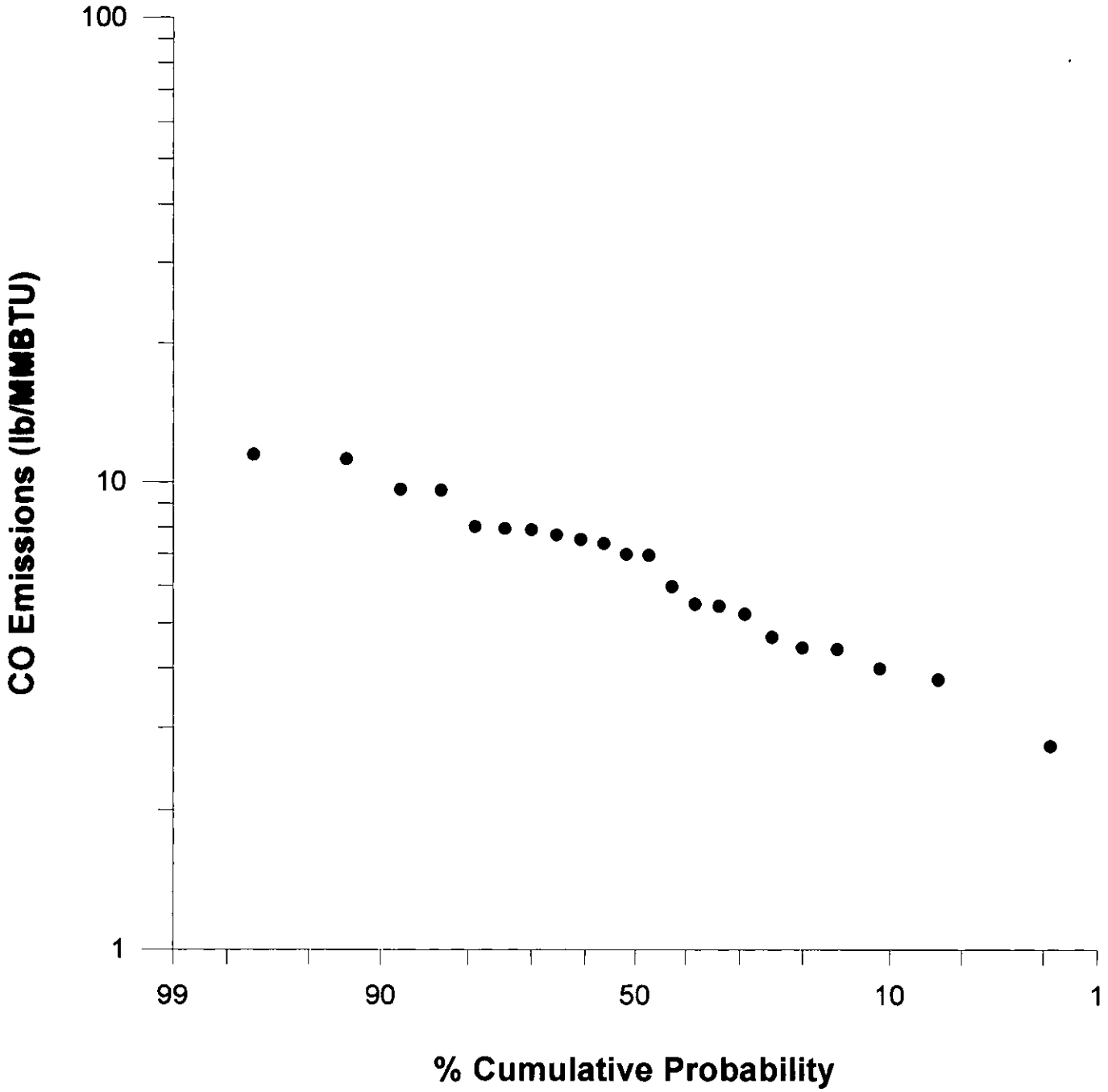
Boiler 4	Traveling Gate	02/17/94	623.65	6.68		
Boiler 4	Traveling Gate	02/17/94	631.71	6.78		
Boiler 4	Traveling Gate	02/22/94	625.33	7.48		7.70
Boiler 4	Traveling Gate	02/22/94	633.82	7.38		
Boiler 4	Traveling Gate	02/22/94	616.86	7.58		
Boiler 4	Traveling Gate	02/22/94	585.45	7.99		
Boiler 4	Traveling Gate	02/22/94	580.29	8.06		
Boiler 4	Traveling Gate	02/23/94	616.93	3.99		5.48
Boiler 4	Traveling Gate	02/23/94	633.14	6.07		
Boiler 4	Traveling Gate	02/23/94	617.98	6.39		
Boiler 4	Traveling Gate	03/04/94	636.45	3.02		3.99
Boiler 4	Traveling Gate	03/04/94	614.71	2.34		
Boiler 4	Traveling Gate	03/04/94	598.50	4.21		
Boiler 4	Traveling Gate	03/04/94	625.69	6.38		
			Max. =	17.49	107.28	11.48
			Avg. =	6.48	39.18	6.63

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.

USSCO#4.wk3
05/17/94

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

U.S. Sugar - Clewiston
Boiler No. 4



Florida Department of
Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

April 26, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Murray Brinson
Vice President, Sugar Processing
United States Sugar Corporation
Post Office Box 1207
Clewiston, Florida 33440

Dear Mr. Brinson:

Re: Boiler No. 4, CO emissions

The Department has received your April 7, 1994, letter requesting the allowable carbon monoxide emissions from boiler No. 4 at your Clewiston sugar mill be increased from 339.1 to 10,418 TPY. When your permit was issued, the Department accepted your carbon monoxide (CO) emission estimate of 0.25 lb/MMBtu (339.1 TPY) and it was incorporated as a standard in the Best Available Control Technology (BACT) determination and permits for boiler No. 4. Your Reference Method 10 test results confirm that the actual CO emissions are significantly greater than the standard. An increase in CO emissions of 100 TPY or more is subject to the Prevention of Significant Deterioration regulations. Therefore, the BACT and permits for this boiler must be modified to show additional air pollution control equipment and/or new CO emission standards. Additional information is needed before the Department can process your request. Please provide the following:

1. The PSD application processing fee of $7,500 and seven additional copies of the application. You may credit your previously submitted $250 to the application fee.

2. A Best Available Control Technology determination. The "top-down" determination should include the use of oxidation catalyst, modification of the fuel/combustion air fuel system, and any other equipment or method that has the potential to significantly reduce the CO emissions.

3. The PSD modeling analysis for CO. The estimated CO emissions, based on your tests, from the bagasse boilers at the sugar mills shall be used in this analysis. Modeling is needed to insure that this large emissions increase of CO by the industry will not cause an exceedance of the ambient air quality standards of 10,000 ug/m^3 (8 hr. avg.) or 40,000 ug/m^3 (1 hr. avg.).

The Department will resume processing your application after receipt of the requested information.

Sincerely,

John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

JCB/WH/bjb

cc: David Knowles, SD
Jeff Koerner, PBCHD

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- Complete items 3, and 4a & b.
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- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

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3. Article Addressed to:
Mr. Murray Brinson
Vice President, Sugar Processing
United States Sugar Corporation
Post Office Box 1207
Clewiston, Florida 33440

4a. Article Number
P 872 563 622

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

7. Date of Delivery
4-28-94

5. Signature (Addressee)

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

6. Signature (Agent)
J.P. Holleran

PS Form **3811**, December 1991 · ★U.S.GPO: 1992—323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 872 563 622

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PS Form **3800**, JUNE 1991

Florida Department of
Environmental Protection

Lawton Chiles
Governor

South District
2295 Victoria Avenue
Fort Myers, Florida 33901

Virginia B. Wetherell
Secretary

March 3, 1994

Mr. Murray T. Brinson
Vice President Sugar Processing
United States Sugar Corporation
Post Office Drawer 1207
Clewiston, FL 33440

FILE

Re: Hendry County -- AP
Clewiston Boiler No. 4
DEP File No. AO26-223258

Dear Mr. Brinson:

Thank you for meeting with the Department on several occasions to discuss the status of U.S. Sugar's pending application for an operation permit for Clewiston Boiler No. 4. As you may recall, U.S. Sugar (by letter dated December 15, 1992) requested the South District Office of the Department to increase the federally enforceable emission limit for carbon monoxide by approximately 16,800 tons per year. The South District (by letters dated January 12, 1993, and August 24, 1993) informed U.S. Sugar that it must apply, with the appropriate application fee, to the Bureau of Air Regulation in Tallahassee for an updated PSD permit to authorize the increase.

On the basis of a phone conversation with Ms. Teresa Heron of the Bureau of Air Regulation in Tallahassee, it is our understanding that U.S. Sugar has not yet filed an application for an updated PSD permit for Clewiston Boiler No. 4. The South District continues suspension of the processing of your operation permit application. Please provide us with the date that you expect to file an application for an updated PSD permit for Clewiston Boiler No. 4. We would appreciate receiving this information by March 31, 1994.

Thank you for your assistance in this matter. **If you have any questions regarding this letter, please contact Gary Maier at (813) 332-6975.**

Sincerely,

Ronald D. Blackburn
Acting Director of
District Management

RECEIVED
APR 04 1994
Bureau of
Air Regulation

RDB/GM/gm

cc: Robert F. Van Voorhees

BRYAN CAVE

700 THIRTEENTH STREET, N.W.
WASHINGTON, D.C. 20005-3960
(202) 508-6000
FACSIMILE: (202) 508-6200

ST. LOUIS, MISSOURI
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NEW YORK, NEW YORK
PHOENIX, ARIZONA
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IRVINE, CALIFORNIA
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RIYADH, SAUDI ARABIA
FRANKFURT AM MAIN, GERMANY

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

March 30, 1994

Ronald D. Blackburn
Acting Director of District Management
Florida Department of Environmental
Protection
South District
2295 Victoria Avenue
Fort Myers, FL 33901

Re: Hendry County - AP Clewiston Boiler No. 4
DEP File No. A026-223258

Dear Mr. Blackburn:

In response to your letter of March 3, 1994, I am writing to confirm that the United States Sugar Corporation ("U.S. Sugar") will be filing an application for modification of the PSD permit for Clewiston Boiler No. 4. The sole purpose of this modification application will be to seek an adjustment in the carbon monoxide emission factor in order to complete the process initiated by the Department and U.S. Sugar in 1989 to "determine a reasonable CO emission factor for boilers of this type."

In filing this modification application, U.S. Sugar will not be seeking to increase carbon monoxide emissions from its boiler, but simply to restate the emission level specified in the PSD permit to reflect accurately the actual emission levels resulting from implementation of the best available control technology as approved by the Department and EPA in the original PSD permit.

U.S. Sugar intends to file this application as soon as it is feasible to do so, which should be no later than April 8, 1994. Based on our discussions with the South District, it is our understanding that processing of the pending operation permit renewal application will be suspended until modification of the PSD permit for Clewiston Boiler No. 4 has been completed. Based on my discussions with Teresa Heron and Preston Lewis, we expect

that this PSD permit modification will be processed in conjunction with the pending permit application for Clewiston Boiler No. 7.

Please feel free to contact me if you have any questions about the status of the PSD modification application.

Sincerely,

Robert F. Van Voorhees

cc: Gary Maier
William H. Congdon
Teresa Heron
Murray T. Brinson
Peter B. Briggs
David A. Buff
Peter Kroll

72190.01