Golder Associates Inc.

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

February 18, 2003

0237615

Florida Department of Environmental Protection
Department of Air Resources Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Attention : Mr. Jeffery Koerner, P. E.

RE: United States Sugar Corporation (U.S. Sugar) – Clewiston Mill
Boiler No. 4 and Boiler No. 7 Fuel Oil Burning Increase
DEP Project No. 0510003-018-AC

Dear Mr. Koerner:

U. S. Sugar is in receipt of the Department's request for additional information (RAI) dated January 15, 2003, for the above referenced project. The following are responses to each of the Department's requests, each provided in the same order as they appear in the letter.

1.a. **Boiler No. 4**

The physical changes to Boiler No. 4 to implement the fuel oil burning change consist of the following:

1. Two (2) new multi-stage combustion low-NO_X burners, complete with flame scanner, fuel/steam valve train, steam-atomized center-fired oil gun and ignitor and flame proving rod.
2. Multi-burner windbox.
3. Fuel oil pump set.
4. Burner management system.

These components will replace the existing oil-firing system, which is more rudimentary (i.e., no burner management system).

The furnace volume for Boiler No. 4 is 21,245 cubic feet (ft^3), while the maximum heat input due to fuel oil will be 326.25 million British thermal units per hour (MMBtu/hr). Therefore, the heat release rate for fuel oil firing will be 15,357 Btu/hr-ft^3.

The fixed capital cost of installing the above components is approximately $400,000. As presented in Golder's recent letter to the Department regarding planned maintenance and repairs to the Clewiston boilers, the estimated cost of a comparable new boiler is $8 million. Reconstruction, as defined in 40 CFR 60.15, is triggered if the cost of the new components exceeds 50 percent of the fixed capital cost of a comparable new boiler. The planned project cost represents 5 percent of the cost of a new boiler. Therefore, reconstruction is not triggered under the New Source Performance Standards (NSPS).

1.b. **Boiler No. 7**

The physical changes to Boiler No. 7 to implement the fuel oil burning change consist of the following:

1. Modify the existing fuel oil burners to configure as multi-stage combustion low- NO_X burners, and modify the fuel/steam valve train to incorporate a constant differential pressure valve.
2. Replace the existing two fuel oil pumps.

These components will replace the existing components. No components will be added.

The furnace volume for Boiler No. 7 is 43,470 ft^3, while the maximum heat input due to fuel oil will be 326.25 MMBtu/hr. Therefore, the heat release rate for fuel oil firing will be 7,505 Btu/hr-ft^3.

The fixed capital cost of installing the above components is approximately $78,000. As presented in Golder's recent letter to the Department regarding planned maintenance and repairs to the Clewiston boilers, the estimated cost of a comparable new boiler is $8.5 million. Reconstruction, as defined in 40 CFR 60.15, is triggered if the cost of the new components exceeds 50 percent of the fixed capital cost of a comparable new boiler. The planned project cost represents less than 1 percent of the cost of a new boiler. Therefore, reconstruction is not triggered under the NSPS.

2. Attached are the two spreadsheets used to calculate current actual emissions due to fuel oil firing from Boiler No. 4. These spreadsheets, taken from the Annual Operating Reports for Clewiston (submitted to the Department), show the emission factors used for fuel oil firing. The factors were based on No. 6 fuel oil firing, since Boiler No. 4 has burned No. 6 fuel oil during the last 2 years. Attached also is a current fuel oil analysis for the oil burned in Boiler No. 4.

3. Attachment UC-EU1-G8 in the December 18, 2002, response letter contains the revised maximum hourly and annual emissions due to fuel oil firing for Boiler No. 7. However, we know of no requirement that would impose allowable limits upon the boiler for fuel oil firing. We believe the imposition in the permit of a fuel oil sulfur limit and maximum fuel oil firing rate are sufficient, and that specific emission limits are unnecessary.

4.a. **Boiler No. 4**

Boiler No. 4 does not currently burn No. 2 distillate oil. As stated in the application for Boiler No. 4, the boiler currently burns No. 6 fuel oil with a maximum sulfur content of 0.7 percent. As further demonstrated, after converting to No. 2 fuel oil with a maximum sulfur content of 0.4 percent, the maximum hourly emissions of PM, SO_2, and NO_X will decrease (refer to Table 3 of the application). Therefore, "modification" is not triggered under the NSPS (refer to 40 CFR 60.14), and the unit will not become subject to Subpart Db requirements due to the proposed project.

4.b. **Boiler No. 7**

We believe the citation at the end of paragraph (2) should refer to 40 CFR 60.44b(j) and (k). These two paragraphs read together provide an exemption from the NO_X standards for a unit that has a heat input capacity of 250 MMBtu/hr or less. Since the modified boiler will have a heat input greater than 250 MMBtu/hr for fuel oil, this exemption will no longer be available.

However, we believe that 60.44b(c) would continue to exempt the boiler from the NO_X standards. This provision states:

> "...no owner or operator of an affected facility that simultaneously combusts coal or oil....with...any other fuel shall cause to be discharged into the atmosphere any gases that contain nitrogen oxides in excess of the emission limit for the coal or oil....as determined from paragraph (a) or (b), **unless the affected facility has an annual capacity factor for coal or oil, or a mixture of these fuels with natural gas of 10 percent (0.10) or less and is subject to a federally enforceable requirement that limits operation of the affected facility to an annual capacity factor of 10 percent (0.10) or less for coal, oil, or a mixture of these fuels with natural gas.**"

In summary, we believe the NSPS provide an exemption from the NO_X standards for any boiler, regardless of heat input capacity for oil, with an annual capacity factor of less than 10 percent for oil. Since Boiler No. 7 will be restricted to a 10 percent capacity factor on oil, the boiler is exempt from the NO_X standards per this provision.

4.c. We concur with comment.

4.d. As previously discussed, we do not believe Boiler No. 4 will be subject to Subpart Db due to the proposed project. Even if it were, no NO_X standard would be applicable since it has a 10-percent annual capacity limitation for oil. Boiler No. 7 is similarly exempt from the NO_X standards. Therefore, if there is no applicable NO_X standard, no NO_X testing is required under the NSPS.

Further, we do not believe that Subpart Db requires stack testing for PM for distillate oil firing. Section 60.43b(b) addresses the applicable PM emission limitation for oil firing, but only covers affected facilities using a "conventional or emerging technology to reduce sulfur dioxide emissions". Since Boiler No. 7 does not use either a conventional or emerging technology to control sulfur dioxide emissions, as defined in 60.41b, no PM emission limit applies to either boiler.

We agree that an initial visible emissions test is required, and that the required total testing time is 3 hours (30 6-minute averages), per 60.11 (b). We agree that compliance with the SO_2 standards will be on the basis of fuel receipts.

4.e. As previously discussed, we do not believe that an NO_X standard is applicable to either boiler under the NSPS, and therefore, continuous monitoring for NO_X is not required. If Boiler No. 4 would become subject to Subpart Db, we would request an alternative sampling plan for opacity.

Please call or e-mail me if you have any questions concerning this additional information.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

DB/jej

Enclosure

cc: Don Griffin
Sarah Watson
Ron Blackburn, DEP
C. Halladay
0237615/4/4.1/L021803.doc
G. Bittle, EPA
G. Bunyak, NPS

Attachment B-4. 2000 Emissions of Criteria Pollutants at U.S. Sugar Corporation Clewiston Boiler 4

Regulated Pollutant	Emission Factors: Carbonaceous Fuel Emission Factor (lb/ton)	Reference	Annual Fuel Usage (TPY)	Annual Emissions (TPY)	Emission Factors: No. 6 Fuel Oil Emission Factor (lb/1,000 gal)	Reference	Annual Fuel Usage (Gallons/yr)	Annual Emissions (TPY)	Total Annual Emissions (TPY)
Criteria and Precursor Air Pollutants									
Particulate Matter (PM)	1.080	1	237,895	128.46	10.48	3 (b)	185,631	0.97	129.44
Particulate Matter (PM_{10})	0.918	(a)	237,895	109.19	8.91	(a)	185,631	0.83	110.02
Sulfur Dioxide (SO_2)	0.001	1	237,895	0.12	62.02	3 (b)	185,631	5.76	5.88
Nitrogen Oxides (NO_x)	0.763	1	237,895	90.76	47	3	185,631	4.36	95.12
Carbon Monoxide (CO)	26.309	1	237,895	3,129.39	5	3	185,631	0.46	3,129.85
VOC	2.232	1	237,895	265.49	0.28	4	185,631	0.03	265.52
Lead - Total	4.45E-04	2	237,895	0.05	1.51E-03	5	185,631	1.40E-04	0.05

Footnotes:

(a) Assuming 85% of PM is PM_{10}.

(b) Average sulfur content of the fuel mix is 0.79% (mixture of 2.5% sulfur fuel oil and 0.7% sulfur fuel oil).

Unless otherwise specified, heating values for each fuel are as follows: 3,600 Btu/lb for wet bagasse and 146,210 Btu/gal for No. 6 fuel oil.

1. Based on compliance test data, collectecd by Air Consulting and Engineering:

PM	0.150 lb/MMBtu	11/17/2000
SO_2	0.00013 lb/MMBtu	1/5/2000
VOC	0.310 lb/MMBtu	11/17/2000
NO_x	0.106 lb/MMBtu	11/17/2000
CO	3.654 lb/MMBtu	11/17/2000

2. Based on EPA's AP-42 Table 1.6-5, "Emission Factors for Trace Elements from Wood Waste Combustion with PM Controls" (2/99).
3. Based on AP-42 Table 1.3-1, "Criteria Pollutant Emission Factors for Fuel Oil Combustion" (9/98), normal firing. Assume 50% SO_2 removal from scrubber.
4. Based on AP-42 Table 1.3-3, "Emission Factors for Total Organic Compounds (TOC), Methane, and Nonmethane TOC (NMTOC) from Uncontrolled Fuel Oil Combustion (9/98).
5. Based on AP-42 Table 1.3-11, "Emission Factors for Metals from Uncontrolled No. 6 Fuel Oil Combustion" (9/98).

Attachment B-4. 2001 Emissions of Criteria Pollutants at U.S. Sugar Corporation Clewiston Boiler No. 4

Regulated Pollutant	Emission Factors: Carbonaceous Fuel Emission Factor (lb/ton)	Carbonaceous Fuel Reference	Carbonaceous Fuel Annual Fuel Usage (TPY)	Carbonaceous Fuel Annual Emissions (TPY)	No. 6 Fuel Oil Emission Factor (lb/1,000 gal)	No. 6 Fuel Oil Reference	No. 6 Fuel Oil Annual Fuel Usage (Gallons/yr)	No. 6 Fuel Oil Annual Emissions (TPY)	Total Annual Emissions (TPY)
Criteria and Precursor Air Pollutants									
Particulate Matter (PM)	0.504	1	262,404	66.13	9.65	3 (b)	172,413	0.83	66.96
Particulate Matter (PM_{10})	0.428	(a)	262,404	56.21	8.21	(a)	172,413	0.71	56.91
Sulfur Dioxide (SO_2)	0.00094	1	262,404	0.12	54.95	3 (b)	172,413	4.74	4.86
Nitrogen Oxides (NO_x)	0.857	1	262,404	112.44	47	3	172,413	4.05	116.49
Carbon Monoxide (CO)	8.366	1	262,404	1,097.64	5	3	172,413	0.43	1,098.07
VOC	0.209	1	262,404	27.42	0.28	4	172,413	0.02	27.45
Lead - Total	4.45E-04	2	262,404	0.06	1.51E-03	5	172,413	1.30E-04	0.06

Footnotes:

(a) Assuming 85% of PM is PM_{10}.

(b) Sulfur content of the fuel is 0.7%.

Unless otherwise specified, heating values for each fuel are as follows: 3,600 Btu/lb for wet bagasse and 146,000 Btu/gal for No. 6 fuel oil.

1. Based on compliance test data, collecteed by Air Consulting and Engineering:

PM	0.070 lb/MMBtu	1/23/2002
SO_2	0.00013 lb/MMBtu	1/5/2000
VOC	0.029 lb/MMBtu	1/23/2002
NO_x	0.119 lb/MMBtu	1/23/2002
CO	1.162 lb/MMBtu	1/23/2002

2. Based on EPA's AP-42 Table 1.6-5, "Emission Factors for Trace Elements from Wood Waste Combustion with PM Controls" (2/99).
3. Based on AP-42 Table 1.3-1, "Criteria Pollutant Emission Factors for Fuel Oil Combustion" (9/98), No. 6 fuel oil, normal firing. Assume 50% SO_2 removal from scrubber.
4. Based on AP-42 Table 1.3-3, "Emission Factors for Total Organic Compounds (TOC), Methane, and Nonmethane TOC (NMTOC) from Uncontrolled Fuel Oil Combustion (9/98).
5. Based on AP-42 Table 1.3-11, "Emission Factors for Metals from Uncontrolled No. 6 Fuel Oil Combustion" (9/98).

#1

Clew 15 702

COASTAL FUELS MARKETING, INC
PORT MANATEE, FL

	12/21/02 15:19:00		Calculated
LAB			BLEND
DATE TESTED			
TANK			
PRODUCT			607B
VOLUME			100.0
BLEND %			100.0
	Test Method	UNITS	
SPECIFIC GRAVITY		60/60 F	0.9674
API GRAVITY	D-1298	60 F	14.78
FLASH POINT	D-93	DEG F	183
VISCOSITY (@122 F)	D-445	SFS	12.6
	D-445	cSt	24.0
POUR POINT	D-97	DEG F	0
SULFUR	D-4294	% WT.	0.690
WATER BY DISTILLATION	D-95	% VOL.	0.35
SEDIMENT BY HOT FILTRATION	IP 390B	% WT.	0.007
GROSS HEAT OF COMBUSTION	D-240	BTU/GAL.	150764
ASH (sample, g)	D482	% WT.	0.051
ASPHALTINES	IP-143	% WT.	3.04
CARBON RESIDUE	D-4530	% WT.	6.87
VANADIUM	D-5863A	ppm	9.0
SODIUM	D-5863B	ppm	37.3
ALUMINUM	D-5184	ppm	23.5
SILICON	D-5184	ppm	29.7

#6 Fuel Oil
0.7 %

Boiler #4
% SO_2

Boiler #4
Heat Content

Golder Associates Inc.

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

December 18, 2002

0237584

RECEIVED

DEC 20 2002

BUREAU OF AIR REGULATION

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

Attention: Jeffery F. Koerner, P.E.

RE: PROJECT NO. 0510003-018-AC (PSD-FL-208A)
CLEWISTON SUGAR MILL AND REFINERY
INCREASE IN OIL FIRING RATE FOR BOILER NO. 7

Dear Mr. Koerner:

United States Sugar Corporation (USSC) has received the Department's request for additional information (RAI) dated October 22, 2002, regarding the above referenced air construction permit application. Each of the Department's comments is addressed below, in the same order as they appear in the RAI letter.

1. There are currently two oil burners (guns) in Boiler No. 7 to provide fuel oil firing. The number of oil burners (guns) will not change as a result of the project.

   The maximum oil firing rate has been slightly revised based on discussions with a perspective vendor. In terms of gallons per hour (gal/hr), the maximum fuel oil firing rate will be 2,417 gal/hr based on 326.25 million British thermal units per hour (MMBtu/hr) heat input due to fuel oil and a fuel oil heating value of 135,000 Btu/gal. These values are based on the following calculations:

   225,000 lb/hr steam x 1,160 Btu/lb / 0.80 / 1E+06 = 326.25 MMBtu/hr

   326.25 MMBtu/hr 135,000 Btu/gal = 2,416.7 gal/hr

   This calculation assumes 80-percent thermal efficiency when burning fuel oil only.

   Revised pages of the application form are attached. Note that this change only slightly affects maximum hourly emissions due to fuel oil firing. Maximum annual emissions due to fuel oil firing are not affected.

2. The lb/MMBtu limits for fuel oil firing would not change due to the project. As stated above, the revised heat input rate due to oil firing is 326.25 MMBtu/hr. All other information is correct. The purpose of the 4,500,000 gal/yr fuel oil limit is to avoid applicable requirements of 40 CFR 60, Subpart Db. Specifically, if the boiler is limited to an annual capacity factor of 10 percent or less for fuel oil firing, the boiler is exempt from the NO_x standards per 40 CFR 60.44b(c) and 60.44b(l)(1).

3. To our knowledge, the proposed project does not trigger any additional requirements under Rule 62-296.405 or 40 CFR 60.49b, nor does it trigger any new regulations.

Rule 62-296.405 is applicable to fossil-fuel steam generators with more than 250 MMBtu/hr heat input. Boiler No. 7 is a carbonaceous fuel burner and is subject to Rule 62-296.410. The carbonaceous fuel burner rule recognizes that fossil fuel is burned in carbonaceous fuel burning units. Nevertheless, no additional requirements or standards would apply under Rule 62-296.405. A continuous opacity monitor would not be required since the annual capacity factor for fuel oil for the boiler is less than 30 percent (reference Rule 62-296.405(1)(f)1).

Reporting and recordkeeping requirements are contained in 40 CFR 60.49b. Boiler No. 7 is already subject to these requirements as they pertain to fuel oil firing, and we are not aware of any new requirements that are triggered by the proposed change.

The proposed project is not subject to 40 CFR 60 Subpart D requirements. According to 40 CFR 60.40b(j), any affected facility meeting the applicability requirements of Subpart Db, under 40 CFR 60.40b(a), and commencing construction after June 19, 1986, is not subject to Subpart D. Construction was commenced on Boiler No. 7 well after June 19, 1986.

4. The dispersion modeling analysis performed for the Boiler No. 4 PSD permit application included Boiler No. 7 while burning 100-percent bagasse, since maximum SO_2 emissions were produced by bagasse firing. The modeled SO_2 emission rate for bagasse firing was 0.17 lb/MMBtu and 138.0 lb/hr (also see page 19 of application form for SO_2 pollutant detail). For the proposed fuel oil firing rate, the SO_2 emissions are 0.05 lb/MMBtu and 16.3 lb/hr. Therefore, SO_2 emissions due to bagasse firing are over eight times higher than emissions due to fuel oil firing, and there is no need for additional modeling analysis.

Please call if you have any questions concerning this additional information.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

DB/jkw

Cc: Don Griffin
Peter Briggs
C. Holladay
P:\Projects\2002\0237584 US Sugar\4\4 I121702\C121702.doc
R. Blackburn SD
J. Settle, EPA
J. Quirpek, WPS

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:			**812**	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr			tons/day
3. Maximum Process or Throughput Rate:				
4. Maximum Production Rate:		**385,000**	**lb/hr steam**	
5. Requested Maximum Operating Schedule:				
	24	hours/day	**7**	days/week
	52	weeks/year	**8,760**	hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

Maximum heat input based on 1-hour maximum steam rate (above) for carbonaceous fuel firing. Maximum 24-hour average firing for carbonaceous fuel is 738 MMBtu/hr. Proposed maximum for No. 2 fuel oil is 326.25 MMBtu/hr.

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **External combustion boilers; Industrial; Bagasse; All boiler sizes**		
2. Source Classification Code (SCC): **1-02-011-01**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **112.78**	5. Maximum Annual Rate: **897,800**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **7.2**
10. Segment Comment (limit to 200 characters): **Maximum hourly rate based on 812 MMBtu/hr (1-hr max) and maximum annual rate based on 738 MMBtu/hr (24-hr max).**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **External combustion boilers; Industrial; Distillate Oil; Grades 1 and 2**		
2. Source Classification Code (SCC): **1-02-005-01**	3. SCC Units: **Thousand Gallons Burned**	
4. Maximum Hourly Rate: **2.417**	5. Maximum Annual Rate: **4,500**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **0.05**	8. Maximum % Ash:	9. Million Btu per SCC Unit: **135**
10. Segment Comment (limit to 200 characters): **Rates based on proposed 326.25 MMBtu/hr and a maximum of 4,500,000 gallons of fuel oil per year.**		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **24.4** lb/hour **97** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.03 lb/MMBtu** Reference: **Permit No. 0510003-014-AV**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **812 MMBtu/hr x 0.03 lb/MMBtu = 24.4 lb/hr** **Annual limit from Permit No. 0510003-014-AV for bagasse firing.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Potential emissions representative of bagasse firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.03 lb/MMBtu**	4. Equivalent Allowable Emissions: **24.4** lb/hour **97** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 5 or 17**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Permit No. 0510003-014-AV. Emissions representative of bagasse firing only.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.03 lb/MMBtu**	4. Equivalent Allowable Emissions: **9.8** lb/hour **9.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 5 or 17**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Emissions representative of No. 2 fuel oil firing only. Annual emissions based on proposed limit of 4,500,000 gal/yr. See Attachment UC-EU1-G8 for calculations.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **24.4** lb/hour **97** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.03 lb/MMBtu** Reference: **Permit No. 0510003-014-AV**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **812 MMBtu/hr x 0.03 lb/MMBtu = 24.4 lb/hr** **Annual limit from Permit No. 0510003-014-AV for bagasse firing.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Potential emissions representative of bagasse firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.03 lb/MMBtu**	4. Equivalent Allowable Emissions: **24.4** lb/hour **97** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 5 or 17**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Permit No. 0510003-014-AV. Emissions representative of bagasse firing only.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.03 lb/MMBtu**	4. Equivalent Allowable Emissions: **9.8** lb/hour **9.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 5 or 17**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Emissions representative of No. 2 fuel oil firing only. Annual emissions based on proposed limit of 4,500,000 gal/yr. See Attachment UC-EU1-G8 for calculations.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **138.0** lb/hour **550** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.17 lb/MMBtu** Reference: **Permit No. 0510003-014-AV**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **812 MMBtu/hr x 0.17 lb/MMBtu = 138.0 lb/hr** **Annual limit from Permit No. 0510003-014-AV for bagasse firing.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Potential emissions representative of bagasse firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.17 lb/MMBtu**	4. Equivalent Allowable Emissions: **138.0** lb/hour **550** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 6**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Permit No. 0510003-014-AV. Emissions representative of bagasse firing only.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SO_2**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.05 lb/MMBtu**	4. Equivalent Allowable Emissions: **16.3** lb/hour **15.2** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 6**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Emissions representative of No. 2 fuel oil firing only. Annual emissions based on proposed limit of 4,500,000 gal/yr. See Attachment UC-EU1-G8 for calculations.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_x**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **203** lb/hour **809** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.25 lb/MMBtu** Reference: **Permit No. 0510003-14-AV**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **812 MMBtu/hr x 0.25 lb/MMBtu = 203.0 lb/hr** **Annual limit from Permit No. 0510003-014-AV for bagasse firing.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Potential emissions representative of bagasse firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.25 lb/MMBtu**	4. Equivalent Allowable Emissions: **203** lb/hour **809** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 7 or 7E**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Permit No. 0510003-014-AV. Emissions representative of bagasse firing only.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted:	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.2 lb/MMBtu**	4. Equivalent Allowable Emissions: **65.3** lb/hour **60.8** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 7 or 7E**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Emissions representative of No. 2 fuel oil firing only. Annual emissions based on proposed limit of 4,500,000 gal/yr. See Attachment UC-EU1-G8 for calculations.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **568.4** lb/hour **2,262** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.70 lb/MMBtu** Reference: **Permit No. 0510003-014-AV**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **812 MMBtu/hr x 0.70 lb/MMBtu = 568.4 lb/hr** **Annual limit from in Permit No. 0510003-014-AV for bagasse firing.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Potential emissions representative of bagasse firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.70 lb/MMBtu**	4. Equivalent Allowable Emissions: **568.4** lb/hour **2,262** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 10**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Permit No. 0510003-014-AV. Emissions representative of bagasse firing only.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **CO**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.066 lb/MMBtu**	4. Equivalent Allowable Emissions: **21.5** lb/hour **20.0** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 10**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Emissions representative of No. 2 fuel oil firing only. Annual emissions based on proposed limit of 4,500,000 gal/yr. See Attachment UC-EU1-G8 for calculations.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **172.1** lb/hour **685** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.212 lb/MMBtu** Reference: **Permit No. 0510003-014-AV**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **812 MMBtu/hr x 0.212 lb/MMBtu = 172.1 lb/hr** **Annual limit from Permit No. 0510003-014-AV for bagasse firing.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Potential emissions representative of bagasse firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.212 lb/MMBtu**	4. Equivalent Allowable Emissions: **172.1** lb/hour **685** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 25 or 25A**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Permit No. 0510003-014-AV. Emissions representative of bagasse firing only.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.004 lb/MMBtu**	4. Equivalent Allowable Emissions: **1.3** lb/hour **1.2** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 25 or 25A**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Emissions representative of No. 2 fuel oil firing only. Annual emissions based on proposed limit of 4,500,000 gal/yr. See Attachment UC-EU1-G8 for calculations.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SAM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **13.8** lb/hour **55** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.017 lb/MMBtu** Reference: **Permit No. 0510003-014-AV**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **812 MMBtu/hr x 0.017 lb/MMBtu = 13.8 lb/hr** **Annual limit from Permit No. 0510003-014-AV for bagasse firing.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Potential emissions representative of bagasse firing.**	

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.017 lb/MMBtu**	4. Equivalent Allowable Emissions: **13.8** lb/hour **55** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 8 when required**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Permit No. 0510003-014-AV. Emissions representative of bagasse firing only.**	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **SAM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.005 lb/MMBtu**	4. Equivalent Allowable Emissions: **1.6** lb/hour **1.5** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 8 when required**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Emissions representative of No. 2 fuel oil firing only. Annual emissions based on proposed limit of 4,500,000 gal/yr. See Attachment UC-EU1-G8 for calculations.**	

Attachment UC-EU1-G8. Future Maximum Emissions due to Fuel Oil, Boiler No. 7, US Sugar Corporation Clewiston (revised 12/17/2002)

Regulated Pollutant	No. 2 Fuel Oil Combustion					
	Emission Factor (lb/MMBtu)	Ref.	Activity Factor[a] Hourly[a] MMBtu/hr	Activity Factor[a] Annual[b] MMBtu/yr [b]	Hourly Emissions (lb/hr)	Annual Emissions (TPY)
Particulate Matter (PM)	0.03	1	326.25	607,500	9.8	9.1
Particulate Matter (PM_{10})	0.03	1	326.25	607,500	9.8	9.1
Sulfur dioxide (SO_2)	0.05	1	326.25	607,500	16.3	15.2
Nitrogen oxides (NO_x)	0.2	1	326.25	607,500	65.3	60.8
Carbon monoxide (CO)	0.066	1	326.25	607,500	21.5	20.0
Volatile Organic Compound (VOC)	0.004	1	326.25	607,500	1.3	1.2
Lead (Pb)	9.0E-06	2	326.25	607,500	2.9E-05	2.7E-05
Sulfuric acid mist (SAM)	0.005	1	326.25	607,500	1.6	1.5
Beryllium (Be)	3.0E-06	2	326.25	607,500	9.8E-06	9.1E-06
Mercury (Hg)	3.0E-06	2	326.25	607,500	9.8E-04	9.1E-04

References:

1. Based on Permit No. 0510003-14-AV.
2. Factors for No. 2 fuel oil combustion, AP-42 Table 1.3-10, "Emission Factors for Trace Elements from Distillate Fuel Oil Combustion Sources" (9/98). Assumes a 99% removal efficiency for lead and beryllium due to ESP control.

Footnotes:

[a] Based on proposed maximum heat input due to fuel oil combustion, calculated as follows:
225,000 lb/hr steam x 1160 Btu/lb (net) / 0.80 / 1E+06 = 326.25 MMBtu/hr

[b] Based on proposed maximum allowable fuel usage of 4,500,000 gallons per year and 135,000 Btu/gal.

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

December 10, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William A. Raiola, V.P. of Sugar Processing Operations
United States Sugar Corporation
111 Ponce Deleon Avenue
Clewiston, Florida 33440

Re: **Reminder of Request for Additional Information**
Project No. 0510003-018-AC (PSD-FL-208A)
Clewiston Sugar Mill and Refinery
Increase in Oil Firing Rate for Boiler No. 7

Dear Raiola:

On October 11, 2002, the Department received your application and sufficient fee for an air construction permit to increase the oil firing rate for Boiler No. 7 at the Clewiston sugar mill and refinery. The application was incomplete. On October 22, 2002, the Department requested you to submit additional information that would allow continued processing of your application. To date, we have not received the requested additional information and the application remains incomplete. Rule 62-4.055(1) of the Florida Administrative Code requires the following:

> *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department. If an applicant requires more than ninety days in which to respond to a request for additional information, the applicant may notify the Department in writing of the circumstances, at which time the application shall be held in active status for one additional period of up to ninety days. Additional extensions shall be granted for good cause shown by the applicant. A showing that the applicant is making a diligent effort to obtain the requested additional information shall constitute good cause. Failure of an applicant to provide the timely requested information by the applicable deadline shall result in denial of the application."*

It has been more than 45 days since our last request for additional information (copy attached). You are reminded that the permit processing time clock has stopped for this project and that we will not continue our review until we receive the additional information. If you require a period of time in addition to the 90 days allowed by rule, please submit a written request indicating the amount of time necessary. If you fail to provide the additional information or request additional time to submit the additional information, the Department will deny your application.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,

Jeffery F. Koerner, P.E.
New Source Review Section

cc: Mr. David Buff, Golder Associates
Mr. Ron Blackburn, SD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

AAL/jfk

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. William A. Raiola
V. P. of Sugar Processing Operations
United States Sugar Corporation
111 Ponce DeLeon Avenue
Clewiston, FL 33440

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery 12-13-02

C. Signature
X [signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Ar 7001 0320 0001 3692 7430

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

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Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: William A. Raiola
Street, Apt. No. or PO Box No.: 111 Ponce DeLeon Ave.
City, State, ZIP+4: Clewiston, FL 33440

PS Form 3800, January 2001 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

October 22, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William A. Raiola, V.P. of Sugar Processing Operations
United States Sugar Corporation
111 Ponce Deleon Avenue
Clewiston, Florida 33440

Re: **Request for Additional Information**
Project No. 0510003-018-AC (PSD-FL-208A)
Clewiston Sugar Mill and Refinery
Increase in Oil Firing Rate for Boiler No. 7

Dear Mr. Raiola:

On October 11, 2002, the Department received your application and sufficient fee for an air construction permit to increase the oil firing rate for Boiler No. 7 at the Clewiston sugar mill and refinery. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The proposed project would increase the maximum heat input rate for Boiler No. 7 from 250 MMBtu per hour to 321 MMBtu per hour by adding two new oil pumps and modifying the existing burners. Please identify the number of burners and oil guns before the project and upon completion of the project. What is the maximum oil-firing rate in terms of gph based on the HHV of the distillate oil?

2. If approved, the proposed project would require modification of the following conditions of Permit No. PSD-FL-208:

   Condition No. 1: The project proposes to modify the maximum heat input rate from oil firing and the corresponding allowable emissions (lb/MMBtu, lb/hour, and tons/year).

   Condition No. 8: The project proposes to increase the maximum heat input rate from oil firing, the equivalent oil firing rate (gph), equivalent steam production (pounds per hour), and possibly the burner/oil gun configuration.

   Condition No. 9: The project proposes to decrease the allowable annual oil-firing rate from 4,600,000 gallons per year to 4,500,000 gallons per year.

   Condition No. 11: The project proposes to increase the designed maximum oil heat input rate from 250 MMBtu/hour (HHV, 1-hour average) to 321 MMBtu/hour (HHV, 1-hour average).

   Please comment. In addition, Condition No. 9 limits the annual capacity factor for distillate oil to 10%. Is the purpose of this condition to avoid applicable requirements of NSPS Subpart Db? Please discuss.

3. In addition to PSD BACT standards specified in Permit No. PSD-FL-208, Boiler No. 7 is also subject to Rule 62-296.405, F.A.C. and 40 CFR 60.49b for industrial-commercial-institutional steam generating units. Does the proposed project trigger any additional requirements of these regulations or any new regulations?

Will the proposed project subject Boiler No. 7 to NSPS Subpart D for fossil fuel fired steam generators (40 CFR 60.40, 60.41, 60.42, 60.43, 60.44, 60.45, and 60.46)?

4. Boiler No. 7 was also part of a PSD-preconstruction review that modified the operations of Boiler No. 4, which resulted in the following additional conditions for Boiler No. 7 as specified in Section IIIB of Permit No. PSD-FL-272A:

   Condition No. 4e: 385,000 pounds of steam per hour, 812 mmBTU per hour of total heat input, and 1839 gallons of oil per hour.

   Condition No. 5d: Any distillate oil fired in Boiler No. 7 shall contain no more than 0.05% sulfur by weight.

   Condition No. 7a(2): Boiler No. 7 shall not produce more than 8,400,000 pounds of steam during any 24-hour period.

   Section IIIB also includes the following explanation for these additional requirements.

   "The PSD permit for Boiler No. 4 (PSD-FL-272A) was issued based on an Air Quality Analysis using the ISC PRIME model that contained several operational constraints on existing emissions units. These constraints are now enforceable conditions of the permit and are in addition to any limits imposed by other valid permits. Modification of these constraints would require modification of the PSD permit and a new Air Quality Analysis."

   In accordance with Rules 62-212.300(1) and 62-212.400(5)(d), F.A.C., please provide reasonable assurance that the proposed project will not cause or contribute to a violation of any ambient air quality standard or maximum allowable increase. For additional information, please contact Cleve Holladay at 850/921-8986.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,

Jeffery F. Koerner, P.E.
New Source Review Section

cc: Mr. David Buff, Golder Associates
Mr. Ron Blackburn, SD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

AAL/jfk

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 22, 2002

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Mr. William A. Raiola, V.P. of Sugar Processing Operations
United States Sugar Corporation
111 Ponce Deleon Avenue
Clewiston, Florida 33440

Re: **Request for Additional Information**
Project No. 0510003-018-AC (PSD-FL-208A)
Clewiston Sugar Mill and Refinery
Increase in Oil Firing Rate for Boiler No. 7

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1. The proposed project would increase the maximum heat input rate for Boiler No. 7 from 250 MMBtu per hour to 321 MMBtu per hour by adding two new oil pumps and modifying the existing burners. Please identify the number of burners and oil guns before the project and upon completion of the project. What is the maximum oil-firing rate in terms of gph based on the HHV of the distillate oil?

2. If approved, the proposed project would require modification of the following conditions of Permit No. PSD-FL-208:

   Condition No. 1: The project proposes to modify the maximum heat input rate from oil firing and the corresponding allowable emissions (lb/MMBtu, lb/hour, and tons/year).

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   Condition No. 9: The project proposes to decrease the allowable annual oil-firing rate from 4,600,000 gallons per year to 4,500,000 gallons per year.

   Condition No. 11: The project proposes to increase the designed maximum oil heat input rate from 250 MMBtu/hour (HHV, 1-hour average) to 321 MMBtu/hour (HHV, 1-hour average).

   Please comment. In addition, Condition No. 9 limits the annual capacity factor for distillate oil to 10%. Is the purpose of this condition to avoid applicable requirements of NSPS Subpart Db? Please discuss.

3. In addition to PSD BACT standards specified in Permit No. PSD-FL-208, Boiler No. 7 is also subject to Rule 62-296.405, F.A.C. and 40 CFR 60.49b for industrial-commercial-institutional steam generating units. Does the proposed project trigger any additional requirements of these regulations or any new regulations?

Will the proposed project subject Boiler No. 7 to NSPS Subpart D for fossil fuel fired steam generators (40 CFR 60.40, 60.41, 60.42, 60.43, 60.44, 60.45, and 60.46)?

4. Boiler No. 7 was also part of a PSD-preconstruction review that modified the operations of Boiler No. 4, which resulted in the following additional conditions for Boiler No. 7 as specified in Section IIIB of Permit No. PSD-FL-272A:

   Condition No. 4e: 385,000 pounds of steam per hour, 812 mmBTU per hour of total heat input, and 1839 gallons of oil per hour.

   Condition No. 5d: Any distillate oil fired in Boiler No. 7 shall contain no more than 0.05% sulfur by weight.

   Condition No. 7a(2): Boiler No. 7 shall not produce more than 8,400,000 pounds of steam during any 24-hour period.

   Section IIIB also includes the following explanation for these additional requirements.

   "The PSD permit for Boiler No. 4 (PSD-FL-272A) was issued based on an Air Quality Analysis using the ISC PRIME model that contained several operational constraints on existing emissions units. These constraints are now enforceable conditions of the permit and are in addition to any limits imposed by other valid permits. Modification of these constraints would require modification of the PSD permit and a new Air Quality Analysis."

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If you have any questions regarding this matter, please call me at 850/921-9536.

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New Source Review Section

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Mr. John Bunyak, NPS

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1. Article Addressed to:

Mr. William A. Raiola
V.P. of Sugar Processing Operations
United States Sugar Corporation
111 Ponce DeLeon Avenue
Clewiston, FL 33440

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) Audrey Sotis — B. Date of Delivery 10-24

C. Signature
x Audrey Sotis ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. A 7001 0320 0001 3692 7775

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: William A. Raiola
Street, Apt. No., or PO Box No.: 111 Ponce DeLeon Avenue
City, State, ZIP+4: Clewiston, FL 33440

7001 0320 0001 3692 7775

PS Form 3800, January 2001 See Reverse for Instructions