

Golder Associates Inc.

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



March 5, 2004

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

Attention: Mr. Jeff Koerner, P. E., New Source Review Section

**SUBJECT: UNITED STATES SUGAR CORPORATION CLEWISTON MILL
3-YEAR BOILER MAINTENANCE PROJECT
PERMIT NO. 0510003-022-AC**

0337546-0100
RECEIVED
MAR 09 2004
BUREAU OF AIR REGULATION

Dear Mr. Koerner:

The purpose of this correspondence is to update the list of maintenance and repair activities planned on the boilers for the 2004 off-season at the Clewiston Mill. Air construction Permit No. 0510003-022-AC was issued to United States Sugar Corporation (USSC) on June 3, 2003, and authorized the repair and replacement of components of the existing boilers at the Clewiston Mill.

Condition 4 of the Emissions Unit Specific Conditions requires USSC to submit a "Maintenance Summary Report" within 60 days of the beginning of each cane milling season. The condition requires that the permittee summarize the following information:

- a general description of the work performed on each boiler during the previous off season;
- a summary of the off season maintenance inspections; and
- a revised schedule of maintenance and repair activities for the next off season.

On October 28, 2003, USSC submitted the required report for the 2003-2004 cane milling season. The report included a schedule of maintenance and repair activities planned for the upcoming 2004 off-season. Since submission of this report, some of the planned maintenance activities have changed.


The purpose of this correspondence is to update the list of maintenance and repair activities planned for the 2004 off-season. The updated list is provided in the enclosed Attachment 1.

In accordance with the construction permit, the replacements U. S. Sugar is planning are all "functionally equivalent" to the existing components, and are intended to return the boilers to their current steam production capabilities. The maintenance activities will not increase the capacity of any boiler or change the basic design parameters including fuel firing rates or heat input rates. The repairs will not increase the emission rates of any boiler or the cane milling capacity of the plant. As such, we believe these repairs are authorized activities under the construction permit.

Please call me at (352)336-5600 or Don Griffin at (863)902-2711 if you have any questions or comments concerning this information, or need additional information. Thank you.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P. E., Q. E. P.
Principal Engineer

DB/jej

Enclosures

cc: Don Griffin
Peter Briggs
R. Blackburn, DEP

Y:\Projects\2003\0337546 US Sugar Blr 7/4/4.1\1030504 doc

ATTACHMENT 1

CLEWISTON BOILER REPAIRS SUMMARY 2004 OFF-SEASON

Boiler 1

- Replace approximately 60% of main generating bank tubes, 14,040 sq feet of heating surface.
- Replace one superheater section, 2,855 sq feet of heating surface.
- Replace east and west and rear waterwall tubes and screenwall tubes, 1500 sq feet of heating surface.
- Replace 50% of air heater tubes, approximately 10,000 sq. feet of air heating surface.
- Replace forced draft fan (approved in DEP letter dated 12/05/2003).
- Stoker repairs.

Boiler 2

- Replace 100% of the boiler generating bank tubes, 23,400 sq feet.
- Replace rear and screenwall tubes, approximately 724 sq feet of heating surface.
- Replace 50% of air heater tubes, approximately 7,500 sq. feet of air heating surface.
- Replace forced draft fan and overfire air fan (approved in DEP letter dated 12/05/2003).
- Stoker repairs.

Boiler 4

- Replace one superheater section and penthouse at top of boiler, approximately 5,400 sq feet.
- Replace front and rear waterwall and screenwall tubes, approximately 3,600 sq feet of heating surface.
- Repair flue gas ductwork.
- Replace bagasse feeders.
- Stoker repairs.
- Repair or replace soot blowers.

Boiler 7

- Stoker repairs.
- Repair flue gas ductwork.