

Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Chief - Bureau of Air Regulation
FROM: Jeff Koerner, Air Permitting North Program
DATE: May 11, 2006
SUBJECT: Draft Air Permit No. 0510003-035-AC
U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery
New Dry Cyclone Collector for Boiler 8

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

The draft permit authorizes installation of a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on Boiler 8. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The P.E. certification briefly summarizes the proposed project. Day #90 is July 29, 2006. I recommend your approval of the attached Draft Permit for this project.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Air Permit No. 0510003-035-AC
New Dry Cyclone Collector for Boiler 8
Hendry County, Florida

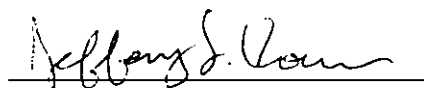
PROJECT DESCRIPTION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

The applicant requests authorization to install a dry multiclone sand separator with a design particulate collection efficiency of 84%. The new equipment will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and electrostatic precipitator (ESP) for Boiler 8. In general, the new control device will consist of approximately 40 individual centrifugal-type cyclone collectors arranged in a grid of 8 by 5. Each collector will be 1.26 feet in diameter and 2.70 feet in height. The design and equipment selection is based on the following: a design flue gas flow rate of 90,000 acfm; a flue gas inlet temperature of 385° F; a flue gas inlet moisture content of 24% by volume; and an inlet particulate matter loading of 10,000 mg/Nm³ (4.13 grains/dscf). At the estimated design flow rate, the dry cyclone collector system will cause a pressure drop of approximately 3 inches, water column.

Installation of this new device in parallel with the two existing wet cyclone collectors will reduce the flue gas exhaust rate to the wet cyclone collectors and help prevent water carryover into the existing ESP. The project is expected to improve performance of the particulate matter control system.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration Number: 49441

5-11-06

(Date)

DRAFT PERMIT

PERMITTEE:

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Authorized Representative:

Mr. William A. Raiola
Vice President of Sugar Processing Operations

Clewiston Sugar Mill and Refinery Air Permit No. 0510003-035-AC Facility ID No. 0510003 SIC Nos. 2061, 2062 Permit Expires: <i>{2 Years from Issuance}</i>
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PROJECT AND LOCATION

This permit authorizes installation of a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on Boiler 8. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. This permit supplements all other existing valid air construction and operation permits for this emissions unit.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

Michael G. Cooke, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

Boiler 8 (EU-028) is a spreader-stoker boiler with a maximum heat input rate of 1030 MMBtu per hour. It fires bagasse as the primary fuel and wood chips as an alternate or supplemental fuel. Distillate oil is fired as a restricted alternate fuel for startup and supplemental uses. Particulate matter emissions from the boiler are currently controlled by two wet cyclone dust collectors as pre-controls followed by an electrostatic precipitator (ESP) as the primary control device. The project authorizes the installation of a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system.

REGULATORY CLASSIFICATION

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to a New Source Performance Standard in 40 CFR 60.

NESHAP: The facility operates units subject to a National Emissions Standard for Hazardous Air Pollutants in 40 CFR 63.

RELEVANT DOCUMENTS

The permit application is not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department. Permit No. PSD-FL-333 (as modified) is also an important relevant document.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting Authority for this project is the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-3381.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); and Appendix B (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of an additional pre-control device for a permitted emissions unit. The installation of this equipment will not result in any substantive change to a Title V permit condition. The description of this new equipment will be included to the Title V renewal permit, which is currently under review by the Department. A separate Title V application is not required. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Boiler 8 (EU-028) - Dry Cyclone Collector

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description
028	Boiler 8 is a spreader-stoker boiler with a maximum heat input rate of 1030 MMBtu per hour. It fires bagasse as the primary fuel and wood chips as an alternate or supplemental fuel. Distillate oil is fired as a restricted alternate fuel for startup and supplemental uses. Particulate matter emissions from the boiler are currently controlled by two wet cyclone dust collectors as pre-controls followed by an electrostatic precipitator (ESP) as the primary control device. A dry cyclone collector will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and ESP.

EQUIPMENT

1. Dry Cyclone Collector: The permittee is authorized to install a dry multiclone sand separator, or equivalent equipment, with a design particulate collection efficiency of 84%. The new equipment will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and electrostatic precipitator (ESP). In general, the new control device will consist of approximately 40 individual centrifugal-type cyclone collectors arranged in a grid of 8 by 5. Each collector will be 1.26 feet in diameter and 2.70 feet in height. The design and equipment selection is based on the following: a design flue gas flow rate of 90,000 acfm; a flue gas inlet temperature of 385° F; a flue gas inlet moisture content of 24% by volume; and an inlet particulate matter loading of 10,000 mg/Nm³ (4.13 grains/dscf). The dry cyclone collector system will result in a pressure drop of approximately 3 inches water column at the design flow rate. [Design: Rule 62-210.300, F.A.C.]
2. Records: The permittee shall notify the Compliance Authority within 15 days of completing construction. [Rule 62-4.070(3), F.A.C.]

SECTION 4. APPENDICES

CONTENTS

Appendix A. Citation Formats

Appendix B. General Conditions

SECTION 4. APPENDIX A
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

References to Previous Permitting Actions

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001" identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

Rule Citation Formats

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX B
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
 - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Draft Air Construction Permit No. 0510003-035-AC
Addition of a Dry Cyclone Collector to Boiler 8

COUNTY

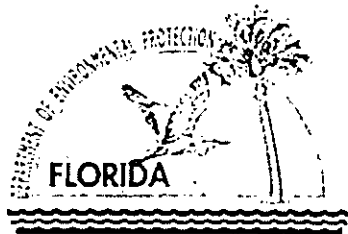
Hendry County, Florida

APPLICANT

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
ARMS Facility ID No. 0510003

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Air Permitting North Program



May 11, 2006

{Filename: TEPD - 0510003-035-AC}

I. GENERAL PROJECT INFORMATION

Facility Description and Location

U.S. Sugar operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. The Standard Industrial Classification Code for these activities are SIC Nos. 2061 (Sugarcane Milling) and 2062 (Sugarcane Refining). The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North. This site is located in an area that is in attainment with, or designated as unclassifiable for, each air pollutant subject to a National Ambient Air Quality Standard (NAAQS).

Regulatory Categories

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to a New Source Performance Standard in 40 CFR 60.

NESHAP: The facility operates units subject to a National Emissions Standard for Hazardous Air Pollutants in 40 CFR 63.

Project Description

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

Boiler 8 (EU-028) is a spreader-stoker boiler with a maximum heat input rate of 1030 MMBtu per hour. It fires bagasse as the primary fuel and wood chips as an alternate or supplemental fuel. Distillate oil is fired as a restricted alternate fuel for startup and supplemental uses. Particulate matter emissions from the boiler are currently controlled by two wet cyclone dust collectors as pre-controls followed by an electrostatic precipitator (ESP) as the primary control device. The applicant proposes to install a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system.

Processing Schedule

The Department received a complete application for an air construction permit on May 10, 2006.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code. 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER); 62-213 (Title V Air Operation Permits for Major Sources of Air Pollution); 62-296 (Emission Limiting Standards); 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures).

General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories defined in Rule 62-210.200, F.A.C.; or 5 tons per year of lead.

For new projects at existing PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

The Clewiston Mill and Refinery is an existing PSD-major facility located in Hendry County, which is an area that is currently in attainment with, or designated as "unclassifiable" for, each pollutant with a state or federal Ambient Air Quality Standard (AAQS). The applicant proposes to install a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system. The project is expected to improve performance of the particulate matter control system. Therefore, the project is not subject to PSD preconstruction review.

3. DEPARTMENT REVIEW

The applicant requests authorization to install a dry multiclone sand separator with a design particulate collection efficiency of 84%. The new equipment will be installed and operated in parallel along with the two existing wet cyclone collectors as a pre-control for the I.D. fan and electrostatic precipitator (ESP) for Boiler 8. In general, the new control device will consist of approximately 40 individual centrifugal-type cyclone collectors arranged in a grid of 8 by 5. Each collector will be 1.26 feet in diameter and 2.70 feet in height. The design and equipment selection is based on the following: a design flue gas flow rate of 90,000 acfm; a flue gas inlet temperature of 385° F; a flue gas inlet moisture content of 24% by volume; and an inlet particulate matter loading of 10,000 mg/Nm³, which is equivalent to:

$$PM_{inlet} = (10,000 \text{ mg/Nm}^3) (1 \text{ g/1000 mg})(1\text{b}/453.6 \text{ g})((7000\text{grains/lb})(\text{Nm}^3)/37.33 \text{ scf}) = 4.13 \text{ grains/dscf}$$

At the estimated design flow rate, the dry cyclone collector system will cause a pressure drop of approximately 3 inches water column. Installation of this new device in parallel with the two existing wet cyclone collectors will reduce the flue gas exhaust rate to the wet cyclone collectors and help prevent water carryover into the existing ESP.

The draft permit will authorize the installation of this equipment or its equivalent. Because this is a pre-control device, no new emissions standards are imposed and no additional testing is required. The permittee will be required to notify the Compliance authority upon completion of construction.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

May 11, 2006

Mr. William A. Raiola, Vice President of Sugar Processing Operations
U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Re: Air Construction Permit No. 0510003-035-AC
Clewiston Sugar Mill and Refinery
New Dry Cyclone Collector for Boiler 8

Dear Mr. Raiola:

On May 10, 2006, you submitted an application requesting authorization to install a new dry cyclone collector for Boiler 8 to operate in parallel with the existing wet cyclone collectors. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

A handwritten signature in black ink, appearing to read "Trina Vielhauer".

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Mr. William A. Raiola, V.P. of Sugar Processing Operations
U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Air Permit No. 0510003-035-AC
Facility ID No. 0510003
Clewiston Sugar Mill and Refinery
New Dry Cyclone Collector for Boiler 8
Hendry County, Florida

Facility Location: U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

Project: The applicant proposes to install a new dry cyclone dust collector to operate in parallel with two existing wet cyclone collectors on Boiler 8. Details of the project are provided in the application and the enclosed "Technical Evaluation and Preliminary Determination".

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the

U.S. Sugar Corporation
Clewiston Sugar Mill and Refinery

Draft Air Permit No. 0510003-035-AC
Dry Cyclone Dust Collector for Boiler 8

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

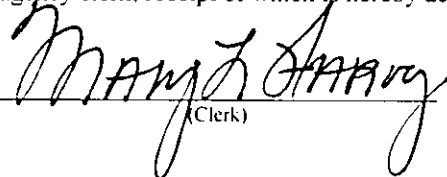
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5/16/2006 to the persons listed below.

Mr. William A. Raiola, U.S. Sugar*
Mr. Don Griffin, U.S. Sugar
Mr. David Buff, Golder Associates Inc.
Mr. Ron Blackburn, SD Office

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


(Clerk)

5/16/06
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

Draft Air Permit No. 0510003-035

U.S. Sugar Corporation – Clewiston Sugar Mill and Refinery
Hendry County, Florida

Applicant: The applicant for this project is the U.S. Sugar Corporation. The applicant's authorized representative and mailing address is: Mr. William A. Raiola, Vice President of Sugar Processing Operations, U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery, 111 Ponce DeLeon Avenue, Clewiston, Florida 33440.

Facility Location: U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

Project: The applicant proposes to install a new dry cyclone collector to operate in parallel with the two existing wet cyclone collectors. The cyclones act as pre-control devices for the I.D. fan and electrostatic precipitator (ESP). The purpose of the project is to reduce the exhaust flow through the two existing wet cyclone collectors and prevent carryover of water into the ESP control system. The project is expected to improve performance of the particulate matter control system.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

(Public Notice to be Published in the Newspaper)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> 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. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee <i>Rachel Delta</i></p> <p>B. Received by (Printed Name) <input type="checkbox"/> Agent <i>Rachel Delta</i> <input type="checkbox"/> Addressee</p> <p>C. Date of Delivery <i>5-15-06</i></p>
<p>1. Article Addressed to:</p> <p>Mr. William A. Raiola, V.P. of Sugar Processing Operations Clewiston Sugar Mill and Refinery United States Sugar Corporation 111 Ponce DeLeon Avenue Clewiston, Florida 33440</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p><i>7000 1670 0013 3110 1472</i></p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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

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Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

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

PS Form 3800, May 2000 See Reverse for Instructions