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093-87757

July 30, 2010

Mr. Jeff Koerner, P.E.
Air Permitting North
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: UNITED STATES SUGAR CORPORATION CLEWISTON MILL
COMMENTS ON DRAFT TITLE V PERMIT NO. 0510003-032-AV AND AIR CONSTRUCTION
PERMIT NO. 0510003-031-AC**

Dear Mr. Koerner:

United States Sugar Corporation (U.S. Sugar) and Golder Associates Inc. (Golder) have received Draft Title V Permit No. 0510003-032-AV for the Clewiston Mill, issued by the Department on February 8, 2010. Upon review of the draft permit, we have a few minor comments. We do not believe that revising the draft permit will require re-publishing the public notice. Our comments are provided below.

DRAFT TITLE V PERMIT NO. 0510003-032-AV

Section 3. Specific Conditions

Subsection A. Boilers 1 and 2

Page 8 of 47

Very first sentence at top of page: appears to contain an extraneous apostrophe (') at the beginning of the sentence.

Section 3. Specific Conditions

Subsection C. Boiler 7

Page 24 of 47, Condition C.28

It is requested that the condition be changed to reflect the current requirements of Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60), Subpart Db, which specifies a semi-annual reporting period. §60.49b, Reporting and Recordkeeping Requirements, states the following:

(w) The reporting period for the reports required under this subpart is each 6 month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

See also Appendix L, NSPS provisions, of the draft permit.

(Note: draft Permit No. 0510003-031-AC may also need to be revised in order to change Permit No. 0510003-018-AC.)

Page 33 of 47, Condition D.24

It is requested that the condition be changed to reflect the current requirements of 40 CFR 60, Subpart Db, which specifies a semi-annual reporting period. §60.49b, Reporting and Recordkeeping Requirements, states the following:

(w) The reporting period for the reports required under this subpart is each 6 month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.



Golder Associates Inc.

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See also Appendix L, NSPS provisions, of the draft permit.

(Note: draft Permit No. 0510003-031-AC may also need to be revised in order to change Permit No. PSD-FL-333.)

Appendix I – Fuel Monitoring
Page I-1 – Distillate Oil

Condition 5.a. – U.S. Sugar requests that the heating value of the fuel be included with the certified fuel oil analysis from the vendor. Since this requires specialty analysis, not normally supplied with the standard vendor analysis, it is requested that this requirement be removed. The heating value must already meet minimum American Society for Testing and Materials (ASTM) specifications for distillate fuel oil.

Condition 5.b. – Request that the methods required by the Mandatory Greenhouse Gas Reporting Rule (40 CFR 98) be added to the list of allowable test methods.

Thank you for your consideration of these comments. Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

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

cc: Keith Tingberg
Peter Briggs

DB/tz