

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL USA 32653
Telephone (352) 336-5600
Fax (352) 336-6603
www.golder.com



April 13, 2006

053-7629

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

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BUREAU OF AIR REGULATION

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

SUBJECT: UNITED STATES SUGAR CORPORATION
CLEWISTON MILL
FACILITY NO. 0510003
BOILER NO. 7 FRONT WALL REPAIR

Dear Mr. Koerner:

The purpose of this correspondence is to advise the Department of an upcoming repair/replacement activity planned for Boiler No. 7 during the current 2006 off-season at the United States Sugar Corporation (USSC) Clewiston Mill. Air construction Permit No. 0510003-022-AC was issued to 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 January 23, 2006, USSC submitted the required report for the 2005 off-season. The report included a schedule of maintenance and repair activities planned for the upcoming 2006 off-season. Since submission of that report, an additional repair/replacement activity has been identified for Boiler No. 7 for the 2006 off-season.

In early February of this year, Boiler No. 7 lost the front wall of the furnace. The front wall was of tube and tile design. USSC prefers to replace the front wall with a membrane-type wall, which represents modern design. This new design is not expected to affect emissions; however, a small increase in steam generation may result due to increased heat transfer efficiency of the membrane type wall. The cost to design and install the new membrane wall is approximately \$1.3 million.

In accordance with the construction permit, this replacement USSC is planning is "functionally equivalent" to the existing components, and is intended to return Boiler No. 7 to its original design state. The repair/replacement activities will not

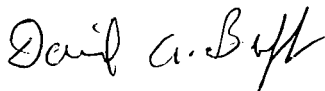


increase the permitted capacity of Boiler No. 7, nor change the basic design parameters including fuel firing rates or heat input rates. The maximum permitted 1-hour average steam rate for the boiler is 385,000 lbs/hr, while the permitted maximum 24-hour steam production rate is 350,000 lbs/hr. These permitted rates will not change. In past compliance testing of Boiler No. 7, the boiler has consistently achieved a steam production rate greater than 90 percent of the maximum 24-hour permitted steam rate. The repairs will not increase the emission rates of Boiler No. 7. 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/all

cc: Don Griffin
Peter Briggs
R. Blackburn, FDEP

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