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December 1, 2008

**BUREAU OF AIR REGULATION**

0738-7595

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

Attention: Mr. Al Linero, Chief, Air Permitting South

**SUBJECT: UNITED STATES SUGAR CORPORATION, CLEWISTON MILL  
3-YEAR BOILER MAINTENANCE PROJECT  
PERMIT NO. 0510003-022-AC  
2008 OFF-SEASON REPAIRS AND PLANNED REPAIRS FOR THE 2009  
OFF-SEASON**

Dear Mr. Linero:

United States Sugar Corporation (U.S. Sugar) was issued Air Construction Permit No. 0510003-022-AC on June 3, 2003. This permit authorized a 3-year boiler maintenance project at the existing Clewiston Sugar Mill and Refinery located in Hendry County, Florida for the 2003 through 2005 off-seasons. Because all the repairs were not completed during the specified time, U.S. Sugar requested an extension to the air permit to include the 2006 through 2008 off-seasons. Due to the pending Title V renewal permit application, the Florida Department of Environmental Protection chose to not extend Permit No. 0510003-022-AC, and the permit has since expired. However, U.S. Sugar is continuing to summarize the maintenance activities conducted on the boilers during the previous off-season and provide advance notice of planned maintenance for the upcoming off-season.

The purpose of this correspondence is to provide the list of maintenance and repair activities at the Clewiston Mill conducted during the 2008 off-season, and the repairs planned on the boilers for the upcoming 2009 off-season. Condition 4 of the Emissions Unit Specific Conditions of Permit No. 0510003-022-AC requires U.S. Sugar 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:

- General description of the work performed on each boiler during the previous off-season;
- Summary of the off-season maintenance inspections; and
- Revised schedule of maintenance and repair activities for the next off-season.

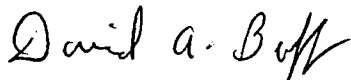
The current U.S. Sugar crop season began October 1, 2008. The list of maintenance and repair activities conducted during the 2008 off-season, and those planned for the 2009 off-season, is provided in the attached table.

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, nor change the basic design parameters, including fuel firing rates or heat input rates. The repairs will not increase the emission rates of any boiler, nor 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 Keith Tingberg at (863) 902-3186 if you have any questions concerning this information, or need additional information.

Sincerely,

**GOLDER ASSOCIATES INC.**



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

DB/tlc

Enclosure

cc: Carter Endsley, FDEP  
Keith Tingberg, USSC  
Bret Nesbitt, USSC

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## **Clewiston Boiler Repairs Summary 2008 Off-Season**

Boiler repairs and maintenance conducted during the 2008 off-season are described below.

### **Boiler No. 1**

- Replaced approximately 200 generating bank tubes identified by non-destructive evaluation testing in 2007; and
- Basic refractory repairs.

### **Boiler No. 2**

- Basic refractory repairs.

### **Boiler No. 4**

- Replaced roof refractory;
- Basic refractory repair;
- Installed new ash conveyor; and
- Installed new steam drum internals.

### **Boiler No. 7**

- Re-tubed economizer;
- Basic refractory repairs; and
- Replaced front row of collector plates in electrostatic precipitator (ESP).

### **Boiler No. 8**

- Replaced smokestack; and
- Basic refractory repairs.

## **Clewiston Boiler Repair Projections 2009 Off-Season**

Boiler repairs projected to be accomplished in the 2009 off-season are described below.

### **Boiler No. 1**

- Basic refractory repairs.

### **Boiler No. 2**

- Basic refractory repairs.

### **Boiler No. 4**

- Replace rear wall refractory; and
- Basic refractory repairs.

### **Boiler No. 7**

- Basic refractory repairs;
- Replace all first field electrodes and collector plates in ESP;
- Replace penthouse refractory and insulation; and
- Install new drum internals.

### **Boiler No. 8**

- Basic refractory repairs; and
- Replace ID fan housing and duct work.