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May 8, 2008

0738-7595

Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attention: Mr. Jeff Koerner, P.E. Air Permitting North

SUBJECT: UNITED STATES SUGAR CORPORATION
CLEWISTON MILL
COMMENTS ON DRAFT TITLE V PERMIT NO. 0510003-032-AV

Dear Mr. Koerner:

United States Sugar Corporation (U. S. Sugar) and Golder Associates Inc. (Golder) has received Draft Title V Permit No. 0510003-032-AV for the Clewiston Mill, issued by the Department on February 7, 2008. Upon review of the final permit, we believe some of the comments we have are of such nature that they should be corrected in the permit. Some of the comments will require that the Draft Air Construction Permit No. 0510003-031-AC be revised.

Please consider the following comments to the draft Title V permit. We are providing an electronic markup of the Title V permit to expedite review and revision of the draft permit by the Department. Although much effort and time were spent in developing these comments, we hope for quick resolution of these issues so that a revised draft permit can be issued.

Table of Contents
Delete Section 3.J. for the Rock Crusher, as this source no longer exists.

Add a new section for *Rental Package Boiler*. A draft air construction permit was issued for the boiler on May 5, 2008.

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Section 1. Facility Information
U.S. Sugar requests that the Facility Description wording be revised as shown in the electronic markup.

Under "Other Regulated PSD Pollutants", please delete the references to: municipal waste combustor organics; municipal waste combustor metals; municipal waste combustor acid gases; and municipal solid waste landfill emissions. These are not emitted by the Clewiston Mill.

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Under "Summary of Regulated Emissions Units", under *Sugar Refinery*, add *Rental Package Boiler* as an emissions unit, and move the *Lime storage and truck/rail handling system* to under the *Sugar Mill.*

Remove EU 011, *Lime silo with baghouse at the boiling house*, and EU 032, *Portable rock crusher*, as these units no longer exist. Also add these units to the permitting note.

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Under Condition 10, additional requirements from Permit No. 0510003-033-AC related to control of fugitive dust emissions were added.

Rule language has been added to Conditions 12.

Under Condition 13.b, the Department is limiting excess emissions during startup and shutdown to two hours in any 24-hour period. U.S. Sugar requested the duration of startup and/or shutdown, as described in their startup/shutdown plans, be specified for excess emissions. This can be up to 12 hours for some boilers. The Department discusses their evaluation of U.S. Sugar's request in the Technical Evaluation and Preliminary Determination (page 7 of 7). In this discussion, the Department recognizes that excess emissions of opacity might occur, and that an alternate standard could be specified since compliance is readily observable. However, no alternate opacity standard is specified by the Department during startup/shutdown. We therefore request that Condition 13.b. be revised to read as follows:

b. The duration of excess emissions shall be minimized by in no case exceed two hours in any 24-hour period, except that excess opacity is allowed for up to 12 hours for a cold startup of the boilers, and for up to 5 hours for a hot startup.

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Section 2. Facility-Wide Conditions
Condition 21: At the beginning of the last sentence, add the phrase "If applicable", since the facility is not currently subject to RMP.

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Section 3. Specific Conditions, Subsection A. Boilers 1 and 2
Several corrections have been made to the Emissions Unit Description.

Condition A.1- The revised steam rates are from the Title V renewal application.

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Condition A.3.a- Although a new air quality modeling analysis was not conducted, a comparison of the new SO_2 emission rates for the boilers burning 0.05% sulfur fuel oil versus the previously modeled emissions based on 1.6% S (off-season) and 2.5% S (crop season) was presented in the Title V renewal application. This comparison was actually based on bagasse burning in the boilers, since bagasse burning theoretically results in the highest SO_2 emissions. Since the previous air modeling analysis had indicated compliance with the air quality standards, and the revised emissions were much lower than those used in the previous analysis, no additional modeling was believed necessary.

Condition A.5- we request that the requirement to monitor inlet water pressure to the scrubbers be removed, since it is not a CAM parameter and is not necessary for operation of the scrubber. Also, water flow rate should be added consistent with the CAM plan.

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Condition A.10- fuel oil sulfur content methods have been added, consistent with previous permits.

Condition A.11- we request that the requirement to monitor inlet water pressure to the scrubbers be removed, since it is not a CAM parameter and is not necessary for operation of the scrubber. Also, water flow rate should be added consistent with the CAM plan.

Condition A.12- we request that the requirement to monitor inlet water pressure to the scrubbers be removed, since it is not a CAM parameter and is not necessary for operation of the scrubber. Also, water flow rate should be added consistent with the CAM plan.

Condition A.13- we request that the requirement to monitor inlet water pressure to the scrubbers be removed, since it is not a CAM parameter and is not necessary for operation of the scrubber.

Condition A.14.a, b- Boiler Nos. 1 and 2 do not have O_2 or CO continuous monitors, as this has never been a requirement of any previous air construction or operating permit.

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Condition A.14.c,d- Oil monitoring and wet scrubber parameters have been revised to be consistent with previous permits and the CAM plan.

Condition A.15- the CAM plan has been separated for Boiler Nos. 1 and 2, since the monitoring parameter ranges are different for each. In April 2007, U.S. Sugar submitted to the Departrement updates to its CAM plan, which incorporated 2006-2007 crop season test data. We believe that the appropriate excursion level should be 90% of the minimum test run value, based on the previously in effect Boiler MACT regulations. However, we accept the Department's methodology, and agree with the 215 gpm for water flow rate for both Boiler Nos. 1 and 2. We also believe the pressure drop indicator range for both boilers should be 7 inches. This is based on the 12/8/2000 testing for Boiler No. 1 which reflected a pressure drop of 7.0 inches, and the 12/17/02 testing of Boiler No. 2 which reflected a pressure drop as low as 6.3 inches.

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Condition A.17.b- changes to make wording consistent with previous permits.

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Minor revisions to be consistent with previous permits.

Condition B.5- we request that the requirement to maintain the annular throttling gap be replaced by the CAM parameter of pressure drop. Pressure drop is a better indicator of proper scrubber operation than the water overflow to the scrubber.

Condition B.6.b- we request minor revisions to this condition to reflect actual procedures.

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Minor revisions to be consistent with previous permits and for clarification.

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Condition B.14- EPA Method 19 should be removed. This is a new requirement and not contained in any previous permit. The calculation method for emissions is the thermal efficiency method using 55% thermal efficiency. A note has been added to this condition to clarify. Methods have also been added for fuel oil analysis.

Condition B.15- we request that the requirement to monitor inlet water pressure to the scrubbers be removed, since it is not a CAM parameter and is not necessary for operation of the scrubber. Also, water flow rate should be added consistent with the CAM plan.

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Condition B.17- minor clarifications.

Condition B.19- we request that the requirement to monitor inlet water pressure to the scrubbers be removed, since it is not a CAM parameter and is not necessary for operation of the scrubber.

Condition B.20- revise to be consistent with permit no. 0510003-039-AC.

Condition B.21.a- this condition was revised to be consistent with Condition E.6.3 of the current Title V permit and Condition 22 of Permit No. 0510003-010-AC/PSD-FL-272A.

Condition B.21.b- this condition is redundant with condition b.6.a, and therefore was reworded to refer to the previous condition.

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Condition B.21.c- revised to reflect permit no. 051003-039-AC.

Condition B.21.d- we request that the requirement to monitor inlet water pressure to the scrubbers be removed, since it is not a CAM parameter and is not necessary for operation of the scrubber.

Condition B.22- additional wording added to reflect PSD permit.

Condition B.23- In April 2007, U.S. Sugar submitted to the Department a request to revise the wet scrubber operating parameters for Boiler No. 4, as contained in permit no. 0510003-010-AC/PSD-FL-272A, and 0510003-017-AV. The request also revised the CAM plan for Boiler No. 4, which incorporated 2006-2007 crop season test data. We believe that the appropriate excursion level should be 90% of the minimum test run value, based on the previously in effect Boiler MACT regulations. However, we accept the Department's methodology, but propose a minimum water flow rate of 245 gpm, based on the 12/17/1996 stack test on the boiler. We also propose the pressure drop indicator range to be 6.4 inches, based on the 12/01/2006 testing for Boiler No. 4.

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Minor updates.

Condition C.2.a- the specification for the nitrogen content of the fuel oil has been deleted in draft permit no. 0510003-031-AC.

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Permitting note has been added after Condition C.14.

Condition C.15- EPA Method 19 should be removed. This is a new requirement and not contained in any previous permit. The calculation method for emissions is the thermal efficiency method using 55% thermal efficiency. Condition C.19 contains the thermal efficiency method. Methods have also been added for fuel oil analysis.

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Condition C.21.a- the requirement to record the duration of SSM events is new and not contained in any previous permit for Boiler No. 7. Please remove.

Condition C.21.b- Wording revised to be consistent with permit no. 0510003-018-AC.

Condition C.22- a revised alternative opacity monitoring plan for firing oil has been approved by EPA, by letter dated February 2, 1008. The condition has been revised to reflect the EPA letter approval.

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Condition C.25- clarified averaging period is based on a 3-hour block average.

Condition C.27- deleted VE observation log based on revised alternative opacity monitoring procedure.

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Minor updates to Emissions Unit Description.

Condition D.1- the Department has added the word "untreated" in regards to wood chips. This wording is not contained in any previous air construction permit. Permit No. 0510003-037-AC/PSD-FL-333C refers to "wood chips". Please remove the word "untreated".

Condition D.2.b- the Department has added a definition of "untreated wood chips" that is not contained in any previous air construction permit. Permit No. 0510003-037-AC/PSD-FL-333C did not "wood chips". Therefore, this definition should be removed.

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Condition D.4- Actual O_2 readings from the Boiler No. 8 CEMS show that the O_2 at the stack ranges from about 5 to 7 percent. This would translate to 3 to 6 percent in the boiler exhaust. For distillate oil firing, the CEMS data shows the O_2 at the stack is about 6 percent, which would translate to 4 to 5 percent in the boiler exhaust.

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Condition D.7.b(3)- clarification has been added that the up to eight 15-minute CEMS blocks may be excluded.

Condition D.8- Methods 6 and 7 were not contained in the PSD permit. It is noted also that Method 19 was in the PSD permit only due to the inclusion of the Boiler MACT rules (40 CFR Part 63, Subpart DDDDD). The calculation method for emissions is based on the thermal efficiency method (see condition D.12). Therefore, it is requested that Method 19 be removed.

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Condition D.10- U.S. Sugar requests that the requirement for annual SO_2 testing be changed to "once every five years" or "prior to permit renewal". There is no SO_2 control equipment on Boiler No. 8. Emissions have tested below the permit limit. Annual testing for SO_2 is deemed unnecessary.

Also, condition D.23 from the PSD permit has been added.

Condition D.12- revised wording from draft permit no. 0510003-031-AC has been added.

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Condition D.14- additional wording that was not contained in the PSD permit has been removed from this condition. Wording that has been left out from the PSD permit has also been added.

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Condition D.18.a- initial compliance requirements have already been satisfied.

Condition D.18.b- We request that the requirement to sample and analyze either bagasse or wood chips only be required during a calendar quarter that the particular fuel is actually fired in Boiler No. 8.

Condition D.19- The recommended CAM parameter limits are 25 kW for crop season operation, and 18 kW for off-season operation. These are based on the minimum test run average for compliance tests during these two periods. In the off-season, boiler load is lower (roughly 50% of full load; therefore the PM loading to the ESP is less and the power input is proportionately less.

Averaging period is clarified to be 3-hour block average.

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Emissions Unit Descriptions- descriptions from Conditions F.4 and F.5 have been moved to the Emissions units Descriptions, consistent with the air construction permit (PSD-FL-272A).

Condition F.1- has been removed, since it is not contained in PSD-FL-272A.

Condition F.2- the annual fuel oil usage limitation has been removed, since it is not contained in PSD-FL-272A.

Condition F.4, F.5, F.6 and F.7- wording has been revised to be consistent with PSD-FL-272A.

Condition F.9- wording has been added regarding fuel oil testing methods to be consistent with PSD-FL-272A.

Condition F.15- The minimum pressure drop for the CAM Plan should be 6 inches of water column, consistent with the minimum test run average pressure drop of 6.2 inches and considering the accuracy of the monitor.

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Emissions Units Descriptions- minor revisions. Also, three sugar silos (S-13, S-14, and S-15) have never been constructed, therefore these should be removed.

Condition G.4- The three sugar silos (S-13, S-14, and S-15) have never been constructed, therefore these should be removed. The total emissions therefore should be 3.89 lb/hr and 17.0 TPY.

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Emissions Unit Descriptions – minor revisions.

Condition H.3- The PM standard is now 15.0 lb/hr based on EPA Method 5, while the PM10 standards is 0.005 gr/dscf and 4.2 lb/hr based on EPA Method 201A (permit no. 0510003-038-AC/PSD-FL-346A).

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Condition H.6- Added EPA Method 201A for PM_{10} emissions.

Condition H.9- Revisions to be consistent with PSD permit.

Condition H.10- added new condition, reflecting requirements from PSD permit. Clarified averaging time.

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Emissions Units Descriptions- Remove EU 011, Lime silo at the boiling house, since this has been shutdown.

Condition I.2- additional operating rate limitations added per the air construction permits.

Additional emission standards and opacity standards added per the air construction permits.

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Condition I.4- clarifications added, per the air construction permit.

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Subsection J, Temporary Portable Rock Crusher, should be removed as this unit is no longer operating.

This section should be replaced with the Rental Package Boiler, which was just issued a draft air construction permit (permit no. 0510003-034-AC).

We will be providing comments on the appendices next week.

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

Sincerely,

GOLDER ASSOCIATES INC.

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DB/nav

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