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Florida Department of Environmental ~~Protection~~ **BUREAU OF AIR REGULATION**
Department of Air Resources Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

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

**RE: UNITED STATES SUGAR CORPORATION, CLEWISTON MILL
3-YEAR BOILER MAINTENANCE PROJECT
PERMIT NO. 0510003-022-AC
2007 OFF-SEASON REPAIRS AND PLANNED REPAIRS FOR THE 2008
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 upcoming 2006 through 2008 off-seasons. Due to the pending Title V renewal permit application, FDEP 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 2007 off-season, and the repairs planned on the boilers for the upcoming 2008 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 U.S. Sugar crop season began October 8, 2007. The list of maintenance and repair activities conducted during the 2007 off-season, and those planned for the 2008 off-season, are 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 rated 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/CB/sl

Enclosures

cc: Ajaya Satyal, FDEP
Bret Nesbitt, USSC
Keith Tingberg, USSC

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Clewiston Boiler Repairs Summary 2007 Off-Season

Boiler repairs and maintenance conducted during the 2007 off-season are described below.

Boiler No. 1

- Installed new soot blower.
- Minor refractory work.

Boiler No. 2

- Installed new roof tubes.
- Rebuilt boiler upper front wall.
- Replaced air heater expansion joint.
- Installed new soot blower.
- Minor refractory work.

Boiler No. 4

- Rebuilt grates.
- Installed new undergrate plenum, ducts, and dampers.
- Installed new undergrate sluice system.
- Installed new economizer.
- Installed new soot blowers.
- Minor refractory work.

Boiler No. 7

- Restored grates.
- Installed new upper generating tubes on the last row.
- Modified generating bank outlet to reduce pressure drop.
- Restored soot blowers.
- Minor refractory work.

Boiler No. 8

- Installed smaller ID fan motor.
- Minor refractory work.

Clewiston Boiler Repair Projections 2008 Off-Season

Boiler repairs projected to be accomplished in the 2008 off-season are described below.

Boiler No. 1

- Retube west 1/3 of generating bank tubes.
- Replace air heater expansion joint.
- Install new roof tubes.
- General refractory and breeching work.

Boiler No. 2

- General refractory and breeching work.

Boiler No. 4

- Replace ash conveyor.
- Increase capacity of ID fan. The increased capacity will not increase steam production, but will allow a higher gas flow out of the boiler be achieved to maintain a negative furnace pressure.
- Replace air heater expansion joint.
- Install new grate drives.
- Replace steam drum steam/water separators.
- General refractory and breeching work.

Boiler No. 7

- Retube economizer.
- Replace ash conveyor.
- Partial retubing of air heater.
- Restore ESP.
- General refractory and breeching work.

Boiler No. 8

- Repipe soot blowers.
- Install new ID fan dampers.
- Replace ESP inlet flue.
- General refractory and breeching work.