

Koerner, Jeff

11-11-05

From: Koerner, Jeff
Sent: Friday, November 11, 2005 12:39 PM
To: Buff, Dave; 'Don Griffin'; Peter Briggs
Subject: US Sugar Projects - Status

Attachments: PSD-FL-333B, RFI - 11-11-05.doc; US Sugar AV Renewal, RFI - 11-11-05.doc

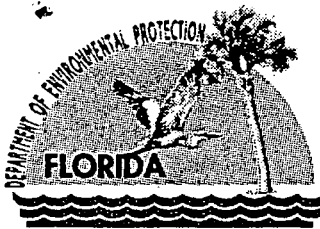
Dave, Don and Peter,

Here are two letters identifying the status of the current projects to revise the PSD permit for Boiler 8 and renew the Title V permit. I think we're almost there and would like to get these done. For Boiler 8, I need an explanation of the problems with ammonia slip. I'm reviewing the CAM Plan for the Title V permit and should be done soon. Hope things in Clewiston are getting back to some version of "normal".

Jeff



PSD-FL-333B, RFI - US Sugar AV
11-11-05.do... renewal, RFI - 11-..



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

November 11, 2005 (Emailed)

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William A. Raiola, V.P. of Sugar Processing Operations
United States Sugar Corporation
111 Ponce DeLeon Avenue
Clewiston, FL 33440

Re: Request for Additional Information

U.S. Sugar Corporation – Clewiston Sugar Mill and Refinery
Project Nos. 0510003-031-AC and 0510003-032-AV
Title V Renewal Application with Concurrent Air Construction Permit Revisions

Dear Mr. Raiola:

The purpose of this letter is to update you on the status of your application to renew your Title V air operation permit. To date, we have received the following additional information related to these projects:

- 08/05/05: Updated application pages to operate a portable rock crusher at this facility.
- 09/26/05: Title V CAM Plan (still under review for completeness).
- 10/18/05: Letter dated 10/17/05 in response to our request for additional information.

The application is currently incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The CAM Plan was not submitted with the initial application and is currently under review for completeness. We will request any additional information regarding the CAM Plan by 11/25/05 (60 days after receipt).
2. We will consider establishing periods of allowable excess emissions (if deemed necessary) contingent on the following:
 - a. Each pollutant must be considered separately as well as the control method. For example, it is possible that excess opacity could be observed during a startup if the control equipment cannot be placed in operation prior to startup for some reason. This is determined on a case-by-case basis.
 - b. The compliance status of a pollutant must be readily verifiable during the startup or shutdown (i.e., opacity observations, CEMS, etc.). For example, particulate matter emissions during a startup are not generally verifiable because EPA Method 5 is typically valid only during steady-state operation (excluding startups, shutdowns, and malfunctions). However, opacity observations may be made by a certified observer at any time.
 - c. The duration and nature of the event as well as the duration and maximum level of emissions must be identified for consideration. For example, although a full boiler startup may take 6 – 12 hours, it may be possible to place the ESP in operation after the first hour of startup. If necessary and supported by actual data, an alternate opacity standard could be considered for the first hour of a startup. Steps to minimize emissions should be identified as well as expected maximum emission levels. This is determined on a case-by-case basis.
 - d. For units with CEMS, the underlying air construction permits may already provide allowable periods of excess emissions. Otherwise, emissions data collected during startups could be used to identify the duration of excess emissions or possibly alternate standards that reflect appropriate procedures are being taken to minimize excess emissions for the startup.

"More Protection, Less Process"

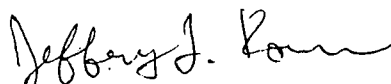
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3. We are also processing a separate application to revise the PSD permit for the recently installed Boiler 8. The revisions include: incorporate NEHSAP Subpart DDDDD requirements for industrial boilers (with alternate pH monitoring procedures); revise the CO standard; add wood chips as an authorized fuel; and revise the ammonia slip standard. Please comment on whether you request that we hold the Title V renewal application "incomplete" while we process and finalize the revisions of the Boiler 8 PSD permit.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,



Jeffery F. Koerner, P.E.

Air Permitting North Program

cc: Mr. Peter Briggs, U.S. Sugar
Mr. Don Griffin, U.S. Sugar
Mr. David Buff, Golder Associates Inc.
Mr. Ron Blackburn, SD Office
Ms. Kathleen Forney, EPA Region 4