

4-13-06

Koerner, Jeff

From: Buff, Dave [DBuff@GOLDER.com]
Sent: Thursday, April 13, 2006 9:35 AM
To: Koerner, Jeff
Cc: Don Griffin; Peter Briggs
Subject: RE: U.S. Sugar 3-Yr Boiler Maintenance project

OK. We will be sending a request to remove the bagasse dust collectors and increasing short-term steam rate on Boiler No. 8. Boiler 8 started up I believe in January 2005. The initial compliance tests were performed in March 2005.

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From: Koerner, Jeff [mailto:Jeff.Koerner@dep.state.fl.us]
Sent: Thursday, April 13, 2006 9:31 AM
To: Buff, Dave
Cc: Don Griffin; Peter Briggs
Subject: RE: U.S. Sugar 3-Yr Boiler Maintenance project

Dave,

Yes, I received the Maintenance Summary Report in January. Please send the Capacity Report and Emissions Summary to me also. Three years ago, it looked like we might finalize a RRRM rule similar to EPA's. I believe this is still in litigation and likely a long way off. Although the AC permit expired, I believe it's a good idea to continue summarizing the maintenance efforts during the off season and providing advance notice of items that are out of the ordinary.

Also, we spoke last week about discontinuing the baghouses on the bagasse conveyor system, which is part of the Boiler 8 project. Unfortunately, the Boiler 8 revisions were already through the public notice and ready for issuance. I can make the revisions, but would need to see a good description of the methods used to confine and control fugitive dust from this system as well as the impact on emissions estimates compared to that provided in the original PSD application with Boiler 8. As long as you're requesting that change, it's probably a good time to revise the maximum steam production rate if you still believe the unit was constructed with a higher capacity. Has Boiler 8 been in operation for more than 2 years yet?

Let me know.

Thanks!

Jeff Koerner, BAR - Air Permitting North
 Florida Department of Environmental Protection
 850/921-9536

6/3/2006

Koerner, Jeff

From: Koerner, Jeff
Sent: Tuesday, April 04, 2006 5:38 PM
To: Holladay, Cleve
Subject: US Sugar - AC/AV Renewal - SO2 Modeling

Cleve,

Please review the Golder SO2 modeling analysis for US Sugar and distillate oil firing. Day #30 for completeness review based on submittal of the modeling files is April 7th (Friday).

Thanks!

Jeff Koerner, BAR - Air Permitting North
Florida Department of Environmental Protection
850/921-9536

SO₂ Modeling files rec'd 3-8-06.