

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL USA 32653
Telephone (352) 336-5600
Fax (352) 336-6603
www.golder.com



YK

August 4, 2005

0537541

Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: Mr. Jeff Koerner, Air Permitting South

RE: UNITED STATES SUGAR CORPORATION
CLEWISTON AND BRYANT MILLS (FACILITY NOS. 0510003 AND 0990061)
EMISSION UNIT ADDENDUM TO TITLE V PERMIT RENEWAL APPLICATION
RELOCATABLE ROCK CRUSHER (FACILITY NO. 7775035) 0510003-032-AV

Dear Mr. Jeff Koerner:

Please find enclosed four (4) copies of the applicable emission unit pages for the relocatable rock crusher (with diesel engine) as well as four (4) copies of the rock crusher's current operating permit (Permit No. 7775035-003-AO) to be incorporated into the United States Sugar Corporation Title V Renewal Application. The rock crusher operates on property owned by the United States Sugar Corporation, such as agricultural lands in Glades, Hendry, and Palm Beach Counties. Please insert this additional emissions unit into the Title V application recently submitted to your office. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff

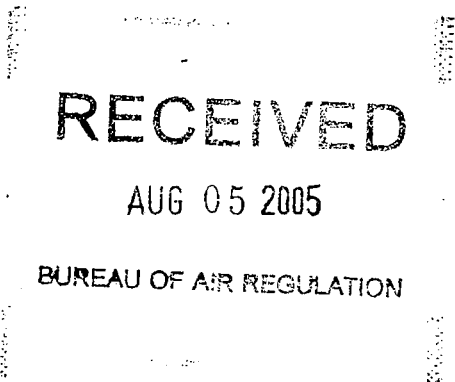
David A. Buff, P.E., Q.E.P.
Principal Engineer

cc: Ron Blackburn, FDEP SW District
Don Griffin
Peter Briggs
Jose Garcia, Palm Beach County Health Unit

Enclosures

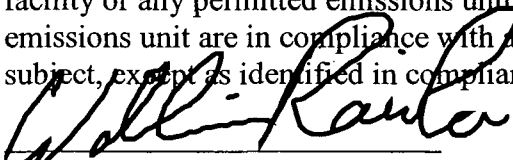
DB/CB/jej

Y:\Projects\2005\0537541 U.S. Sugar Clewiston Mill\4.1\Rock Crusher\L072205.doc

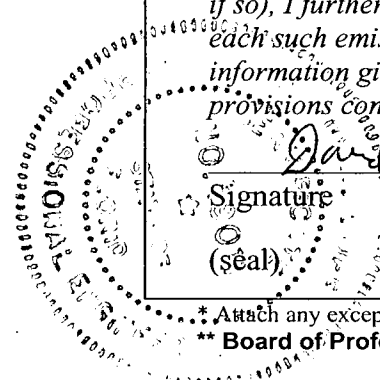


Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: William A. Raiola, Senior Vice President, Sugar Processing Operations
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: United States Sugar Corporation Street Address: 111 Ponce DeLeon Avenue City: Clewiston State: FL Zip Code: 33440
4. Application Responsible Official Telephone Numbers... Telephone: (863) 983-8121 ext. Fax: (863) 902-2729
5. Application Responsible Official Email Address: braiola@ussugar.com
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.  Signature _____ Date <u>August 4, 2005</u>

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 545 Fax: (352) 336-6603
4. Professional Engineer Email Address: dbuff@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature: <u>David A. Buff</u> Date: <u>8/4/05</u> (seal)

* Attach any exception to certification statement.

** Board of Professional Engineers Certificate of Authorization #00001670

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application – For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application – For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an “unregulated emissions unit” does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Relocatable (Portable) Rock Crusher with diesel engine

3. Emissions Unit Identification Number: **001**

4. Emissions Unit Status Code:
A

5. Commence Construction Date:

6. Initial Startup Date:

7. Emissions Unit Major Group SIC Code:
20

8. Acid Rain Unit?
 Yes
 No

9. Package Unit:

Manufacturer: **Iowa Manufacturing Co. Crusher, Conveyors, and Feeder**

Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

This is a permitted (Permit No. 7775035-003-AO) relocatable stone crusher that operates with power supplied by a 318 horsepower (hp) diesel engine on property owned by the United States Sugar Corporation in Glades, Hendry and Palm Beach Counties.

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

Dust suppression by wetting, as needed

2. Control Device or Method Code(s): **061**

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: 435 TPH
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 20 hours/day 7 days/week 52 weeks/year 7,280 hours/year
6. Operating Capacity/Schedule Comment: <p>Refers to maximum throughput rate of the relocatable rock crusher. Maximum annual rate is 3,166,800 tons per year (TPY).</p> <p>Diesel engine maximum rate is 10 gallons per hour (GPH) diesel fuel (max 0.5% sulfur) at 318 horsepower (hp).</p>

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: Diesel Engine/Rock Crusher		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: P	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: Portable rock crusher that operates on property owned by the United States Sugar Corporation, such as agricultural lands in Glades, Hendry and Palm Beach counties.			

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

D. SEGMENT (PROCESS/FUEL) INFORMATION**Segment Description and Rate: Segment 1 of 2**

1. Segment Description (Process/Fuel Type): Manufacturing Industries; Mineral Products; Stone Quarrying/Processing; Primary Crushing		
2. Source Classification Code (SCC): 3-05-020-01		3. SCC Units: Tons Raw Material
4. Maximum Hourly Rate: 435	5. Maximum Annual Rate: 3,166,800	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: Based on crushing rock at maximum operation of 7,280 hours per year (hr/yr).		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): Internal Combustion Engines - Industrial; Distillate Oil (Diesel); Reciprocating		
2. Source Classification Code (SCC): 2-02-001-02		3. SCC Units: 1,000 Gallons Burned
4. Maximum Hourly Rate: 0.01	5. Maximum Annual Rate: 73,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 138
10. Segment Comment: Based on maximum operation of 7,280 hr/yr.		

EMISSIONS UNIT INFORMATION**Section [1]****Relocatable (Portable) Rock Crusher****E. EMISSIONS UNIT POLLUTANTS****List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	061		NS
PM₁₀	061		NS

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: EPA Method 9	
5. Visible Emissions Comment: Permit No. 7775035-003-AO and Rule 62-296.320(4)(b), F.A.C.	

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: USS-EU1-11 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: USS-EU1-12 <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

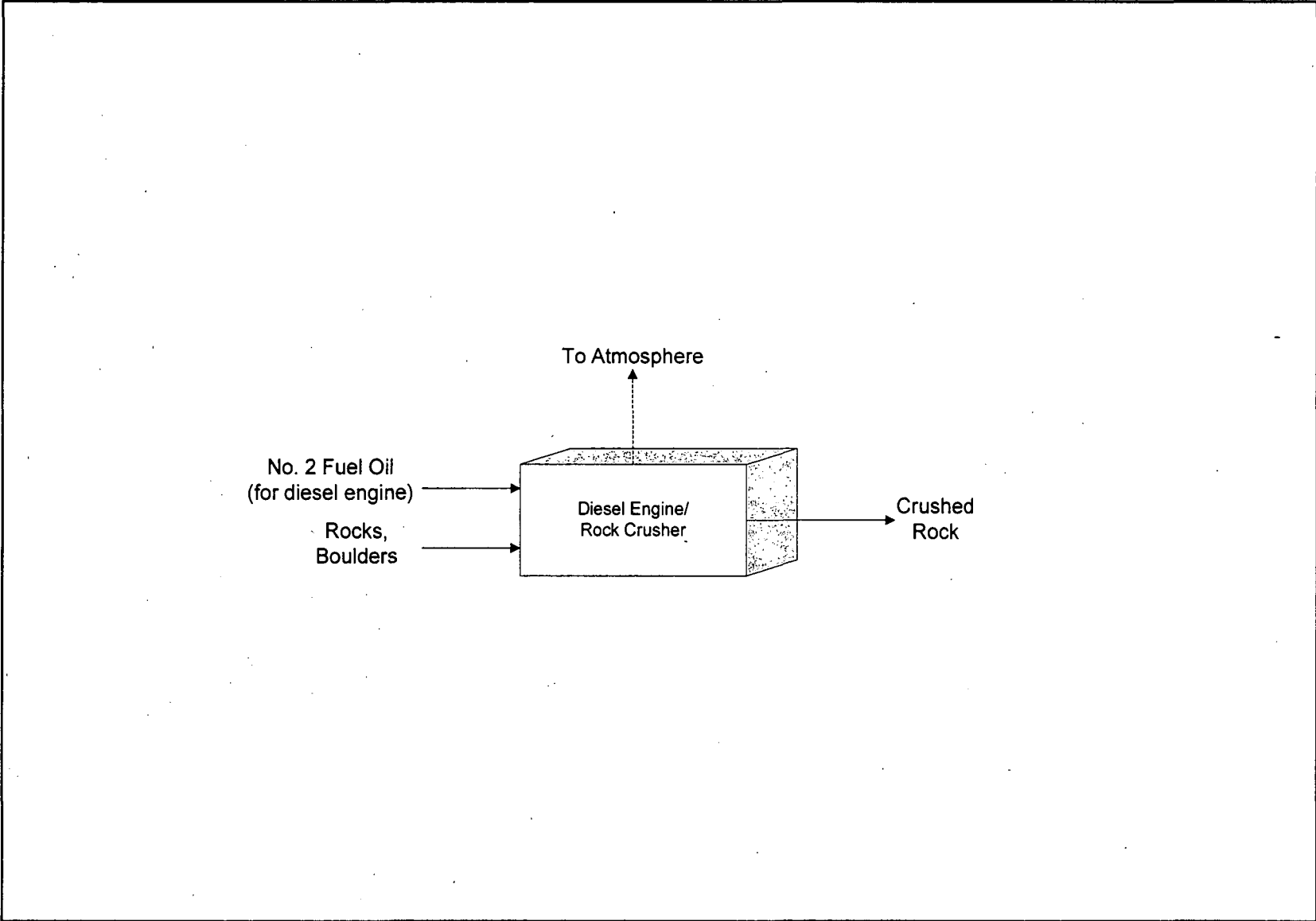
1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1]

Relocatable (Portable) Rock Crusher

Additional Requirements Comment



Attachment USS-EU1-I1
 U. S. Sugar Corporation
 Process Flow Diagram
 Clewiston, Florida

Process Flow Legend:
 Solid / Liquid ———→
 Gas - - - - -→
 Steam - · - · - · - -→

Emission Unit: Rock Crusher
 Filename: 0537541/4.1/Rock Crusher/USS-EU1-I1.vsd
 Latest Revision Date: 7/22/2005



ATTACHMENT USS-EU1-I2

DIESEL ENGINE FUEL ANALYSIS

Parameter	Diesel (0.5% S max)
Density (lb/gal)	7.2
Approximate Heating Value (Btu/lb)	19,535
Approximate Heating Value (Btu/gal)	138,000
<u>Ultimate Analysis (dry basis):</u>	
Carbon	84.7%
Hydrogen	15.3%
Nitrogen	0.18%
Oxygen	0.38%
Sulfur	0.5%
Ash/Inorganic	0.06% ^a
Moisture	0.51% ^a

Represents typical values.

Footnotes:

^a Source: Perry's Chemical Engineer's Handbook. Sixth Edition, 1984.
Represents average fuel characteristics.