

Golder Associates Inc.

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August 6, 2007

07387595

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

RECEIVED

AUG 14 2007

BUREAU OF AIR REGULATION

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

**RE: UNITED STATES SUGAR CORPORATION
CLEWISTON AND BRYANT MILLS
TITLE V RENEWAL APPLICATION
PROJECT NOS. 0510003-031-AC AND 0510003-032-AV
THIRD REQUEST FOR ADDITIONAL INFORMATION**

Dear Mr. Koerner:

United States Sugar Corporation (U.S. Sugar) has received the Department's request for additional information (RAI) dated June 29, 2007, regarding the Title V renewal application. Each of the Department's requests is answered below, in the same order as they appear in the June 29, 2007, RAI letter.

1. **Attached is the latest Compliance Report and Plan, which was submitted by Golder Associates on your behalf in September of 2006. Please review and update this plan accordingly. (The date on this PDF file is incorrectly identified as today's date, which is actually the date the file was converted to a PDF file.)**

Response: All issues previously identified in the Compliance Plan have been resolved. These are described below:

- a. VE Testing for Bagasse Handling System Dust Collectors: The air permit for the Bagasse Handling System was revised on 3/30/07 (Permit No. 0510003-037-AC/PSD-FL-333C). This permit deleted the requirement to operate the dust collectors for the biomass handling system. Therefore, the requirement to conduct VE tests on the dust collectors was removed.
- b. Installation of Dust Collectors for Bagasse Handling System: The air permit for the Bagasse Handling System was revised on 3/30/07 (Permit No. 0510003-037-AC/PSD-FL-333C). This permit deleted the requirement to install the dust collectors for the biomass handling system. Therefore, the requirement to install additional dust collectors was removed.

- c. Installation of White Sugar Dryer and Compliance Testing: Changes to the new White Sugar Dryer were completed in early 2007, and a compliance test which demonstrated compliance was conducted in February 2007. U.S. Sugar paid a penalty, and the consent order was closed. Therefore, this compliance issue has been resolved.
 - d. Dust Collector for Limestone Silo at the Molasses Plant: The required VE test was conducted on January 11, 2007, and the results were submitted to the Department at the end of January 2007. Therefore, this compliance issue has been resolved.
 - e. Dust Collectors for Lime Unloading and Storage (BT-13): The required VE test was conducted on January 11, 2007, and the results were submitted to the Department at the end of January 2007. Therefore, this compliance issue has been resolved.
2. **On June 15th, we received a request to operate a small package boiler to support the refinery operation this summer. On June 18th, we issued an exemption for this one-time temporary operation. However, the request also indicated that the ability to operate the small boiler during the off-crop season was desirable as a permanent option. Subsequent conversations with Dave Buff, Golder Associates, indicate that U.S. Sugar wants this flexibility in the renewed Title V permit. Please submit the corresponding application pages, a summary of potential emissions, a list of operational restrictions (if any), and a summary of the operation requested.**

Response: The Title V application to operate a small package boiler while all other boilers are shutdown or in startup or shutdown mode is attached. The request includes the ability to operate the package boiler when one mill boiler is in the startup or shutdown mode in order to not entirely lose steam to the refinery during this transition period. Without this ability, the package boiler could not operate unless all mill boilers are already completely shutdown, which would result in an interim period with no or little steam. This change does not affect the total annual operating hours of the boiler.

3. **Previously, there had been discussion of adding Application No. 0510040-040-AV (project related to the health-based compliance alternatives for NESHAP Subpart DDDDD) to this application for a renewed Title V permit. Please be aware that, on June 8, 2007, the United States Court of Appeals for the District of Columbia vacated the provisions of 40 CFR 63 Subpart DDDDD. However, the provisions of 40 CFR 63, Subpart DDDDD have not been removed from the Code of Federal Regulation and EPA is currently evaluating its options in response to this court decision. The facility is subject to DDDDD until such time as EPA publishes a change in the federal register. At this time we are uncertain of EPA's intended actions. However, also note that the Title V renewal application also covers the NESHAP Subpart DDDDD provisions. Please contact the Department to discuss your alternatives related to this issue.**

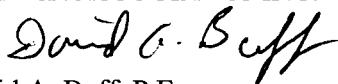
Response: It is suggested that the requirements for Subpart DDDDD be included by reference only at this time. The health-based compliance alternative (HBCA) under Subpart DDDDD is currently under review by the Department. It is requested that the Department not address the HBCA in the

Title V operating permit at this time other than by reference to the rule, but instead incorporate those provisions as a separate Title V revision application. This will allow the Title V renewal to proceed, while providing additional time to determine the status of the Subpart DDDDD regulations.

Thank you for consideration of this information. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E.
Principal Engineer

DB/all

cc: Mr. Keith Tingberg, U.S. Sugar Corporation
Mr. Peter Briggs, U.S. Sugar Corporation
Mr. A. Satyal, SD Office
Mr. James Stormer, PBCHD

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**SMALL PACKAGE BOILER
APPLICATION FOR REVISION OF
TITLE V AIR OPERATION PERMIT
AND AIR CONSTRUCTION PERMIT
UNITED STATES SUGAR CORPORATION
*CLEWISTON, FLORIDA***

**Prepared For:
United States Sugar Corporation
111 Ponce de Leon Avenue
Clewiston, Florida 33440**

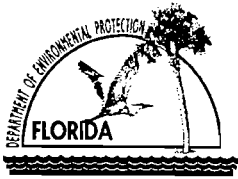
**Prepared By:
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500**

August 2007

07387595

**DISTRIBUTION:
4 Copies – FDEP
2 Copies – U.S. Sugar
1 Copy – Golder Associates Inc.**

APPLICATION FOR AIR PERMIT – LONG FORM



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: United States Sugar Corporation	
2. Site Name: Clewiston Mill	
3. Facility Identification Number: 0510003	
4. Facility Location...: Street Address or Other Locator: W.C. Owens Ave. and S.R. 832 City: Clewiston County: Hendry Zip Code: 33440	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Neil Smith, Vice President and General Manager, Sugar Manufacturing	
2. Application Contact Mailing Address... Organization/Firm: United States Sugar Corporation Street Address: 111 Ponce de Leon Avenue City: Clewiston State: FL Zip Code: 33440	
3. Application Contact Telephone Numbers... Telephone: (863) 902-2703 ext. Fax: (863) 902-2729	
4. Application Contact Email Address: nsmith@ussugar.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Application to permanently allow the ability to operate up to a 300-horsepower boiler to provide the necessary steam for packaging operations while all other Mill boilers are down or in startup or shutdown mode.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
	300-HP Package Boiler		

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

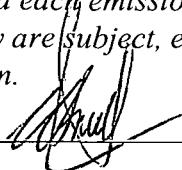
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () - ext. Fax: () -
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility 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 requirements identified in this application to which the facility 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.</i> _____ Signature _____ Date

APPLICATION INFORMATION

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: Neil Smith, Vice President and General Manager, Sugar Manufacturing
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" 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 de Leon Avenue City: Clewiston State: FL Zip Code: 33440
4. Application Responsible Official Telephone Numbers... Telephone: (863) 902-2703 ext. Fax: (863) 902-2729
5. Application Responsible Official Email Address: nsmith@ussugar.com
6. Application Responsible Official Certification: <i>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.</i> Signature  Date <u>8/9/07</u>

APPLICATION INFORMATION

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
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 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 checked="" 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 (seal) _____ Date

* Attach any exception to certification statement.

** Board of Professional Engineers Certificate of Authorization #00001670

FACILITY INFORMATION

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 506.1 North (km) 2956.9		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 26/44/06 Longitude (DD/MM/SS) 80/56/19	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 20	6. Facility SIC(s): 2061 2062
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: Neil Smith, Vice President and General Manager, Sugar Manufacturing
2. Facility Contact Mailing Address... Organization/Firm: United States Sugar Corporation Street Address: 111 Ponce de Leon Avenue City: Clewiston State: FL Zip Code: 33440
3. Facility Contact Telephone Numbers: Telephone: (863) 902-2703 ext. Fax: (863) 902-2729
4. Facility Contact Email Address: nsmith@ussugar.com

Facility Primary Responsible Official

Complete if an “application responsible official” is identified in Section I. that is not the facility “primary responsible official.”

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: One or more emission units potentially subject to NESHAP for asbestos removal in the event that the facility may wish to perform asbestos removal in the future.	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Particulate Matter Total – PM	A	N
Particulate Matter – PM ₁₀	A	N
Sulfur Dioxide – SO ₂	A	N
Nitrogen Oxides – NO _x	A	N
Carbon Monoxide – CO	A	N
Sulfuric Acid Mist – SAM	A	N
Total Hazardous Air Pollutants – HAP	A	N
Volatile Organic Compounds – VOC	A	N
Acetaldehyde – H001	A	N
Acrolein – H006	A	N
Benzene – H017	A	N
Chlorine – H038	A	N
P-Cresol – H052	A	N
Formaldehyde – H095	A	N
Hydrogen Chloride – H106	A	N
Manganese Compounds – H113	A	N
Mercury – H114	B	N
Naphthalene – H132	A	N
Phenol – H144	A	N
Polycyclic Organic Matter – H151	A	N
Styrene – H163	A	N
Toluene – H169	A	N
Dibenzofuran – H058	A	N
Ammonia – NH ₃	B	N

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot 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) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: May 2005
2. Process Flow Diagram(s): (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 checked="" type="checkbox"/> Previously Submitted, Date: May 2005
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (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 checked="" type="checkbox"/> Previously Submitted, Date: May 2005

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: Attachment A
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: Attachment A
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
 Attached, Document ID: _____ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
 Attached, Document ID: **Attachment A**
 Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
 Attached, Document ID: **USSC-FI-CV3**
 Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
 Attached, Document ID: _____
 Equipment/Activities On site but Not Required to be Individually Listed
 Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
 Attached, Document ID: _____ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: **Attachment A** Not Applicable

Additional Requirements Comment

ATTACHMENT USSC-FI-CV3

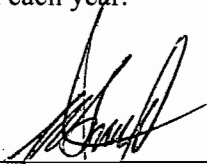
COMPLIANCE REPORT AND PLAN

ATTACHMENT USSC-FI-CV3**COMPLIANCE REPORT AND PLAN**

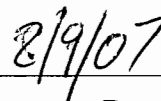
United States Sugar Corporation certifies that the Clewiston Mill, as of the date of this application, is in compliance with each applicable requirement addressed in this concurrently processed air construction permit and Title V air permit revision application.

I, the undersigned, am responsible official as defined in Chapter 62-213, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Compliance statements for this facility will be submitted on an annual basis to FDEP, before March 1st of each year.



Signature, Responsible Official



Date

EMISSIONS UNIT INFORMATION

Section [1]
300-HP Package Boiler

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]
300-HP Package Boiler**

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:
300-HP Rental Package Boiler, Trailer-mounted

3. Emissions Unit Identification Number:

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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--------------------------------	--------------------------	--	--

9. Package Unit:
Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: _____ MW

11. Emissions Unit Comment:

A package boiler up to 300-horsepower in capacity capable of firing No. 2 Fuel Oil. The manufacturer will depend on the rental unit available at the time of the rental.

EMISSIONS UNIT INFORMATION

Section [1]

300-HP Package Boiler

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

2. Control Device or Method Code(s):

EMISSIONS UNIT INFORMATION

**Section [1]
300-HP Package Boiler**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: 12 million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 9 weeks/year 744 hours/year
6. Operating Capacity/Schedule Comment: Reflects maximum capacity of package boiler. Unit could have lower maximum heat input. Unit will operate while all other Mill boilers are either shutdown, or in startup or shutdown mode.

EMISSIONS UNIT INFORMATION

Section [1]

300-HP Package Boiler

**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:		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: V	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: 350 °F	9. Actual Volumetric Flow Rate: 3,800 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: Stack dimensions will vary depending on what model of boiler is rented.			

EMISSIONS UNIT INFORMATION

**Section [1]
300-HP Package Boiler**

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): External combustion boilers; Industrial; Distillate Oil; Grade 2		
2. Source Classification Code (SCC): 1-02-005-01		3. SCC Units: 1,000 Gallons burned
4. Maximum Hourly Rate: 0.086	5. Maximum Annual Rate: 63.77	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.05	8. Maximum % Ash:	9. Million Btu per SCC Unit: 140
10. Segment Comment: Maximum hourly rate based on 12 MMBtu/hr and 140,000 Btu/gallon. Annual rate based on 744 hr/yr maximum operation.		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [1]

300-HP Package Boiler

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			NS
PM₁₀			NS
SO₂			NS
NO_x			NS
CO			NS
VOC			NS
SAM			NS
Lead			NS
Mercury			NS

EMISSIONS UNIT INFORMATION

Section [1]
300-HP Package Boiler

POLLUTANT DETAIL INFORMATION

Page [1] of [5]
Particulate Matter Total – PM

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.17 lb/hour 0.062 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.014 lb/MMBtu Reference: AP-42, Chapter 1.3		7. Emissions Method Code: 3	
8.a. Baseline Actual Emission (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Hourly: 0.014 lb/MMBtu x 12 MMBtu/hr = 0.168 lb/hr Annual: 0.168 lb/hr x 744 hr/yr x 1 ton/2,000 lb = 0.062 TPY			
9. Pollutant Potential/Estimated Fugitive Emissions Comment:			

EMISSIONS UNIT INFORMATION

Section [1]
300-HP Package Boiler

POLLUTANT DETAIL INFORMATION

Page [1] of [5]
Particulate Matter Total – PM

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

Section [1]
300-HP Package Boiler

Page [2] of [5]
Sulfur Dioxide – SO₂

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.62 lb/hour 0.23 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.05% Sulfur Reference: Temporary Permit Issued June 18, 2007		7. Emissions Method Code: 2	
8.a. Baseline Actual Emission (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Hourly: 0.05 lb S/100 lb oil x 7.2 lb/gal x 2 lb SO₂/lb S x 10³ gal/140 MMBtu = 0.0514 lb/MMBtu 0.0514 lb/MMBtu x 12 MMBtu/hr = 0.617 lb/hr Annual: 0.617 lb/hr x 744 hr/yr x 1 ton/2,000 lb = 0.230 TPY			
11. Pollutant Potential/Estimated Fugitive Emissions Comment: Based on firing No. 2 Fuel Oil with 0.05% sulfur content.			

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

Section [1]
300-HP Package Boiler

Page [2] of [5]
Sulfur Dioxide – SO₂

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.05 % Sulfur	4. Equivalent Allowable Emissions: 0.62 lb/hour 0.23 tons/year
5. Method of Compliance: Fuel Oil Analysis	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

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300-HP Package Boiler

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Nitrogen Oxides – NO_x

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: NO_x		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2.4 lb/hour 0.893 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.20 lb/MMBtu Reference: AP-42, Chapter 1.3 (Safety factor of 1.5 applied)		7. Emissions Method Code: 3	
8.a. Baseline Actual Emission (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Hourly: 0.20 lb/MMBtu x 12 MMBtu/hr = 2.4 lb/hr Annual: 2.4 lb/hr x 744 hr/yr x 1 ton/2,000 lb = 0.893 TPY			
11. Pollutant Potential/Estimated Fugitive Emissions Comment:			

EMISSIONS UNIT INFORMATION

Section [1]
300-HP Package Boiler

POLLUTANT DETAIL INFORMATION

Page [3] of [5]
Nitrogen Oxides – NO_x

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

Section [1]
300-HP Package Boiler

Page [4] of [5]
Carbon Monoxide - CO

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.43 lb/hour 0.161 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.036 lb/MMBtu Reference: AP-42, Chapter 1.3		7. Emissions Method Code: 3	
8.a. Baseline Actual Emission (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Hourly: 0.036 lb/MMBtu x 12 MMBtu/hr = 0.432 lb/hr Annual: 0.432 lb/hr x 744 hr/yr x 1 ton/2,000 lb = 0.161 TPY			
11. Pollutant Potential/Estimated Fugitive Emissions Comment:			

EMISSIONS UNIT INFORMATIONSection [1]
300-HP Package Boiler**POLLUTANT DETAIL INFORMATION**Page [4] of [5]
Carbon Monoxide - CO**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS****Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.****Allowable Emissions** Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [1]
300-HP Package Boiler

POLLUTANT DETAIL INFORMATION

Page [5] of [5]
Volatile Organic Compounds - VOC

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.029 lb/hour 0.011 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.0024 lb/MMBtu Reference: AP-42, Chapter 1.3		7. Emissions Method Code: 3	
8.a. Baseline Actual Emission (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Hourly: 0.0024 lb/MMBtu x 12 MMBtu/hr = 0.029 lb/hr Annual: 0.029 lb/hr x 744 hr/yr x 1 ton/2,000 lb = 0.011 TPY			
11. Pollutant Potential/Estimated Fugitive Emissions Comment:			

EMISSIONS UNIT INFORMATIONSection [1]
300-HP Package Boiler**POLLUTANT DETAIL INFORMATION**Page [5] of [5]
Volatile Organic Compounds – VOC**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS****Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.****Allowable Emissions** Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [1]

300-HP Package Boiler

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: 27 % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: DEP Method 9	
5. Visible Emissions Comment: Rule 62-296.406(1)	

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]

300-HP Package Boiler

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [1]

300-HP Package Boiler

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 type="checkbox"/> Attached, Document ID: _____ <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: <u>USSC-EU1-I2</u> <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]

300-HP Package Boiler

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 checked="" 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 checked="" 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 checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: Attachment A <input 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 checked="" type="checkbox"/> Attached, Document ID: USSC-EU1-IV4 <input 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]

300-HP Package Boiler

Additional Requirements Comment

ATTACHMENT USSC-EU1-I2

FUEL ANALYSIS OR SPECIFICATION

**ATTACHMENT USSC-EU1-I2
300-HP PACKAGE BOILER FUEL ANALYSIS**

Parameter	Units	No. 2 Fuel Oil
Density	lb/gal	6.83
Moisture	%	0.51 ^a
HHV	Btu/gal	140,000
Carbon	%	84.7
Hydrogen	%	15.3
Nitrogen	%	0.015 ^b
Oxygen	%	0.38
Sulfur	%	0.05 ^b
Ash/Inorganic	%	0.06 ^a

Btu/lb = British thermal unit per pound

HHV = higher heating value

Notes:

^a Source: Perry's Chemical Engineering Handbook. Sixth Edition, 1984.

Represents average fuel characteristics.

^b Proposed maximum content.

ATTACHMENT USSC-EU1-IV4

ALTERNATIVE METHODS OF OPERATION

ATTACHMENT USSC-EU1-IV4

ALTERNATIVE METHODS OF OPERATION

United States Sugar Corporation will operate a package boiler of up to 300-horsepower capacity at its Clewiston Mill when all of the other boilers are either shutdown or in startup or shutdown mode.

ATTACHMENT A

ATTACHMENT A

1.0 INTRODUCTION

United States Sugar Corporation (U.S. Sugar) owns and operates a sugar mill and refinery located in Clewiston, Hendry County, Florida. The sugar mill and refinery currently operate under Title V Air Operation Permit No. 0510003-017-AV, issued October 18, 2004. U.S. Sugar operates five sugar mill boilers at the Clewiston Mill. The five boilers provide steam to the sugar mill as well as to the sugar refinery. Boiler Nos. 1, 2, and 4 operate primarily during the crop season, which is typically November through May, to provide steam to the sugar mill and refinery. Boiler Nos. 7 and 8 can operate year-round to provide steam to the sugar mill during the crop season and steam to the sugar refinery during the off-crop season. Boiler Nos. 1, 2, and 4 can operate as backup units during the off-season when Boiler No. 7 is down for maintenance, repair, or during periods of unusually low steam demand.

2.0 PROJECT DESCRIPTION

Normally, steam from the existing boilers at the Mill is used to support sugar refining and sugar packaging operations at the facility. Although the existing permit allows continuous operation of the existing boilers, only one or two boilers are typically operated during the off-season to support the refinery operations. However, beginning around July 1 of each year, all the Mill boilers are shut down for the Independence Day national holiday. Although most of the refinery operations are shut down during this period, sugar packaging operations continue. The sugar packaging operations require a small amount of steam. U.S. Sugar is requesting the ability to operate a package boiler of up to 300-horsepower (hp) capacity to provide the necessary steam for packaging operations. The boiler may be a rental unit. Typical specifications of the package boiler are attached as a generic example. These specifications may change based on the actual unit that is rented/purchased.

On June 18, 2007, the Florida Department of Environmental Protection (FDEP) issued an exemption from the requirement to obtain an air construction permit to U.S. Sugar for the operation of a 300-hp package boiler to provide the necessary steam to continue packaging operations at the Mill while no other boilers are operating. The exemption allowed U.S. Sugar to operate the boiler for no more than a total of 744 hours. The exemption established the following conditions for the package boiler:

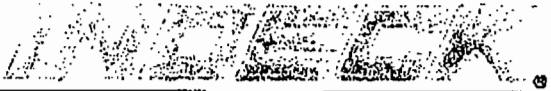
1. A maximum heat capacity of 12 million British thermal units per hour (MMBtu/hr);
2. Fire only No. 2 fuel oil with a maximum sulfur content of 0.05 percent by weight;
3. The boiler does not operate when any other Mill boilers are operating; and
4. The boiler does not operate for more than 744 hours.

U.S. Sugar will comply with these requirements for all future boiler operations. U.S. Sugar requests the ability to operate a 300-hp package boiler when no other Mill boilers are operating, and when one of the Mill boilers is starting up or shutting down. It is requested that the ability to operate a package boiler up to 300 hp be permanently added to the current operating permit.

The specific rental boiler used each year will be determined by what is available to rent at the time of the rental. As an option, U.S. Sugar could purchase a permanent package boiler. Depending on the original construction date of the boiler, it may be subject to the New Source Performance Standard (NSPS), Subpart Dc. The boiler will be subject to NSPS Subpart Dc if it is manufactured after June 9, 1989, and has a maximum heat input capacity of greater than 10 MMBtu/hr. Because the boiler will fire only No. 2 Fuel oil with a maximum sulfur content of 0.05 percent, the only requirements under Subpart Dc are a notification to the state, vendor certification of the sulfur content in the fuel, and monthly fuel combustion records in the form of fuel bills or meter readings.

Rule 62-296.406, Florida Administrative Code (F.A.C.), commonly referred to as the Small Boiler Best Available Control Technology (BACT) is applicable to the proposed boiler. U.S. Sugar will comply with the visible emissions limits specified in Rule 62-296.406(1), F.A.C., and comply with the particulate matter and sulfur dioxide control technology requirements in Rules 62-296.406(2), F.A.C., and 62-296.406(3), F.A.C., respectively, by firing only No. 2 fuel oil with a maximum sulfur content of 0.05 percent sulfur, which was recently determined by FDEP to be BACT.

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POWER EQUIPMENT COMPANY

April 27, 2007

U.S. Sugar
111 Ponce de Leon Ave.
Clewiston, FL 33440

Attention: Jerry Clements

Subject: Rental 300 BHP Firetube Van

Reference: IPE Quote No.: QU00018800

Dear Mr. Clements:

In response to your most recent request, we are pleased to provide the following pricing and equipment description for your review, evaluation and further consideration.

INDECK POWER EQUIPMENT COMPANY PROPOSES TO FURNISH THE FOLLOWING:

One (1) 300 HP Indeck mobile steam system consisting of the following major components, integrally mounted, piped and wired within a 45' long van type trailer with air-ride suspension.

- 1 - 300 HP package automatic firetube boiler, arranged to fire either natural gas or No. 2 fuel oil with either fuel requiring a gas pilot. The boiler is designed and built to the ASME Power Boiler Code, Section 1 for 200 PSIG and have an operating pressure range of 15 - 180 PSIG dry and saturated steam.
- 1 - 350 gallon duplex feedwater system, complete with tank, trim and controls, duplex pumps and motors with starters. A steam preheat system, sized for 100% cold water make-up is also included.
- 1 - Automatic water softener including brine tank and controls.
- 1 - Chemical treatment system complete with tank, pump and agitator assembly.
- 1 - Boiler blowdown separator with cooling water controls.
- 1 - Wall-mounted primary boiler control panel arranged for 480/3/60 main electric power with an integral 120/1/60 control voltage transformer mounted and wired in the panel, complete with all required switches, programmer, indicting lights, terminal strips and relays.

300 HP - Rental Boiler Room Specifications

General Description

One (1) complete 300 HP boiler room trailer, consisting of a 300 HP package automatic firetube boiler, designed for 200 psi, complete with standard boiler trim and flame safeguard system meeting IRI Insurance requirements, a 750 gallon feedwater system with all trim, steam preheater assembly to maintain 200 Deg. F. feedwater with (2) boiler feedwater pumps with electric motors, an automatic water softener system with timer control and brine tank, a chemical treatment system with tank, pump and agitator assembly and a centrifugal blowdown separator assembly. All of the above equipment is integrally mounted, wired and piped inside a van type trailer with easy customer connections.

Boiler Information:

Design Pressure	200 PSI
Maximum Operating Pressure	180 PSI
Minimum Operating Pressure	15 PSI

Gas Fired Requirements:

Gas Consumption (100%)	12,562 SCFH
Gas Pressure Required at Connection - Must be Regulated to	5.0 PSI
Electrical Amps on Gas Firing	75

Oil Fired Requirements :(#2 Oil Only)

Oil Consumption (100%)	85 GPH
Minimum Oil Pressure At Connection	Positive
Maximum Oil Pressure At Connection	30 PSI
Pilot Gas Pressure Required for Oil Start-up	2.0 PSI
Electrical Amps on Oil Firing	80

Feedwater Requirements:

Minimum Water Pressure	40 PSI
Maximum Water Pressure	100 PSI

Electrical Requirements - Single Point Connection:

Electrical Amps- Gas Fired	75
Electrical Amps- Oil Fired	80
F.D. Fan	20 HP
Feedwater Pump	20 HP
Oil Pump (#2 Oil Only)	1 1/2 HP
Voltage	480V/3-Phase/60 cycle
Motor Starter	Included
Transformer (480 to 120)	Included

Dimensional Information:

Trailer Width	8 Ft.
Trailer Length	45 Ft.
Shipping Weight	58,000 lbs.

For further information, see customer connection drawing or contact Indeck at 1-708-541-8300.

OUR NEW AREA
CODE IS
847

INDECK

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