



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

October 4, 2006

(SENT VIA ELECTRONIC MAIL – RECEIPT REQUESTED)

Mr. Neil Smith, Vice President of Sugar Processing Operations
U.S. Sugar Corporation
111 Ponce DeLeon Avenue
Clewiston, Florida 33440

Re: Request for Additional Information
Project Nos. 0510003-0031-AC and 0510003-032-AV
Clewiston Sugar Mill and Refinery / Bryant Sugar Mill
Title V Renewal Projects

Dear Mr. Smith:

The Department is currently processing your application for a permit to renew the Title V air operation permits for the Clewiston Sugar Mill and Refinery and the Bryant Sugar Mill. On September 5, 2006, the Department received additional information from Golder Associates Inc. in response to its request dated June 5, 2006. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. CAM Plans Proposed by Applicant: The response indicates that the proposed CAM indicator values were reduced by a factor of 90% to be consistent with the industrial boiler MACT. The Department notes that the tests used to establish the CAM indicator values for PM were conducted to demonstrate compliance with the current permitted emissions standard (i.e., 0.15 lb PM/MMBtu) and not the surrogate PM MACT standard for existing units of 0.07 lb PM/MMBtu. Therefore, it will be necessary to conduct additional testing to establish the MACT monitoring values that demonstrate compliance with the more stringent standard if that is the method of compliance used. Although the monitoring methods and frequencies may be the same, the indicator ranges may be different due to the different numerical standards. However, in accordance with Rule 62-213.440(1), F.A.C., "However, when there are multiple, redundant, or conflicting applicable requirements, these provisions can be reduced to a single streamlined term or condition that is the *most stringent of the multiple applicable requirements*." Is this the request? Please explain.
2. On August 10, 2006, representatives of U.S. Sugar and the Department held a teleconference to discuss additional information needed to support U.S. Sugar's request for the Clewiston and Bryant Mills to be considered a single facility given the special set of circumstances presented. It was determined that an air quality analysis is necessary to show the impacts of moving Bryant Boiler 5 to the Clewiston Mill after all of the other Bryant boilers are shut down in 2007. The modeling effort would provide a comparison of impacts from the existing operations at both mills (boilers and other emissions units) with the proposed scenario of the Clewiston Mill plus Bryant Boiler 5. In addition, it was determined that U.S. Sugar's consultant (Golder Associates Inc.) would provide a modeling protocol for the Department's review before the modeling analysis was performed. Such a protocol should include, but not be limited by, the following:
 - Models to be used (i.e., AERMOD, CALPUFF, etc.);
 - Qualified meteorological data file set;
 - Source inventory;
 - Emissions summary table;
 - Clearly identified unique project constraints;
 - Operational conditions (i.e., 100% load case, 75% load case, etc.); and

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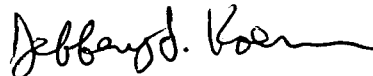
- Description of methods and comparisons.

The Department needs the protocol and final modeling analysis to come to a conclusion regarding the single facility issue. The application remains incomplete until the protocol and final modeling analysis are submitted.

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

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

Sincerely,



Jeffery F. Koerner, P.E.
BAR - Air Permitting North

On October 4, 2006, this request for additional information was sent by electronic mail to the following parties:

Mr. Neil Smith, U.S. Sugar Corporation (NSMITH@USSUGAR.COM)
Mr. Peter Briggs, U.S. Sugar Corporation (PBRIGGS@USSUGAR.COM)
Mr. Don Griffin, U.S. Sugar Corporation (DGRIFFIN@USSUGAR.COM)
Mr. David Buff, Golder Associates Inc. (DBUFF@GOLDER.COM)
Mr. Ron Blackburn, SD Office (RON.BLACKBURN@DEP.STATE.FL.US)
Mr. James Stormer, PBCHD (JAMES_STORMER@DOH.STATE.FL.US)
Ms. Kathleen Forney, EPA Region 4 (FORNEY.KATHLEEN@EPA.GOV)