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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Mr. William A. Raiola, Vice President  
 of Sugar Processing Operations  
 United States Sugar Corporation  
 Clewiston Sugar Mill & Refinery  
 111 Ponce DeLeon Avenue  
 Clewiston, FL 33440

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) Audica Solis B. Date of Delivery 1-17-3

C. Signature X Audica Solis  Agent  
 Addressee

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

7001 0320 0001 3692 7195

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT  
 (Domestic Mail Only; No Insurance Coverage Provided)**

**OFFICIAL USE**

5612 2692 1000 0220 7001

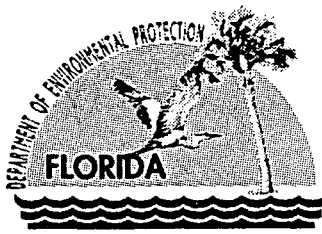
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
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Sent To William A. Raiola  
 Street, Apt. No.,  
 or P.O. Box 111 Ponce DeLeon Avenue  
 City, State, ZIP+4 Clewiston, FL 33440

PS Form 3800, January 2001

See Reverse for Instructions



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

January 15, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: **Request for Additional Information**  
Project No. 0510003-018-AC  
Clewiston Sugar Mill and Refinery  
Modifications to Boiler Nos. 4 and 7

Dear Mr. Raiola:

On December 20, 2002, the Department received your application and sufficient fee for an air construction permit to modify the oil firing system of Clewiston Boiler No. 4. On this date, the Department also received the additional information requested regarding the proposed request to modify the oil firing system for Clewiston Boiler No. 7. The Department considers these requests to be a single project, which will be processed as Project No. 0510003-018-AC. The application for Boiler Nos. 4 and 7 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 below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please provide a more detailed description of the physical modifications being made to each boiler's oil firing system. Identify any components being removed or replaced and any new components being added. What will the heat release rates (Btu/hour-ft<sup>3</sup>) be for each boiler? Estimate the fixed capital costs of any new components and the cost of a comparable new boiler. Provide a discussion of these costs related to "reconstruction" as defined by the NSPS requirements (40 CFR 60.15).
2. Please provide specific factors and references for the emission factors used to estimate the current actual emissions listed in Table 1 of the application for Boiler No. 4. Were the factors based on No. 6 fuel oil or No. 2 fuel oil? Which fuel does Boiler No. 4 actually burn? Please provide a fuel analysis (similar to Attachment UC-EU1-J2 in the Boiler No. 4 application) for the actual fuel oil currently being fired in Boiler No. 4.
3. Based on the current Title V air operation permit, emissions standards are specified for Boiler No. 7 when firing fossil fuel in terms of "lb/MMBtu heat input", "lb/hour", and "tons per year". Based upon the application, the emission standards in terms of "lb/MMBtu heat input" will not change, but the hourly and annual emission rates will increase based on the modified maximum heat input rate for oil firing. Do the hourly and annual emission rates presented in Attachment UC-EU1-G8 (Additional Information received 12/20/03) represent the requested revised standards for oil firing? *{Note: Any draft permit would have to specify the revised hourly and annual mass emission rates for oil firing.}*

"More Protection, Less Process"

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4. The following is based on the Department's preliminary review of applicable regulations:

a. Boiler No. 4:

- 1) This unit is currently subject to Rule 62-296.410, F.A.C. (carbonaceous fuel burning equipment) and Rule 62-212.400, F.A.C. (PSD preconstruction review). It does not appear that any NSPS requirements apply to the unit, as it now exists. BACT determinations have been made for carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds.
- 2) Based on the proposed modification, the maximum heat input rate will increase to 326 MMBtu per hour. The unit will become subject to Rule 62-296.405, F.A.C. (fossil fuel fired steam generating units > 250 MMBtu per hour). If the unit currently fires distillate oil, then the increased heat input rate and fuel consumption will result in increased hourly emission rates for nitrogen oxides and particulate matter, which constitutes a modification in accordance with 40 CFR 60.14. Therefore, the unit will also become subject to the NSPS Subpart Db requirements. *{Note: It appears that the previous BACT determinations are at least as stringent as the NSPS Subpart Db requirements. Similar to Boiler No. 7, the unit fires a "very low sulfur fuel oil" (defined in the NSPS as  $\leq 0.5\%$  sulfur by weight) and permit limits restrict the annual oil firing rate is limited to less than a 10% annual capacity factor. This avoids some of the more stringent NSPS monitoring requirements.}*

b. Boiler No. 7:

- 1) This unit is currently subject to Rule 62-296.410, F.A.C. (carbonaceous fuel burning equipment), Rule 62-296.406, F.A.C. (fossil fuel fired steam generating units < 250 MMBtu per hour), Rule 62-212.400, F.A.C. (PSD preconstruction review), and the requirements of NSPS Subpart Db. BACT determinations have been made for nitrogen oxides, particulate matter, sulfur dioxide, sulfuric acid mist, and volatile organic compounds.
- 2) Based on the proposed modification, the maximum heat input rate will increase to 326 MMBtu per hour. The unit will no longer be subject to Rule 62-296.406, F.A.C., but will become subject to Rule 62-296.405, F.A.C. (fossil fuel fired steam generating units > 250 MMBtu per hour), which establishes the emission standards of NSPS Subpart D as applicable requirements. However, this unit is currently subject to NSPS Subpart Db. Paragraph 40 CFR 60.40b(f) of this rule states that any unit subject to NSPS Subpart Db and commencing construction, modification, or reconstruction after June 19, 1986 is not also subject to NSPS Subpart D. Therefore, Boiler No. 7 remains subject only to the requirements of NSPS Subpart Db. The increased fuel consumption rate constitutes a modification in accordance with 40 CFR 60.14 because it will result in increased hourly emission rates of nitrogen oxides, particulate matter, and sulfur dioxide. Although, the unit is already subject to NSPS Subpart Db, the increased heat input rate will subject the unit to the NOx standard of this subpart [40 CFR 60.45b(j) and (k)].

c. PSD Applicability for Combined Projects

Based on the information in the applications and requested restrictions, it does not appear that the combined projects will trigger PSD preconstruction review.

d. Initial Compliance Tests for Each Boiler

Initial compliance tests while burning only distillate oil shall be conducted for the following:

- 1) NOx: 40 CFR 60.44b(j) and 40 CFR 60.46b(h) requires a 24-hour initial test and subsequent 3-hour annual tests. 40 CFR 60.46b(g) requires a demonstration of the maximum heat input capacity by operating the unit at maximum capacity for 24 hours.
- 2) PM: 40 CFR 60.46b(d) requires an initial test of three, 2-hour runs and a 3-hour visible emissions test.

3) SO<sub>2</sub>: 40 CFR 60.45b(j) allows compliance with the standards to be demonstrated based on fuel receipts.

e. Continuous Emissions Monitors

1) NO<sub>x</sub>: 40 CFR 60.48b(i) does not require units described in 40 CFR 60.44b(j) or (k) to install NO<sub>x</sub> CEMS. The requirements of 40 CFR 60.44b(j) are:

- Combust alone or in combination only distillate oil with a nitrogen content  $\leq 0.30\%$  by weight;
- Have an annual capacity factor for distillate oil  $\leq 10\%$ ; and
- Have a federally enforceable requirement to fire only distillate oil with a nitrogen content  $\leq 0.30\%$  by weight and limiting operation to an annual capacity factor for distillate oil  $\leq 10\%$ .

Paragraph (k) states that units with a maximum heat input capacity  $\leq 250$  MMBtu per hour are not subject to the NO<sub>x</sub> standards of the subpart. This will no longer apply.

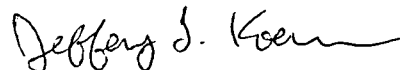
2) Opacity: 40 CFR 60.48b(a) requires the installation of a continuous opacity monitoring system (COMS). An Alternate Sampling Procedure (ASP No. 95-B-01) was issued for Boiler No. 7 to waive the COMS requirements. It appears that this unit will continue to meet the requirements of the ASP after modification. Will such a request be made Boiler No. 4 if it is subject to NSPS Subpart Db?

Please comment.

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 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. now 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  
New Source Review Section

AAL/jfk

cc: Mr. David Buff, Golder Associates  
Mr. Ron Blackburn, SD Office  
Mr. Gregg Worley, EPA Region 4  
Mr. John Bunyak, NPS