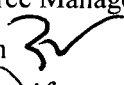



# Florida Department of Environmental Protection

## Memorandum

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TO: Michael G. Cooke, Division of Air Resource Management  
THRU: Trina Vielhauer, Bureau of Air Regulation   
FROM: Jeff Koerner, Air Permitting North Program   
DATE: January 6, 2006  
SUBJECT: Air Permit No. 0510003-034-AC  
U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery  
New Lime Loading/Unloading Operation

The Final Permit for this project is attached for your approval and signature, which authorizes the construction of two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. The project results in a minor source air construction permit and is not subject to PSD preconstruction review.

The Department distributed an "Intent to Issue Permit" package on November 16, 2005. The applicant published the "Public Notice of Intent to Issue" in The Clewiston News on December 8, 2005. The Department received proof of publication on December 15, 2005. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

 Day #90 is February 20, 2005. I recommend your approval of the attached Final Permit for this project.

Attachments

# FINAL DETERMINATION

## PERMITTEE

U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

## PERMITTING AUTHORITY

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation, Air Permitting North Program  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida, 32399-2400

## PROJECT

Air Permit No. 0510003-03-AC  
U.S. Sugar Corporation, Clewiston Sugar Mill and Refinery

This permit authorizes the installation of two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

## NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on November 16, 2005. The applicant published the "Public Notice of Intent to Issue" in The Clewiston News on December 8, 2005. The Department received proof of publication on December 15, 2005. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed.

## COMMENTS

No comments on the Draft Permit were received from the public or the Department's South District Office. The applicant had the following comments.

Page 4 of 4, Condition 3: Should the rule citation for the alternative visible emissions VE limit of 5% be Rule 297.620, F.A.C.?

*Response:* The visible emissions standard for control by baghouse is established pursuant to the authority in Rule 62-4.070(3), F.A.C. A properly maintained and operated baghouse should not have visible emissions exceeding 5% opacity.

Page 4 of 4, Condition 5: The permit requires monitoring the pneumatic line pressure and the pressure differential across the baghouse during visible emissions tests. The baghouses will be cleaned by pulse jet, which is activated by a pressure differential set point. However, the pressure gauge is optional and U.S. Sugar was not planning on purchasing this. Are these gauges necessary? The pneumatic line pressure for loading the silos by truck would be dependent on the trucks and for unloading the railcar to the receiver would depend on the railcars. It is not clear at this time if proper gauges would be installed or available to take these measurements. Is this monitoring requirement necessary?

*Response:* The pressure differential gauge is necessary to ensure proper operation of the equipment. It is common industry practice to monitor line pressure when pneumatically unloading lime or similar products. High line pressures can overload a system or otherwise cause excess fugitive emissions. No changes were made to the permit.

## CONCLUSION

Only minor revisions were made to correct typographical errors. The final action of the Department is to issue the permit with the changes described above.

# NOTICE OF FINAL PERMIT

## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an  
Application for Permit by:

U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

Clewiston Sugar Mill and Refinery  
Air Permit No. 0510003-034-AC  
New Lime Loading/Unloading System

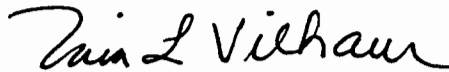
*Authorized Representative:*

Mr. William A. Raiola  
Vice President of Sugar Processing Operations

Enclosed is the Final Permit, which authorizes installation of two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. As noted in the attached Final Determination, only minor changes and clarifications were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

### CERTIFICATE OF SERVICE

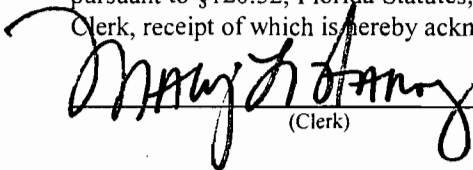
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 11/20/06 to the persons listed:

Mr. William A. Raiola, U.S. Sugar\*  
Mr. Don Griffin, U.S. Sugar

Mr. David Buff, Golder Associates Inc.  
Mr. Ron Blackburn, SD Office

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk)

11/20/06  
(Date)



# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

## PERMITTEE:

U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

### Authorized Representative:

Mr. William A. Raiola  
Vice President of Sugar Processing Operations

Clewiston Sugar Mill and Refinery  
Air Permit No. 0510003-034-AC  
Facility ID No. 0510003  
SIC Nos. 2061, 2062  
Permit Expires: February 1, 2009

## PROJECT AND LOCATION

This permit authorizes installation of two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North.

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

## CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

*Michael G. Cooke*

Michael G. Cooke, Director  
Division of Air Resource Management

*1/11/06*

(Date)

## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

A combination of lime and flocculants are used to clarify raw sugarcane juice, which is then evaporated, crystallized, and centrifuged to form raw sugar. Some of the raw sugar is sold and some of it is processed at the on-site refinery into white sugar. The applicant proposes new equipment to unload and store lime for use in the process (new Emissions Unit 031). Lime will be delivered by railcar and/or truck and unloaded into two new storage silos. The total throughput of lime is expected to be approximately 5000 tons per year. Lime will be unloaded from the silos via bottom drop into a lime slaker. Water will be mixed with the lime and pumped to a lime slurry storage tank and agitator for use in the process.

Lime will be unloaded pneumatically from trucks to the silos by a blower system at a rate of approximately 33 tons per hour. A 25 ton truck will be unloaded in about 45 minutes. Lime will be unloaded from railcars by a separate vacuum-type system, which includes a collection bin, rotary airlocks, and transporter blower to pneumatically transport lime to the silos at a rate of approximately 10,000 pounds per hour. It will take about 18 hours to unload 180,000 pounds of lime from a railcar.

Each silo and the collection bin will be controlled by a baghouse. The silos will be controlled with a bin vent filter to remove particulate matter during silo loading and unloading. Emissions from the collection bin will be controlled by a filter receiver to remove particulate matter during railcar unloading. Each baghouse will be designed for a flow rate of less than 500 acfm and an outlet grain loading of 0.02 grains per dscf. It is estimated that the maximum particulate matter emissions from each baghouse will be 0.08 pounds per hour and 0.35 tons per year. The project will result in a potential increase in particulate matter emissions of 1.05 tons per year.

### REGULATORY CLASSIFICATION

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to a New Source Performance Standard in 40 CFR 60.

NESHAP: The facility operates units subject to a National Emissions Standard for Hazardous Air Pollutants in 40 CFR 63.

### RELEVANT DOCUMENTS

The permit application is not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting Authority for this project is the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-3381.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); Appendix B (General Conditions); and Appendix C (Common State Regulatory Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Baghouses - Lime Silo Loading/Unloading (EU-031)

This section of the permit addresses the following emissions unit.

#### Emissions Unit No. 031

This emissions unit regulates the loading and unloading of the two new lime silos by truck and railcar. Baghouse control systems will be installed on each lime silo (Emissions Points LS-1 and LS-2) and on the collection bin (Emission Point CB-1) associated with the railcar unloading system. The exhaust from each baghouse vent is at ambient conditions and is located approximately 65 feet above ground level.

#### EQUIPMENT

1. Equipment: This permit authorizes installation of two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). Each baghouse control system shall be designed and maintained for a flow rate of approximately 500 acfm and an outlet grain loading of 0.02 grains per dscf. [Rule 62-4.070(3), F.A.C.]

#### PERFORMANCE RESTRICTIONS

2. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

3. Opacity Standards: Emissions from each baghouse vent shall not exceed 5% opacity. The permittee shall take reasonable precautions to minimize fugitive particulate matter emissions from other activities related to silo loading and unloading. Emissions from these other activities (without baghouse controls) related to silo loading and unloading operations shall not exceed 20% opacity. [Rules 62-4.070(3) and 62-296.320(4)(b), F.A.C.]

#### EMISSIONS PERFORMANCE TESTING

4. Compliance Tests: In accordance with EPA Method 9, each baghouse vent shall be tested to demonstrate compliance with the emissions standards specified. Initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. Subsequently, each baghouse vent shall be tested annually to demonstrate compliance with the opacity standards during each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>). The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Separate tests shall be conducted while unloading lime from a truck and unloading lime from a railcar unless these systems can be used simultaneously. Tests shall be conducted at a lime unloading rate representative of the typical operation used throughout the year. [Rule 62-297.310(7)(a), F.A.C.]

#### RECORDS AND REPORTS

5. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix C of Section 4 of this permit. For each test run, the report shall also indicate the lime unloading rate, pneumatic line pressure, and pressure differential across the baghouse. [Rule 62-297.310(8), F.A.C.]

**SECTION 4. APPENDICES**

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**CONTENTS**

Appendix A. Citation Formats

Appendix B. General Conditions

Appendix C. Common State Regulatory Requirements



## SECTION 4. APPENDIX A

### CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

#### REFERENCES TO PREVIOUS PERMITTING ACTIONS

##### Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

##### New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number  
“001” identifies the specific permit project  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a Title V Major Source Air Operation Permit

##### PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project

#### RULE CITATION FORMATS

##### Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

##### Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7]

*Means:* Title 40, Part 60, Section 7

## SECTION 4. APPENDIX B

### GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (Not Applicable);
  - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
  - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SECTION 4. APPENDIX C**  
**COMMON STATE REGULATORY REQUIREMENTS**

*{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}*

**EMISSIONS AND CONTROLS**

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

**TESTING REQUIREMENTS**

10. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
11. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it

**SECTION 4. APPENDIX C**  
**COMMON STATE REGULATORY REQUIREMENTS**

is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
- a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
  - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
  - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

14. Determination of Process Variables

- a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
  2. The facility at which the emissions unit is located.

**SECTION 4. APPENDIX C**  
**COMMON STATE REGULATORY REQUIREMENTS**

3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**RECORDS AND REPORTS**

19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

**SENDER: COMPLETE THIS SECTION**

- 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, V.P. of Sugar  
Processing Operations  
Clewiston Sugar Mill and Refinery  
United States Sugar Corporation  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

**2. Article Number**  
(Transfer from service label)

7000 1670 0013 3110 0123

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

*Rachel Felton*

- Agent
- Addressee

**B. Received by (Printed Name)**

*Rachel Felton*

**C. Date of Delivery**

*1-23-06*

**D. Is delivery address different from item 1?**

- Yes
- No

If YES, enter delivery address below:

**3. Service Type**

- Certified Mail
- Express Mail
- Registered
- Return Receipt for Merchandise
- Insured Mail
- C.O.D.

**4. Restricted Delivery? (Extra Fee)**

- Yes

**U.S. Postal Service  
CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

7000 1670 0013 3110 0123

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark  
Here

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

PS Form 3800, May 2000

See Reverse for Instructions



111 Ponce de Leon Ave.  
Clewiston, Florida 33440  
Telephone 863/902-8121  
Fax 863/902-3149

December 12, 2005,

Ron Blackburn, P.E.  
Florida Dept. of Environmental Protection  
P. O. Box 2549  
Ft. Myers, Fl. 33902-2549

RE: Hendry County AP --- USSC  
Air Construction Permit No. 0510003-034-AC  
Baghouses for New Lime Silo Loading/Unloading Operation

Dear Mr. Blackburn:

We are enclosing Affidavit of Publication certifying that the "Public Notice of Intent to Issue Air Construction Permit" was duly published in the legal section of the December 8, 2005 issue of "The Clewiston News" newspaper in Hendry County.

If you have any questions or need further information, please let me know.

Sincerely,

UNITED STATES SUGAR CORPORATION

A handwritten signature in black ink, appearing to read "Peter B. Briggs", is written over the typed name.

Peter B. Briggs  
Vice President,  
Environmental Compliance & Programs

PB:tw  
Enclosure

cc: William A. Raiola  
Pat Whidden  
Donald Griffin

DEC 15 2005

D.E.P. - South District



**The Clewiston News**

Published Weekly

Clewiston, Florida

**AFFIDAVIT OF PUBLICATION**

State of Florida  
County of Hendry

Before the undersigned authority, personally appeared Mark Young, who on oath says he is the Editor of the Clewiston News, a weekly newspaper published at Clewiston in Hendry County, Florida, that the

attached copy of advertisement being a notice

in the matter Public notice of intent to issue air

permit US. Sugar Corporation Ad# 100935

in the \_\_\_\_\_ court, was published in said newspaper in the issue(s)

of December 8, 2005

Affiant further says that the said Clewiston News is a newspaper published at Clewiston, in said Hendry County, continuously published in said Hendry County, Florida, each week, and has been entered as periodicals matter at the post office in Clewiston, in said Hendry County, Florida, for a period of one year next preceding the first publication says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

*[Handwritten signature]*

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

Notary Public



Ideybis Gonzalez  
Commission #DD341238  
Expires: Jul 26, 2008  
Bonded Thru  
Atlantic Bonding Co., Inc

**PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT**

Florida Department of Environmental Protection  
Draft Air Permit No. 06-10003-034  
U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery  
Hendry County, Florida

**Applicant:** The applicant for this project is the U.S. Sugar Corporation. The applicant's authorized representative and mailing address is: Mr. William A. Raiola, Vice President of Sugar Processing Operations; U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery; 111 Ponce DeLeon Avenue; Clewiston, Florida 33440.

**Facility Location:** U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

**Project:** The applicant proposes to install the following: two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The project has the potential to emit 1 ton per year of particulate matter from this operation. The draft permit requires baghouse control systems on each lime silo and the railcar collection bin. The exhaust from each baghouse vent is limited to 5% opacity.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-206, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mall Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner, the name and address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.  
100935 CGS 12/8/05

**Blackburn, Ron**

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**From:** Blackburn, Ron  
**Sent:** Thursday, December 15, 2005 10:24 AM  
**To:** 'pbriggs@ussugar.com'  
**Cc:** Koerner, Jeff  
**Subject:** US Sugar Permit No. 0510003-034-AC (Lime Silo)

Peter:

Received your Affidavit of Publication for the referenced project. Jeff is handling that one for us. Will forward Jeff the hard copy to Tallahassee from here.  
(Jeff: Date of publication is December 8, 2005)

Thanks all and have a Merry Christmas.

Ron

Ron Blackburn

District Air Program Administrator  
Department of Environmental Protection  
South District Air Resources Management  
Ft. Myers, FL. (239) 332-6975

TO; JEFF KOENER, P.E.  
AIR RESOURCES

FROM: RON BLACKBURN / FT. MYERS

*THANKS JEFF*  
*AK*

## Memorandum

# Florida Department of Environmental Protection

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TO: Trina Vielhauer, Chief - Bureau of Air Regulation  
FROM: Jeff Koerner, Air Permitting North Program *JK*  
DATE: November 10, 2005  
SUBJECT: Draft Air Permit No. 0510003-034-AC  
U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery  
New Lime Silos

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

The draft permit authorizes the construction of two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The P.E. certification briefly summarizes the proposed project. Day #74 is December 24, 2005. I recommend your approval of the attached Draft Permit for this project.

Attachments

**BEST AVAILABLE COPY**  
**P.E. CERTIFICATION STATEMENT**

**PERMITTEE**

U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

Air Permit No. 0510003-034-AC  
New Lime Silo Loading/Unloading  
Hendry County, Florida

**PROJECT DESCRIPTION**

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

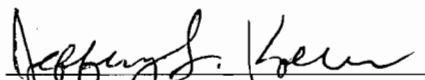
A combination of lime and flocculants are used to clarify raw sugarcane juice, which is then evaporated, crystallized, and centrifuged to form raw sugar. Some of the raw sugar is sold and some of it is processed at the on-site refinery into white sugar. The applicant proposes new equipment to unload and store lime for use in the process. Lime will be delivered by railcar and/or truck and unloaded into two new storage silos. The total throughput of lime is expected to be approximately 5000 tons per year. Lime will be unloaded from the silos via bottom drop into a lime slaker. Water will be mixed with the lime and pumped to a lime slurry storage tank and agitator for use in the process.

Lime will be unloaded pneumatically from trucks to the silos by a blower system at a rate of approximately 33 tons per hour. A 25 ton truck will be unloaded in about 45 minutes. Lime will be unloaded from railcars by a separate vacuum-type system, which includes a collection bin, rotary airlocks, and transporter blower to pneumatically transport lime to the silos at a rate of approximately 10,000 pounds per hour. It will take about 18 hours to unload 180,000 pounds of lime from a railcar.

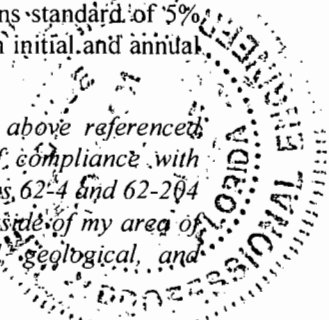
Each silo and the collection bin will be controlled by a baghouse. The silos will be controlled with a bin vent filter to remove particulate matter during silo loading and unloading. Emissions from the collection bin will be controlled by a filter receiver to remove particulate matter during railcar unloading. Each baghouse will be designed for a flow rate of approximately 500 acfm and an outlet grain loading of 0.02 grains per dscf. It is estimated that the maximum particulate matter emissions from each baghouse will be 0.08 pounds per hour and 0.35 tons per year. The project will result in a potential increase in particulate matter emissions of 1.05 tons per year.

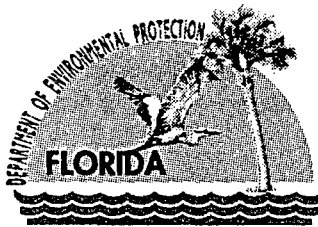
The process should be well-controlled and there should be no visible emissions from the baghouse vents. The draft permit will authorize the installation of the proposed equipment and establish a visible emissions standard of 5% opacity from each baghouse vent. The permittee will be required to demonstrate compliance with initial and annual EPA Method 9 observations.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.  
Registration Number: 49441

  
11-10-05  
(Date)



# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

November 14, 2005

Mr. William A. Raiola, Vice President of Sugar Processing Operations  
U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

Re: Air Construction Permit No. 0510003-034-AC  
Clewiston Sugar Mill and Refinery  
Baghouses for New Lime Silo Loading/Unloading Operation

Dear Mr. Raiola:

On October 13, 2005, you submitted an application requesting authorization for a new lime silo loading/unloading operation. The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Air Permit by:*

Mr. William A. Raiola, V.P. of Sugar Processing Operations  
U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

Air Permit No. 0510003-034-AC  
Facility ID No. 0510003  
Clewiston Sugar Mill and Refinery  
Baghouses, Lime Silo Loading/Unloading  
Hendry County, Florida

**Facility Location:** U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

**Project:** The applicant proposes to install the following: two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). Details of the project are provided in the application and the enclosed "Technical Evaluation and Preliminary Determination".

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



\_\_\_\_\_  
Trina Vielhauer, Chief  
Bureau of Air Regulation



**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 11/16/05 to the persons listed below.

Mr. William A. Raiola, U.S. Sugar\*  
Mr. Don Griffin, U.S. Sugar  
Mr. David Buff, Golder Associates Inc.  
Mr. Ron Blackburn, SD Office

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
(Clerk)

11/16/05  
(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

Draft Air Permit No. 0510003-034

U.S. Sugar Corporation – Clewiston Sugar Mill and Refinery  
Hendry County, Florida

**Applicant:** The applicant for this project is the U.S. Sugar Corporation. The applicant's authorized representative and mailing address is: Mr. William A. Raiola, Vice President of Sugar Processing Operations; U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery; 111 Ponce DeLeon Avenue; Clewiston, Florida 33440.

**Facility Location:** U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

**Project:** The applicant proposes to install the following: two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The project has the potential to emit 1 ton per year of particulate matter from this operation. The draft permit requires baghouse control systems on each lime silo and the railcar collection bin. The exhaust from each baghouse vent is limited to 5% opacity.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of filing. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

(Public Notice to be Published in the Newspaper)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**PROJECT**

Draft Air Construction Permit No. 0510003-034-AC  
Addition of Baghouses for New Lime Silo Loading/Unloading

**COUNTY**

Hendry County, Florida

**APPLICANT**

U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
ARMS Facility ID No. 0510003

**PERMITTING  
AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
Air Permitting North Program



November 7, 2005

{Filename: TEPD - 0510003-034-AC}

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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## 1. GENERAL PROJECT INFORMATION

### Applicant

U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

### Facility Description and Location

U.S. Sugar operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. The Standard Industrial Classification Code for these activities are SIC Nos. 2061 (Sugarcane Milling) and 2062 (Sugarcane Refining). The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North. This site is located in an area that is in attainment with, or designated as unclassifiable for, each air pollutant subject to a National Ambient Air Quality Standard (NAAQS).

### Regulatory Categories

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to a New Source Performance Standard in 40 CFR 60.

NESHAP: The facility operates units subject to a National Emissions Standard for Hazardous Air Pollutants in 40 CFR 63.

### Project Description

Sugarcane is harvested in nearby fields and transported to the existing Clewiston Mill, where the cane is processed into raw sugar. A combination of lime and flocculants are used to clarify raw sugarcane juice, which is then evaporated, crystallized, and centrifuged to form raw sugar. Some of the raw sugar is sold and some of it is processed at the on-site refinery into white sugar. The applicant proposes new equipment to unload and store lime for use in the process.

Lime will be delivered by railcar and/or truck and unloaded into two new storage silos. The total throughput of lime is expected to be approximately 5000 tons per year. Lime will be unloaded from the silos via bottom drop into a lime slaker. Water will be mixed with the lime and pumped to a lime slurry storage tank and agitator for use in the process.

Lime will be unloaded pneumatically from trucks to the silos by a blower system at a rate of approximately 33 tons per hour. A 25 ton truck will be unloaded in about 45 minutes. Lime will be unloaded from railcars by a separate vacuum-type system, which includes a collection bin, rotary airlocks, and transporter blower to pneumatically transport lime to the silos at a rate of approximately 10,000 pounds per hour. It will take about 18 hours to unload 180,000 pounds of lime from a railcar.

Each silo and the collection bin will be controlled by a baghouse. The silos will be controlled with a bin vent filter (Smoot Model No. 60BV16) to remove particulate matter during silo loading and unloading. Emissions from the collection bin will be controlled by a filter receiver (Smoot Model No. 60FR 14) to remove particulate matter during railcar unloading. Each baghouse will be designed for a flow rate of less than 500 acfm and an outlet grain loading of 0.02 grains per dscf. It is estimated that the maximum particulate matter emissions from each baghouse will be 0.08 pounds per hour and 0.35 tons per year. The project will result in a potential increase in particulate matter emissions of 1.05 tons per year.

### Processing Schedule

The Department received a complete application for an air construction permit on October 13, 2005.

## 2. APPLICABLE REGULATIONS

### State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air

## **TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

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quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER
62-213	Title V Air Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

### **General PSD Applicability**

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Table 62-212.400-1, F.A.C.); or 5 tons per year of lead.

For new projects at existing PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

### **PSD Applicability for Project**

The Clewiston Mill and Refinery is an existing PSD-major facility located in Hendry County, which is an area that is currently in attainment with, or designated as "unclassifiable" for, each pollutant with a state or federal Ambient Air Quality Standard (AAQS). The project will potentially increase of particulate matter emissions by 1.05 tons per year. This is well below the PSD Significant Emissions Rate of 15 tons per year of PM<sub>10</sub> or 25 tons per year of PM. Therefore, the project is not subject to PSD preconstruction review.

### **3. DRAFT PERMIT**

The applicant proposes to install three baghouses to control particulate matter emissions from the silo loading and unloading operations. Each baghouse will be designed for a flow rate of less than 500 acfm and an outlet grain loading of 0.02 grains per dscf. The process should be well-controlled and there should be no visible emissions from the baghouse vents. The draft permit will authorize the installation of the proposed equipment and establish a visible emissions standard of 5% opacity from each baghouse vent. The permittee will be required to demonstrate compliance with initial and annual EPA Method 9 observations.

### **4. PRELIMINARY DETERMINATION**

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

# DRAFT PERMIT

## PERMITTEE:

U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

### Authorized Representative:

Mr. William A. Raiola  
Vice President of Sugar Processing Operations

Clewiston Sugar Mill and Refinery Air Permit No. 0510003-034-AC Facility ID No. 0510003 SIC Nos. 2061, 2062 Permit Expires: {3 Years from Issuance}
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## PROJECT AND LOCATION

This permit authorizes installation of two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The new equipment will be installed at the existing Clewiston Mill and Refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida. The UTM coordinates are Zone 17, 506.1 km East, and 2956.9 km North.

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

## CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

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Michael G. Cooke, Director  
Division of Air Resource Management

(Date)

## SECTION 1. GENERAL INFORMATION

### FACILITY AND PROJECT DESCRIPTION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

A combination of lime and flocculants are used to clarify raw sugarcane juice, which is then evaporated, crystallized, and centrifuged to form raw sugar. Some of the raw sugar is sold and some of it is processed at the on-site refinery into white sugar. The applicant proposes new equipment to unload and store lime for use in the process (new Emissions Unit 031). Lime will be delivered by railcar and/or truck and unloaded into two new storage silos. The total throughput of lime is expected to be approximately 5000 tons per year. Lime will be unloaded from the silos via bottom drop into a lime slaker. Water will be mixed with the lime and pumped to a lime slurry storage tank and agitator for use in the process.

Lime will be unloaded pneumatically from trucks to the silos by a blower system at a rate of approximately 33 tons per hour. A 25 ton truck will be unloaded in about 45 minutes. Lime will be unloaded from railcars by a separate vacuum-type system, which includes a collection bin, rotary airlocks, and transporter blower to pneumatically transport lime to the silos at a rate of approximately 10,000 pounds per hour. It will take about 18 hours to unload 180,000 pounds of lime from a railcar.

Each silo and the collection bin will be controlled by a baghouse. The silos will be controlled with a bin vent filter to remove particulate matter during silo loading and unloading. Emissions from the collection bin will be controlled by a filter receiver to remove particulate matter during railcar unloading. Each baghouse will be designed for a flow rate of less than 500 acfm and an outlet grain loading of 0.02 grains per dscf. It is estimated that the maximum particulate matter emissions from each baghouse will be 0.08 pounds per hour and 0.35 tons per year. The project will result in a potential increase in particulate matter emissions of 1.05 tons per year.

### REGULATORY CLASSIFICATION

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to a New Source Performance Standard in 40 CFR 60.

NESHAP: The facility operates units subject to a National Emissions Standard for Hazardous Air Pollutants in 40 CFR 63.

### RELEVANT DOCUMENTS

The permit application is not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.



## SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting Authority for this project is the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-3381.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); Appendix B (General Conditions); and Appendix C (Common State Regulatory Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Baghouses - Lime Silo Loading/Unloading (EU-031)

This section of the permit addresses the following emissions unit.

#### Emissions Unit No. 031

This emissions unit regulates the loading and unloading of the two new lime silos by truck and railcar. Baghouse control systems will be installed on each lime silo (Emissions Points LS-1 and LS-2) and on the collection bin (Emission Point CB-1) associated with the railcar unloading system. The exhaust from each baghouse vent is at ambient conditions and is located approximately 65 feet above ground level.

#### EQUIPMENT

1. Equipment: This permit authorizes installation of two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). Each baghouse control system shall be designed and maintained for a flow rate of approximately 500 acfm and an outlet grain loading of 0.02 grains per dscf. [Rule 62-4.070(3), F.A.C.]

#### PERFORMANCE RESTRICTIONS

2. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

3. Opacity Standards: Emissions from each baghouse vent shall not exceed 5% opacity. The permittee shall take reasonable precautions to minimize fugitive particulate matter emissions from other activities related to silo loading and unloading. Emissions from these other activities (without baghouse controls) related to silo loading and unloading operations shall not exceed 20% opacity. [Rules 62-4.070(3) and 62-296.320(4)(b), F.A.C.]

#### EMISSIONS PERFORMANCE TESTING

4. Compliance Tests: In accordance with EPA Method 9, each baghouse vent shall be tested to demonstrate compliance with the emissions standards specified. Initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. Subsequently, each baghouse vent shall be tested annually to demonstrate compliance with the opacity standards during each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>). The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Separate tests shall be conducted while unloading lime from a truck and unloading lime from a railcar unless these systems can be used simultaneously. Tests shall be conducted at a lime unloading rate representative of the typical operation used throughout the year. [Rule 62-297.310(7)(a), F.A.C.]

#### RECORDS AND REPORTS

5. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix C of Section 4 of this permit. For each test run, the report shall also indicate the lime unloading rate, pneumatic line pressure, and pressure differential across the baghouse. [Rule 62-297.310(8), F.A.C.]

**SECTION 4. APPENDICES**  
**CONTENTS**

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- Appendix A. Citation Formats
- Appendix B. General Conditions
- Appendix C. Common State Regulatory Requirements

**SECTION 4. APPENDIX A**  
**CITATION FORMATS**

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*The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.*

**REFERENCES TO PREVIOUS PERMITTING ACTIONS**

Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number  
“001” identifies the specific permit project  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project

**RULE CITATION FORMATS**

Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7]

*Means:* Title 40, Part 60, Section 7

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (Not Applicable);
  - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
  - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SECTION 4. APPENDIX C**  
**COMMON STATE REGULATORY REQUIREMENTS**

*{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}*

**EMISSIONS AND CONTROLS**

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

**TESTING REQUIREMENTS**

10. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
11. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it

**SECTION 4. APPENDIX C**  
**COMMON STATE REGULATORY REQUIREMENTS**

is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
- a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
  - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
  - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

14. Determination of Process Variables

- a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
  2. The facility at which the emissions unit is located.



**SECTION 4. APPENDIX C**  
**COMMON STATE REGULATORY REQUIREMENTS**

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3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**RECORDS AND REPORTS**

19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

# P.E. CERTIFICATION STATEMENT

## PERMITTEE

U.S. Sugar Corporation  
Clewiston Sugar Mill and Refinery  
111 Ponce DeLeon Avenue  
Clewiston, Florida 33440

Air Permit No. 0510003-034-AC  
New Lime Silo Loading/Unloading  
Hendry County, Florida

## PROJECT DESCRIPTION

The United States Sugar Corporation operates the existing Clewiston sugar mill and refinery, which is located at the intersection of W.C. Owens Avenue and State Road 832 in Hendry County, Florida. Sugarcane is harvested from nearby fields and transported to the mill by train. In the mill, sugarcane is cut into small pieces and passed through a series of presses to squeeze juice from the cane. The juice undergoes clarification, separation, evaporation, and crystallization to produce raw, unrefined sugar. In the refinery, raw sugar is decolorized, concentrated, crystallized, dried, conditioned, screened, packaged, stored, and distributed as refined sugar. The fibrous byproduct remaining from the sugarcane is called bagasse and is burned as boiler fuel to provide steam and heating requirements for the mill and refinery.

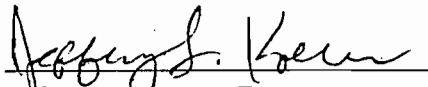
A combination of lime and flocculants are used to clarify raw sugarcane juice, which is then evaporated, crystallized, and centrifuged to form raw sugar. Some of the raw sugar is sold and some of it is processed at the on-site refinery into white sugar. The applicant proposes new equipment to unload and store lime for use in the process. Lime will be delivered by railcar and/or truck and unloaded into two new storage silos. The total throughput of lime is expected to be approximately 5000 tons per year. Lime will be unloaded from the silos via bottom drop into a lime slaker. Water will be mixed with the lime and pumped to a lime slurry storage tank and agitator for use in the process.

Lime will be unloaded pneumatically from trucks to the silos by a blower system at a rate of approximately 33 tons per hour. A 25 ton truck will be unloaded in about 45 minutes. Lime will be unloaded from railcars by a separate vacuum-type system, which includes a collection bin, rotary airlocks, and transporter blower to pneumatically transport lime to the silos at a rate of approximately 10,000 pounds per hour. It will take about 18 hours to unload 180,000 pounds of lime from a railcar.

Each silo and the collection bin will be controlled by a baghouse. The silos will be controlled with a bin vent filter to remove particulate matter during silo loading and unloading. Emissions from the collection bin will be controlled by a filter receiver to remove particulate matter during railcar unloading. Each baghouse will be designed for a flow rate of approximately 500 acfm and an outlet grain loading of 0.02 grains per dscf. It is estimated that the maximum particulate matter emissions from each baghouse will be 0.08 pounds per hour and 0.35 tons per year. The project will result in a potential increase in particulate matter emissions of 1.05 tons per year.

The process should be well-controlled and there should be no visible emissions from the baghouse vents. The draft permit will authorize the installation of the proposed equipment and establish a visible emissions standard of 5% opacity from each baghouse vent. The permittee will be required to demonstrate compliance with initial and annual EPA Method 9 observations.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.  
Registration Number: 49441

11-10-05

(Date)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><i>Rachel Felt</i></p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p><i>Rachel Felt 11-2-05</i></p>
<p>1. Article Addressed to:</p> <p>Mr. William A. Raiola, V.P. of Sugar Processing Operations 111 Ponce DeLeon Avenue Clewiston, Florida 33440</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p><b>7001 0320 0001 3692 4088</b></p>

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

<b>U.S. Postal Service</b> <b>CERTIFIED MAIL RECEIPT</b> <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
<b>OFFICIAL USE</b>	
Postage \$ Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required)	Postmark Here
<p>Tc</p> <p>Sen Mr. William A. Raiola, V.P. of Sugar            Processing Operations            111 Ponce DeLeon Avenue            Clewiston, Florida 33440</p>	
<p>PS Form 3800, January 2001 <span style="float: right;">See Reverse for Instructions</span></p>	

7001 0320 0001 3692 4088

**Golder Associates Inc.**

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



October 12, 2005

0537579

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

RECEIVED  
OCT 13 2005

BUREAU OF AIR REGULATION

Attention: Mr. Jeff Koerner, Air Permitting South

RE: UNITED STATES SUGAR CORPORATION  
CLEWISTON MILL  
APPLICATION FOR A NEW LIME SYSTEM

Dear Mr. Jeff Koerner:

Please find enclosed four (4) copies of the new lime system application for the Clewiston Mill. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in cursive script that reads 'David A. Buff'.

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

cc: Don Griffin  
Peter Briggs



**RECEIVED**

OCT 13 2005

**BUREAU OF AIR REGULATION**

**APPLICATION FOR  
AIR CONSTRUCTION PERMIT  
FOR NEW LIME SYSTEM  
UNITED STATES SUGAR CORPORATION**

***CLEWISTON MILL***

**Prepared For:  
United States Sugar Corporation  
Clewiston, Florida**

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

**October 2005**

**0537579**

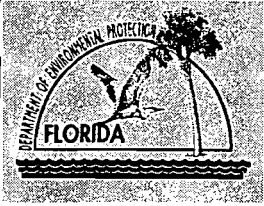
**DISTRIBUTION:**

**4 Copies – FDEP**

**2 Copies – USSC**

**2 Copies – Golder Associates Inc.**

**APPLICATION – 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 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
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**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 & Revised/Renewal 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: <b>United States Sugar Corporation</b>	
2. Site Name: <b>U.S. Sugar Clewiston Mill</b>	
3. Facility Identification Number: <b>0510003</b>	
4. Facility Location...: Street Address or Other Locator: <b>W.C. Owens Ave. and S.R. 832</b> City: <b>Clewiston</b> County: <b>Henry</b> Zip Code: <b>33440</b>	
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: <b>William A. Raiola, Senior Vice President, Sugar Processing Operations</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>United States Sugar Corporation</b> Street Address: <b>111 Ponce DeLeon Ave.</b> City: <b>Clewiston</b> State: <b>Florida</b> Zip Code: <b>33440</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(863) 983-8121</b> ext.                      Fax: <b>(863) 902-2729</b>	
4. Application Contact Email Address: <b>braiola@ussugar.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>10-13-05</i>
2. Project Number(s):	<i>0510003-034-AC</i>
3. PSD Number (if applicable):	
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 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**

**Air Construction Permit application to install two new lime storage silos, each with a baghouse for control of PM/PM<sub>10</sub> emissions. The lime is stored for use in the clarification process to clarify raw sugar cane juice. An additional baghouse will be installed on the railcar unloading system to control PM/PM<sub>10</sub> emissions as the lime is transported from the railcar to the collection bin.**

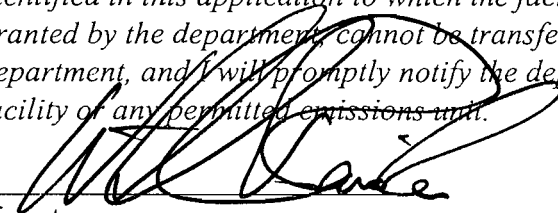




**APPLICATION INFORMATION**

**Owner/Authorized Representative Statement**

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

1. Owner/Authorized Representative Name :	
<b>William A. Raiola, Senior Vice President, Sugar Processing Operations</b>	
2. Owner/Authorized Representative Mailing Address...	
Organization/Firm: <b>United States Sugar Corporation</b>	
Street Address: <b>111 Ponce DeLeon Ave.</b>	
City: <b>Clewiston</b> State: <b>FL</b> Zip Code: <b>33440</b>	
3. Owner/Authorized Representative Telephone Numbers...	
Telephone: <b>(863) 983-8121</b> ext. Fax: <b>(863) 902-2729</b>	
4. Owner/Authorized Representative Email Address: <b>braiola@ussugar.com</b>	
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 of any permitted emissions unit.</i>	
 Signature	<u>10/10/05</u> 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:
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: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
5. Application Responsible Official Email Address:
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 _____

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates Inc.**</b> Street Address: <b>6241 NW 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653-1500</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 336-5600</b> ext. <b>545</b> Fax: <b>(352) 336-6603</b>
4. Professional Engineer Email Address: <b>dbuff@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i>  (1) <i>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>  (2) <i>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>  (3) <i>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>  (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input checked="" 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>  (5) <i>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>10/12/05</u> (seal)

\* Attach any exception to certification statement.  
Board of Professional Engineers Certificate of Authorization #00001670

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

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

#### Facility Contact

1. Facility Contact Name: <b>William A. Raiola, Senior Vice President, Sugar Processing Operations</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>United States Sugar Corporation</b> Street Address: <b>111 Ponce DeLeon Ave.</b> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <span>City: <b>Clewiston</b></span> <span>State: <b>FL</b></span> <span>Zip Code: <b>33440</b></span> </div>
3. Facility Contact Telephone Numbers: Telephone: <b>(863) 983-8121</b> ext.      Fax: <b>(863) 902-2729</b>
4. Facility Contact Email Address: <b>braiola@ussugar.com</b>

#### 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: <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <span>City:</span> <span>State:</span> <span>Zip Code:</span> </div>
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:	

**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
Sulfur Dioxide - SO <sub>2</sub>	A	N
Nitrogen Oxides - NO <sub>x</sub>	A	N
Carbon Monoxide - CO	A	N
Particulate Matter - PM <sub>10</sub>	A	N
Sulfuric Acid Mist - SAM	A	N
Total Hazardous Air Pollutants - HAPs	A	N
Volatile Organic Compounds - VOC	A	N
Acetaldehyde - H001	A	N
Benzene - H017	A	N
Formaldehyde - H095	A	N
Phenol - H144	A	N
Polycyclic Organic Matter - H151	A	N
Styrene - H163	A	N
Toluene - H169	A	N
Naphthalene - H132	A	N
Dibenzofuran - H058	A	N





**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 checked="" type="checkbox"/> Attached, Document ID: <u>USSC-FI-C1</u> <input type="checkbox"/> Previously Submitted, Date: _____
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 checked="" type="checkbox"/> Attached, Document ID: <u>USSC-FI-C2</u> <input type="checkbox"/> Previously Submitted, Date: _____
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 type="checkbox"/> Previously Submitted, Date: _____

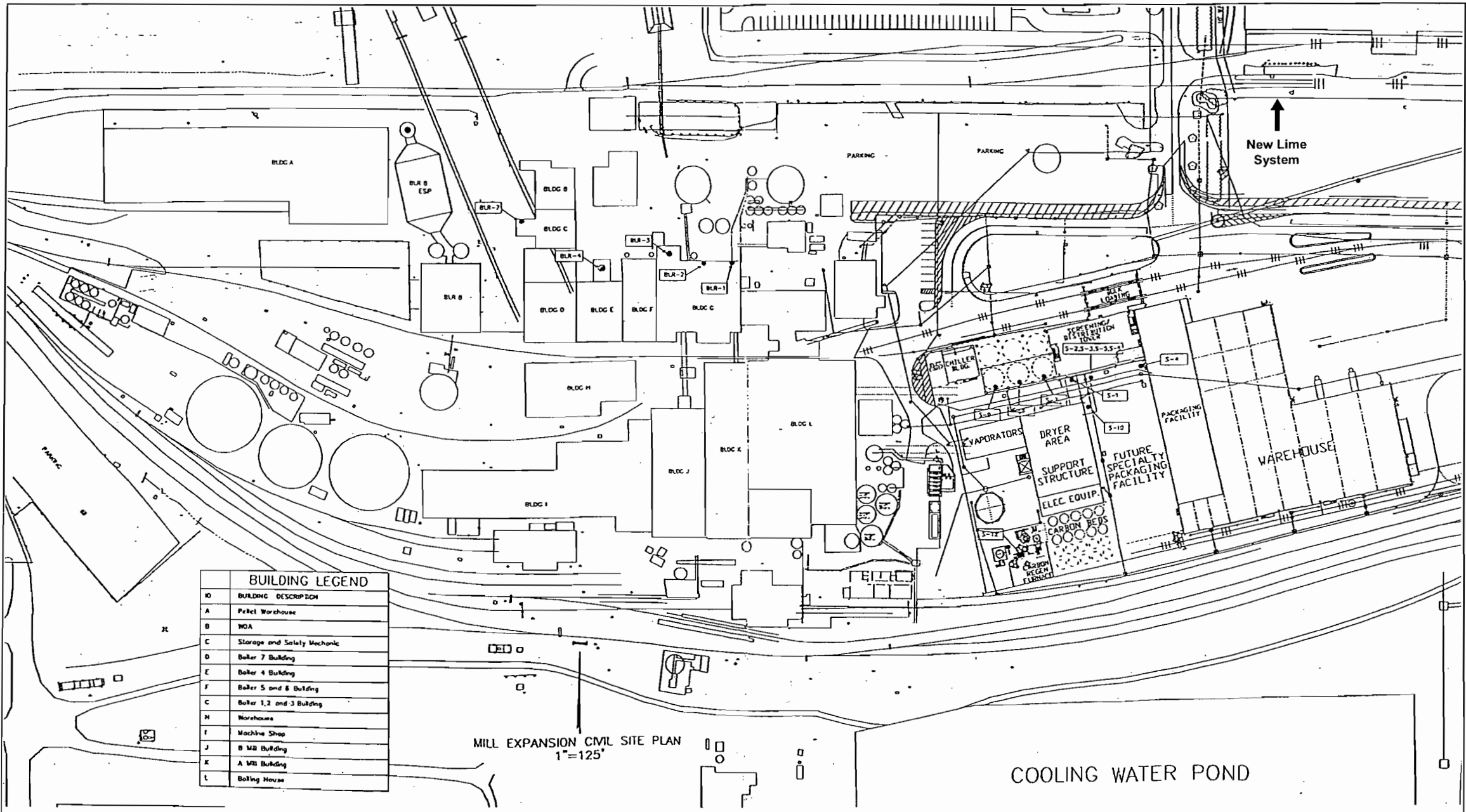
**Additional Requirements for Air Construction Permit Applications**

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 or Modification: <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), 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(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. 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



**ATTACHMENT USSC-FI-C1a,b**

**FACILITY PLOT PLANS**



ID	BUILDING DESCRIPTION
A	Pellet Warehouse
B	WOA
C	Storage and Safety Mechanic
D	Baker 7 Building
E	Baker 4 Building
F	Baker 5 and 8 Building
C	Baker 1, 2 and 3 Building
H	Warehouse
I	Machine Shop
J	B Mill Building
K	A Mill Building
L	Baling House

MILL EXPANSION CIVIL SITE PLAN  
1"=125'

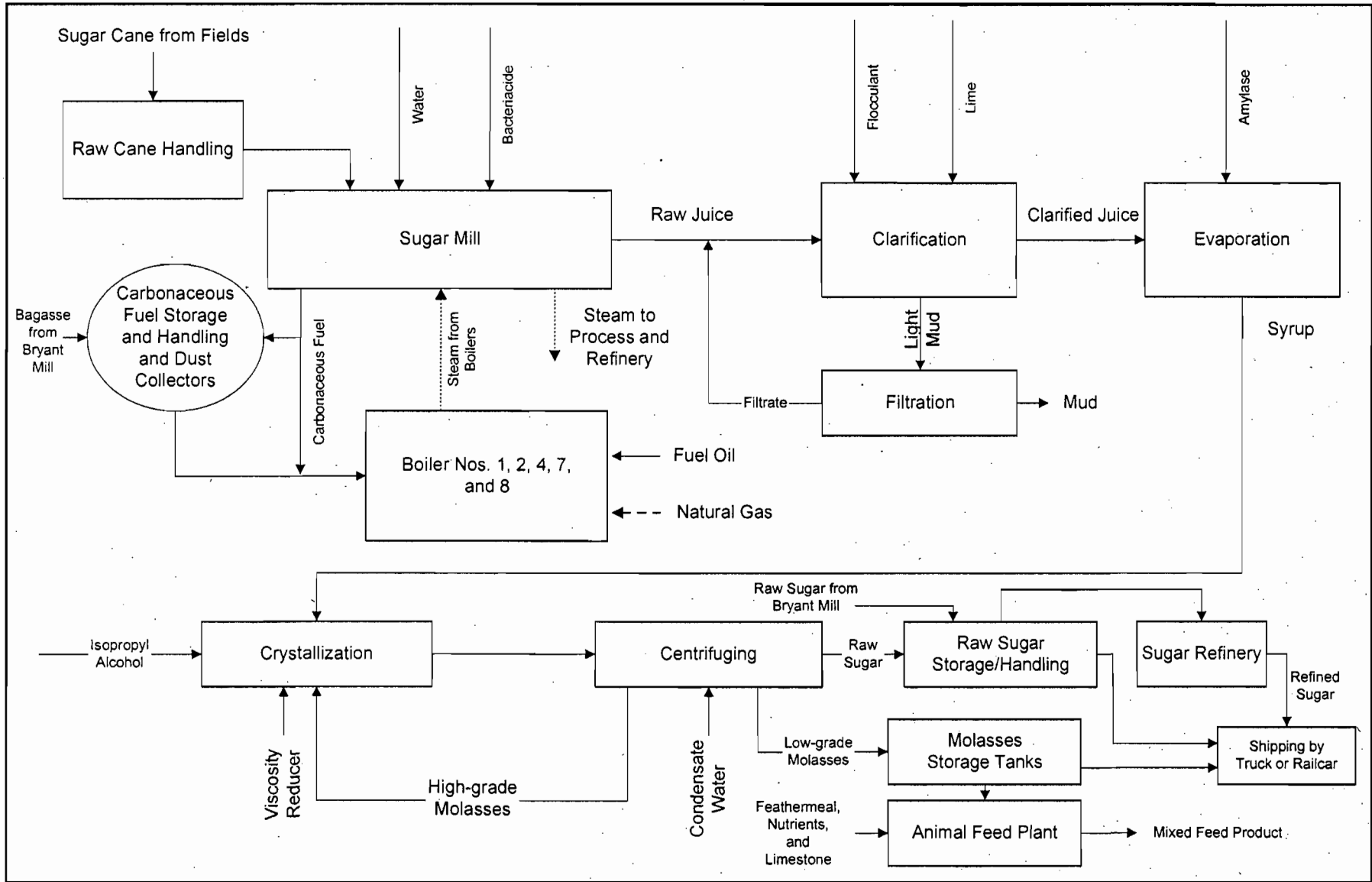
Attachment USSC-FI-C1a.  
Facility Plot Plan  
U.S. Sugar Corporation, Clewiston Mill  
Clewiston, Florida






**ATTACHMENT USSC-FI-C2**

**PROCESS FLOW DIAGRAM**



<p>Attachment USSC-FI-C2 Process Flow Diagram U. S. Sugar Corporation Clewiston Mill, Florida</p>	<p><b>Process Flow Legend</b>          Solid/Liquid →          Steam .....          Gaseous - - -</p>	<p>Clewiston Sugar Mill Facility           Filename: USSC-FI-C2.vsd          Date: 06/28/05</p>	
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## EMISSIONS UNIT INFORMATION

Section [1] of [1]  
Lime System

### 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] of [1]  
Lime System

**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:  
**Lime unloading and storage in two lime silos.**

3. Emissions Unit Identification Number:

4. Emissions Unit Status Code: <b>C</b>	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: <b>20</b>	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:  
**Unloading and storage for lime used to clarify raw sugar juice in the Boiling House.**

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]  
Lime System

**Emissions Unit Control Equipment**

1. Control Equipment/Method(s) Description:  
Baghouse on top of each storage silo (2): Smoot Model No. 60BV16  
Baghouse for railcar unloading (1): Smoot Model No. 60FR14

2. Control Device or Method Code(s): 017

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]  
Lime System

**B. EMISSIONS UNIT CAPACITY INFORMATION**

(Optional for unregulated emissions units.)

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Process or Throughput Rate: <b>5,000 TPY</b>
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: <b>24 hours/day</b> <b>7 days/week</b> <b>52 weeks/year</b> <b>8,760 hours/year</b>
6. Operating Capacity/Schedule Comment: <b>Represents total lime throughput through the lime system.</b>

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]  
Lime System

**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: Lime Silo #1 and #2		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: H	6. Stack Height: 65 feet	7. Exit Diameter: 0.67 feet	
8. Exit Temperature: 75°F	9. Actual Volumetric Flow Rate: 476 acfm	10. Water Vapor: 1 %	
11. Maximum Dry Standard Flow Rate: 465 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: Horizontal discharge of dust collector located on top of each lime silo. Exit temperature is at ambient conditions. Dust collector for railcar unloading has the equivalent exit diameter, exit temperature, moisture content and flow rates.			

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]  
 Lime System

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

1. Segment Description (Process/Fuel Type): <b>Industrial Processes; Mineral Products; Bulk Materials Storage Bins; Minerals; Lime</b>		
2. Source Classification Code (SCC): <b>3-05-102-98</b>		3. SCC Units: <b>Tons Processed</b>
4. Maximum Hourly Rate: <b>38</b>	5. Maximum Annual Rate: <b>5,000</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: <b>Lime unloading and storage. Lime may be unloaded into the silos via railcar or truck. Maximum hourly rate is based on one 25 ton truck unloading in approximately 45 minutes and one 180,000 lb railcar unloading at 10,000 lb/hr. Maximum annual rate is based on the total throughput to the lime system.</b>		

**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**

**POLLUTANT DETAIL INFORMATION**

Section [1] of [1]  
Lime System

Page [1] of [2]  
Particulate Matter Total

**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: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>0.24 lb/hour                      1.05 tons/year</b>	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year	
6. Emission Factor: <b>0.02 gr/dscf</b>  Reference: <b>Design rate</b>	7. Emissions Method Code: <b>2</b>
8. Calculation of Emissions: <b>465 dscfm * 0.02 gr/dscf * 60 min/hr ÷ 7,000 gr/lb = 0.08 lb/hr from each baghouse</b>  <b>0.08 lb/hr * 8,760 hr/yr ÷ 2,000 lb/ton = 0.35 TPY from each baghouse</b>  <b>Total of 3 baghouses : 0.08 lb/hr x 3 = 0.24 lb/hr</b> <b>0.35 TPY x 3 = 1.05 TPY</b>  <b>See Attachment USSC-EU1-D10.</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>The maximum dry standard flow rate of each baghouse is 465 dscfm. Potential emissions take into account emissions from both silos and railcar unloading.</b>	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]  
Lime System

**POLLUTANT DETAIL INFORMATION**

Page [1] of [2]  
Particulate Matter Total

**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] of [1]  
Lime System

Page [2] of [2]  
Particulate Matter < 10 µm

**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: <b>PM<sub>10</sub></b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>0.24 lb/hour                      1.05 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.02 gr/dscf</b>  Reference: <b>Design rate</b>		7. Emissions Method Code: <b>2</b>	
8. Calculation of Emissions: <b>465 dscfm * 0.02 gr/dscf * 60 min/hr ÷ 7,000 gr/lb = 0.08 lb/hr from each baghouse</b>  <b>0.08 lb/hr * 8,760 hr/yr ÷ 2,000 lb/ton = 0.35 TPY from each baghouse</b>  <b>Total of 3 baghouses : 0.08 lb/hr x 3 = 0.24 lb/hr</b> <b>0.35 TPY x 3 = 1.05 TPY</b>  <b>See Attachment USSC-EU1-D10.</b>			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>The maximum dry standard flow rate of each baghouse is 465 dscfm. Potential emissions take into account emissions from both silos and railcar unloading.</b>			

**EMISSIONS UNIT INFORMATION**Section [1] of [1]  
Lime System**POLLUTANT DETAIL INFORMATION**Page [2] of [2]  
Particulate Matter < 10 µm**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] of [1]  
Lime System

**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: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: <b>EPA Method 9</b>	
5. Visible Emissions Comment: <b>Rule 62-296.320, F.A.C.</b>	

**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] of [1]  
Lime System

**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] of [1]  
Lime System

**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: <u>USSC-EU1-I1</u> <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 type="checkbox"/> Attached, Document ID: _____ <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 checked="" type="checkbox"/> Attached, Document ID: <u>USSC-EU1-I3</u> <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) <input type="checkbox"/> 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] of [1]  
Lime System

**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 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] of [1]  
Line System

**Additional Requirements Comment**

**ATTACHMENT USSC-EU1-D10**

**EMISSIONS CALCULATIONS**



## ATTACHMENT USSC-EU1-D10

## CALCULATION OF EMISSIONS

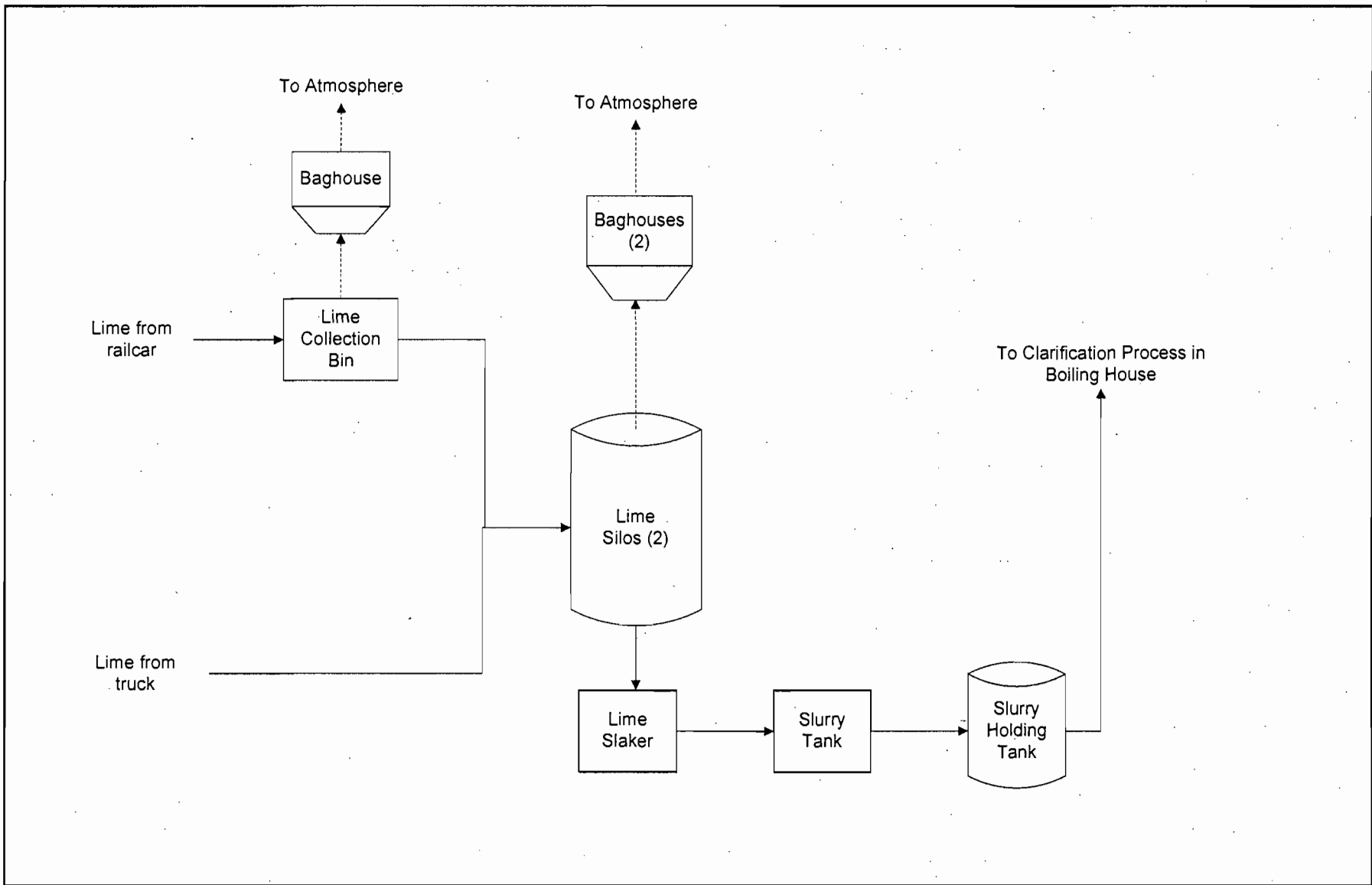
**Summary of PM/PM<sub>10</sub> Maximum Potential Emission Rate  
for Railcar Unloading and Each Lime Storage Silo**


Source	Control Equipment	Exhaust Flow (dscfm)	Exhaust Grain Loading (gr/dscf)	Operating Hours (hr/yr)	PM/PM <sub>10</sub> Emission Rate	
					lb/hour	TPY
Lime Silo #1	Baghouse	465	0.02	8,760	0.08	0.35
Lime Silo #2	Baghouse	465	0.02	8,760	0.08	0.35
Railcar Unloading	Baghouse	466	0.02	8,760	0.08	0.35

Note: dscfm = dry standard cubic feet per minute.  
 gr/dscf = grains per dry standard cubic feet.  
 lb/hr = pounds per hour.  
 TPY = tons per year.

**ATTACHMENT USSC-EU1-I1**

**PROCESS FLOW DIAGRAM**



<p>Attachment USSC-EU1-I1 Lime System Flow Diagram U.S. Sugar Clewiston</p>	<p><b>Process Flow Legend</b></p> <p>Solid/Liquid Flow </p> <p>Gas Flow </p>	<p>Filename: USSC-EU1-I1 Date: 10/5/2005</p> 
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**ATTACHMENT USSC-EU1-I3**

**CONTROL EQUIPMENT PARAMETERS  
FOR THE LIME SYSTEM**

**ATTACHMENT USSC-EU1-13a**  
**CONTROL EQUIPMENT PARAMETERS FOR EACH**  
**LIME SILO BAGHOUSE AT U.S. SUGAR CLEWISTON**

Manufacturer and Model No.	Smoot Model 60BV16
Outlet Gas Temp (°F)	75
Outlet Gas Flow Rate (acfm)	476
Exhaust Gas Moisture Content (%)	1.0
Outlet Gas Flow Rate (scfm)	465
Cleaning Method	Reverse Pulse
No. of bags	16
Bag Material	16 oz. Polyester Singed Fabric
Total Area of Filter Media (sq. ft)	116
Air to Cloth Ratio	4.10
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.02
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.080

Note: Parameters based on manufacturers design specifications as shown on the following page.

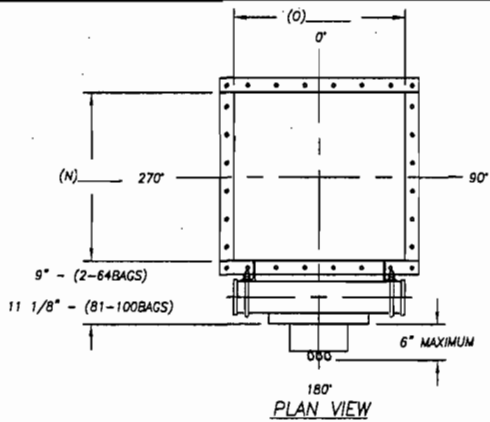
Sample calculations:

$$\text{Outlet loading rate (lb/hr)} = \text{outlet gas flow rate (acfm)} \times \text{outlet loading rate (grains/acf)} \div 7000 \text{ grains/lb} \times 60 \text{ min/hr}$$

WHEN ORDERING A SMOOT BIN VENT, USE THE NUMBERING SYSTEM BELOW:

A4- BBRBV -B -C -D -E -F -G -H -J -K

BAG LENGTH NO. OF BAGS



MODEL DASH NO.	NEMA RATING
B1	NEMA 4
B2	NEMA 4X, SS
B3	NEMA 7/9 (XP)

MODEL DASH NO.	MATERIAL OF CONSTRUCTION
D1	CARBON STEEL
D2	CARBON STEEL - EPOXY COATED PRODUCT CONTACT ONLY
D3	304 STAINLESS STEEL PRODUCT CONTACT ONLY
D4	304 STAINLESS STEEL

MODEL DASH NO.	DP GAUGE/SWITCH
E1	NO DP GAUGE DR SWITCH
E2	DP GAUGE ONLY
E3	DP GAUGE & SWITCH
E4	4-20MA DP GAUGE & X-MITTER w/TIMER BOARD

MODEL DASH NO.	BAG CATCH GRID
C1	WITHOUT BAG CATCH
C2	WITH BAG CATCH

MODEL DASH NO.	FILTER HEAD ACCESS
F1	W/O PLENUM ACCESS
F2	WITH PLENUM ACCESS (NOT AVAILABLE ON OPTION K3)

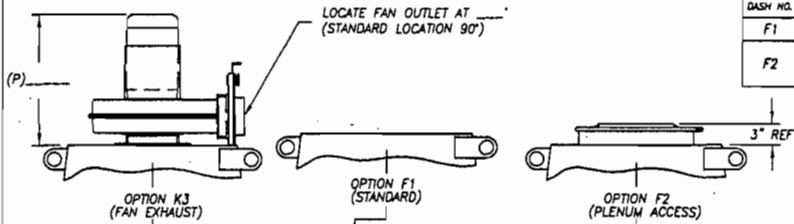
MODEL DASH NO.	TIMER BOARD & ENCLOSURES
G1	NO TIMER BOARD
G2	TIMER BOARD - SHIPPED LOOSE
G3	TIMER BOARD & ENCLOSURE - SHIPPED LOOSE
G4	TIMER BOARD & ENCLOSURE - MOUNTED TO FILTER (STANDARD WITH OPTION E-4)

MODEL DASH NO.	BAG MATERIAL
H1	POLYESTER
H2	NOMEX
H3	TETRATEX
H4	GORE-TEX #

MODEL DASH NO.	BAG CAGE
J1	GALVANIZED
J2	304 SS
J3	EPOXY COATED

MODEL DASH NO.	EXHAUST OPTIONS
K1	STUB EXHAUST
K2	WEATHER EXHAUST w/ SCREEN
K3	FAN

K3 SUB NO.	MODEL NO.	MOTOR HP.
1		0.5
2	PB-9	0.75
3		1
4		0.75
5	PB-10A	1
6		1.5
7		2
8		1
9		1.5
10	PB-12A	2
11		3
12		5
13		2
14	PB-14A	3
15		5
16		3
17		5
18	PB-15A	7.5
19		10
20		15

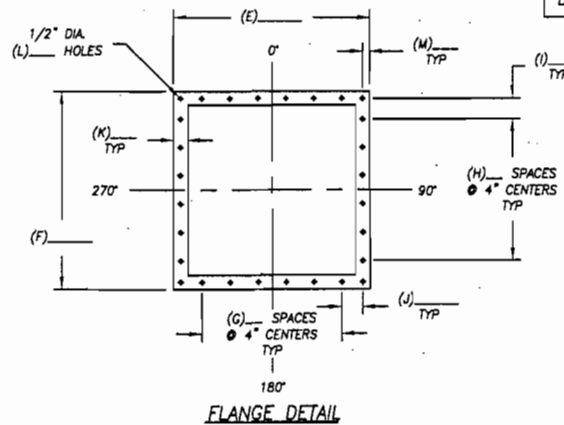


NOTE:

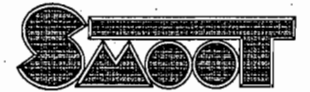
1. FILTER CONTAINS (A) \_\_\_\_\_ SqFt OF FILTER MEDIA.
2. FILTER REQUIRES (B) \_\_\_\_\_ SCFM OF HIGH PRESSURE SUPPLY AIR AT 80-100PSIG.
3. ESTIMATED WEIGHT (D) \_\_\_\_\_ lbs.

CUSTOMER: \_\_\_\_\_  
 CUSTOMER PO NO.: \_\_\_\_\_  
 SMOOT JOB NO.: \_\_\_\_\_  
 ITEM NO.: \_\_\_\_\_  
 QTY.: \_\_\_\_\_  
 ISSUE: \_\_\_\_\_

USE THIS DRAWING WITH DRAWING #4-9\_2 (DIMENSIONAL INFO.)



C.F. # 21.1.1-4-A  
 REV. 0 8/9/01



Division of Magnum Systems

Kansas City,

Kansas

BIN VENT FILTER  
 BOTTOM BAG REMOVAL  
 CUSTOMER DRAWING

DATE 3/28/01  
 DWN BY ELB  
 SCALE NONE

DWG. NO. 4-9\_1  
 APPROVED  
 SHEET 1 OF 2

**ATTACHMENT USSC-EU1-13b**  
**CONTROL EQUIPMENT PARAMETERS FOR THE**  
**RAILCAR UNLOADING BAGHOUSE AT U.S. SUGAR CLEWISTON**

Manufacturer and Model No.	Smoot Model 60FR14
Outlet Gas Temp (°F)	75
Outlet Gas Flow Rate (acfm)	477
Exhaust Gas Moisture Content (%)	1.0
Outlet Gas Flow Rate (scfm)	466
No. of bags	14
Bag Material	16 oz. Polyester Singed Fabric
Total Area of Filter Media (sq. ft)	104
Air to Cloth Ratio	4.9
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.02
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.080

Note: Parameters based on manufacturers design specifications as shown on the following page.

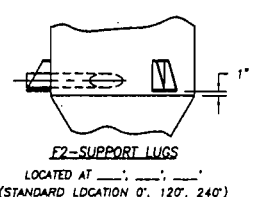
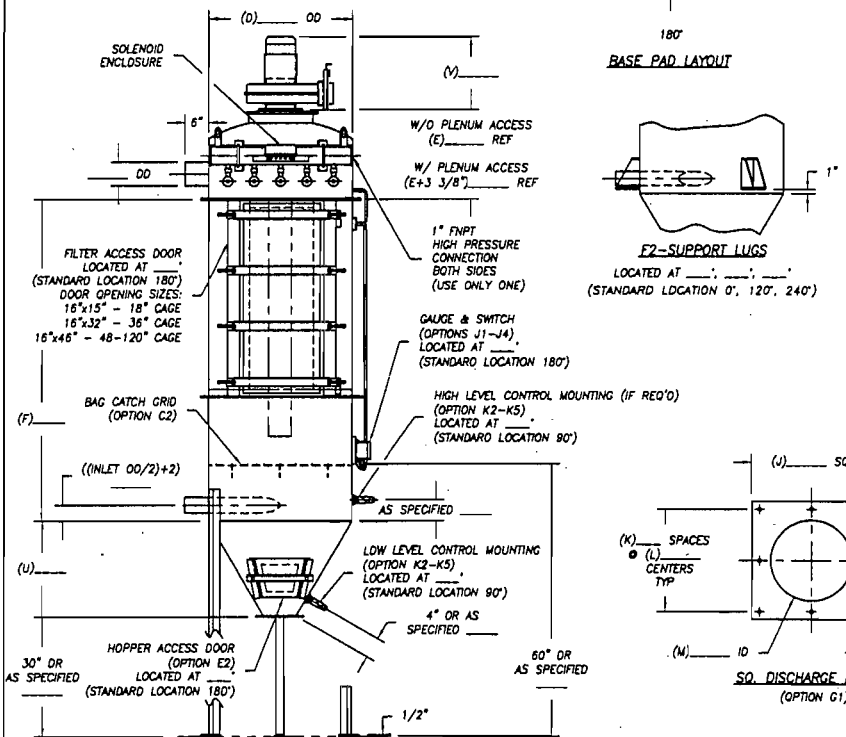
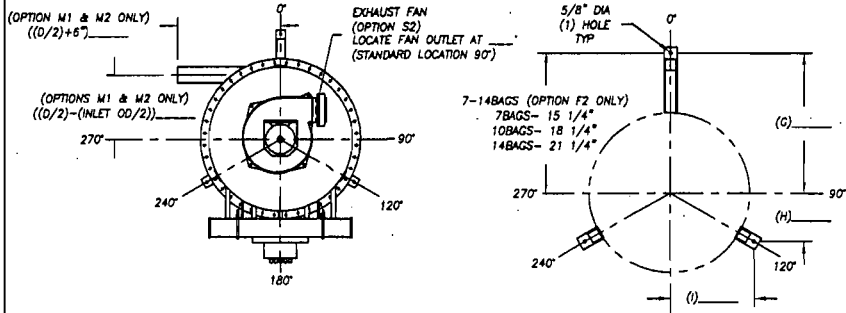
Sample calculations:

$$\text{Outlet loading rate (lb/hr)} = \text{outlet gas flow rate (acfm)} \times \text{outlet loading rate (grains/acf)} \div 7000 \text{ grains/lb} \times 60 \text{ min/hr}$$

WHEN ORDERING A SMOOT FILTER RECEIVER, PLEASE USE THE NUMBERING SYSTEM BELOW.

A2 \_\_\_\_\_ B \_\_\_\_\_ C \_\_\_\_\_ D \_\_\_\_\_ E \_\_\_\_\_ F \_\_\_\_\_ G \_\_\_\_\_ H \_\_\_\_\_ J \_\_\_\_\_ K \_\_\_\_\_ L \_\_\_\_\_ M \_\_\_\_\_ N \_\_\_\_\_ P \_\_\_\_\_ Q \_\_\_\_\_ R \_\_\_\_\_ S \_\_\_\_\_

FILTER MODEL # (SEE SHEET 2)



MODEL DASH #	ELECTRICAL ENCLOSURE TYPE
B1	NEMA 4, CARBON STEEL
B2	NEMA 4X, STAINLESS STEEL
B3	NEMA 7/9, EXPLOSION PROOF

MODEL DASH #	BAG CATCH GRID
C1	WITHOUT BAG CATCH
C2	WITH BAG CATCH

MODEL DASH #	PLENUM ACCESS
D1	WITHOUT PLENUM ACCESS
D2	WITH PLENUM ACCESS (STANDARD WITH OPTION R2)

MODEL DASH #	HOPPER ACCESS
E1	WITHOUT HOPPER ACCESS
E2	WITH HOPPER ACCESS

MODEL DASH #	FILTER SUPPORT
F1	FILTER SUPPORT LEGS
F2	FILTER SUPPORT LUGS

MODEL DASH #	DISCHARGE TYPE
G1	SO. FLANGE
G2	ROUND FLANGE

MODEL DASH #	MATERIAL OF CONSTRUCTION
H1	CARBON STEEL
H2	CARBON STEEL - EPOXY COATED PRODUCT CONTACT ONLY
H3	304 STAINLESS STEEL - PRODUCT CONTACT ONLY
H4	STAINLESS STEEL

MODEL DASH #	DP GAUGE/ SWITCH
J1	NO DP GAUGE OR SWITCH
J2	DP GAUGE ONLY
J3	DP GAUGE & SWITCH
J4	4-20MA DP GAUGE & X-WITTER w/ TIMER BOARD

MODEL DASH #	LEVEL CONTROL MOUNTING
K1	WITHOUT LEVEL CONTROL
K2	PROXIMITY (1) EA. (M30x1.5)
K3	PADDLE (1) EA. (2 1/2" FNPT)
K4	PROBE (1) EA. (3/4" FNPT)
K5	ENGINEERING/CUSTOMER TO SPECIFY

MODEL DASH #	CAGE TYPE
L1	GALVANIZED
L2	EPOXY COATED
L3	304 STAINLESS STEEL

MODEL DASH #	INLET TYPE
M1	CCW TANGENTIAL
M2	CW TANGENTIAL
M3	DEFLECTOR
M3	TARGET BOX

MODEL DASH #	BAG TYPE
N1	POLYESTER BAG
N2	NOWEX BAG
N3	TETRALEX BAG
N4	CORE-TEX BAG
N5	45 PLEAT CARTRIDGE (POLYESTER)

MODEL DASH #	EXHAUST OPTIONS	
S1.0	TUBE STUB	
S2	FAN	
FAN SUB #	MODEL NUMBER	MOTOR HP
1	HPB	1.5
2	PB-10a	2.0
3	PB-12a	2.0
4	PB-14a	5.0
5	PB-15a	7.5
6	ENGINEERING TO SPECIFY	

SELECT FAN USING CHART ON DRAWING 2-99\_2

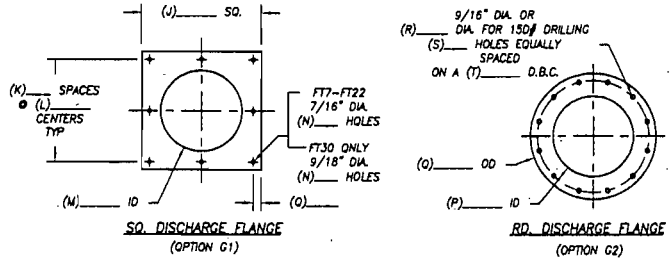
MODEL DASH #	TIMER BOARD & ENCLOSURES
P1	NO TIMER BOARD
P2	TIMER BOARD - SHIPPED LOOSE
P3	TIMER BOARD & ENCLOSURE - SHIPPED LOOSE
P4	TIMER BOARD & ENCLOSURE - MOUNTED TO FILTER (STANDARD WITH OPTION J4)

NOMINAL SIZE	MODEL DASH # INLET		MODEL DASH # OUTLET	
	11 GA	SCH 40	11 GA	SCH 40
2	Q1	Q8	R1	R8
3	Q2	Q9	R2	R9
4	Q3	Q10	R3	R10
5	Q4	Q11	R4	R11
6	Q5	Q12	R5	R12
8	Q6	Q13	R6	R13
10	Q7	Q14	R7	R14

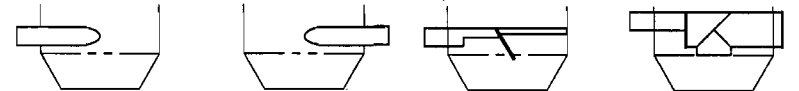
NOTE:  
 1. FILTER CONTAINS (A) \_\_\_\_\_ SCFM OF FILTER MEDIA.  
 2. FILTER REQUIRES (B) \_\_\_\_\_ SCFM OF HIGH PRESSURE SUPPLY AIR AT 80-100 PSIG.  
 3. ESTIMATED WEIGHT:  
 ESTIMATED EMPTY WEIGHT = (C) \_\_\_\_\_ lbs.  
 STORAGE CAPACITY = \_\_\_\_\_ CuFt  
 PRODUCT DENSITY = \_\_\_\_\_ lbs/CuFt  
 ESTIMATED FULL WEIGHT = \_\_\_\_\_ lbs.

USE THIS DRAWING WITH DRAWING #2-99\_2 (DIMENSIONAL INFO.)

C.F. # 21.1.1-4-A  
 REV. 0 4/16/01  
 PAGE 1 OF 2



- M1-CCW TANGENTIAL INLET LOCATED AT (STANDARD LOCATION 0")
- M2-CW TANGENTIAL INLET LOCATED AT (STANDARD LOCATION 0")
- M3-DEFLECTOR INLET LOCATED AT (STANDARD LOCATION 270")
- M4-TARGET BOX INLET LOCATED AT (STANDARD LOCATION 270")



CUSTOMER: \_\_\_\_\_  
 CUSTOMER PO NO.: \_\_\_\_\_  
 SMOOT JOB NO.: \_\_\_\_\_  
 ITEM NO.: \_\_\_\_\_  
 QTY.: \_\_\_\_\_  
 ISSUE: \_\_\_\_\_

**Smoot**  
 Division of Magnum Systems

Kansas City, Kansas

**ROUND FILTER RECEIVER  
 BOTTOM BAG REMOVAL  
 CUSTOMER DRAWING  
 SHEET 1 OF 2**

DATE 4/16/01 DWG. NO. 2-99\_1  
 DWN. BY ELB APPROVED \_\_\_\_\_  
 SCALE NONE



**ATTACHMENT A**

**ATTACHMENT A****SUPPLEMENTAL INFORMATION FOR  
CONSTRUCTION PERMIT APPLICATION**

United States Sugar Corporation (U.S. Sugar) owns and operates a sugar mill and refinery located in Clewiston, Hendry County, Florida. The mill and refinery currently operate under Title V Operating Permit No. 0510003-014-AV. U.S. Sugar harvests sugar cane and transports it to the Clewiston Mill, where the cane is processed into raw sugar in the mill. U.S. Sugar sells some of the raw sugar and the remainder of the raw sugar is refined into white sugar.

Lime is used in the clarification process in the U.S. Sugar Boiling House to clarify raw sugar cane juice. The combination of lime and flocculants produces clarified juice that undergoes evaporation, crystallization, and centrifugation to form raw sugar. This raw sugar is then sent through the refinery process to produce refined sugar.

Lime will be delivered by railcar and truck and off-loaded into two new storage silos. Lime from the trucks will be transported to the silos via a blower system at a rate of 33 tons per hour (TPH) (i.e., 45 minutes to unload a 25 ton truck). Loading of the silos via railcar is accomplished through a transport system that feeds lime into the transport air stream at a rate of 10,000 pounds per hour (lb/hr). It will take approximately 18 hours to unload an 180,000 pound railcar. The lime from the railcar enters a vacuum-type unloading system that transports the lime from the railcar to a collection bin. The collection bin has a baghouse to filter the transport air. A rotary air lock then feeds the lime into the air stream from a transporter blower, which transports the lime to the silos. Each silo contains a dust collector.

Total throughput of lime into the system is approximately 5,000 tons per year (TPY). Unloading of the silos is accomplished via gravity bottom drop into a lime slaker where the lime is mixed with water and pumped to a lime slurry storage tank and agitator.

U.S. Sugar will install a bin vent filter (Smoot Model No. 60BV16) on each lime silo to reduce particulate matter (PM) emissions associated with loading and unloading of the silos. A filter-receiver (Smoot Model No. 60FR14) will be installed on the railcar unloading system to reduce PM emissions associated with unloading the railcars.

Maximum PM and particulate matter less than 10 microns in diameter ( $PM_{10}$ ) emissions from each baghouse are 0.08 lb/hr and 0.35 TPY. Total PM/ $PM_{10}$  emissions from all three baghouses are 0.24 lb/hr and 1.05 TPY. The PM/ $PM_{10}$  emissions are based on a maximum dry standard flow rate from each baghouse of 465 dry standard cubic feet per minute (dscfm) and a design grain loading rate of 0.02 grains per dry standard cubic feet (gr/dscf) per baghouse. Hours of operation are assumed continuous. Details of each bin vent filter, including emissions estimates, are included in this application for an air construction permit.

**The Clewiston News**

Published Weekly

Clewiston, Florida

**AFFIDAVIT OF PUBLICATION**

State of Florida  
County of Hendry

Before the undersigned authority, personally appeared Mark Young, who on oath says he is the Editor of the Clewiston News, a weekly newspaper published at Clewiston in Hendry County, Florida, that the

attached copy of advertisement being a Notice

in the matter Public notice of intent to issue air permit U.S. Sugar Corporation Ad# 100935

in the \_\_\_\_\_ court, was published in said newspaper in the issue(s) of December 8, 2005

Affiant further says that the said Clewiston News is a newspaper published at Clewiston, in said Hendry County, continuously published in said Hendry County, Florida, each week, and has been entered as periodicals matter at the post office in Clewiston, in said Hendry County, Florida, for a period of one year next preceding the first publication says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Mark Young

Sworn to and subscribed before me this 9 day of Dec, 2005

Idybis Gonzalez  
Notary Public



**Idybis Gonzalez**  
Commission #DD341238  
Expires: Jul 26, 2008  
Bonded Thru  
Atlantic Bonding Co., Inc

DEC 15 2005  
D.E.P. - South District

**PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT**

**Florida Department of Environmental Protection  
Draft Air Permit No. 0510003-034  
U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery  
Hendry County, Florida**

**Applicant:** The applicant for this project is the U.S. Sugar Corporation. The applicant's authorized representative and mailing address is: Mr. William A. Raiola, Vice President of Sugar Processing Operations, U.S. Sugar Corporation - Clewiston Sugar Mill and Refinery; 111 Ponce DeLeon Avenue, Clewiston, Florida 33440.

**Facility Location:** U.S. Sugar Corporation operates an existing sugar mill and refinery, which is located in Hendry County at 111 Ponce DeLeon Avenue in Clewiston, Florida.

**Project:** The applicant proposes to install the following: two new lime silos, truck and railcar pneumatic unloading and conveying equipment, three associated baghouse control systems, and a lime slaker system (as necessary). The project has the potential to emit 1 ton per year of particulate matter from this operation. The draft permit requires baghouse control systems on each lime silo and the railcar collection bin. The exhaust from each baghouse vent is limited to 5% opacity.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

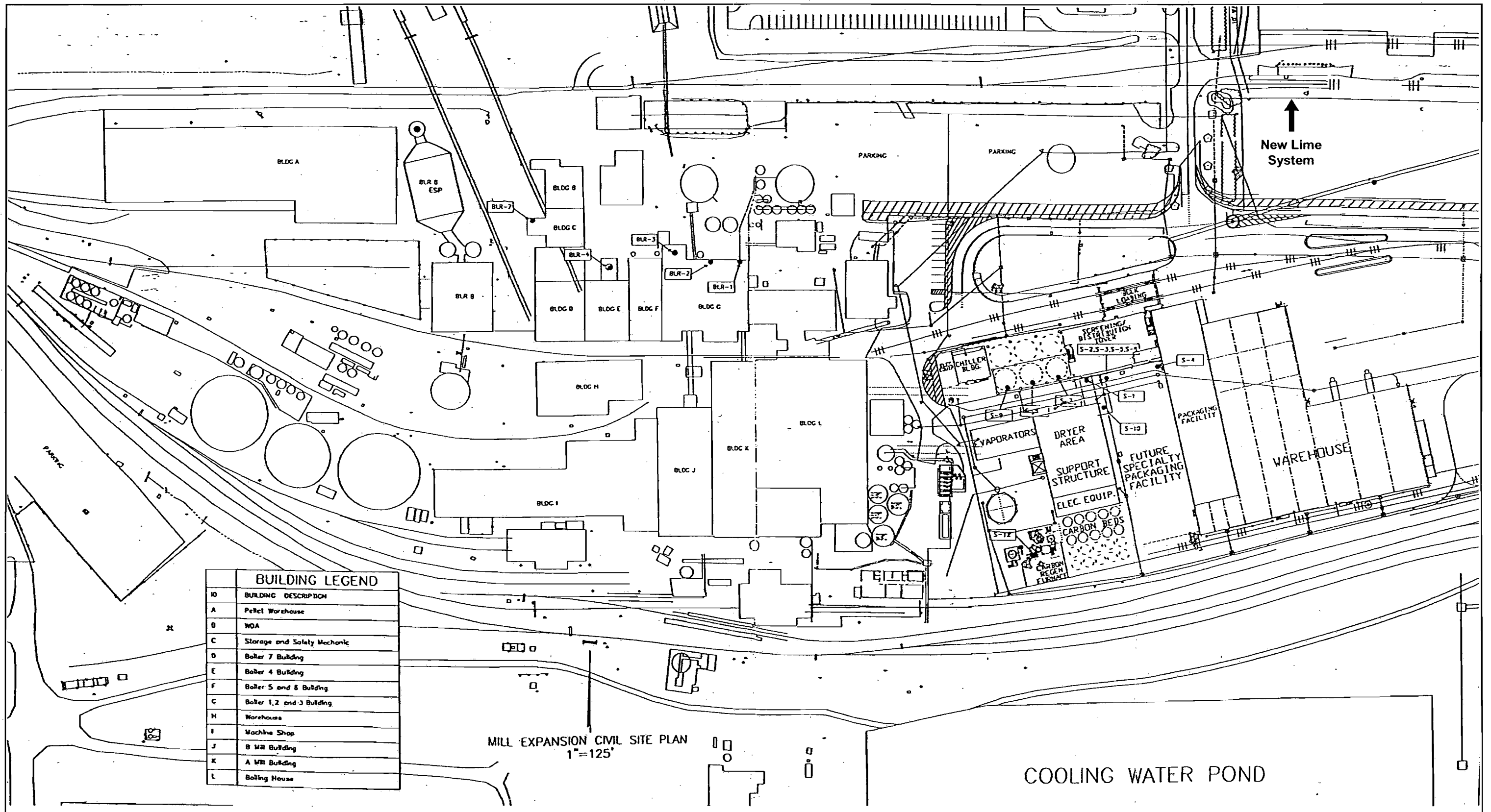
**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mall Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S. however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.  
100935 CGS 12/8/05



ID	BUILDING DESCRIPTION
A	Pellet Warehouse
B	WOA
C	Storage and Safety Mechanic
D	Boiler 7 Building
E	Boiler 4 Building
F	Boiler 5 and 8 Building
G	Boiler 1, 2 and 3 Building
H	Warehouse
I	Machine Shop
J	B Mill Building
K	A Mill Building
L	Boiling House

MILL EXPANSION CIVIL SITE PLAN  
1"=125'

Attachment USSC-FI-C1a.  
Facility Plot Plan  
U.S. Sugar Corporation, Clewiston Mill  
Clewiston, Florida



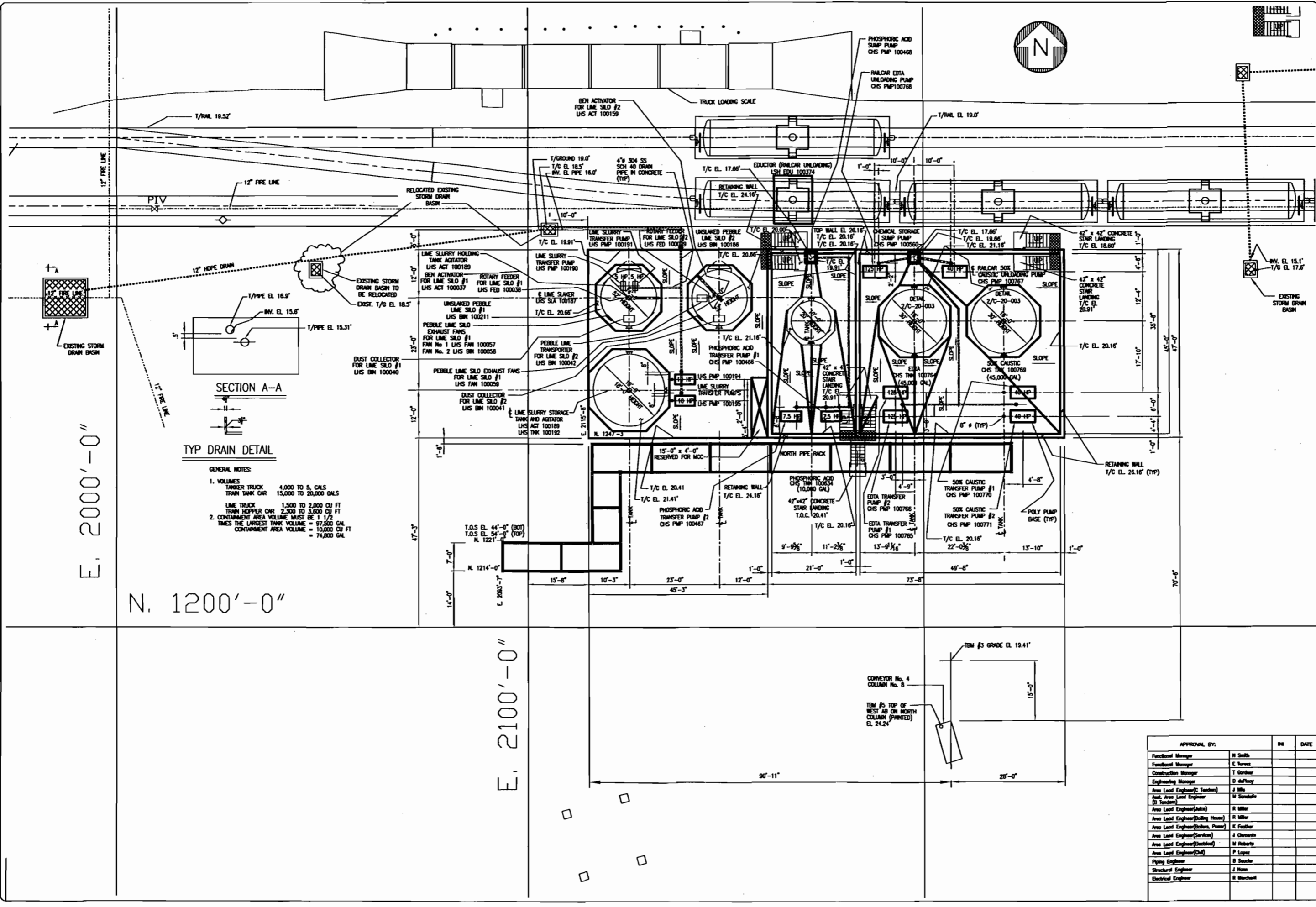
NO	DATE	APP	DESCRIPTION

NO	DATE	APP	DESCRIPTION

UNITED STATES SUGAR CORP.  
Clewiston, Florida  
PROJECT  
BREAKTHROUGH  
CI181014

CHEMICAL STORAGE AND PREP.  
LOCATION PLAN

APPROVAL BY:	IN	DATE
Functional Manager	H Smith	
Functional Manager	E Torres	
Construction Manager	T Gardner	
Engineering Manager	D deFloy	
Area Lead Engineer (C. Tenen)	J Ma	
Asst. Area Lead Engineer (B. Tenen)	M Somerville	
Area Lead Engineer (John)	R Miller	
Area Lead Engineer (Dilling House)	R Miller	
Area Lead Engineer (Dilling House)	K Feather	
Area Lead Engineer (Gardner)	J Chavira	
Area Lead Engineer (Electrical)	M Roberts	
Area Lead Engineer (Civil)	P Lopez	
Piping Engineer	B Sauer	
Structural Engineer	J Hess	
Electrical Engineer	R Marchant	



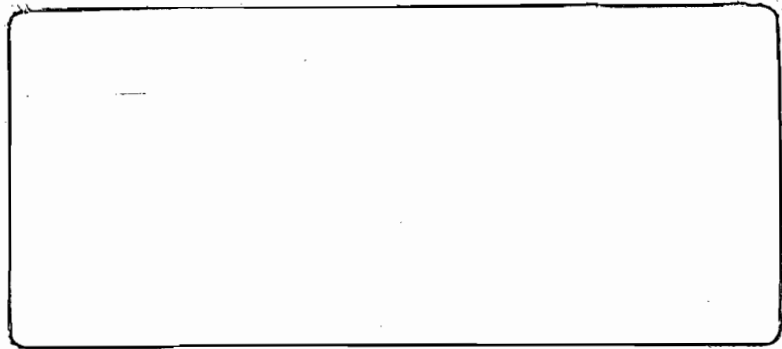
SECTION A-A  
TYP DRAIN DETAIL

- GENERAL NOTES:
- VOLUMES  
TANKER TRUCK 4,000 TO 5,000 GALS  
TRAIN TANK CAR 15,000 TO 20,000 GALS  
LIME TRUCK 1,500 TO 2,000 CU FT  
TRAIN HOPPER CAR 2,300 TO 3,600 CU FT  
2. CONTAINMENT AREA VOLUME MUST BE 1 1/2 TIMES THE LARGEST TANK VOLUME = 97,500 GAL  
CONTAINMENT AREA VOLUME = 10,000 CU FT  
CONTAINMENT AREA VOLUME = 74,800 GAL

E. 2000'-0"

N. 1200'-0"

E. 2100'-0"





**RECEIVED**

OCT 13 2005

BUREAU OF AIR REGULATION

**APPLICATION FOR  
AIR CONSTRUCTION PERMIT  
FOR NEW LIME SYSTEM  
UNITED STATES SUGAR CORPORATION**

***CLEWISTON MILL***

**Prepared For:  
United States Sugar Corporation  
Clewiston, Florida**

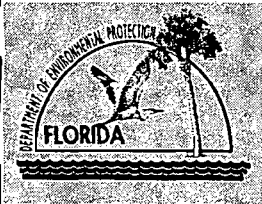
**Prepared By:  
Golder Associates Inc.  
6241 NW 23rd Street, Suite 500  
Gainesville, Florida 32653-1500**

**October 2005**

**0537579**

**DISTRIBUTION:  
4 Copies – FDEP  
2 Copies – USSC  
2 Copies – Golder Associates Inc.**

**APPLICATION – 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 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
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**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 & Revised/Renewal 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: <b>United States Sugar Corporation</b>	
2. Site Name: <b>U.S. Sugar Clewiston Mill</b>	
3. Facility Identification Number: <b>0510003</b>	
4. Facility Location...: Street Address or Other Locator: <b>W.C. Owens Ave. and S.R. 832</b> City: <b>Clewiston</b> County: <b>Henry</b> Zip Code: <b>33440</b>	
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: <b>William A. Raiola, Senior Vice President, Sugar Processing Operations</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>United States Sugar Corporation</b> Street Address: <b>111 Ponce DeLeon Ave.</b> City: <b>Clewiston</b> State: <b>Florida</b> Zip Code: <b>33440</b>	
3. Application Contact Telephone Numbers... Telephone: ( <b>863</b> ) <b>983-8121</b> ext.                      Fax: ( <b>863</b> ) <b>902-2729</b>	
4. Application Contact Email Address: <b>braiola@ussugar.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>10-13-05</i>
2. Project Number(s):	<i>0510003-034-AC</i>
3. PSD Number (if applicable):	
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 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

Air Construction Permit application to install two new lime storage silos, each with a baghouse for control of PM/PM<sub>10</sub> emissions. The lime is stored for use in the clarification process to clarify raw sugar cane juice. An additional baghouse will be installed on the railcar unloading system to control PM/PM<sub>10</sub> emissions as the lime is transported from the railcar to the collection bin.

**APPLICATION INFORMATION**

**Scope of Application**

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
	Lime System	AC1F	

**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 :	
<b>William A. Raiola, Senior Vice President, Sugar Processing Operations</b>	
2. Owner/Authorized Representative Mailing Address...	
Organization/Firm: <b>United States Sugar Corporation</b>	
Street Address: <b>111 Ponce DeLeon Ave.</b>	
City: <b>Clewiston</b> State: <b>FL</b> Zip Code: <b>33440</b>	
3. Owner/Authorized Representative Telephone Numbers...	
Telephone: <b>(863) 983-8121</b> ext. Fax: <b>(863) 902-2729</b>	
4. Owner/Authorized Representative Email Address: <b>braiola@ussugar.com</b>	
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 of any permitted emissions unit.</i>	
 Signature	<u>10/10/05</u> Date

# APPLICATION INFORMATION

## Application Responsible Official Certification

Complete if applying for an initial/revise/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:			
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:			
Street Address:			
City:	State:	Zip Code:	
4. Application Responsible Official Telephone Numbers...			
Telephone: ( ) - ext. Fax: ( ) -			
5. Application Responsible Official Email Address:			
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	

APPLICATION INFORMATION

**Professional Engineer Certification**

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates Inc.**</b> Street Address: <b>6241 NW 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653-1500</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 336-5600</b> ext. <b>545</b> Fax: <b>(352) 336-6603</b>
4. Professional Engineer Email Address: <b>dbuff@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i>  (1) <i>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>  (2) <i>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>  (3) <i>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>  (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input checked="" 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>  (5) <i>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>10/12/05</u> (seal)

\* Attach any exception to certification statement.

Board of Professional Engineers Certificate of Authorization #00001670



## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

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

#### Facility Contact

1. Facility Contact Name: <b>William A. Raiola, Senior Vice President, Sugar Processing Operations</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>United States Sugar Corporation</b> Street Address: <b>111 Ponce DeLeon Ave.</b> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <span>City: <b>Clewiston</b></span> <span>State: <b>FL</b></span> <span>Zip Code: <b>33440</b></span> </div>
3. Facility Contact Telephone Numbers: Telephone: <b>(863) 983-8121</b> ext.      Fax: <b>(863) 902-2729</b>
4. Facility Contact Email Address: <b>braiola@ussugar.com</b>

#### 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: <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <span>City:</span> <span>State:</span> <span>Zip Code:</span> </div>
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:	

## 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
Sulfur Dioxide - SO <sub>2</sub>	A	N
Nitrogen Oxides - NO <sub>x</sub>	A	N
Carbon Monoxide - CO	A	N
Particulate Matter - PM <sub>10</sub>	A	N
Sulfuric Acid Mist - SAM	A	N
Total Hazardous Air Pollutants - HAPs	A	N
Volatile Organic Compounds - VOC	A	N
Acetaldehyde - H001	A	N
Benzene - H017	A	N
Formaldehyde - H095	A	N
Phenol - H144	A	N
Polycyclic Organic Matter - H151	A	N
Styrene - H163	A	N
Toluene - H169	A	N
Naphthalene - H132	A	N
Dibenzofuran - H058	A	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 checked="" type="checkbox"/> Attached, Document ID: <u>USSC-FI-C1</u> <input type="checkbox"/> Previously Submitted, Date: _____
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 checked="" type="checkbox"/> Attached, Document ID: <u>USSC-FI-C2</u> <input type="checkbox"/> Previously Submitted, Date: _____
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 type="checkbox"/> Previously Submitted, Date: _____

**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 or Modification: <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), 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(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. 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)

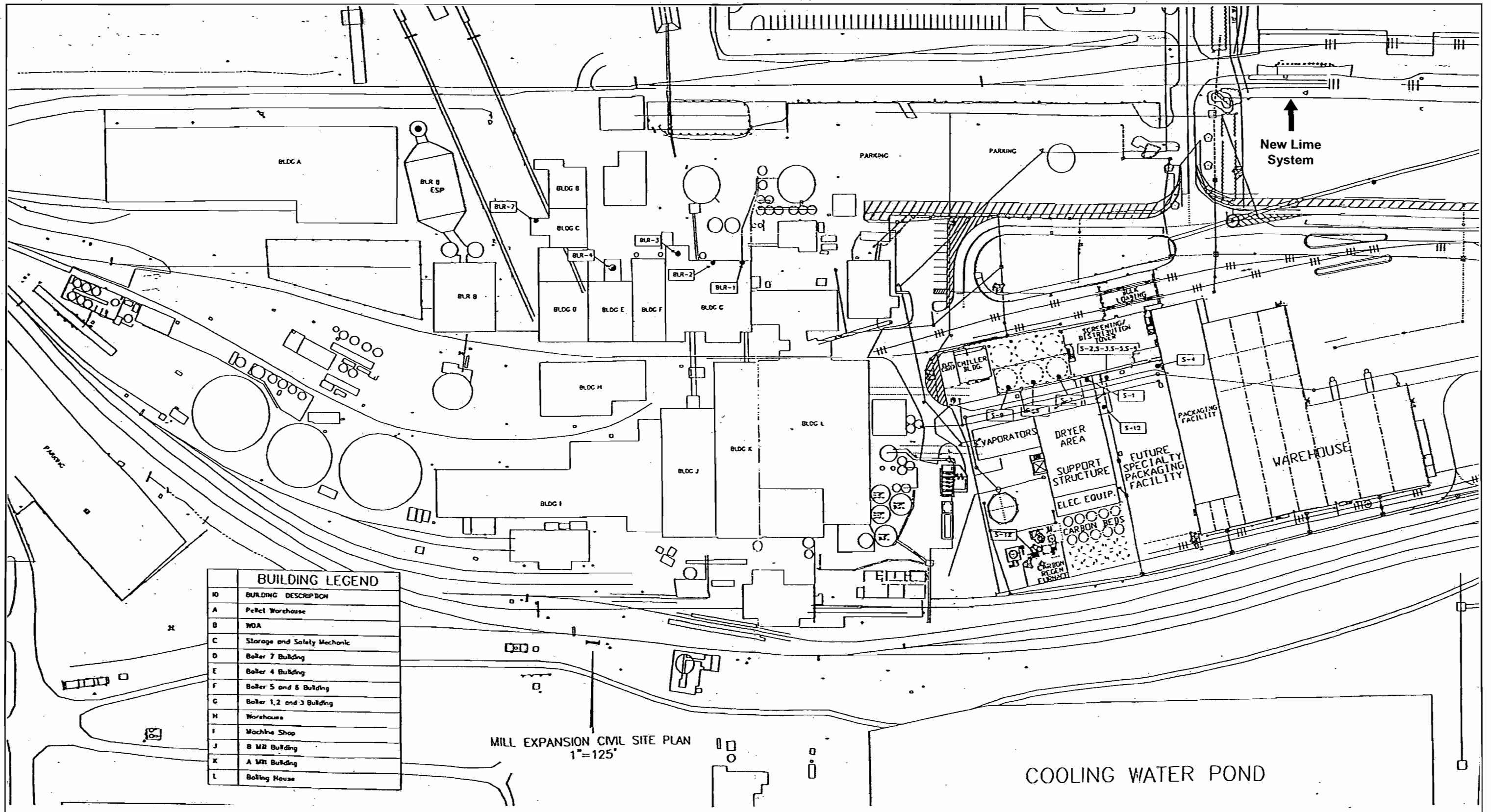
**Additional Requirements for Title V Air Operation Permit Applications**

- 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:\_\_\_\_\_  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:\_\_\_\_\_   
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:\_\_\_\_\_  Not Applicable

**Additional Requirements Comment**

**ATTACHMENT USSC-FI-C1a,b**

**FACILITY PLOT PLANS**



ID	BUILDING DESCRIPTION
A	Pellet Warehouse
B	WDA
C	Storage and Safety Mechanic
D	Boiler 7 Building
E	Boiler 4 Building
F	Boiler 5 and 6 Building
G	Boiler 1, 2 and 3 Building
H	Warehouses
I	Machine Shop
J	B Mill Building
K	A Mill Building
L	Boiling House

Attachment USSC-FI-C1a.  
 Facility Plot Plan  
 U.S. Sugar Corporation, Clewiston Mill  
 Clewiston, Florida





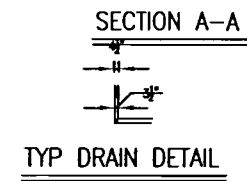
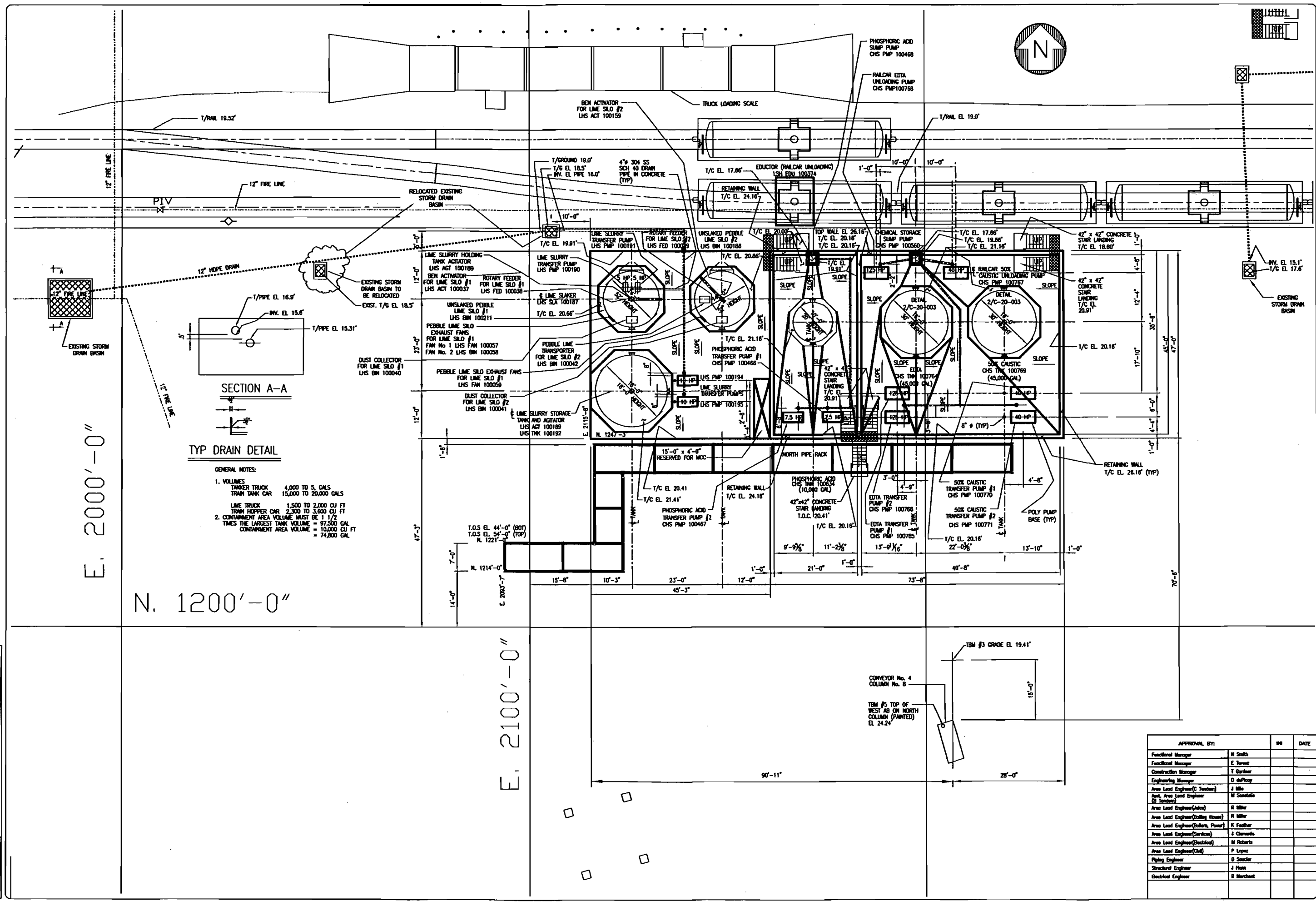
NO	DATE	APP	DESCRIPTION

NO	DATE	APP	DESCRIPTION

UNITED STATES SUGAR CORP.  
Clewiston, Florida  
PROJECT  
BREAKTHROUGH  
C1180104

CHEMICAL STORAGE AND PREP.  
LOCATION PLAN

APPROVAL BY:	IN	DATE
Functional Manager	N Smith	
Functional Manager	E Turner	
Construction Manager	T Corbett	
Engineering Manager	D dePoo	
Area Lead Engineer (C Tenders)	J Mite	
Area Lead Engineer (B Tenders)	M Sonstale	
Area Lead Engineer (Aids)	R Miller	
Area Lead Engineer (Rolling House)	R Miller	
Area Lead Engineer (Boilers, Power)	K Feather	
Area Lead Engineer (Services)	J Clements	
Area Lead Engineer (Electrical)	M Roberts	
Area Lead Engineer (Civil)	P Lopez	
Piping Engineer	B Sessler	
Structural Engineer	J Hain	
Electrical Engineer	B Marchant	



- GENERAL NOTES:
- VOLUMES  
TANKER TRUCK 4,000 TO 5,000 GALS  
TRAIN TANK CAR 15,000 TO 20,000 GALS  
LIME TRUCK 1,500 TO 2,000 CU FT  
TRAIN HOPPER CAR 2,300 TO 3,600 CU FT
  - CONTAINMENT AREA VOLUME MUST BE 1 1/2 TIMES THE LARGEST TANK VOLUME = 97,500 GAL  
CONTAINMENT AREA VOLUME = 10,000 CU FT = 74,800 GAL

E. 2000'-0"

N. 1200'-0"

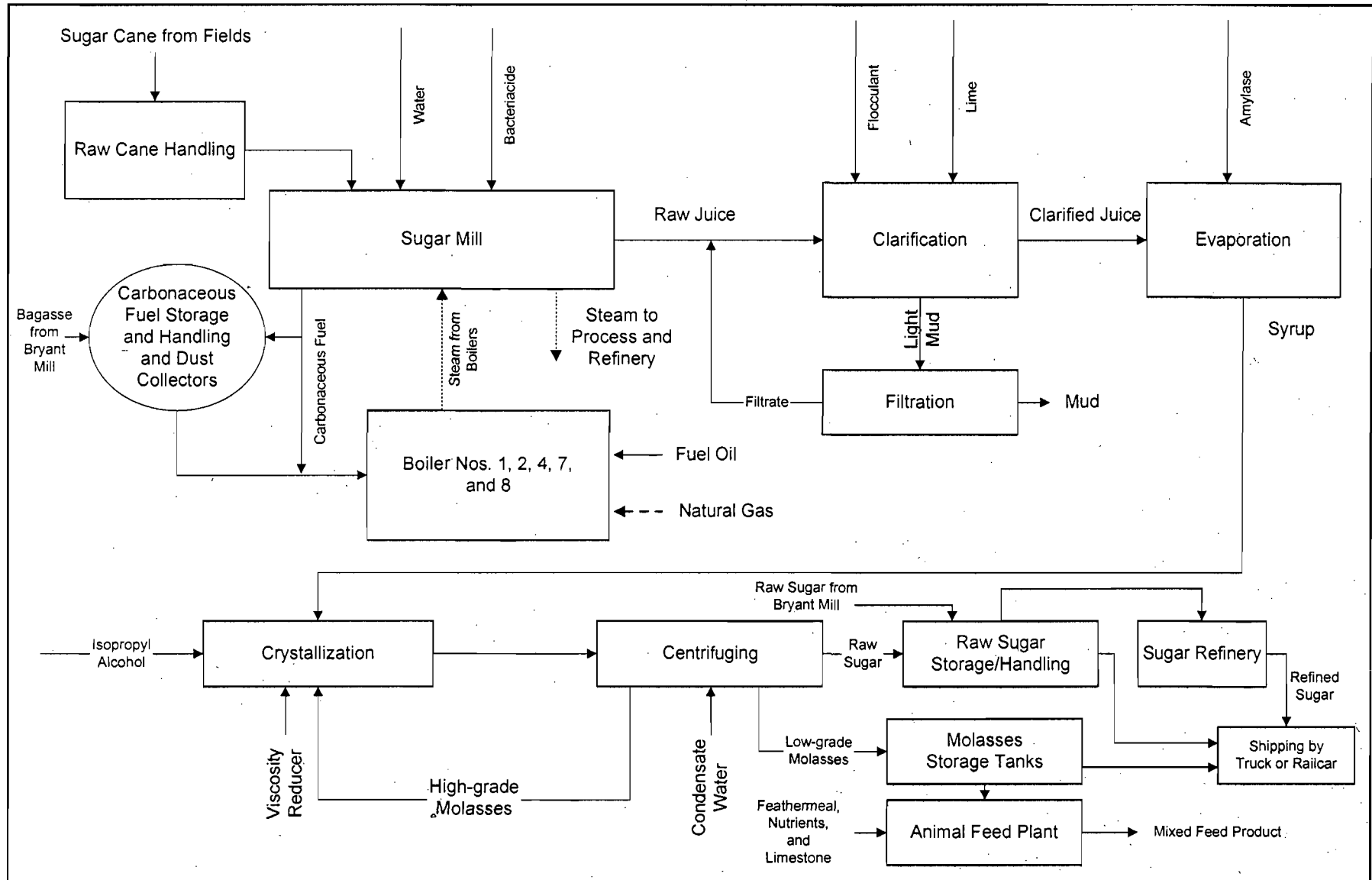
E. 2100'-0"



APPROVAL BY:	IN	DATE
Functional Manager	N Smith	
Functional Manager	E Turner	
Construction Manager	T Corbett	
Engineering Manager	D dePoo	
Area Lead Engineer (C Tenders)	J Mite	
Area Lead Engineer (B Tenders)	M Sonstale	
Area Lead Engineer (Aids)	R Miller	
Area Lead Engineer (Rolling House)	R Miller	
Area Lead Engineer (Boilers, Power)	K Feather	
Area Lead Engineer (Services)	J Clements	
Area Lead Engineer (Electrical)	M Roberts	
Area Lead Engineer (Civil)	P Lopez	
Piping Engineer	B Sessler	
Structural Engineer	J Hain	
Electrical Engineer	B Marchant	

**ATTACHMENT USSC-FI-C2**

**PROCESS FLOW DIAGRAM**



Attachment USSC-FI-C2  
 Process Flow Diagram  
 U.S. Sugar Corporation  
 Clewiston Mill, Florida

**Process Flow Legend**

- Solid/Liquid
- Steam
- Gaseous

Clewiston Sugar Mill Facility

Filename: USSC-FI-C2.vsd

Date: 06/28/05



## EMISSIONS UNIT INFORMATION

Section [1] of [1]  
Lime System

### 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] of [1]  
Lime System

**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:  
**Lime unloading and storage in two lime silos.**

3. Emissions Unit Identification Number:

4. Emissions Unit Status Code: <b>C</b>	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: <b>20</b>	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:  
**Unloading and storage for lime used to clarify raw sugar juice in the Boiling House.**

**EMISSIONS UNIT INFORMATION**

**Section [1] of [1]  
Lime System**

**Emissions Unit Control Equipment**

**1. Control Equipment/Method(s) Description:**

**Baghouse on top of each storage silo (2): Smoot Model No. 60BV16**

**Baghouse for railcar unloading (1): Smoot Model No. 60FR14**

**2. Control Device or Method Code(s): 017**

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]  
Lime System

**B. EMISSIONS UNIT CAPACITY INFORMATION**

(Optional for unregulated emissions units.)

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Process or Throughput Rate: <b>5,000 TPY</b>		
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:		
	<b>24</b> hours/day	<b>7</b> days/week
	<b>52</b> weeks/year	<b>8,760</b> hours/year
6. Operating Capacity/Schedule Comment: <b>Represents total lime throughput through the lime system.</b>		

**EMISSIONS UNIT INFORMATION**

Section **[1]** of **[1]**  
 Lime System

**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: <b>Lime Silo #1 and #2</b>		2. Emission Point Type Code: <b>1</b>
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: <b>H</b>	6. Stack Height: <b>65 feet</b>	7. Exit Diameter: <b>0.67 feet</b>
8. Exit Temperature: <b>75°F</b>	9. Actual Volumetric Flow Rate: <b>476 acfm</b>	10. Water Vapor: <b>1 %</b>
11. Maximum Dry Standard Flow Rate: <b>465 dscfm</b>		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: <b>Horizontal discharge of dust collector located on top of each lime silo. Exit temperature is at ambient conditions. Dust collector for railcar unloading has the equivalent exit diameter, exit temperature, moisture content and flow rates.</b>		



**EMISSIONS UNIT INFORMATION**

Section **[1]** of **[1]**  
 Line System

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate: Segment 1 of 1**

1. Segment Description (Process/Fuel Type): <b>Industrial Processes; Mineral Products; Bulk Materials Storage Bins; Minerals; Lime</b>		
2. Source Classification Code (SCC): <b>3-05-102-98</b>		3. SCC Units: <b>Tons Processed</b>
4. Maximum Hourly Rate: <b>38</b>	5. Maximum Annual Rate: <b>5,000</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: <b>Lime unloading and storage. Lime may be unloaded into the silos via railcar or truck. Maximum hourly rate is based on one 25 ton truck unloading in approximately 45 minutes and one 180,000 lb railcar unloading at 10,000 lb/hr. Maximum annual rate is based on the total throughput to the lime system.</b>		

**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] of [1]  
 Lime System

**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	017	NA	NS
PM <sub>10</sub>	017	NA	NS

**EMISSIONS UNIT INFORMATION**

Section **[1]** of **[1]**  
Lime System

**POLLUTANT DETAIL INFORMATION**

Page **[1]** of **[2]**  
Particulate Matter Total

**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: <b>PM</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>0.24 lb/hour</b> <b>1.05 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.02 gr/dscf</b>  Reference: <b>Design rate</b>		7. Emissions Method Code: <b>2</b>	
8. Calculation of Emissions: <b>465 dscfm * 0.02 gr/dscf * 60 min/hr ÷ 7,000 gr/lb = 0.08 lb/hr from each baghouse</b>  <b>0.08 lb/hr * 8,760 hr/yr ÷ 2,000 lb/ton = 0.35 TPY from each baghouse</b>  <b>Total of 3 baghouses : 0.08 lb/hr x 3 = 0.24 lb/hr</b> <b>0.35 TPY x 3 = 1.05 TPY</b>  <b>See Attachment USSC-EU1-D10.</b>			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>The maximum dry standard flow rate of each baghouse is 465 dscfm. Potential emissions take into account emissions from both silos and railcar unloading.</b>			

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]  
Lime System

**POLLUTANT DETAIL INFORMATION**

Page [1] of [2]  
Particulate Matter Total

**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] of [1]  
Lime System

**POLLUTANT DETAIL INFORMATION**

Page [2] of [2]  
Particulate Matter < 10 µm

**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: <b>PM<sub>10</sub></b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>0.24 lb/hour                      1.05 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.02 gr/dscf</b>  Reference: <b>Design rate</b>		7. Emissions Method Code: <b>2</b>	
8. Calculation of Emissions: <b>465 dscfm * 0.02 gr/dscf * 60 min/hr ÷ 7,000 gr/lb = 0.08 lb/hr from each baghouse</b>  <b>0.08 lb/hr * 8,760 hr/yr ÷ 2,000 lb/ton = 0.35 TPY from each baghouse</b>  <b>Total of 3 baghouses : 0.08 lb/hr x 3 = 0.24 lb/hr</b> <b>0.35 TPY x 3 = 1.05 TPY</b>  <b>See Attachment USSC-EU1-D10.</b>			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: <b>The maximum dry standard flow rate of each baghouse is 465 dscfm. Potential emissions take into account emissions from both silos and railcar unloading.</b>			

**EMISSIONS UNIT INFORMATION**Section [1] of [1]  
Lime System**POLLUTANT DETAIL INFORMATION**Page [2] of [2]  
Particulate Matter < 10 µm**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] of [1]  
Lime System

**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: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: <b>EPA Method 9</b>	
5. Visible Emissions Comment: <b>Rule 62-296.320, F.A.C.</b>	

**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] of [1]  
Lime System

**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] of [1]  
Lime System

**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: <u>USSC-EU1-I1</u> <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 type="checkbox"/> Attached, Document ID: _____ <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 checked="" type="checkbox"/> Attached, Document ID: <u>USSC-EU1-I3</u> <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) <input type="checkbox"/> 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] of [1]  
Line System

**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 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] of [1]  
Lime System

**Additional Requirements Comment**

[Empty box for Additional Requirements Comment]

**ATTACHMENT USSC-EU1-D10**

**EMISSIONS CALCULATIONS**

**ATTACHMENT USSC-EU1-D10**

**CALCULATION OF EMISSIONS**

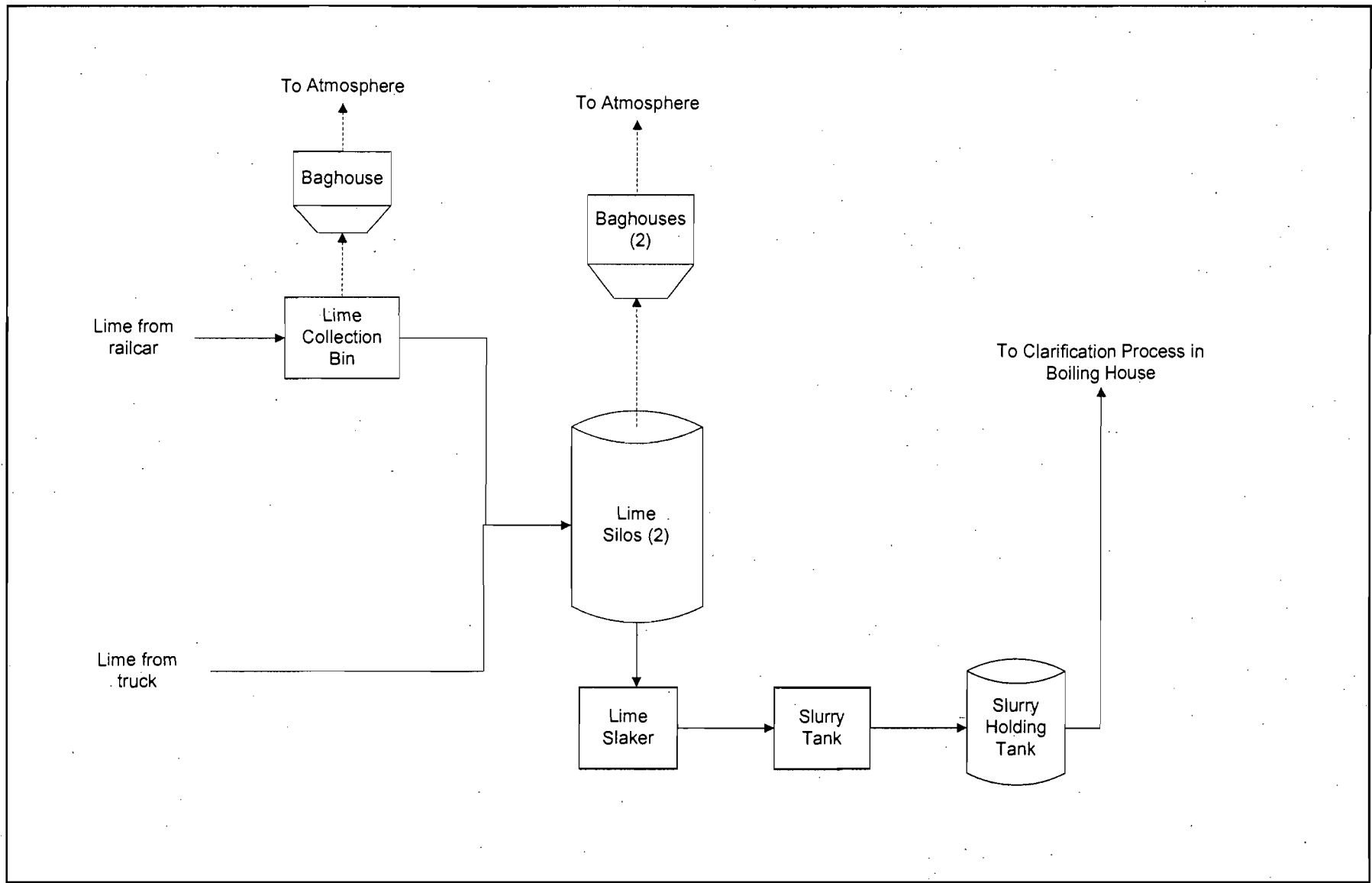
**Summary of PM/PM<sub>10</sub> Maximum Potential Emission Rate  
for Railcar Unloading and Each Lime Storage Silo**

Source	Control Equipment	Exhaust Flow (dscfm)	Exhaust Grain Loading (gr/dscf)	Operating Hours (hr/yr)	PM/PM <sub>10</sub> Emission Rate	
					lb/hour	TPY
Lime Silo #1	Baghouse	465	0.02	8,760	0.08	0.35
Lime Silo #2	Baghouse	465	0.02	8,760	0.08	0.35
Railcar Unloading	Baghouse	466	0.02	8,760	0.08	0.35

Note: dscfm = dry standard cubic feet per minute.  
 gr/dscf = grains per dry standard cubic feet.  
 lb/hr = pounds per hour.  
 TPY = tons per year.

**ATTACHMENT USSC-EU1-I1**

**PROCESS FLOW DIAGRAM**



Attachment USSC-EU1-I1  
 Lime System Flow Diagram  
 U.S. Sugar Clewiston

**Process Flow Legend**

Solid/Liquid Flow ———→  
 Gas Flow - - - - ->

Filename: USSC-EU1-I1  
 Date: 10/5/2005



**ATTACHMENT USSC-EU1-I3**

**CONTROL EQUIPMENT PARAMETERS  
FOR THE LIME SYSTEM**



**ATTACHMENT USSC-EU1-I3a**  
**CONTROL EQUIPMENT PARAMETERS FOR EACH**  
**LIME SILO BAGHOUSE AT U.S. SUGAR CLEWISTON**

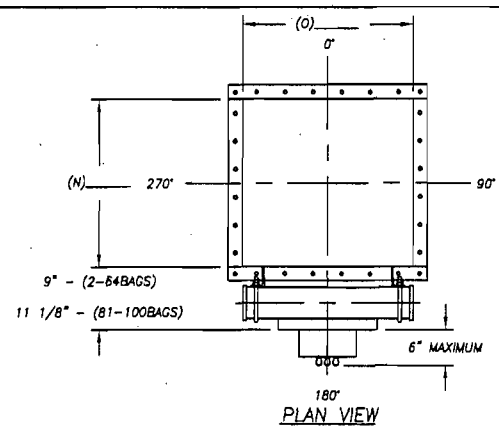
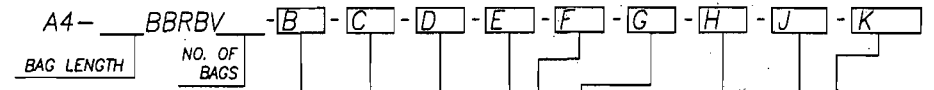
Manufacturer and Model No.	Smoot Model 60BV16
Outlet Gas Temp (°F)	75
Outlet Gas Flow Rate (acfm)	476
Exhaust Gas Moisture Content (%)	1.0
Outlet Gas Flow Rate (scfm)	465
Cleaning Method	Reverse Pulse
No. of bags	16
Bag Material	16 oz. Polyester Singed Fabric
Total Area of Filter Media (sq. ft)	116
Air to Cloth Ratio	4.10
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.02
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.080

Note: Parameters based on manufacturers design specifications as shown on the following page.

Sample calculations:

$$\text{Outlet loading rate (lb/hr)} = \text{outlet gas flow rate (acfm)} \times \text{outlet loading rate (grains/acf)} \div 7000 \text{ grains/lb} \times 60 \text{ min/hr}$$

WHEN ORDERING A SMOOT BIN VENT, USE THE NUMBERING SYSTEM BELOW:



MODEL DASH NO.	NEMA RATING
B1	NEMA 4
B2	NEMA 4X, SS
B3	NEMA 7/9 (XP)

MODEL DASH NO.	MATERIAL OF CONSTRUCTION
D1	CARBON STEEL
D2	CARBON STEEL - EPOXY COATED PRODUCT CONTACT ONLY
D3	304 STAINLESS STEEL PRODUCT CONTACT ONLY
D4	304 STAINLESS STEEL

MODEL DASH NO.	DP GAUGE/SWITCH
E1	NO DP GAUGE OR SWITCH
E2	DP GAUGE ONLY
E3	DP GAUGE & SWITCH
E4	4-20mA DP GAUGE & X-MITTER w/TIMER BOARD

MODEL DASH NO.	EXHAUST OPTIONS
K1	STUB EXHAUST
K2	WEATHER EXHAUST w/ SCREEN
K3	FAN

MODEL DASH NO.	BAG CATCH GRID
C1	WITHOUT BAG CATCH
C2	WITH BAG CATCH

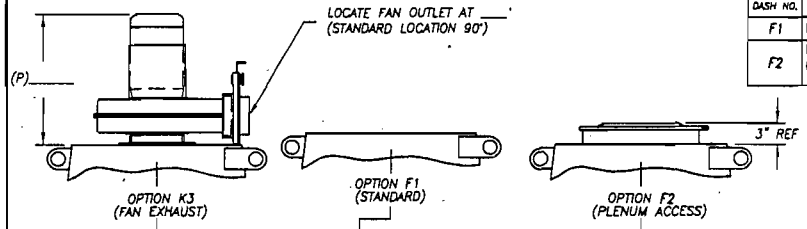
MODEL DASH NO.	TIMER BOARD & ENCLOSURES
G1	NO TIMER BOARD
G2	TIMER BOARD - SHIPPED LOOSE
G3	TIMER BOARD & ENCLOSURE - SHIPPED LOOSE
G4	TIMER BOARD & ENCLOSURE - MOUNTED TO FILTER (STANDARD WITH OPTION E-4)

MODEL DASH NO.	BAG MATERIAL
H1	POLYESTER
H2	NOMEX
H3	TETRALEX
H4	GORE-TEX <sup>®</sup>

MODEL DASH NO.	BAG CAGE
J1	GALVANIZED
J2	304 SS
J3	EPOXY COATED

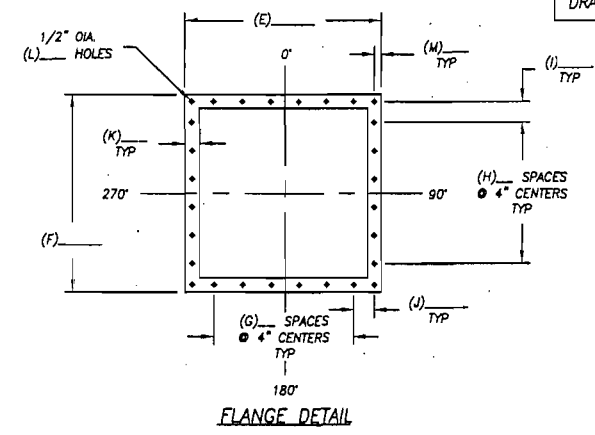
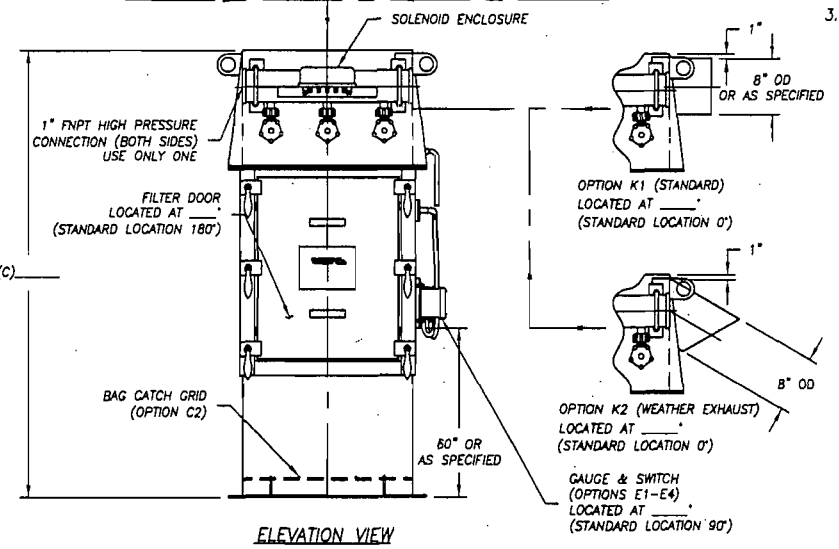
K3 SUB NO.	MODEL NO.	MOTOR HP.
1		0.5
2	PB-9	0.75
3		1
4		0.75
5		1
6	PB-10A	1.5
7		2
8		1
9		1.5
10	PB-12A	2
11		3
12		5
13		2
14	PB-14A	3
15		5
16		3
17		5
18	PB-15A	7.5
19		10
20		15

MODEL DASH NO.	FILTER HEAD ACCESS
F1	W/O PLENUM ACCESS
F2	WITH PLENUM ACCESS (NOT AVAILABLE ON OPTION K3)



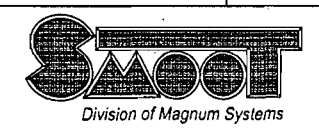
- NOTE:
1. FILTER CONTAINS (A) \_\_\_\_\_ SqFT OF FILTER MEDIA.
  2. FILTER REQUIRES (B) \_\_\_\_\_ SCFM OF HIGH PRESSURE SUPPLY AIR AT 80-100PSIG.
  3. ESTIMATED WEIGHT (D) \_\_\_\_\_ lbs.

CUSTOMER: \_\_\_\_\_  
 CUSTOMER PO NO.: \_\_\_\_\_  
 SMOOT JOB NO.: \_\_\_\_\_  
 ITEM NO.: \_\_\_\_\_  
 QTY.: \_\_\_\_\_  
 ISSUE: \_\_\_\_\_



USE THIS DRAWING WITH DRAWING #4-9\_2 (DIMENSIONAL INFO.)

C.F. # 211.1-4-A  
REV. 0 8/9/01



Kansas City, Kansas

BIN VENT FILTER  
 BOTTOM BAG REMOVAL  
 CUSTOMER DRAWING

DATE 3/28/01      DWG. NO. 4-9\_1  
 DWN. BY ELB      APPROVED \_\_\_\_\_  
 SCALE NONE      SHEET 1 OF 2

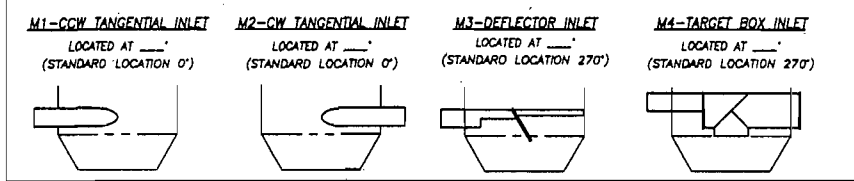
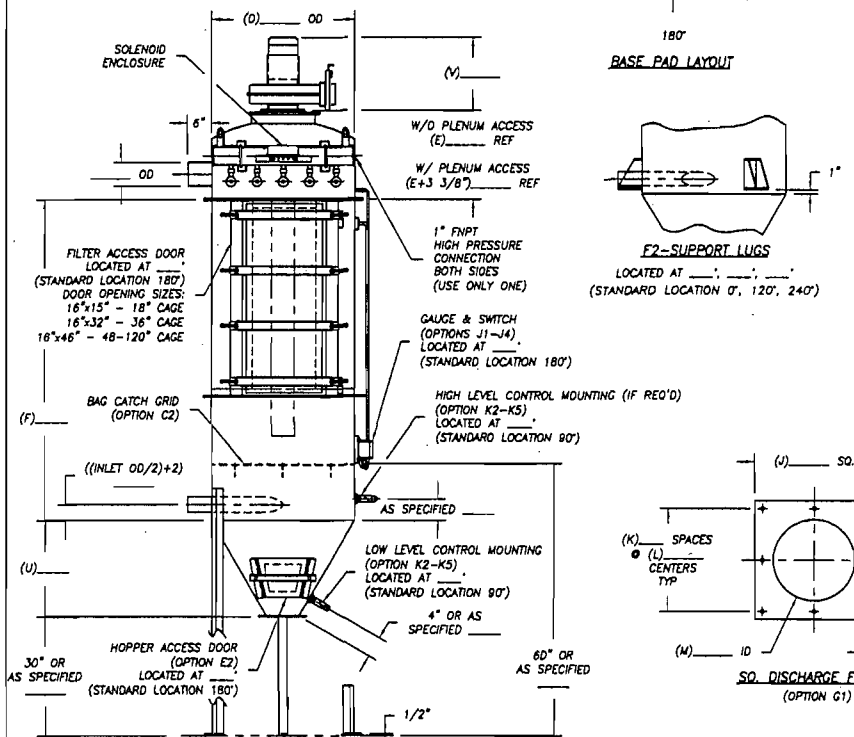
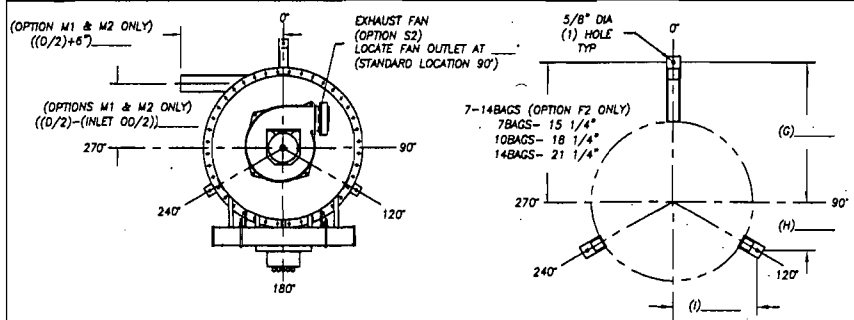
**ATTACHMENT USSC-EU1-I3b  
CONTROL EQUIPMENT PARAMETERS FOR THE  
RAILCAR UNLOADING BAGHOUSE AT U.S. SUGAR CLEWISTON**

Manufacturer and Model No.	Smoot Model 60FR14
Outlet Gas Temp (°F)	75
Outlet Gas Flow Rate (acfm)	477
Exhaust Gas Moisture Content (%)	1.0
Outlet Gas Flow Rate (scfm)	466
No. of bags	14
Bag Material	16 oz. Polyester Singed Fabric
Total Area of Filter Media (sq. ft)	104
Air to Cloth Ratio	4.9
Manufacturer's Guaranteed Outlet Loading (grains/acf)	0.02
Pollutants	Outlet Loading
Particulate Matter (lb/hr)	0.080

Note: Parameters based on manufacturers design specifications as shown on the following page.

Sample calculations:

$$\text{Outlet loading rate (lb/hr)} = \text{outlet gas flow rate (acfm)} \times \text{outlet loading rate (grains/acf)} \div 7000 \text{ grains/lb} \times 60 \text{ min/hr}$$



WHEN ORDERING A SMOOT FILTER RECEIVER, PLEASE USE THE NUMBERING SYSTEM BELOW.

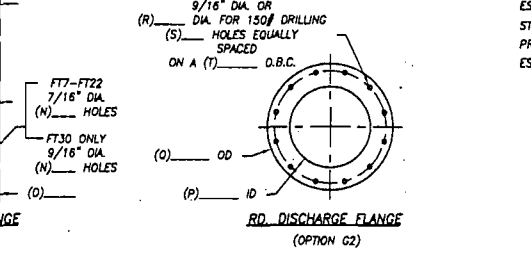
A2 - B - C - D - E - F - G - H - J - K - L - M - N - P - Q - R - S

MODEL DASH #	ELECTRICAL ENCLOSURE TYPE	MODEL DASH #	MATERIAL OF CONSTRUCTION
B1	NEMA 4, CARBON STEEL	H1	CARBON STEEL
B2	NEMA 4X, STAINLESS STEEL	H2	CARBON STEEL - EPOXY COATED PRODUCT CONTACT ONLY
B3	NEMA 7/9, EXPLOSION PROOF	H3	304 STAINLESS STEEL PRODUCT CONTACT ONLY
		H4	STAINLESS STEEL

MODEL DASH #	BAG CATCH GRID	MODEL DASH #	DP GAUGE/ SWITCH
C1	WITHOUT BAG CATCH	J1	NO DP GAUGE DR SWITCH
C2	WITH BAG CATCH	J2	DP GAUGE ONLY
		J3	DP GAUGE & SWITCH
		J4	4-20mA DP GAUGE & X-MITTER w/ TIMER BOARD

MODEL DASH #	PLENUM ACCESS	MODEL DASH #	LEVEL CONTROL MOUNTING
O1	WITHOUT PLENUM ACCESS	K1	WITHOUT LEVEL CONTROL
O2	WITH PLENUM ACCESS (STANDARD WITH OPTION R2)	K2	PROXIMITY (1) EA. (M30x1.5)
		K3	PADDLE (1) EA. (2 1/2" FNPT)
		K4	PROBE (1) EA. (3/4" FNPT)
		K5	ENGINEERING/CUSTOMER TO SPECIFY

MODEL DASH #	HOPPER ACCESS	MODEL DASH #	DISCHARGE TYPE
E1	WITHOUT HOPPER ACCESS	G1	SO. FLANGE
E2	WITH HOPPER ACCESS	G2	ROUND FLANGE



MODEL DASH #	INLET TYPE	MODEL DASH #	BAG TYPE	MODEL DASH #	EXHAUST OPTIONS
M1	CCW TANGENTIAL	N1	POLYESTER BAG	S1.0	TUBE STUB
M2	CW TANGENTIAL	N2	NOVEX BAG	S2	FAN
M3	DEFLECTOR	N3	TETRALEX BAG	FAN SUB #	MODEL NUMBER
		N4	GORE-TEX BAG	1	HPB
		N5	45 PLEAT CARTRIDGE (POLYESTER)	2	PB-10A
				3	PB-12A
				4	PB-14A
				5	PB-15A
				6	ENGINEERING TO SPECIFY

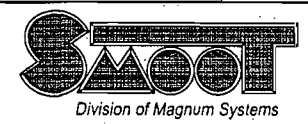
MODEL DASH #	TIMER BOARD & ENCLOSURES
P1	NO TIMER BOARD
P2	TIMER BOARD - SHIPPED LOOSE
P3	TIMER BOARD & ENCLOSURE - SHIPPED LOOSE
P4	TIMER BOARD & ENCLOSURE - MOUNTED TO FILTER (STANDARD WITH OPTION J4)

NOMINAL SIZE	MODEL DASH # INLET		MODEL DASH # OUTLET	
	11 GA	SCH 40	11 GA	SCH 40
2	O1	O8	R1	R8
3	O2	O9	R2	R9
4	O3	O10	R3	R10
5	O4	O11	R4	R11
6	O5	O12	R5	R12
8	O6	O13	R6	R13
10	O7	O14	R7	R14

NOTE:  
 1. FILTER CONTAINS (A) \_\_\_\_\_ SqFT OF FILTER MEDIA.  
 2. FILTER REQUIRES (B) \_\_\_\_\_ SCFM OF HIGH PRESSURE SUPPLY AIR AT 80-100 PSIG.  
 3. ESTIMATED WEIGHT:  
 ESTIMATED EMPTY WEIGHT = (C) \_\_\_\_\_ lbs.  
 STORAGE CAPACITY = \_\_\_\_\_ CuFt  
 PRODUCT DENSITY = \_\_\_\_\_ lbs/CuFt  
 ESTIMATED FULL WEIGHT = \_\_\_\_\_ lbs.

USE THIS DRAWING WITH DRAWING #2-99\_2 (DIMENSIONAL INFO.)

C.F. # 211.1-4-A  
 REV. 0 4/16/01  
 PAGE 1 OF 2



Kansas City, Kansas

ROUND FILTER RECEIVER  
 BOTTOM BAG REMOVAL  
 CUSTOMER DRAWING  
 SHEET 1 OF 2

CUSTOMER: \_\_\_\_\_  
 CUSTOMER PO NO.: \_\_\_\_\_  
 SMOOT JOB NO.: \_\_\_\_\_  
 ITEM NO.: \_\_\_\_\_  
 QTY.: \_\_\_\_\_  
 ISSUE: \_\_\_\_\_

DATE 4/16/01 DWG. NO. 2-99\_1  
 DWN. BY ELB APPROVED \_\_\_\_\_  
 SCALE NONE

**ATTACHMENT A**

**ATTACHMENT A**  
**SUPPLEMENTAL INFORMATION FOR**  
**CONSTRUCTION PERMIT APPLICATION**

United States Sugar Corporation (U.S. Sugar) owns and operates a sugar mill and refinery located in Clewiston, Hendry County, Florida. The mill and refinery currently operate under Title V Operating Permit No. 0510003-014-AV. U.S. Sugar harvests sugar cane and transports it to the Clewiston Mill, where the cane is processed into raw sugar in the mill. U.S. Sugar sells some of the raw sugar and the remainder of the raw sugar is refined into white sugar.

Lime is used in the clarification process in the U.S. Sugar Boiling House to clarify raw sugar cane juice. The combination of lime and flocculants produces clarified juice that undergoes evaporation, crystallization, and centrifugation to form raw sugar. This raw sugar is then sent through the refinery process to produce refined sugar.

Lime will be delivered by railcar and truck and off-loaded into two new storage silos. Lime from the trucks will be transported to the silos via a blower system at a rate of 33 tons per hour (TPH) (i.e., 45 minutes to unload a 25 ton truck). Loading of the silos via railcar is accomplished through a transport system that feeds lime into the transport air stream at a rate of 10,000 pounds per hour (lb/hr). It will take approximately 18 hours to unload an 180,000 pound railcar. The lime from the railcar enters a vacuum-type unloading system that transports the lime from the railcar to a collection bin. The collection bin has a baghouse to filter the transport air. A rotary air lock then feeds the lime into the air stream from a transporter blower, which transports the lime to the silos. Each silo contains a dust collector.

Total throughput of lime into the system is approximately 5,000 tons per year (TPY). Unloading of the silos is accomplished via gravity bottom drop into a lime slaker where the lime is mixed with water and pumped to a lime slurry storage tank and agitator.

U.S. Sugar will install a bin vent filter (Smoot Model No. 60BV16) on each lime silo to reduce particulate matter (PM) emissions associated with loading and unloading of the silos. A filter-receiver (Smoot Model No. 60FR14) will be installed on the railcar unloading system to reduce PM emissions associated with unloading the railcars.

Maximum PM and particulate matter less than 10 microns in diameter ( $PM_{10}$ ) emissions from each baghouse are 0.08 lb/hr and 0.35 TPY. Total PM/ $PM_{10}$  emissions from all three baghouses are 0.24 lb/hr and 1.05 TPY. The PM/  $PM_{10}$  emissions are based on a maximum dry standard flow rate from each baghouse of 465 dry standard cubic feet per minute (dscfm) and a design grain loading rate of 0.02 grains per dry standard cubic feet (gr/dscf) per baghouse. Hours of operation are assumed continuous. Details of each bin vent filter, including emissions estimates, are included in this application for an air construction permit.