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

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

Attention: Mr. Jeff Koerner, Air Permitting South

RE: UNITED STATES SUGAR CORPORATION

> CLEWISTON 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.

Dail a. Suff

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

Principal Engineer

Don Griffin cc:

Peter Briggs



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BUREAU OF AIR REGULATION

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EUREAU 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.

	10 ensure accuracy, p	piease see form instruc	tions.		
<u>Id</u>	Identification of Facility				
1:	Facility Owner/Company Name: United St	ates Sugar Corpora	tion		
2.	Site Name: U.S. Sugar Clewiston Mill				
3.	Facility Identification Number: 0510003				
4.	Facility Location:		· · · · · · · · · · · · · · · · · · ·		
	Street Address or Other Locator: W.C. Ow	ens Ave. and S.R. 8	32		
	City: Clewiston County:	Hendry	Zip Code: 33440		
5.	Relocatable Facility?	6. Existing Titl	e V Permitted Facility?		
	☐ Yes ☐ No	⊠ Yes	□ No		
<u> Ar</u>	oplication Contact	·	· 		
1.	Application Contact Name: William A. Raiol	a, Senior Vice Preside	nt, Sugar Processing Operations		
2.	Application Contact Mailing Address		-		
	Organization/Firm: United States Sugar Co	orporation			
	Street Address: 111 Ponce DeLeon Ave	. .			
	City: Clewiston	State: Florida	Zip Code: 33440		
3.	Application Contact Telephone Numbers	•			
	Telephone: (863) 983-8121 ext.	Fax: (863) 90	2-2729		
4.	Application Contact Email Address: braic	ola@ussugar.com			
Application Processing Information (DEP Use)					
1.	Date of Receipt of Application:	10-13-0	5		
2.	Project Number(s):	0510003	5 -034-AC		
3.	PSD Number (if applicable):				
1	Siting Number (if applicable):				

Effective: 06/16/03

1

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. ☐ 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 ₁₀ 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 ₁₀ emissions as the lime is transported from the railcar to the collection bin.

Scope of Application

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

App.	lication	Processing Fee

Check one:	Attached - Amount:	 Not Applicable

Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name:

William A. Raiola, Senior Vice President, Sugar Processing Operations

2. Owner/Authorized Representative Mailing Address...

Organization/Firm: United States Sugar Corporation

Street Address: 111 Ponce DeLeon Ave.

City: Clewiston

State: FL

Zip Code: 33440

3. Owner/Authorized Representative Telephone Numbers...

Telephone: (863) 983-8121

ext.

Fax:

(863) 902-2729

4. Owner/Authorized Representative Email Address: braiola@ussugar.com

5. Owner/Authorized Representative Statement:

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 connot be transferred without authorization from the department, and will promptly notify the department upon sale or legal transfer of the

Signature

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:
	- Pp nounch reaponate of the management of the m
: - <u>-</u>	
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable):
,	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.
	For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
	For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
	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, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.
	Signature Date

Pr	ofessional Engineer Certification
1.	Professional Engineer Name: David A. Buff
	Registration Number: 19011
2.	Professional Engineer Mailing Address
	Organization/Firm: Golder Associates Inc.**
1	Street Address: 6241 NW 23 rd Street, Suite 500
	City: Gainesville State: FL Zip Code: 32653-1500
3.	Professional Engineer Telephone Numbers
	Telephone: (352) 336-5600 ext.545 Fax: (352) 336-6603
4.	Professional Engineer Email Address: dbuff@golder.com
5.	Professional Engineer Statement:
	I, the undersigned, hereby certify, except as particularly noted herein*, that:
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
	(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here \square , 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.
	(4) If the purpose of this application is to obtain an air construction permit (check here \boxtimes , 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 \square , 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.
100 83 Miles	(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here \square , 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 the information of the corresponding application for air construction permit and with the provisions contained in such permit. 10 12 05 Date Date

Attach any exception to certification statement.

Board of Professional Engineers Certificate of Authorization #00001670

DEP Form No. 62-210.900(1) – Form

0537579/4.3/ Effective: 06/16/03

A. GENERAL FACILITY INFORMATION

Fa	cility Location and	<u>Type</u>			
1. Facility UTM Coordinates		2.	2. Facility Latitude/Longitude		
Zone 17 East (km) 506.1			Latitude (DD/MM/	SS) 26/44/06	
	Nort	h (km) 2956.9		Longitude (DD/MN	M/SS) 80/56/19
3.	Governmental	4. Facility Status	5.	Facility Major	6. Facility SIC(s):
	Facility Code:	Code:		Group SIC Code:	2061, 2062
7	0 E ::1:4: C :			20	
7.	Facility Comment:				
			•		•
}					,
		·			
Fa	cility Contact			·	
1.	Facility Contact N	ame:	-		,
	Wiliam A. Raiola, S	ienior Vice Presider	nt, Sugar	Processing Operation	ns
2.		•		·	
	•	: United States Sug		ration	
	9	: 111 Ponce DeLeor		•	
	City: Clewiston State: FL Zip Code: 33440				
				. FL Zip	——————————————————————————————————————
3.	Facility Contact T	elephone Numbers:	:	· · ·	
	Facility Contact T Telephone: (863)	elephone Numbers:	ext.	Fax: (863) 902-27	
3.	Facility Contact T Telephone: (863)	elephone Numbers:	ext.	Fax: (863) 902-27	
4.	Facility Contact T Telephone: (863) Facility Contact E	elephone Numbers: 983-8121 6 mail Address: braic	ext.	Fax: (863) 902-27	
4. <u>Fa</u>	Facility Contact T Telephone: (863) Facility Contact E cility Primary Resp	elephone Numbers: 983-8121 e mail Address: braic consible Official	ext. ola@ussu	Fax: (863) 902-27:	29
4. <u>Fa</u>	Facility Contact T Telephone: (863) Facility Contact E cility Primary Resp	elephone Numbers: 983-8121 mail Address: braic consible Official cation responsible	ext. ola@ussu	Fax: (863) 902-27:	
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4. Fa Co fac 1. 2.	Facility Contact T Telephone: (863) Facility Contact E cility Primary Respondence if an "applicity "primary respondence if an "applicity "primary Respondence if an "applicity Primary Respondence	elephone Numbers: 983-8121 mail Address: braic consible Official cation responsible onsible official." sponsible Official I	ext. ola@ussu official* Name: Mailing A	Fax: (863) 902-27: gar.com is identified in Sec Address Zip	tion I. that is not the

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.	Small Business Stationary Source
2. 🗆	Synthetic Non-Title V Source
3. 🛛	Title V Source
4. 🛛	Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)
5. 🗆	Synthetic Minor Source of Air Pollutants, Other than HAPs
6. 🛛	Major Source of Hazardous Air Pollutants (HAPs)
7. 🗆	Synthetic Minor Source of HAPs
8. 🛛	One or More Emissions Units Subject to NSPS (40 CFR Part 60)
9.	One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)
10.	One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)
11. 🗆	Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))
12. Fa	cility Regulatory Classifications Comment:

List of Pollutants Emitted by Facility

Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Particulate Matter Total - PM	Α	N
Sulfur Dioxide - SO ₂	A	N
Nitrogen Oxides - NO _x	Α	N
Carbon Monoxide - CO	A	N
Particulate Matter - PM ₁₀	Α	N
Sulfuric Acid Mist - SAM	Α	N
Total Hazardous Air Pollutants - HAPs	Α	Ņ
Volatile Organic Compounds - VOC	A	N
Acetaldehyde - H001	A	N .
Benzene - H017	A	N .
Formaldehyde - H095	A	Ņ.
Phenol - H144	Α	N
Polycyclic Organic Matter - H151	Α	N.
Styrene - H163	Α	N
Toluene - H169	Α	N
Naphthalene - H132	A	: N
Dibenzofuran - H058	A	N

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:

C. FACILITY ADDITIONAL INFORMATION

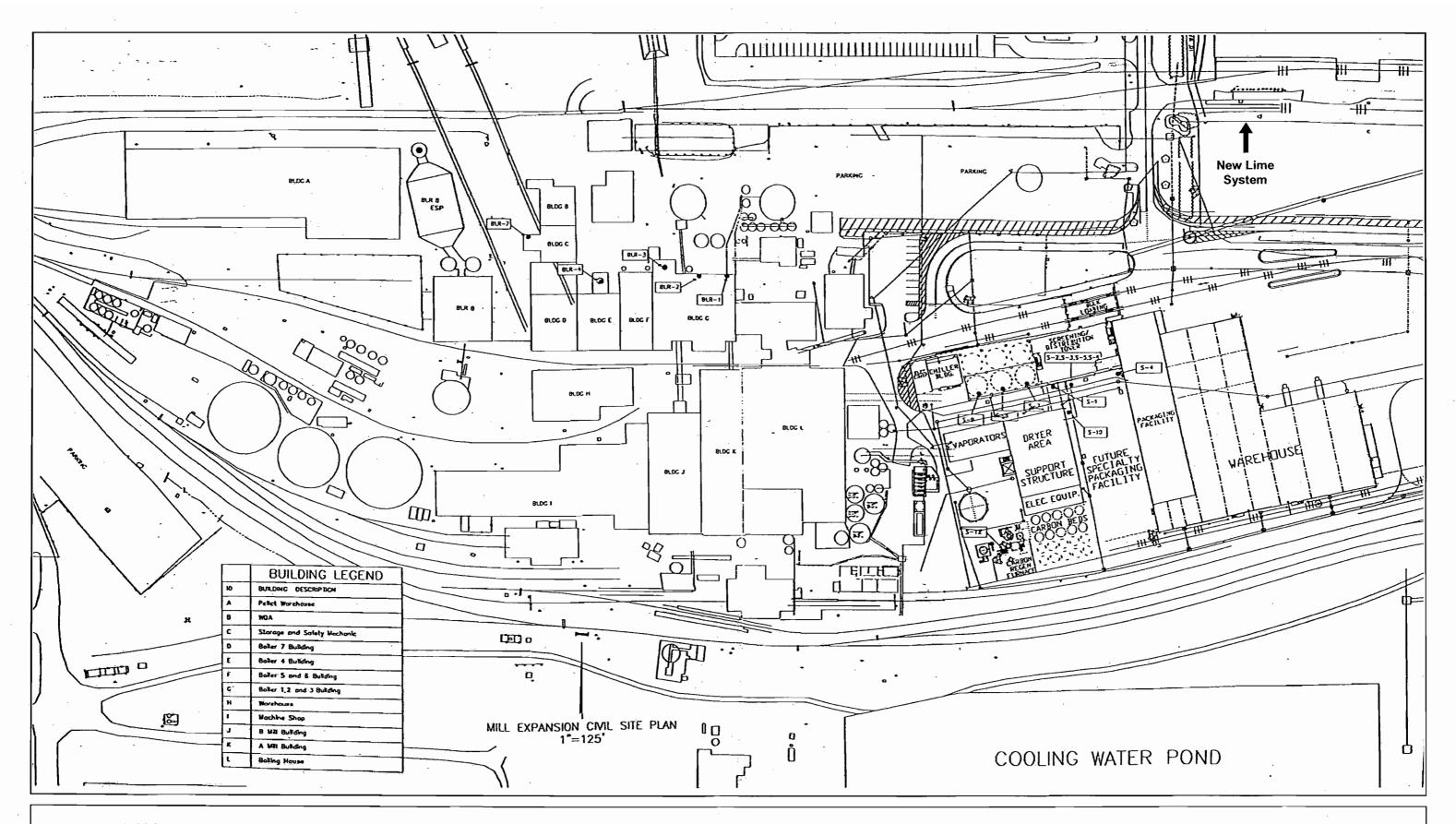
Additional Requirements for All Applications, Except as Otherwise Stated

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)
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
ľ	sought)
	Attached, Document ID: USSC-FI-C2 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)
. •	Attached, Document ID: Previously Submitted, Date:
A	ditional Requirements for Air Construction Permit Applications
1.	Area Map Showing Facility Location:
	☐ Attached, Document ID: 🖾 Not Applicable (existing permitted facility)
2,	Description of Proposed Construction or Modification:
	Attached, Document ID: Attachment A
3.	Rule Applicability Analysis:
	Attached, Document ID: Attachment A
4.	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)
5.	Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.):
	☐ Attached, Document ID: ☐ Not Applicable
6.	Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.):
	☐ Attached, Document ID: ⊠ Not Applicable
.7.	Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.):
	☐ Attached, Document ID: ⊠ Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.):
	☐ Attached, Document ID: ⊠ Not Applicable
9.	Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.):
	☐ Attached, Document ID: ☐ Not Applicable
10	. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
	☐ Attached, Document ID: ⊠ Not Applicable

<u>A</u>	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)
A	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	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:
L	Not Applicable (revision application with no change in applicable requirements)
3	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	5. Verification of Risk Management Plan Submission to EPA (If applicable, required for
	initial/renewal applications only):
	☐ Attached, Document ID: ☐ Not Applicable
6	6. Requested Changes to Current Title V Air Operation Permit:
L	☐ Attached, Document ID: ☐ Not Applicable
_ <u>A</u>	Additional Requirements Comment

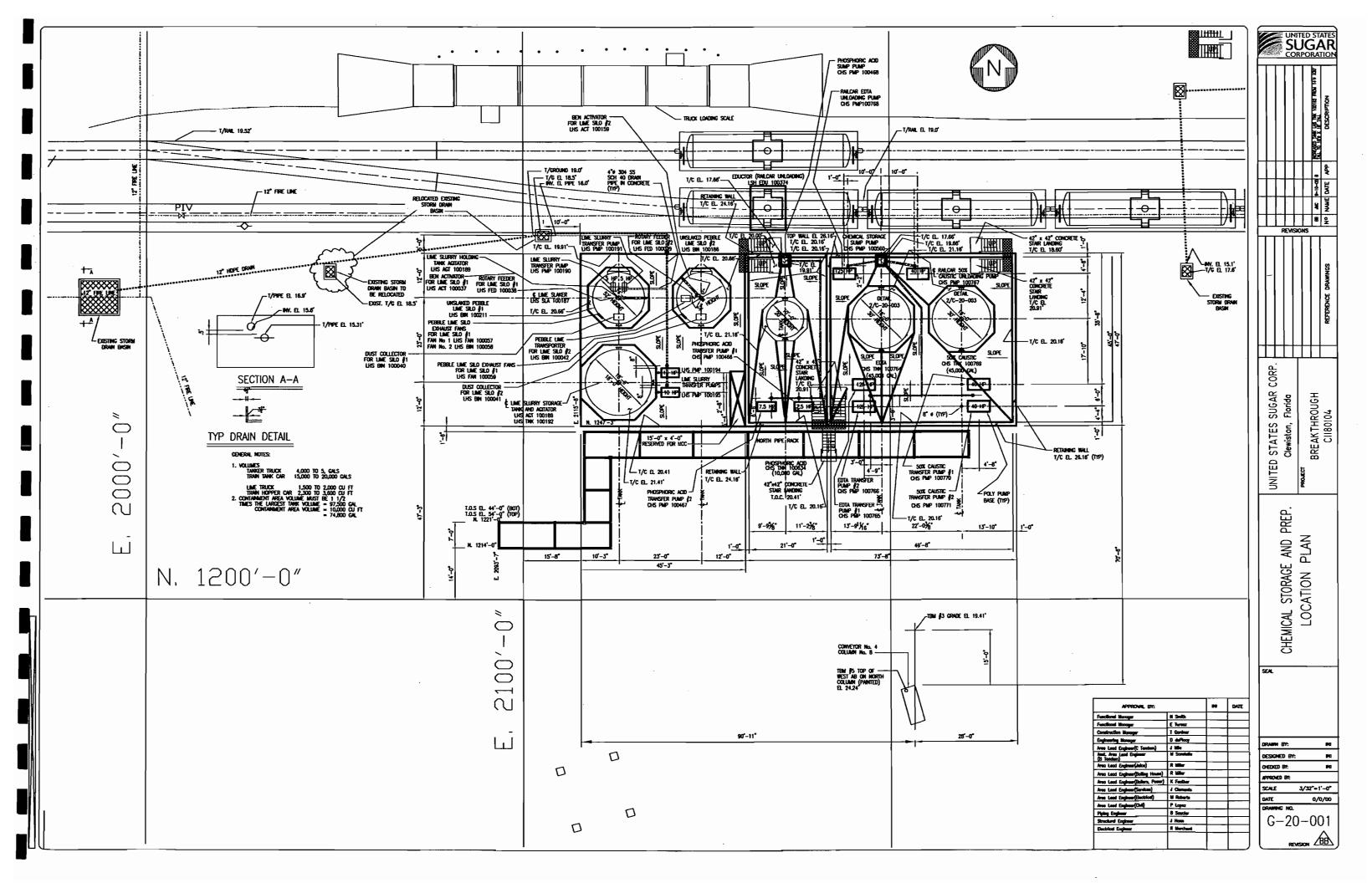
ATTACHMENT USSC-FI-C1a,b

FACILITY PLOT PLANS



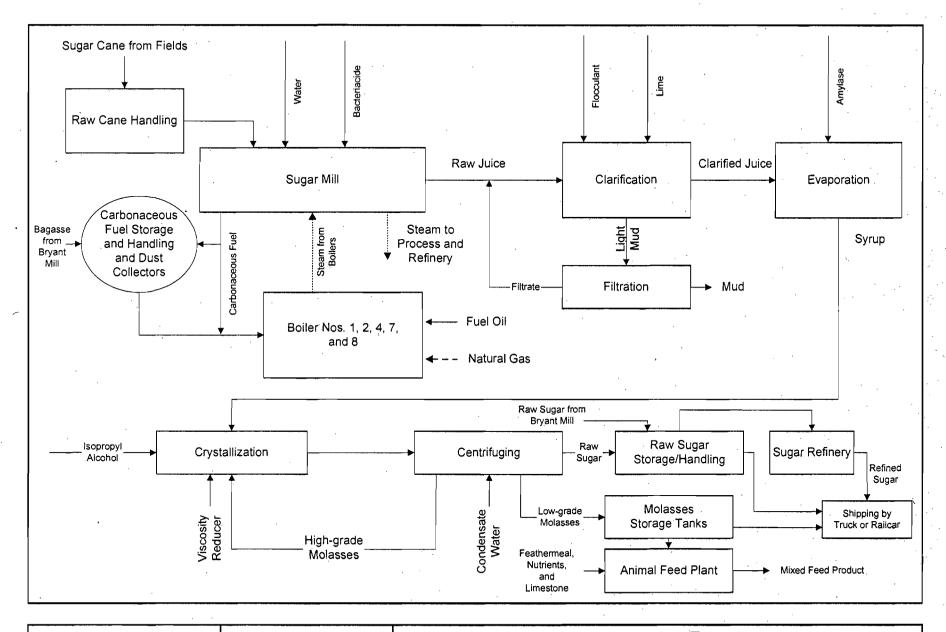
Attachment USSC-FI-C1a.
Facility Plot Plan
U.S. Sugar Corporation, Clewiston Mill
Clewiston, Florida





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



Section [1] of Lime System

o**f** [1]

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.

DEP Form No. 62-210.900(1) – Form Effective: 06/16/03

0537579/4.3/USSC_DB_Form1_LimeSys.doc 10/5/2005

Section [1] Lime System of [1]

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.)				
	emissions	s unit.		ons Unit Information S	
·	 :	sions unit addressed ed emissions unit.	in this Emissio	ons Unit Information S	ection is an
<u>En</u>	nissions Unit.	Description and Sta	atus		
1.	Type of Emis	ssions Unit Addresse	d in this Section	on: (Check one)	
	process o		activity, which	dresses, as a single em a produces one or more int (stack or vent).	
	process o		nd activities wh	ich has at least one de	issions unit, a group of finable emission point
				dresses, as a single em es which produce fugi	
2.	2. Description of Emissions Unit Addressed in this Section: Lime unloading and storage in two lime silos.				
3.	Emissions U	nit Identification Nu	mber:	•	
4.	Emissions	5. Commence	6. Initial	7. Emissions Unit	8. Acid Rain Unit?
	Unit Status	Construction	Startup	Major Group	☐Yes
	Code:	Date:	Date:	SIC Code:	⊠ No
	С	·		20	•
9.	Package Unit			·	
	Manufacture	r:		Model Number:	
10	. Generator N	lameplate Rating:	MW	· 	
	. Emissions U				
Un	loading and st	orage for lime used t	to clarify raw su	gar juice in the Boiling	g House.
		· ·	•		

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

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 Throughp	out Rate: 5,000 TPY	
2.	Maximum Production Rate:		
3.	Maximum Heat Input Rate:	million Btu/hr	
4.	Maximum Incineration Rate:	pounds/hr	
		tons/day	
5.	Requested Maximum Operating	g Schedule:	
		24 hours/day	· 7 days/week
		52 weeks/year	8,760 hours/year
6.	Operating Capacity/Schedule C		
	Panracanta tatal lima throughns	it through the lime evetem	
	Represents total lime throughpu	it till ough the lille system.	
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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:			t for VE Tracking:
	·			
			•	
				•
4.	ID Numbers or Description	ns of Emission Ur	nits with this Emissic	on 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:
11.	Maximum Dry Standard F 465 dscfm	low Rate:	12. Nonstack Emiss feet	sion Point Height:
13.	Emission Point UTM Coo	rdinates		Latitude/Longitude
	Zone: East (km):		Latitude (DD/M	ŕ
1.5	North (km)		Longitude (DD)	/MM/SS)
15.	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.			
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Lime System

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1.	Segment Description (Proc Industrial Processes; Mine	V	k Materials Stor	age Bins; Minerals; Lime
		٠.	•	
2.	Source Classification Code 3-05-102-98	e (SCC):	3. SCC Units Tons Proce	
4.	Maximum Hourly Rate: 38	5. Maximum 2 5,000	Annual Rate:	6. Estimated Annual Activity Factor:
7.	Maximum % Sulfur:	8. Maximum	% Ash:	9. Million Btu per SCC Unit:
Lin hou lb i	urly rate is based on one 25	ton truck unload	ing in approxima	los via railcar or truck. Maximum ately 45 minutes and one 180,000 sed on the total throughput to the
Se	gment Description and Ra	ite: Segment	of	
1.	Segment Description (Prod	cess/Fuel Type):		
•				
2.	Source Classification Code	e (SCC):	3. SCC Units	
4	14	5 Maximum	Annual Rate:	6 Estimated Annual Activity
,.	Maximum Hourly Rate:	3. Waxiiium	Aimuai Naic.	6. Estimated Annual Activity Factor:
	Maximum Hourly Rate: Maximum % Sulfur:	8. Maximum 9		
7.	·			Factor:
7.	Maximum % Sulfur:			Factor:
7.	Maximum % Sulfur:			Factor:

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Lime System

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	Primary Control Device Code	Secondary Control Device Code	4. Pollutant Regulatory Code
PM	017	NA	NS
PM ₁₀	017	NA	NS
			•
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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: PM	2. Total Perce	ent Efficie	ncy of Control:
3.	Potential Emissions:		4. Synth	etically Limited?
•	0.24 lb/hour 1.0	5 tons/year	□Ye	es 🛛 No
5.	Range of Estimated Fugitive Emissions (as to tons/year	applicable):		,
6.	Emission Factor: 0.02 gr/dscf			7. Emissions Method Code:
	Reference: Design rate			. 4 .
8.	Reference: Design rate 8. Calculation of Emissions: 465 dscfm * 0.02 gr/dscf * 60 min/hr ÷ 7,000 gr/lb = 0.08 lb/hr from each baghouse 0.08 lb/hr * 8,760 hr/yr ÷ 2,000 lb/ton = 0.35 TPY from each baghouse Total of 3 baghouses: 0.08 lb/hr x 3 = 0.24 lb/hr 0.35 TPY x 3 = 1.05 TPY See Attachment USSC-EU1-D10.			
Th	9. Pollutant Potential/Estimated Fugitive Emissions Comment: The maximum dry standard flow rate of each baghouse is 465 dscfm. Potential emissions take into account emissions from both silos and railcar unloading.			

[1]

Section [1] of 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.

Al	lowable Emissions Allowable Emissions	c	f
1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units:	4.	Equivalent Allowable Emissions:
		ľ	lb/hour tons/year
5.	Method of Compliance:	<u> </u>	
6.	Allowable Emissions Comment (Description	of (Operating Method):
Al	lowable Emissions Allowable Emissions	c	of
1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units:	4.	Equivalent Allowable Emissions: 1b/hour tons/year
5.	Method of Compliance:		
6.	Allowable Emissions Comment (Description	of (Operating Method):
A 11	Journhla Emissions Allowable Emissions		
	lowable Emissions Allowable Emissions		
l. 	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:	<u> </u>	· · · · · · · · · · · · · · · · · · ·
6.	Allowable Emissions Comment (Description	of (Operating Method):

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: PM ₁₀	2. Total Perce	ent Efficie	ency of Control:
3.	Potential Emissions:	5 tons/year	4. Synth	netically Limited?
5.	Range of Estimated Fugitive Emissions (as to tons/year	applicable):		
6.	Emission Factor: 0.02 gr/dscf Reference: Design rate			7. Emissions Method Code: 2
8.	Calculation of Emissions: 465 dscfm * 0.02 gr/dscf * 60 min/hr ÷ 7,000 g	r/lb = 0.08 lb/hr	from each	baghouse
	0.08 lb/hr * 8,760 hr/yr ÷ 2,000 lb/ton = 0.35 Tl	PY from each ba	ghouse	
	Total of 3 baghouses: 0.08 lb/hr x 3 = 0.24 lb 0.35 TPY x 3 = 1.05 T			•
	See Attachment USSC-EU1-D10.			
9. Pollutant Potential/Estimated Fugitive Emissions Comment: The maximum dry standard flow rate of each baghouse is 465 dscfm. Potential emissions take into account emissions from both silos and railcar unloading.				
			•	

Section [1] **Lime System**

of ં [1] . POLLUTANT DETAIL INFORMATION

Page [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	n of Operating Method):
Allowable Emissions Allowable Emissions	of
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	n of Operating Method):
	•
	· · · · · · · · · · · · · · · · · · ·
Allowable Emissions Allowable Emissions	of
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 Allowship Emigricus Comment (Description	of Operating Mathod):
6. Allowable Emissions Comment (Description	of Operating Method).
	•

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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: 2. Basis for Allowable Opacity: VE20 ☑ Rule ☐ Other
3.	Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: Maximum Period of Excess Opacity Allowed: min/hour
4.	Method of Compliance: EPA Method 9
5.	Visible Emissions Comment: Rule 62-296.320, F.A.C.
	sible Emissions Limitation: Visible Emissions Limitation of Visible Emissions Subtype: 2. Basis for Allowable Opacity:
	Rule Other
3.	Allowable Opacity: Normal Conditions:
4.	Method of Compliance:
5.	Visible Emissions Comment:

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H. CONTINUOUS MONITOR INFORMATION

Continuous Monitoring System: Continuous Monitor ____ of _ 1. Parameter Code: 2. Pollutant(s):

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

				·	
3.	CMS Requirement:	□ R	tule		Other
4.	Monitor Information Manufacturer:		•		
	Model Number:		S	erial Numbe	r:
5.	Installation Date:	6. P	Perfo	rmance Spe	cification Test Date:
7.	Continuous Monitor Comment:				
					•
	<u> </u>			·	<u> </u>
<u>Co</u>	ontinuous Monitoring System: Continuous	Monit	tor_	of	_
1.	Parameter Code:	2	2. P	ollutant(s):	
3.	CMS Requirement:	□ R	Rule		Other
4.	Monitor Information Manufacturer:	•			
	Model Number:		S	erial Numbe	r:
5.	Installation Date:	6	6. P	erformance	Specification Test Date:
7.	Continuous Monitor Comment:			-	
					•

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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) Attached, Document ID: USSC-EU1-11 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) Attached, Document ID: 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) Attached, Document ID: USSC-EU1-13 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) Attached, Document ID: Previously Submitted, Date Not Applicable (construction application)				
 Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date Not Applicable 					
6.	Compliance Demonstration Reports/Records Attached, Document ID: Test Date(s)/Pollutant(s) Tested:				
	Previously Submitted, Date: Test Date(s)/Pollutant(s) Tested:				
	To be Submitted, Date (if known): Test Date(s)/Pollutant(s) Tested:				
	Not Applicable ■ The state of t				
	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 Attached, Document ID: Not Applicable				

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Additional Requirements for Air Construction	

										
1.	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)) Attached, Document ID: Not Applicable									
2	2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., an	а								
2.	Rule 62-212.500(4)(f), F.A.C.)	u								
	☐ Attached, Document ID: ☐ Not Applicable									
3.	3. Description of Stack Sampling Facilities (Required for proposed new stack sampling									
	facilities only)									
	☐ Attached, Document ID: ⊠ Not Applicable									
<u>A</u>	Additional Requirements for Title V Air Operation Permit Applications									
1.	. Identification of Applicable Requirements									
	☐ Attached, Document ID: ☐ Not Applicable									
2.	2. Compliance Assurance Monitoring									
	☐ Attached, Document ID: ☐ Not Applicable									
3.	. Alternative Methods of Operation									
	☐ Attached, Document ID: ☐ Not Applicable	•								
4.	Alternative Modes of Operation (Emissions Trading)									
	☐ Attached, Document ID: ☐ Not Applicable									
5.	5. Acid Rain Part Application									
	☐ Certificate of Representation (EPA Form No. 7610-1)									
	Copy Attached, Document ID:									
	☐ Acid Rain Part (Form No. 62-210.900(1)(a))	•								
	Attached, Document ID:	٠								
	Previously Submitted, Date:									
	Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)									
	Attached, Document ID:									
	Previously Submitted, Date:									
	New Unit Exemption (Form No. 62-210.900(1)(a)2.)									
	Attached, Document ID:									
	Previously Submitted, Date:									
	Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)									
	Attached, Document ID:									
	Previously Submitted, Date:									
	Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)									
	Attached, Document ID:									
	Previously Submitted, Date:									
	Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)									
1	Attached, Document ID:									
	☐ Previously Submitted, Date:									
1	IXI NIAI ADDIICADI									

EMISSIONS UNIT INFORMATION Section [1] of [1] Lime System Additional Requirements Comment

ATTACHMENT USSC-EU1-D10

EMISSIONS CALCULATIONS

ATTACHMENT USSC-EU1-D10

CALCULATION OF EMISSIONS

Summary of PM/PM₁₀ 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 ₁₀ En	nission Rate 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.

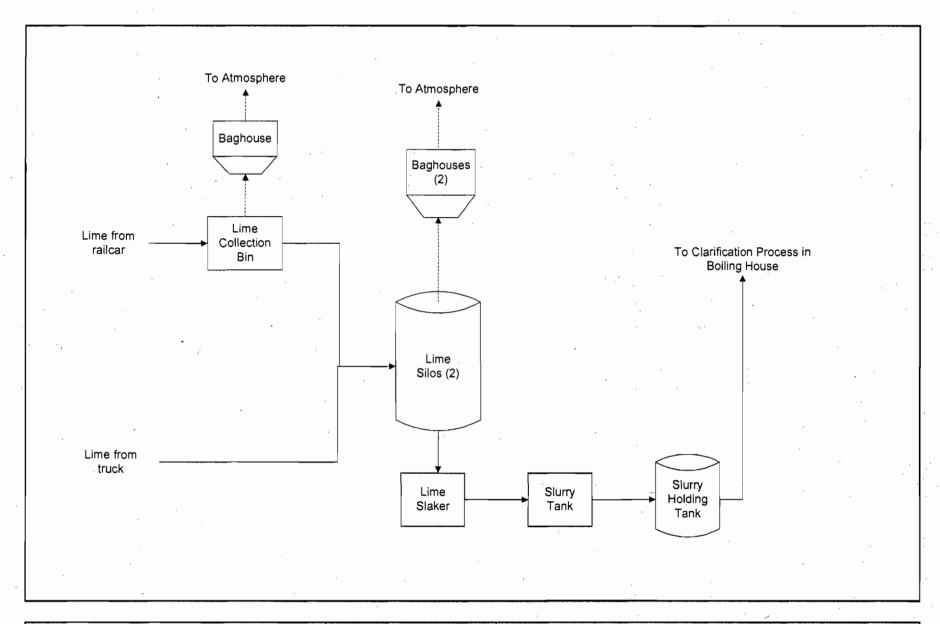
gr/dscf = grains per dry standard cubic feet.

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

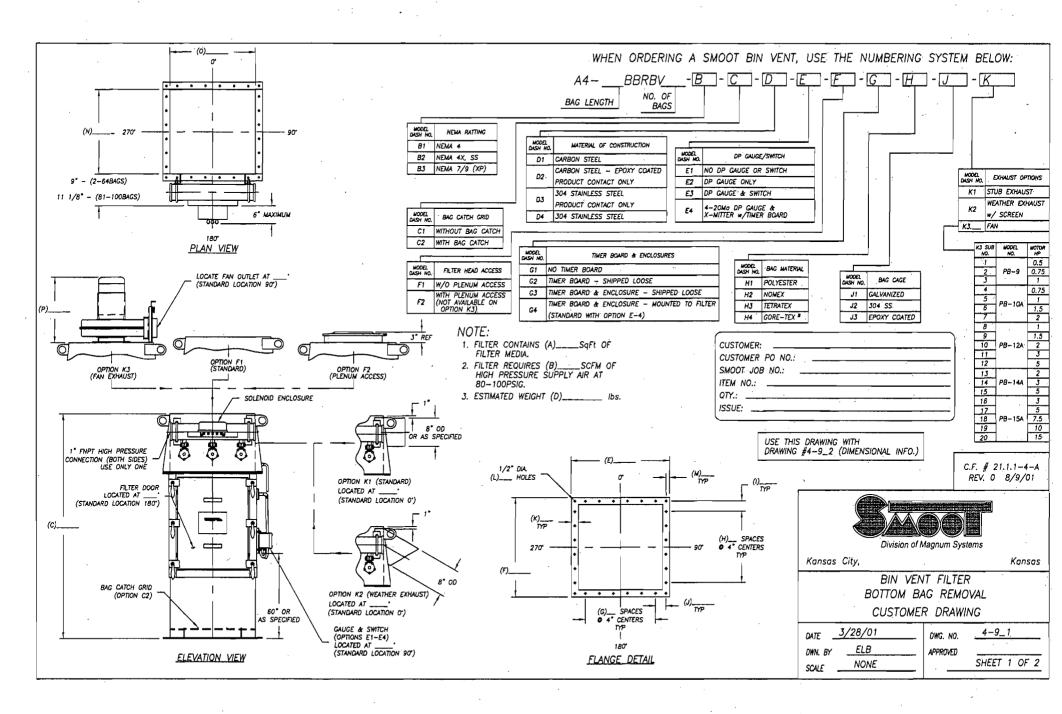
CONTROL EQUIPMENT PARAMETERS FOR EACH LIME SILO BAGHOUSE AT U.S. SUGAR CLEWISTON

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:

Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X outlet loading rate (grains/acf) ÷ 7000 grains/lb X 60 min/hr



ATTACHMENT USSC-EU1-I3b

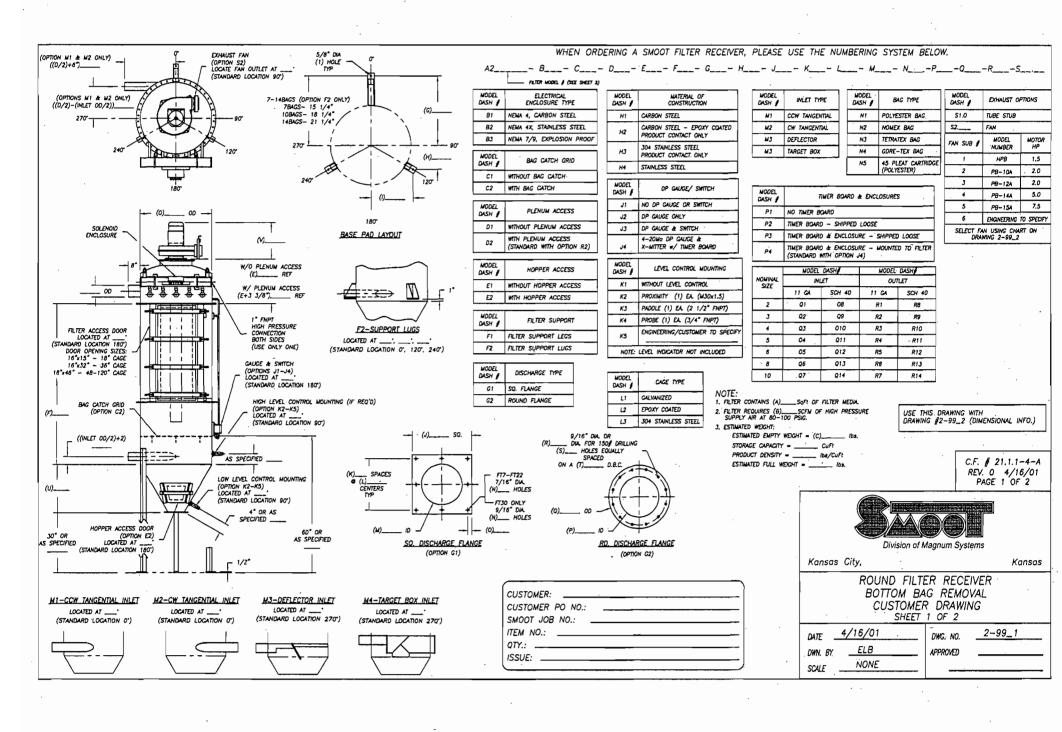
CONTROL EQUIPMENT PARAMETERS FOR THE RAILCAR UNLOADING BAGHOUSE AT U.S. SUGAR CLEWISTON

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:

Outlet loading rate (lb/hr) = outlet gas flow rate (acfm) X outlet loading rate (grains/acf) ÷ 7000 grains/lb X 60 min/hr



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 though 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 (PM₁₀) emissions from each baghouse are 0.08 lb/hr and 0.35 TPY. Total PM/PM₁₀ emissions from all three baghouses are 0.24 lb/hr and 1.05 TPY. The PM/ PM₁₀ 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.