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DIVISION OF AIR
RESOURCE MANAGEMENT

November 7, 2011

103-87718

Mr. Jeff Koerner, Administrator, Office of Permitting and Compliance
Florida Department of Environmental Protection
Department of Air Resources Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

**RE: UNITED STATES SUGAR CORPORATION, CLEWISTON MILL
ANNUAL BOILER MAINTENANCE SUMMARY REPORT
PERMIT NO. 0510003-032-AV, APPENDIX J
2011 OFF-SEASON REPAIRS AND PLANNED REPAIRS FOR THE 2012 OFF-SEASON**

Dear Mr. Koerner:

This correspondence provides to the Florida Department of Environmental Protection (FDEP) the list of boiler maintenance and repair activities conducted at the United States Sugar Corporation (US Sugar) Clewiston Mill during the 2011 off-season and the repairs planned on the boilers for the upcoming 2012 off-season.

US Sugar was issued Air Construction Permit No. 0510003-022-AC on June 3, 2003. This permit authorized a 3-year boiler maintenance project at the existing Clewiston Sugar Mill and Refinery located in Hendry County, Florida, for the 2003 through 2005 off-seasons. Because all the repairs were not completed during the specified time, US Sugar requested an extension to the air permit to include the 2006 through 2008 off-seasons. Due to the pending Title V renewal permit application, the FDEP chose to not extend Permit No. 0510003-022-AC, and the permit has since expired. However, the FDEP included the reporting requirement in the Title V permit (Permit No. 0510003-032-AV) when the renewal was issued on August 17, 2010.

Condition 2 of Appendix J of the Title V operating permit requires US Sugar to submit a "Maintenance Summary Report" within 60 days of the beginning of each cane milling season. The condition requires that the permittee summarize the following information:

- General description of the work performed on each boiler during the previous off-season
- Summary of the off-season maintenance inspections
- Revised schedule of maintenance and repair activities for the next off-season

The current US Sugar crop season began October 1, 2011. The maintenance and repair activities conducted during the 2011 off-season, and those planned for the 2012 off-season, are provided in the attached table.

In accordance with the Title V operating permit, the replacements that US Sugar is planning are all "functionally equivalent" to the existing components and are intended to return the boilers to their current steam production capabilities. The maintenance activities will not increase the capacity of any boiler nor change the basic design parameters, including fuel firing rates or heat input rates. The repairs will not increase the emission rates of any boiler nor the cane milling capacity of the plant. As such, we believe these repairs are authorized activities under the Title V air operation permit.

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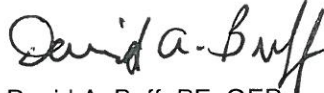
Please call me at (352) 336-5600 or Keith Tingberg at (863) 902-3186 if you have any questions concerning this information, or need additional information.

Sincerely,

GOLDER ASSOCIATES INC.



Philip D. Cobb, PE
Senior Project Engineer



David A. Buff, PE, QEP
Principal Engineer

cc: Carter Endsley, FDEP
Keith Tingberg, USSC
Bret Nesbitt, USSC

Enclosures

DB/nav

CLEWISTON BOILER REPAIRS SUMMARY

Boiler repairs and maintenance conducted during the 2011 off-season are described below.

Boiler No. 1

- Boiler casing and refractory patch work.
- Replaced hot undergrate air ducting.

Boiler No. 2

- Boiler casing and refractory patch work.
- Replaced hot undergrate air ducting.

Boiler No. 4

- Boiler casing and refractory patch work.
- Replaced forced draft (FD) fan ducting.
- Replaced 50 percent of the air heater tubes.
- Replaced 12 generating bank tubes.

Boiler No. 7

- Boiler casing and refractory patch work.
- Replaced third field of collector plates and electrodes in electrostatic precipitator (ESP) plus casing.

Boiler No. 8

- Replaced fifth field of collector plates and electrodes in ESP plus casing.

CLEWISTON BOILER MAINTENANCE INSPECTIONS

Boiler maintenance inspections performed during the 2011 off-season are described below.

Boiler Nos. 7 & 8

- ESP inspections by the original equipment manufacturer (OEM).

Boiler Nos. 1, 2, 4, 7, 8

- Eddy current testing of all generating bank tubes.
- Grate inspections by a qualified OEM inspector.
- Safety relief valve certifications.
- Quarterly maintenance and inspections of CEMS.
- General crawl-through inspections by US Sugar.

CLEWISTON BOILER REPAIR PROJECTIONS

Boiler repairs projected to be accomplished during the 2012 off-season are described below.

Boiler No. 1

- Boiler casing and refractory patch work.
- Replace air heater outlet to scrubber inlet flue.

Boiler No. 2

- Boiler casing and refractory patch work.
- Replace air heater outlet to scrubber inlet flue.

Boiler No. 4

- Boiler casing and refractory patch work.
- Replace 50 percent of air heater tubes.

Boiler No. 7

- Boiler casing and refractory patch work.
- Replace air heater tubes.
- Replace hoppers and screw conveyors on the ESP.

Boiler No. 8

- Replace fourth field of collector plates and electrodes in ESP plus casing.