



March 18, 2014

13-02341
Via Electronic Delivery

Mr. Jeff Koerner, P.E.
Florida Department of Environmental Protection
South District
2295 Victoria Avenue
Fort Myers, Florida 33901

**RE: UNITED STATES SUGAR CORPORATION
CLEWISTON MILL (FACILITY NO. 0510003)
CAPACITY REPORT AND EMISSIONS SUMMARY
2013-2014 CROP SEASON**

Dear Mr. Koerner:

Please find enclosed two copies of the Capacity Report and Emissions Summary for the Clewiston Mill. This report was required under Permit No. 0510003-022-AC, issued June 3, 2003. In addition, Section 4, Appendix J of the current Title V air operating permit (Permit No. 05100030-053-AV) requires that "Routine maintenance activities shall not increase the capacity of any boiler or change the basic design parameters including fuel firing rates or heat input rates. In addition, such activities shall not increase the emission rates of any boiler or the cane milling capacity of the plant." This report documents that there has been no increase in capacity or emissions from the boilers due to maintenance activities.

If you have any questions regarding this report, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in blue ink that reads "David A. Buff".

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

A handwritten signature in blue ink that reads "Philip D. Cobb".

Philip D. Cobb, Ph.D., P.E.
Senior Project Engineer

cc: Keith Tingberg, USSC
Bret Nesbitt, USSC
Doug Neeley, EPA Region 4

Attachment

DB/PDC/edk



**TABLE 1
CAPACITY REPORT AND EMISSIONS SUMMARY FOR U.S. SUGAR CLEWISTON MILL, 2013-2014 CROP SEASON**

| Boiler | Test Date | Permitted 24-Hour Average Steam Production Rate (lb/hr) | Tested Steam Production Rate (lb/hr) | % of Permitted Capacity (%) | Tested Heat Input Rate (MMBtu/hr) | Emission Rate Units | Emission Test Results | | | | | | | | | | | |
|--------|----------------------------|---|--|--------------------------------------|---|------------------------|----------------------------|---------------------------------------|----------------------------|-------------------------------------|----------------------------|-------------------------------------|---|--|----------------------------|--|----------------------------|-------------------------------------|
| | | | | | | | PM | | NO _x | | CO | | Non-Methane VOC | | SO ₂ | | Ammonia Slip | |
| | | | | | | | Tested Emission Rate | Allowable Emissions ^{a,f} | Tested Emission Rate | Allowable Emissions ^f | Tested Emission Rate | Allowable Emissions ^f | Tested Emission Rate | Allowable Emissions ^{a,f} | Tested Emission Rate | Allowable Emissions ^{a,f} | Tested Emission Rate | Allowable Emissions ^f |
| 1 | 12/17/2013 | 185,000 | 174,096 | 94.1% | 360 | (lb/MMBtu) (lb/hr) | 0.116 41.7 | 0.229 82.5 | N/A | N/A | N/A | N/A | N/A | N/A | N/A | | | |
| 2 | 12/18/2013 | 185,000 | 177,295 | 95.8% | 374 | (lb/MMBtu) (lb/hr) | 0.094 35.0 | 0.228 85.3 | N/A | N/A | N/A | N/A | N/A | N/A | N/A | | | |
| 4 | 12/12/2013 - 12/13/2013 | 271,604 | 263,019 | 96.8% | 588 | (lb/MMBtu) (lb/hr) | 0.057 33.1 | 0.143 84.14 | 0.148 87.0 | 0.20 117.7 | 1.558 920.8 | 6.5 3,824.6 | 0.028 ^b 16.9 ^b | 0.50 ^b 296.8 ^b | N/A N/A | 0.06 ^c 34.6 ^c | N/A | |
| 7 | 12/11/2013 | 350,000 ^g | 383,217 | 109.5% | 792 | (lb/MMBtu) (lb/hr) | 0.003 2.6 | 0.03 23.8 | 0.147 116.6 | 0.244 193.3 | 0.353 279.4 | 0.70 554.6 | 0.005 ^b 4.0 ^b | 0.212 ^b 161.0 ^b | N/A N/A | 0.17 N/A | N/A | |
| 8 | 01/09/2014 | 575,000 | 536,653 | 93.3% | 974 | (lb/MMBtu) (lb/hr) | 0.002 1.5 | 0.025 24.4 | N/A N/A | 0.14 ^e 136.4 | N/A N/A | 400 ^{d,e} N/A | 0.011 ^b 11.1 ^b | 0.05 ^b 48.8 | N/A N/A | 0.06 58.4 | 11.6 ^d | 20 ^d |

^a Allowable emissions based on burning combined bagasse and No. 2 fuel oil.

^b Reported as propane.

^c Only required during the federal fiscal year (October 1 to September 30) prior to renewal of the air operation permit.

^d In units of ppmvd @ 7% oxygen.

^e Based on CEMS data; 30-day rolling average.

^f Based on Title V Permit No. 0510003-053-AV, 0510003-037-AC, and 0510003-039-AC.

^g This capacity represents a 24-hour average capacity. The 1-hour average capacity limit is 385,000 lb/hr; therefore, the actual capacity is less than 100% of the 1-hour average capacity.