

**Golder Associates Inc.**

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September 13, 2006

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**RECEIVED**

SEP 14 2006

BUREAU OF AIR REGULATION

Florida Department of Environmental Protection  
Twin Towers Office Building  
2000 Blair Stone Road  
Tallahassee, FL 32399-2400

Attention: Mr. Jeff Koerner, District Air Permitting North

RE: UNITED STATES SUGAR CORPORATION  
FACILITY ID: 0510003  
NESHAPS SUBPART DDDDD  
HEALTH-BASED COMPLIANCE ALTERNATIVE DEMONSTRATION AND TITLE V  
PERMIT REVISION APPLICATION

Dear Mr. Koerner:

On behalf of United States Sugar Corporation (U. S. Sugar), please find attached a demonstration of eligibility for the health-based compliance alternative (HBCA) for the total selected metals (TSM) and hydrogen chloride (HCl) emission limits under the NESHAPS, 40 CFR 63, Subpart DDDDD. The demonstration includes an application for revision of the Title V operating permit, as required by Subpart DDDDD. Since this submittal is also a Title V operating permit application, four copies are being submitted to you, along with the signed responsible official signature page and signed compliance statement.

As required by Subpart DDDDD, a copy of the HBCA report is also being submitted to U.S. EPA, Risk and Exposure Assessment Group, Emission Standards Division, Research Triangle Park, North Carolina.

If you have any questions this information, please do not hesitate to call me at (352) 336-5600 or email at [dbuff@golder.com](mailto:dbuff@golder.com).

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

Enclosures

DB/nav

cc: Don Griffin  
Peter Briggs  
Ron Blackburn, FDEP South District

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