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October 13, 2005

RECEIVED

OCT 13 2005

VIA HAND DELIVERY

BUREAU OF AIR REGULATION

Jeff Koerner, Prof. Eng. II
Division of Air Resources
Department of Environmental Protection
111 S. Magnolia Drive, Suite 4
Tallahassee, FL 32399

Re: Application to Transfer Title V Permit
Permit No. 0990016-006-AV

Dear Jeff:

Enclosed for filing is the original and a copy of an application to transfer the Title V air permit for the Atlantic Sugar Mill. The need for the transfer resulted from the recent merger of the current permittee, Atlantic Sugar Association, Inc. into the new permittee, Atlantic Holding LLC.

Per your suggestion, we attached a list of the historic construction and operation permits for the Atlantic Sugar Mill. However, we do not believe these permits need to be formally transferred.

Pursuant to Rule 62-213.440(3)(a)2.b., F.A.C., a Statement of Compliance for the facility will be submitted in the near future.

Please call if you have any questions.

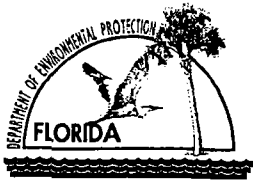
Sincerely,



John T. LaVIA, III

Enclosures

cc: Bill Tarr



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR TRANSFER OF AIR PERMIT

Title V Permit No.*: 0990016-006-AV

Non-Title V Permit No(s): Attached is a list of historic construction and operation permits for the facility.
The permittee does not believe these permits need to be formally transferred.

Notification of Sale or Legal Transfer

Facility Owner/Company Name (As Currently Permitted): Atlantic Sugar Association, Inc.	Facility ID No.: 0990016
Site Name: Atlantic Sugar Mill	County: Palm Beach
Street Address or Other Locator: SR 880 - 16 miles East of Belle Glade	
City: Belle Glade	Zip Code: 33430

I, the undersigned, hereby notify the department of the sale or legal transfer of the facility listed above. Under its current air permit(s), I am the owner or authorized representative of the non-Title V source or the responsible official of the Title V source addressed in this application, whichever is applicable.

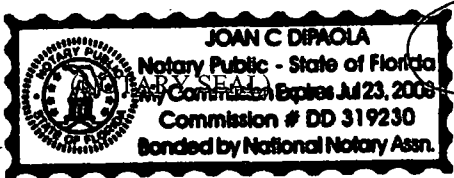
[Signature]
 (Signature)

Name: Armando A. Tabernilla
 Title: First Vice President

Date: 10/11/05

STATE OF FLORIDA
 COUNTY OF Palm Beach

Sworn to (or affirmed) and subscribed before me this 11th day of October 2005




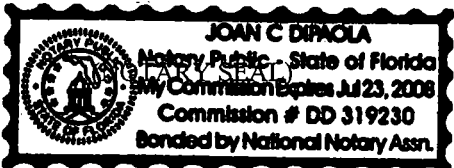
[Signature]
 (Signature of Notary Public - State of Florida)
Joan C. DiPaola
 (Name of Notary Typed, Printed, or Stamped)

Personally Known OR Produced Identification

Type of Identification Produced _____

* Title V Sources Only: Attach a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee. If there is a change in designated representative at an Acid Rain source, submit a copy of the Certificate of Representation submitted to EPA pursuant to 40 CFR 72, subpart B. A Statement of Compliance (DEP Form 62-213.900(7)) covering the portion of the calendar year up to the date of transfer of responsibility shall be submitted to the Department after the date of transfer, as required by Rule 62-213.440(3)(a)2.b., F.A.C.

Notification of New Ownership

New Facility Owner/Company Name: Atlantic Holding LLC	
New Site Name: Atlantic Sugar Mill	County: Palm Beach
<p>I, the undersigned, am or will be the new owner or authorized representative* of the non-Title V source or the new responsible official of the Title V source addressed in this application, whichever is applicable. I further state that I have examined the application and documents submitted by the current permittee, the basis on which the above listed permit(s) was/were issued by the Department, and state that they accurately and completely describe the permitted facility. I further state that I am familiar with the permit(s), agree to comply with its/their terms and conditions, and agree to assume the rights and liabilities contained therein. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete. I also agree to promptly notify the Department of any future change in ownership of, or responsibility for, the permitted facility.</p> <p> _____ (Signature)</p> <p>Name: <u>Armando A. Tabernilla</u></p> <p>Title: <u>Vice President, Okeelanta Corporation (sole member)</u> Date: <u>10/11/05</u></p> <p>Mailing Address: <u>One North Clematis Street, Suite 200</u></p> <p>City: <u>West Palm Beach</u> Zip Code: <u>33401</u></p> <p>Telephone No: <u>561-655-6303</u> Fax No.: <u>561-366-5180</u></p> <p>Effective Date of Sale or Legal Transfer: <u>September 9, 2005</u> (If not yet known, leave blank. Once known, date must be provided to the Department to process a change of ownership administrative permit correction in accordance with Rule 62-210.360, F.A.C.)</p> <p>STATE OF FLORIDA COUNTY OF <u>Palm Beach</u></p> <p>Sworn to (or affirmed) and subscribed before me this <u>11th</u> day of <u>October</u> 20<u>05</u>.</p> <p> <u>Joan C. DiPaola</u> (Signature of Notary Public – State of Florida)</p> <p><u>Joan C. DiPaola</u> (Name of Notary Typed, Printed, or Stamped)</p> <p>Personally Known <input checked="" type="checkbox"/> OR Produced Identification <input type="checkbox"/></p> <p>Type of Identification Produced _____</p>	

* Attach letter of authorization if other than owner or corporate officer.

Agreement to Transfer Title V Permit

This Agreement is entered into as of October 11th, 2005, by and between Atlantic Sugar Association, Inc. ("Atlantic Sugar") and Atlantic Holding LLC ("Atlantic Holding") (collectively "the Parties").

WHEREAS, on September 9, 2005, Atlantic Sugar was merged into Atlantic Holding;

WHEREAS, Atlantic Sugar wishes to transfer a certain Title V Permit (No. 0990016-006-AV) (the "Title V Permit") to Atlantic Holding; and

WHEREAS, Atlantic Holding wishes to accept the transfer of the Title V Permit;

Now, THEREFORE, the Parties agree to the following:

1. Atlantic Holding agrees to accept the transfer of the Title V Permit.

2. For purposes of compliance with DEP Form No. 62-210.900(7), the transfer of responsibility, coverage and liability for the Title V Permit occurred on September 9, 2005.

Atlantic Sugar Association, Inc.



Armando A. Tabernilla
First Vice President

Date: 10/11/05

Atlantic Holding LLC



Armando A. Tabernilla
Vice President and Secretary,
Okeelanta Corporation
(sole member)

Date: 10/11/05

Appendix H-1, Permit History/ID Number Changes

Atlantic Sugar Association, Inc.
 Atlantic Sugar Mill
 Page 1 of 5

Facility ID No.: 0990016

Permit History (for tracking purposes):

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
001	<u>Boiler No. 1</u>					
	Initial Permit	AO50-2031	5/18/73	7/1/75		
	Construction Replace Scrubber	AC50-2031A	2/10/75	11/30/75	12/22/75 1/30/76	
	Operation	AO50-2031A	4/5/76	4/5/81		
	Operation	AO50-7404	3/27/81	3/1/86		
	Operation	AO50-115034	3/24/86	3/24/91		
	Burn Rice Hulls	AC50-2031A - amended	4/23/90	3/24/91		
	Operation	AO50-189612 AO50-189612 Modification	12/7/90	12/7/95		
	Increase heat input to 280 MMBtu/hr	0990016-001-AC	2/22/96	2/22/97	03/20/96	
	RACT for VOCs & NO _x	0990016-001-AC & AO50-189612 amended	5/22/98	2/22/97	03/20/96	10/9/91

Appendix H-1, Permit History/ID Number Changes

Atlantic Sugar Association, Inc.
 Atlantic Sugar Mill
 Page 2 of 5

Facility ID No.: 0990016

Permit History (for tracking purposes):

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
002	<u>Boiler No. 2</u>					
	Initial Permit	AO50-2032	5/18/73	7/1/75		
	Construct Scrubber	AC50-2032A	2/10/75	11/30/75	12/30/75	
	Operation	AO50-2032A	4/5/76	4/5/81		
	Operation	AO50-7405	3/27/81	3/1/86		
	Operation	AO50-115141	3/25/86	3/24/91		
	Burn Rice Hulls	AC50-2032A - amended	4/23/90	3/24/91		4/3/86
	Operation	AO50-189608 AO50-189608 Modification	12/7/90	12/7/95		
	Increase heat input to 280 MMBtu/hr	0990016-002-AC	2/22/96	2/22/97	03/20/96	
	RACT for VOCs & NO _x	0990016-002-AC & AO50- 189608 amended	5/22/98	2/22/97	03/20/96	10/9/91

Appendix H-1, Permit History/ID Number Changes

Atlantic Sugar Association, Inc.
 Atlantic Sugar Mill
 Page 3 of 5

Facility ID No.: 0990016

Permit History (for tracking purposes):

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date^{1,2}</u>	<u>Revised Date(s)</u>
003	<u>Boiler No. 3</u>					
	Initial Permit	AO50-2033	5/18/73	7/1/75		
	Construct Scrubber	AC50-2033A	2/10/75	11/30/75	12/30/75	
	Operation	AO50-2033A	4/5/76	4/5/81		
	Operation	AO50-7406	3/27/81	3/1/86		
	Operation	AO50-114767	2/17/86	2/17/91		
	Burn Rice Hulls	AC50-2033A - amended	4/23/90	3/24/91		
	Operation	AO50-189610 AO50-189610 Modification	12/7/90	12/7/95		
	RACT for VOCs & NO _x	AC50-2033A & AO50-189612 amended	5/22/98	2/22/97	03/20/96	10/9/91

Appendix H-1, Permit History/ID Number Changes

Atlantic Sugar Association, Inc.
 Atlantic Sugar Mill
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Facility ID No.: 0990016

Permit History (for tracking purposes):

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date^{1,2}</u>	<u>Revised Date(s)</u>
004	<u>Boiler No. 4</u>					
	Construct Scrubber	AC50-2333	10/9/74	4/31/75	6/15/75	
	Operation	AO50-2333A	4/5/76	4/5/81		
	Construct Replacement Scrubber	AC50-5363	9/15/78	12/31/78		
	Operation	AO50-5867	5/8/79	5/8/84		
	Operation	AO50-87857	6/22/84	6/22/89		
	Operation	AO50-162864	4/28/89	4/28/94		6/2/89
	No VE test required	AO50-162864 Modification	6/16/89	4/28/94		
	RACT for VOCs & NO _x	AC50-5363 & AO50-162864 amended	5/22/98	2/22/97	03/20/96	10/9/91

Appendix H-1, Permit History/ID Number Changes

Atlantic Sugar Association, Inc.
 Atlantic Sugar Mill
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Facility ID No.: 0990016

Permit History (for tracking purposes):

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date^{1,2}</u>	<u>Revised Date(s)</u>
-005	<u>Boiler No. 5</u>					
	Construction PSD	AC50-42389 RACT PSD-FL-078	10/6/81 12/4/81	5/31/82		
	Operation Permit (initial)	AO50-68741	12/1/83	12/1/88		
	Construction Modification PSD Modification	AC50-107181 PSD-FL-078 AO50-132597	10/15/86 11/17/86 4/29/87	6/30/87 4/29/92		6/12/87 10/21/87
	Operation Permit	AC50-107181 amendment	4/23/90			
	Operation Permit					

ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 52FTM500016

To: **Facility ID No.:** 0990016

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., allows Title V Sources to operate under valid permits that were in effect at the time of application until the Title V permit becomes effective}