

**Golder Associates Inc.**

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June 15, 2009

0838-7514

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

**RECEIVED**

JUN 16 2009

Attention: Ms. Trina Vielhauer, Chief, Bureau of Air Regulations

BUREAU OF AIR REGULATION

**RE: DEP FILE NO. 0990026-014-AC  
BEST AVAILABLE RETROFIT TECHNOLOGY PROJECT  
SUGAR CANE GROWERS COOPERATIVE OF FLORIDA  
GLADES SUGAR HOUSE  
REQUEST TO WITHDRAW BART APPLICATION**

Dear Ms. Vielhauer:

In January 2007, Golder Associates, Inc. (Golder) submitted a visibility source attribution analysis report to the Florida Department of Environmental Protection (FDEP) for the Sugar Cane Growers Cooperative of Florida (SCGCF) Belle Glade sugar mill. The purpose of the analysis was to determine whether the Belle Glade facility was exempt from the Best Available Retrofit Technology (BART) requirements based on the visibility modeling results. The analysis found that the maximum 8th-highest visibility impact due to the BART-eligible source exceeded the BART exemption criteria of 0.5 deciview (dv) at the nearest Class I area. As a result, a determination was made that the Belle Glade facility is subject to BART requirements and the BART-eligible emissions units at the facility are subject to a BART determination.

A BART control analysis was submitted to FDEP in January of 2008. It was subsequently discovered, however, that an error had occurred in the original modeling analysis, and based on the revised modeling results, the Belle Glade facility was indeed exempt from the BART requirements. This revised BART modeling analysis was submitted to FDEP by Golder in January 2009.

Based on a letter dated May 10, 2009 from FDEP, the SCGCF Belle Glade facility has been determined to be exempt from BART. As a result, SCGCF requests to withdraw the application for a BART determination submitted in January 2008 to satisfy the requirements of the BART rule (62-296.340, Florida Administrative Code).

Thank you for consideration of this request. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

**GOLDER ASSOCIATES INC.**

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

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

SKM/DB/tz

cc: K. Lockhart, SCGCF  
J. Alvarez, SCGCF  
T. Rogers, FDEP

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