

Golder Associates Inc.

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September 13, 2006

0637604

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

RECEIVED

SEP 14 2006

BUREAU OF AIR REGULATION

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.

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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