

Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

March 22, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Rebecca M. Peterson
Solutia Inc.
P. O. Box 97
Gonzalez, FL 32560-0097

Re: Adipic Controls Modernization Project/Title V Permit No. 0330040-002-AV

Dear Ms. Peterson:

The Department received your letter dated March 10, 2004 requesting "concurrence" with Solutia's proposal to replace about two-thirds of the controls for the Adipic Acid Plant at the Pensacola facility as a routine replacement. It is stated that the new control system will increase efficiency while reducing energy usage and waste production. Solutia denies that there will be any increase in production or emissions associated with the increase in efficiency. Solutia believes that the project should be exempted from permitting requirements as a non-modification.

The Department makes determinations of routine replacement exemptions on a case by case basis. This project could conceivably be viewed as a large-scale optimization project vs. the routine replacement of individual control instruments that cease to be functional. Viewed this way, this project could be subject to permitting requirements as a minor modification if the optimization results in an increase in actual emissions (via higher production resulting from increased efficiency). Consequently, the Department needs clarification on the nature of and the amount of the efficiency increase (extent of optimization) and why the efficiency increase will not result in more production and emissions. To resolve these concerns, the following information is requested:

1. Estimates of the actual efficiency increase and the energy and waste reductions.
2. Estimate of the potential increase in production associated with No. 1 above.
3. Estimate of the potential increase in actual emissions associated with No. 2 above.

If you have any questions, please call John Reynolds at 850/921-9530.

Sincerely,

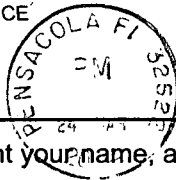
James K. Pennington, P.E.
Administrator
North Permitting Section

cc: Sandra Veazy, DEP NWD
Kennard Kosky, P.E.

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DIVISION OF AIR RESOURCES MANAGEMENT
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TALLAHASSEE, FLORIDA 32399-2400

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 Ms. Rebecca M. Peterson

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1. Article Addressed to:
 Ms. Rebecca M. Peterson
 Solutia Inc.
 P.O. Box 97
 Gonzalez, Florida 32560-0097

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 x *Becky Zepp* Agent Addressee

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<p>1. Article Addressed to: Ms. Rebecca M. Peterson Solutia, Inc. P.O. Box 97 Gonzalez, Florida 32560-0097</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
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