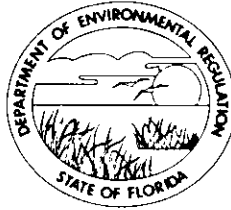


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

July 29, 1987

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Hudson C. Smith
General Manager
Occidental Chemical Agricultural
Products, Inc.
Post Office Box 300
White Springs, Florida 32096

Dear Mr. Smith:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits to modify the C and D sulfuric acid plants located at the existing Suwannee River Chemical Complex (SRCC), in White Springs, Hamilton County, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/bm

Attachments

cc: J. B. Koogler, Ph.D., P.E.
B. Stewart, NE Dist.
Wayne Aronson
Miguel Flores

P 274 007 717

RECEIPT FOR CERTIFIED MAIL

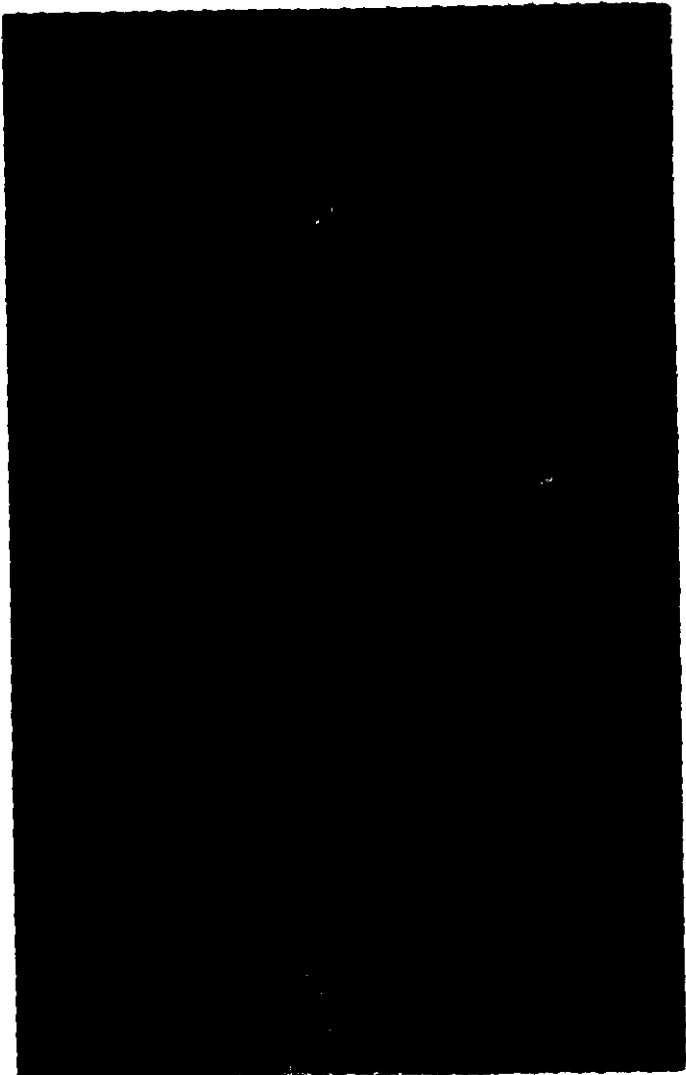
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1985-480-794

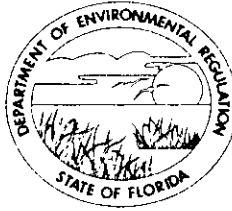
PS Form 3800, June 1985

Sent to Hudson C. Smith, Gen. Mgr	
Occidental Chem. Agr. Prod.,	
Street and No Inc.	
P.O. Box 300	
P.O. State and ZIP Code	
White Springs, FL 32096	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
Mailed 07/31/87	
Permits: AC 24-131270	
AC 24-131271	



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue permits to Occidental Chemical Agricultural Products, Inc., to modify the existing C and D plants at the existing Suwannee River Chemical Complex (SRCC), located in White Springs, Hamilton County, Florida. The project will involve an increase in the acid production of C and D plants from 1800 tons per day (TPD) to 2000 TPD (each plant) and a reduction in the production of acid on the older A and B plants from 1000 TPD to 800 TPD (each plant). Piping size changes, if required, would be the only physical change associated with this modification. A determination of best available control technology (BACT) or lowest achievable emission rate (LAER) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

Occidental Chemical Agricultural
Products, Inc.
July 27, 1987
Page 2

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

Preliminary Determination
and
Technical Evaluation

Occidental Chemical Agricultural Products Inc.
Suwannee River Chemical Complex
White Springs, Hamilton County, Florida

Sulfuric Acid Plants C and D
Permit Nos. AC 24-131270, 131271

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

July 27, 1987

I. Application

A. Applicant

Occidental Chemical Agricultural Products Inc.
P. O. Box 300
White Springs, Florida 32096

B. Project and Location

The applicant proposes to modify the existing facility by increasing the sulfuric acid production capacity of the C and D plants at the permittee's Suwannee River Chemical Complex (SRCC) located in White Springs, Hamilton County, Florida. The project will involve an increase in the acid production of C and D plants from 1800 tons per day (TPD) to 2000 TPD (each plant) and a reduction in the production of acid on the older A and B plants from 1000 TPD to 800 TPD (each plant). Piping size changes, if required, would be the only physical change associated with this modification.

The UTM coordinates of this facility are zone 17, 328.3 km East and 3368.8 km North.

C. Sources Reviewed

The four sources reviewed in this technical evaluation will be the A, B, C, and D Sulfuric Acid Plants located at SRCC.

Occidental applied for the modification of their current permit on February 25, 1987. The application was deemed complete on July 1, 1987.

D. Facility Category

Occidental's SRCC is classified under the Standard Industrial Classification (SIC) Code as group No. 20, Chemical and Allied Products, and Industry No. 2819, Sulfuric Acid Contact Process. The facility is also classified as a major one in accordance with Table 500-1 in Chapter 17-2 of the Florida Administrative Code (FAC).

II. Project Description

A. Project

Sulfuric acid is manufactured as an intermediate product in the manufacture of phosphoric acid. The A and B sulfuric acid plants installed originally are based on a single contact process whereas the C and D plants, built more recently, are based on double contact process. Through this modification, Occidental hopes to transfer part of the acid production capacity of the older A and B plants to the newer C and D plants. The reduction

in A and B plants' acid production will correspond to the increases in the C and D plants' production rates (netting out emissions). Both C and D plants are currently permitted under the Standards of Performance for New Stationary Sources (NSPS), 40 CFR 60, Subpart H. The modified emission limits on A and B plants will be incorporated into the permit modification for C and D plants so as to ensure federal enforceability.

The net emission increase due to this project will be 33 TPY for SO₂ (40 TPY significant emission level) and 0.8 TPY for acid mist (7 TPY significant emission level).

B. Operating Hours and Rates

The maximum operating hours and rates will be:

Sulfuric Acid Plant	TPD (100% Acid)	Annual Operating Hours
A	800	8520
B	800	8520
C	2000	8520
D	2000	8520

Note: TPD = Tons per day.

III. Rule Applicability

The proposed modified project will emit the pollutants sulfur dioxide (SO₂) and sulfuric acid mist and is subject to a preconstruction review in accordance with Chapters 17-2 and 17-4 of the Florida Administrative Code (FAC) and Chapter 403 of the Florida Statutes.

The facility is located in Hamilton County, an area designated as attainment for all pollutants, in accordance with Rule 17-2.420, FAC. The proposed modification will not be subject to Prevention of Significant Deterioration (PSD) Review Requirements since there is no net significant increase in the pollutants emitted (See Table 500-2) in accordance with Rule 17-2.500(2)(d)4., FAC.

The project will be subject to Rule 17-2.520, FAC, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

Sulfuric acid plants A and B will be subject to Source Specific Emission Limiting Standards in accordance with Rule 17-2.600(2)(a), FAC, as existing sulfuric acid plants. The standards limit SO₂ emissions to 29 lbs/ton of acid (100% acid), acid mist to 0.5 lb/ton acid (100% acid) and visible emissions (VE) to 10% opacity.

Plants C and D, already permitted under 40 CFR 60, Subpart H, NSPS for sulfuric acid plants, will be limited to emissions of SO₂ at 4 lbs/ton of acid produced (100% acid), acid mist at 0.14 lb/ton acid (100% acid) and VE at 10% opacity. The tighter limit on acid mist emissions (as compared to the standard of 0.15 lb/ton acid) is proposed to ensure a net increase in permitted annual emissions to less than significant levels.

Compliance procedures currently observed will continue to be in effect. However, an initial compliance test will be required to show that the C and D acid plants can comply with the emission limiting standards at the higher operating rates. EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources, in accordance with 40 CFR 60, Appendix A, will be required to determine compliance with the VE limits. Determination of compliance with SO₂ and acid mist limits will be as described in 40 CFR 60, Subpart H.

IV. Source Impact Analysis

A. Emission Limitations

Emissions from the following sources shall not exceed:

Acid Plant	lb/T*	SO ₂		Acid Mist		VE
		TPY	lb/T*	TPY	% opacity	
A	29	4118	0.5	70	10	
B	29	4118	0.5	70	10	
C	4	1420	0.14	50	10	
D	4	1420	0.14	50	10	

* Based on 100% sulfuric acid.

The net emissions increase due to this project will be:

- o 33 TPY for SO₂ (significant emission level is 40 TPY)
- o 0.8 TPY for acid mist (significant emission level is 7 TPY)

B. Ambient Air Analysis

The Department has evaluated the ambient air impacts associated with the proposed emission changes at the Occidental facility. Short-term emission increases will occur at the C and D sulfuric acid plants and short-term emission decreases will occur at the A and B sulfuric acid plants. The A and B emission decreases are occurring through shorter stacks than the C and D increases, but the emission characteristics of the C and D plants have a lower plume-rise. These offsetting effects were analyzed using an air quality dispersion model (the Industrial Source Complex Short-Term (ISCST) model) to determine the net result. The results indicate changes less than 1 ug/m³ for all averaging periods. Based on this modeling, the Department is satisfied that the emission changes will result in an insignificant difference (positive for short-term averages and

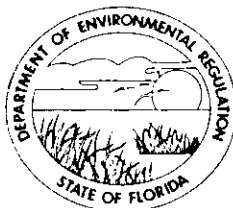
negative for long-term averages) in projected ambient SO₂ concentration levels.

V. Conclusion

Based on the information submitted by Occidental, the Department has reasonable assurance that the changes in the operating rates of the A, B, C and D sulfuric acid plants at the SRCC, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of an ambient air quality standard or PSD increment, or any other provisions of Chapter 17-2, FAC.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.
P. O. Box 300
White Springs, Florida 32096

Permit Number: AC 24-131270
Expiration Date: July 1, 1988
County: Hamilton
Latitude/Longitude: 30° 26' 27"N/
82° 47' 16"W
Project: Sulfuric Acid Plant "D"

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the existing Sulfuric Acid Plant D by increasing the production capacity from 1800 TPD (tons per day) to 2000 TPD.

Construction shall be in accordance with the permit application and plans, documents and reference literature submitted unless otherwise stated in the General and Specific Conditions herein.

Attachments:

1. Occidental's application package dated February 25, 1987.
2. DER's letter of incompleteness dated March 25, 1987.
3. Occidental's response dated March 30, 1987.
4. Occidental's additional information dated April 17, 1987.
5. DER's letter dated May 14, 1987.
6. Occidental's response dated June 30, 1987.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131270
Expiration Date: July 1, 1988

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131270
Expiration Date: July 1, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

-8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131270
Expiration Date: July 1, 1988

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131270
Expiration Date: July 1, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

For Sulfuric Acid Plant "D"

1. The maximum production rate shall not exceed 2000 TPD (tons per day) based on 100% H₂SO₄.
2. The maximum annual operating hours shall not exceed 8520 (355 days/yr).

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131270
Expiration Date: July 1, 1988

SPECIFIC CONDITIONS:

3. Sulfur dioxide (SO₂) emissions shall not exceed:
 - a. 4 lb/ton of 100% H₂SO₄ produced
 - b. 334 lbs/hr
 - c. 1420 TPY (tons per year)
4. Sulfuric acid mist emissions shall not exceed:
 - a. 0.14 lb/ton of 100% H₂SO₄ produced
 - b. 12 lbs/hr
 - c. 50 TPY
5. Visible emissions shall not exceed 10% opacity.
6. The permittee shall comply with all the requirements of 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants.
7. Compliance tests shall be carried out in accordance with 40 CFR 60, Subpart H. The DER shall be notified 30 days in advance of the tests. Initial compliance tests shall be conducted for acid mist, SO₂, and visible emissions to determine compliance with the standards. Performance tests for nitrogen oxides to determine emissions shall be requested by DER when deemed necessary.
8. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (Rule 17-4, FAC)

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-4, FAC).

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131270
Expiration Date: July 1, 1988

SPECIFIC CONDITIONS:

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4, FAC)

9. Any change in the method of operation, equipment, or operating hours shall be submitted for approval to the Department's District office.

10. This permit shall replace previous permit(s) issued for Occidental's Sulfuric Acid Plant "D".

11. Sulfuric Acid Plants A and B shall each be restricted to the following:

- a. Maximum annual operating hours of 8520 (355 days)
- b. Maximum production rate of 800 TPD (100% H₂SO₄)
- c. SO₂ emissions not to exceed:
 - i) 29 lbs/ton of 100% H₂SO₄ produced
 - ii) 4118 TPY
- d. Sulfuric acid mist emissions not to exceed:
 - i) 0.5 lb/ton of 100% H₂SO₄ produced
 - ii) 71 TPY
- e. Visible emissions not to exceed 10% opacity

The current operating permit for A and B plants shall be amended to reflect the restrictions on the operating parameters.

12. When a start-up involving more than one acid plant occurs, a second (sequent) plant shall not be started up until the first (prior) plant is started and in compliance.

The permittee shall take all reasonable precautions possible to avoid violations of ambient air impacts during plant start-ups.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131270
Expiration Date: July 1, 1988

SPECIFIC CONDITIONS:

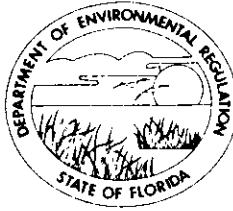
Issued this _____ day of _____, 19____

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.
P. O. Box 300
White Springs, Florida 32096

Permit Number: AC 24-131271
Expiration Date: July 1, 1988
County: Hamilton
Latitude/Longitude: 30° 26' 27"N/
82° 47' 16"W
Project: Sulfuric Acid Plant "C"

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the existing Sulfuric Acid Plant C by increasing the production capacity from 1800 TPD (tons per day) to 2000 TPD.

Construction shall be in accordance with the permit application and plans, documents and reference literature submitted unless otherwise stated in the General and Specific Conditions herein.

Attachments:

1. Occidental's application package dated February 25, 1987.
2. DER's letter of incompleteness dated March 25, 1987.
3. Occidental's response dated March 30, 1987.
4. Occidental's additional information dated April 17, 1987.
5. DER's letter dated May 14, 1987.
6. Occidental's response dated June 30, 1987.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131271
Expiration Date: July 1, 1988

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131271
Expiration Date: July 1, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131271
Expiration Date: July 1, 1988

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131271
Expiration Date: July 1, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

For Sulfuric Acid Plant "C"

1. The maximum production rate shall not exceed 2000 TPD (tons per day) based on 100% H₂SO₄.
2. The maximum annual operating hours shall not exceed 8520 (355 days/yr).

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131271
Expiration Date: July 1, 1988

SPECIFIC CONDITIONS:

3. Sulfur dioxide (SO₂) emissions shall not exceed:
 - a. 4 lb/ton of 100% H₂SO₄ produced
 - b. 334 lbs/hr
 - c. 1420 TPY (tons per year)
4. Sulfuric acid mist emissions shall not exceed:
 - a. 0.14 lb/ton of 100% H₂SO₄ produced
 - b. 12 lbs/hr
 - c. 50 TPY
5. Visible emissions shall not exceed 10% opacity.
6. The permittee shall comply with all the requirements of 40 CFR 60 Subpart H, Standards of Performance for Sulfuric Acid Plants.
7. Compliance tests shall be carried out in accordance with 40 CFR 60, Subpart H. The DER shall be notified 30 days in advance of the tests. Initial compliance tests shall be conducted for acid mist, SO₂, and visible emissions to determine compliance with the standards. Performance tests for nitrogen oxides to determine emissions shall be requested by DER when deemed necessary.
8. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (Rule 17-4, FAC)

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-4, FAC).

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131271
Expiration Date: July 1, 1988

SPECIFIC CONDITIONS:

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4, FAC)

9. Any change in the method of operation, equipment, or operating hours shall be submitted for approval to the Department's District office.

10. This permit shall replace previous permit(s) issued for Occidental's Sulfuric Acid Plant "C".

11. Sulfuric Acid Plants A and B shall each be restricted to the following:

- a. Maximum annual operating hours of 8520 (355 days)
- b. Maximum production rate of 800 TPD (100% H₂SO₄)
- c. SO₂ emissions not to exceed:
 - i) 29 lbs/ton of 100% H₂SO₄ produced
 - ii) 4118 TPY
- d. Sulfuric acid mist emissions not to exceed:
 - i) 0.5 lb/ton of 100% H₂SO₄ produced
 - ii) 71 TPY
- e. Visible emissions not to exceed 10% opacity

The current operating permit for A and B plants shall be amended to reflect the restrictions on the operating parameters.

12. When a start-up involving more than one acid plant occurs, a second (sequent) plant shall not be started up until the first (prior) plant is started and in compliance.

The permittee shall take all reasonable precautions possible to avoid violations of ambient air impacts during plant start-ups.

PERMITTEE:
Occidental Chemical Agricultural
Products, Inc.

Permit Number: AC 24-131271
Expiration Date: July 1, 1988

SPECIFIC CONDITIONS:

Issued this ____ day of ____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Applications for Permits by:

Occidental Chemical Agricultural
Products, Inc.
Post Office Box 300
White Springs, Florida 32096

DER File Nos. AC 24-131270
AC 24-131271

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits (copies attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Occidental Chemical Agricultural Products, Inc., applied on February 27, 1987, to the Department of Environmental Regulation for the purpose of modifying their C and D sulfuric acid plants located at their existing Suwannee River Chemical Complex (SRCC), in White Springs, Hamilton County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits were needed for the proposed work.

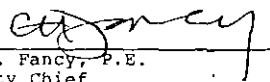
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, PAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

J. B. Koogler, Ph.D., P.E.
B. Stewart, NE Dist.
Wayne Aronson, EPA
Miguel Flores, NPS

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on July 31, 1987.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Hoggin V. Jones
Clerk

7/31/87
Date