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DER

MAR 31 1987

BAQM

OCCIDENTAL CHEMICAL COMPANY, FLORIDA OPERATIONS, Post Office Box 300, White Springs, Florida 32092 Telephone 904 397-8101

March 30, 1987

Mr. C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32301-8241

3-31-87  
I have cc'd Proderp  
& Bill Stewart (NE Dist)  
Bum

Re: Application Nos. AC24-131270 and 131271

Dear Mr. Fancy:

We received your letter requesting additional information regarding the above referenced applications. It is presumed that the purpose of this request is to establish an "actual emission" base for sulfuric acid plants "A","B","C" and "D". Occidental would like to point out that the Department has the authority under 40 CFR51.165 (a)(1)(xii)(C) and Rule 17-2.100(2)(b), FAC (copies attached) to "presume that source-specific federally enforceable allowable emissions for a source are equivalent to the actual emissions of the source." This is the presumption that Occidental made when calculating sulfur dioxide, acid mist and nitrogen oxide emission rate increases and decreases for the "A","B","C" and "D" sulfuric acid plants included in the construction permit applications submitted to the Department for the rate increases for the C and D plants and the rate decreases for the A and B plants.

The emission rates from these plants are federally enforceable because they have all been included in PSD construction permits. The C and D plants were constructed under a federally issued PSD construction permit and the emission rates for the A and B plants were included in the air quality review for this construction permit. Subsequent to that time the emission rates of all four sulfuric acid plants have been included in PSD construction permits for the construction of Occidental's Swift Creek Chemical Complex, for a rate increase for the E and F sulfuric acid plants at Swift Creek and for a fuels switch at the Suwannee River Chemical Complex.

Page 2  
March 30, 1987

In view of the above, Occidental is of the opinion that the 1982-1986 operating records for the "A", "B", "C", and "D" sulfuric acid plants requested by the Department should have no bearing on the rate increases/decreases requested for these four plants. In spite of its opinion, Occidental is submitting the requested operating records for the Department's review. The requested information (operating hours, rates and acid mist) has been taken from Annual Reports that Occidental has submitted to the Department and is summarized in the attached table.

The following responds by item number to specific items 1 through 4.

Item 1. Checks payable to FDER in the amount of \$900 each to cover the applications fees.

Item 2. See Table I, Summary of Annual Operating Rates (1) "A", "B", "C" and "D" sulfuric acid plants, Occidental Chemical Ag Products, Inc. Suwannee River Chemical Complex 1982 - 1986.

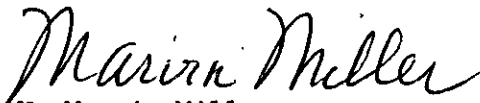
Item 3. No physical changes to the plants are anticipated. The only modification is the addition of 11,000 liters of catalyst to the existing beds.

Item 4. The latitude and longitude of the plants are:

Latitude	30°	26'	27" N
Longitude	82°	47'	16" W

If you have further questions or need additional information, please contact our office.

Sincerely,



W. Marvin Miller  
Environmental Coordinator

WMM/psb

enclosures

cc: Pradeep Ravel, FDER - Tallahassee, FL  
Larry George, FDER - Tallahassee, FL  
Bill Stewart, FDER - Jax, FL 3-31-87 BRM

SUMMARY OF ANNUAL OPERATING RATES (1)  
 "A", "B", "C" AND "D" SULFURIC ACID PLANTS  
 OCCIDENTAL CHEMICAL AGRICULTURAL PRODUCTS, INC.  
 SUWANNEE RIVER CHEMICAL COMPLEX 1982 - 1986

YEAR	RATES	SRCC Sulfuric Acid Plants			
		"A"	"B"	"C"	"D"
1986	Operating Hours	8,467	8,366	8,350	7,375
	Rate (TPD)	949	949	1,820	1,820
	Actual Emissions				
	SO <sub>2</sub> (TPY)	4,316	4,000	1,137	973
	Miŝt (TPY)	22	28	22	14
1985	Operating Hours	4,697	6,496	7,612	8,279
	Rate (TPD)	977	976	1,817	1,817
	Actual Emissions				
	SO <sub>2</sub> (TPY)	2,511	3,318	1,098	1,219
	Miŝt (TPY)	18	27	20	16
1984	Operating Hours	7,841	8,434	7,997	7,862
	Rate (TPD)	950	957	1,856	1,858
	Actual Emissions				
	SO <sub>2</sub> (TPY)	4,099	3,689	1,073	1,220
	Miŝt	43	27	31	21
1983	Operating Hours	3,377	3,326	6,233	7,106
	Rate (TPD)	910	913	1,581	1,583
	Actual Emissions				
	SO <sub>2</sub> (TPY)	1,754	1,472	719	830
	Miŝt (TPY)	8	18	16	19
1982	Operating Hours	7,762	7,980	8,383	8,450
	Rate (TPD)	856	860	1,428	1,261
	SO <sub>2</sub> (TPY)	3,795	3,168	816	832
	Miŝt (TPY)	17	46	10	22

(1) From Annual Reports submitted to FDER by Occidental.

(1) Any increase in actual emissions from a particular physical change or change in the method of operation at a stationary source; and

(2) Any other increases and decreases in actual emissions at the source that are contemporaneous with the particular change and are otherwise creditable.

(B) An increase or decrease in actual emissions is contemporaneous with the increase from the particular change only if it occurs before the date that the increase from the particular change occurs;

(C) An increase or decrease in actual emissions is creditable only if:

(1) It occurs within a reasonable period to be specified by the reviewing authority; and

(2) The reviewing authority has not relied on it in issuing a permit for the source under regulations approved pursuant to this section which permit is in effect when the increase in actual emissions from the particular change occurs.

(D) An increase in actual emissions is creditable only to the extent that the new level of actual emissions exceeds the old level.

(E) A decrease in actual emissions is creditable only to the extent that:

(1) The old level of actual emission or the old level of allowable emissions whichever is lower, exceeds the new level of actual emissions;

(2) It is federally enforceable at and after the time that actual construction on the particular change begins; and

(3) The reviewing authority has not relied on it in issuing any permit under regulations approved pursuant to 40 CFR Part 51 Subpart I or the state has not relied on it in demonstrating attainment or reasonable further progress;

(4) It has approximately the same qualitative significance for public health and welfare as that attributed to the increase from the particular change.

(F) An increase that results from a physical change at a source occurs when the emissions unit on which construction occurred becomes operational and begins to emit a particular pollutant. Any replacement unit that requires shakedown becomes operational only after a reasonable shakedown period, not to exceed 180 days.

(vii) "Emissions unit" means any part of a stationary source which emits or

would have the potential to emit any pollutant subject to regulation under the Act.

(viii) "Secondary emissions" means emissions which would occur as a result of the construction or operation of a major stationary source or major modification, but do not come from the major stationary source or major modification itself. For the purpose of this section, secondary emissions must be specific, well defined, quantifiable, and impact the same general area as the stationary source or modification which causes the secondary emissions.

Secondary emissions include emissions from any offsite support facility which would not be constructed or increase its emissions except as a result of the construction or operation of the major stationary source of major modification. Secondary emissions do not include any emissions which come directly from a mobile source such as emissions from the tailpipe of a motor vehicle, from a train, or from a vessel.

(ix) "Fugitive emissions" means those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening.

(x) "Significant" means, in reference to a net emissions increase or the potential of a source to emit any of the following pollutants, a rate of emissions that would equal or exceed any of the following rates:

*Pollutant Emissions Rate*

Carbon monoxide: 100 tons per year (tpy)

Nitrogen oxides: 40 tpy

Sulfur dioxide: 40 tpy

Particulate matter: 25 tpy

Ozone: 40 tpy of volatile organic compounds

Lead: 0.6 tpy

(xi) "Allowable emissions" means the emissions rate of a stationary source calculated using the maximum rated capacity of the source (unless the source is subject to federally enforceable limits which restrict the operating rate, or hours of operation, or both) and the most stringent of the following:

(A) The applicable standards set forth in 40 CFR Part 60 or 61;

(B) Any applicable State Implementation Plan emissions limitation including those with a future compliance date; or

(C) The emissions rate specified as a federally enforceable permit condition, including those with a future compliance date.

(xii)(A) "Actual emissions" means the actual rate of emissions of a pollutant from an emissions unit as determined in accordance with paragraphs (a)(1)(xii) (B) through (D) of this section.

(B) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the unit actually emitted the pollutant during a two-year period which precedes the particular date and which is representative of normal source operation. The reviewing authority shall allow the use of a different time period upon a determination that it is more representative of normal source operation. Actual emissions shall be calculated using the unit's actual operating hours, production rates, and types of materials processed, stored, or combusted during the selected time period.

(C) The reviewing authority may presume that the source-specific allowable emissions for the unit are equivalent to the actual emissions of the unit.

(D) For any emissions unit which has not begun normal operations on the particular date, actual emissions shall equal the potential to emit of the unit on that date.

(xiii) "Lowest achievable emission rate" means, for any source, the more stringent rate of emissions based on the following:

(A) The most stringent emissions limitation which is contained in the implementation plan of any State for such class or category of stationary source, unless the owner or operator of the proposed stationary source demonstrates that such limitations are not achievable; or

(B) The most stringent emissions limitation which is achieved in practice by such class or category of stationary sources. This limitation, when applied to a modification, means the lowest achievable emissions rate for the new or modified emissions units within or stationary source. In no event shall the application of the term permit a proposed new or modified stationary source to emit any pollutant in excess of the amount allowable under an applicable new source standard of performance.

(xiv) "Federally enforceable" means all limitations and conditions which are enforceable by the Administrator,

## PART I: DEFINITIONS

**17-2.100 Definitions.** The following words and phrases when used in this chapter shall, unless content clearly indicates otherwise, have the following meanings:

(1) "Acid Mist" - Liquid drops of any size of any acid including but not limited to sulfuric acid and sulfur trioxide, hydrochloric acid and nitric acid as measured by test methods approved by the Department.

(2) "Actual Emissions" - The actual rate of emission of a pollutant from a source as determined in accordance with the following provisions:

(a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the source actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the source.

The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the source. Actual emissions shall be calculated using the source's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

(b) The Department may presume that source specific federally enforceable allowable emissions for a source are equivalent to the actual emissions of the source.

(c) For a source which has not completed start-up and testing on a particular date, actual emissions shall equal the potential emissions of the source on that date.

(3) "Administrator" - The Administrator of the United States Environmental Protection Agency or the Administrator's designee.

(4) "Adverse Impact on Visibility" - An impairment to visibility which interferes with the management, protection, preservation, or enjoyment of the visitor's visual experience of a Federal Class I area. This determination shall be made on a case-by-case basis, utilizing EPA-approved methods of visibility impairment analysis, if available, and taking into account such factors as the geographic extent, intensity, duration, frequency, and time of visibility impairments, and how these factors correlate with the times of visitor use of the Federal Class I area and the frequency and timing of natural conditions that reduce visibility.

(5) "Affected Pollutant" - In a nonattainment area or area of influence the pollutant for which the area is designated nonattainment is the affected pollutant except in the case of ozone nonattainment areas where the affected pollutant is volatile organic compounds (VOC).

McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW

APRIL 1, 1987

ISSUES:

- 1) Heater Treater Firing Time
- 2) Heater Treater Capacity
- 3) Flare Operation
- 4) Exclusion of  $\text{NO}_x$ , VOC, CO and PM in Flare Emissions
- 5) Basis for 95% Loading of Engines
- 6) Engine Emission Factors
- 7) Fuel Consumption Estimate
- 8) BTU Content of Fuel Gas
- 9) Heater Treater Specific Gravity Estimate
- 10) Fugitive Emission Calculation Method
- 11)  $\text{SO}_2$  Emission Factor for Engines
- 12) Exclusion of Methane and Ethane from Emission Calculations

McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW

FLORIDA DER ISSUE #1

Heater Treater Firing Time

REPLY

- McLellan field*
- Minimum amount of freewater produced (500 barrels/day = maximum)
  - Required heating temperature is low due to higher ambient temperature
  - Inlet emulsion heat exchanger increases heating efficiency
  - Turbulator deflects heat from flame to walls of firetube, which increases efficiency 8-10%
  - Most heater treaters in our operations are fired a maximum of 12 hrs/day

CONCLUSION

- 12 hours/day runtime for the heater treater is a good estimate

**McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW**

**FLORIDA DER ISSUE #2**

Heater Treater Capacity

**REPLY**

- Rates quoted on manufacturer's data are general guidelines
- Since low levels of water will be produced (500 barrels/day maximum), more oil can be treated effectively
- If heater treater does not function effectively, separator will be converted to a three-phase separator

**CONCLUSION**

- Heater treater selected in facility design is satisfactory



**McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW**

**FLORIDA DER ISSUE #3**

Flare Operation

**REPLY**

- No steam goes to flare
- Flare is smokeless, self-aspirating

**CONCLUSION**

- Opacity limit (20%) will be met under normal operating conditions

**McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW**

**FLORIDA DER ISSUE #4**

Exclusion of NO<sub>x</sub>, VOC, CO and PM in Flare Emissions

**REPLY**

- Flare efficiency assumed to be approximately 100% with a gas heat value of at least 1000 BTU/FT<sup>3</sup>
- NO<sub>x</sub>\*: Formation of NO<sub>x</sub> is insignificant in a temperature range of 1000°F to 1600°F
- VOC: VOC emissions are negligible, with 100% combustion efficiency
- CO\*: At combustion efficiencies greater than 98%, CO emissions are negligible
- PM\*: Natural gas burns very clean, and particulate emissions are negligible

\*There is no method to calculate NO<sub>x</sub>, CO and PM emissions for flares

**CONCLUSION**

- NO<sub>x</sub>, VOC, CO and PM emissions can be excluded from flare emission calculations

**McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW**

**FLORIDA DER ISSUE #5**

Basis for 95% Loading of Engines

**REPLY**

- Larger horsepower engines than are actually needed have been selected
- 95% loading reduces operating costs and maintenance costs

**CONCLUSION**

- 95% loading on all engines is a conservative assumption

**McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW**

**FLORIDA DER ISSUE #6**

Engine Emission Factors

**REPLY**

- Engine emission factors represent total hydrocarbons (see Footnote AP-42; Table 3.3.2-1)

**CONCLUSION**

- Emission factors used for engines are correct

**McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW**

**FLORIDA DER ISSUE #7**

Fuel Consumption Estimate

**REPLY**

- 7500 BTU/hp·hr is an estimate of average fuel consumption assuming approximately 30% efficiency

**CONCLUSION**

- 7500 BTU/hp·hr is a conservative estimate for the average fuel consumption of an engine

McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW

FLORIDA DER ISSUE #8

BTU Content of Fuel Gas

REPLY

- BTU content given in the application was from an analysis run during the first 33-1 production test (4/18/86)
- The latest gas analysis composition (10/9/86) is given in the application
- The wet BTU content of the latest analysis = 1006.53 BTU/FT<sup>3</sup>

CONCLUSION

- The BTU content in the application can be changed from 1161.98 BTU/FT<sup>3</sup> to 1006.53 BTU/FT<sup>3</sup>

**McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW**

**FLORIDA DER ISSUE #9**

Heater Treater Specific Gravity Estimate

**REPLY**

- Heater treater specific gravity = .95 is a representative value calculated from field data
- Stock tank specific = 1.1465 and separator specific gravity = .7854; .95 is an estimate of heater treater specific gravity

**CONCLUSION**

- Use .95 as heater treater specific gravity until gas analysis can be obtained after construction of facility

McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW

FLORIDA DER ISSUE #10

Fugitive Emission Calculation Method

REPLY

- Approximate method of calculating fugitive emissions from API #4322 was used since no other method was available
- Onshore facility emission factors are estimates derived from individual equipment factors

CONCLUSION

- Use approximate fugitive emission calculation for construction application



**McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW**

**FLORIDA DER ISSUE #11**

SO<sub>2</sub> Emission Factor for Engines

**REPLY**

- Calculations of SO<sub>2</sub> emission factor for engines are one decimal place off

**CONCLUSION**

- Change SO<sub>2</sub> emission factor for engines from .000125 to .0000125 (LB/hp·hr)

McLELLAN FIELD DEVELOPMENT  
FLORIDA DER AIR PERMIT REVIEW

FLORIDA DER ISSUE #12

Exclusion of Methane and Ethane from Emission Calculations

REPLY

- Federal Register, Volume 42, July 1977 states that methane and ethane have negligible photochemical reactivity in forming oxidants and, therefore, should not be inventoried or controlled by state implementation plans  
510(2)(a) 2.210(permits) VOC 100(209) + (7)
- Preconstruction review requirements (FDER Regulations) require the owner/operator of a new facility to demonstrate that federally enforceable allowable emissions will not violate any ambient air quality standard. Methane and ethane are not federally enforceable emissions
- Under Table 500-2 (FDER Regulations), ozone is defined as a "regulated air pollutant". Methane and ethane do not form ozone (according to the EPA) and, therefore, should not be regulated
- Previous air permits approved by the FDER did not include methane and ethane emissions. New FDER regulations stating methane and ethane emissions will now be inventoried have not been sent to us

CONCLUSION

It is not necessary to include methane and ethane emissions in the permit application



Ask EXXON Retailer for map of ALA-GA.

MAP CONTINUED ABOVE

# GULF OF MEXIC

## Points of Interest

When seeking diversion close to home or en route, look on the map for these red number symbols ①. Corresponding numbers below describe these attractions. Admission free unless noted and frequently reduced for children. Facts were up-to-date at publication but are subject to change. Other points of interest are located by ● or ○ and principal public recreation areas by † (see chart for facilities).

## Principal Public Recreation Areas

RED symbols on the map shown thus † locate principal recreation areas that are listed below. Facts were up-to-date at publication but are subject to change.

- **PENSACOLA (C-6)**. Self-guided tours of U.S. Naval Air Station daily 9-5. On grounds is Naval Aviation Museum. Near tip of Santa Rosa Island is Fort Pickens, a coastal defense relic (1834), part of Gulf Islands Nat. Seashore, which preserves a trip of coastal islands. Auto fee \$1. In city enter a marked auto route passes sites in 10 Historical Districts.
- **GULFARIUM (D-6)**. Porpoise, sea lion and "living sea" shows, marine life exhibits. Daily 9-dusk. \$3.
- **GULF WORLD (F-6)**. Native Gulf sea life and a coral reef with tropical fish can be observed in windowed tanks. Underwater shows, trained porpoise and sea lion acts. Daily March-Oct. Fee.
- **FLORIDA CAVERNS STATE PARK (B-1)**. Guided tours of underground caverns are given daily. Tour, \$1.56. Swimming in Blue Hole Springs. Park open daily 8-5.

- **CITRUS TOWER (J-6)**. Offers panoramic view of citrus-growing area from top. Elevator. Daily. \$1.50.
- **WALT DISNEY WORLD (J-6)**. Highlighted by "Magic Kingdom" entertainment complex which includes six theme lands: Main Street, U.S.A., Adventureland, Frontierland, Liberty Square, Fantasyland and Tomorrowland; Space Mountain. Daily 9-7, to 1 a.m. in summer. Fee.
- **ORLANDO (K-5)**. Family entertainment centered around performing dolphin, penguin, whale and seal shows at Sea World of Florida; Japanese village, marine life exhibits, animal petting areas. Daily 9-6, to 8 in summer. \$5.50.  
About 180 re-created performers in 100 memorable movie and TV scenes in Stars Hall of Fame nearby. Open daily. \$3.95.  
Orlando is a lovely resort city noted for its parks and 54 lakes within city limits.

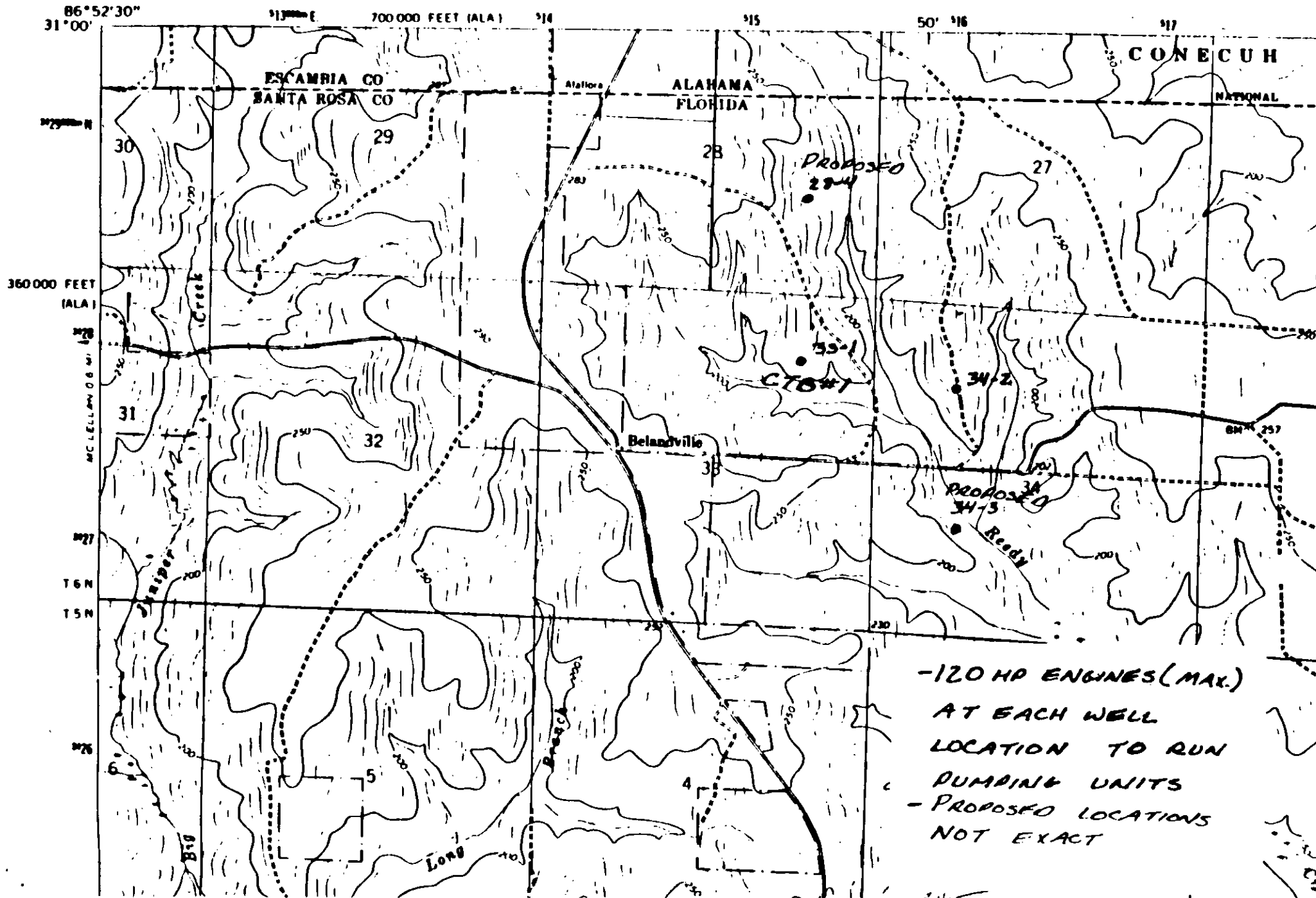
- **MYAKKA RIVER STATE PARK (H-8)**. Extensive preserve with appearance of African veldt is a wildlife sanctuary where wild birds and animals roam free. Daily. 25c. Tours (fee) by trackless train and boat available.
- **HAPPINESS TOWER (K-8)**. Panoramic view from top. Elevator. Daily 8-6. \$1.
- **ELLIOTT MUSEUM (M-8)**. Contains collection of antique horse-drawn and automotive vehicles; old-time shops, old country store, art gallery. Daily 1-5. \$1. House of Refuge Museum, restored 1875 life-saving station; turtle aquarium. Daily 1-5. 50c.
- **PALMDALE (K-9)**. Cypress Knee Museum, first cypress knee factory, has catwalk into cypress swamp. Daily 8-dusk. \$1.
- **SEMINOLE INDIANS**. Reservations are at Brighton (K-8), Hollywood (M-10) and in

- Available
- Trailers permitted
- Trailer hookups available
- ▲ Boat ramps
- Boats for hire
- Historic interest
- Reservations required

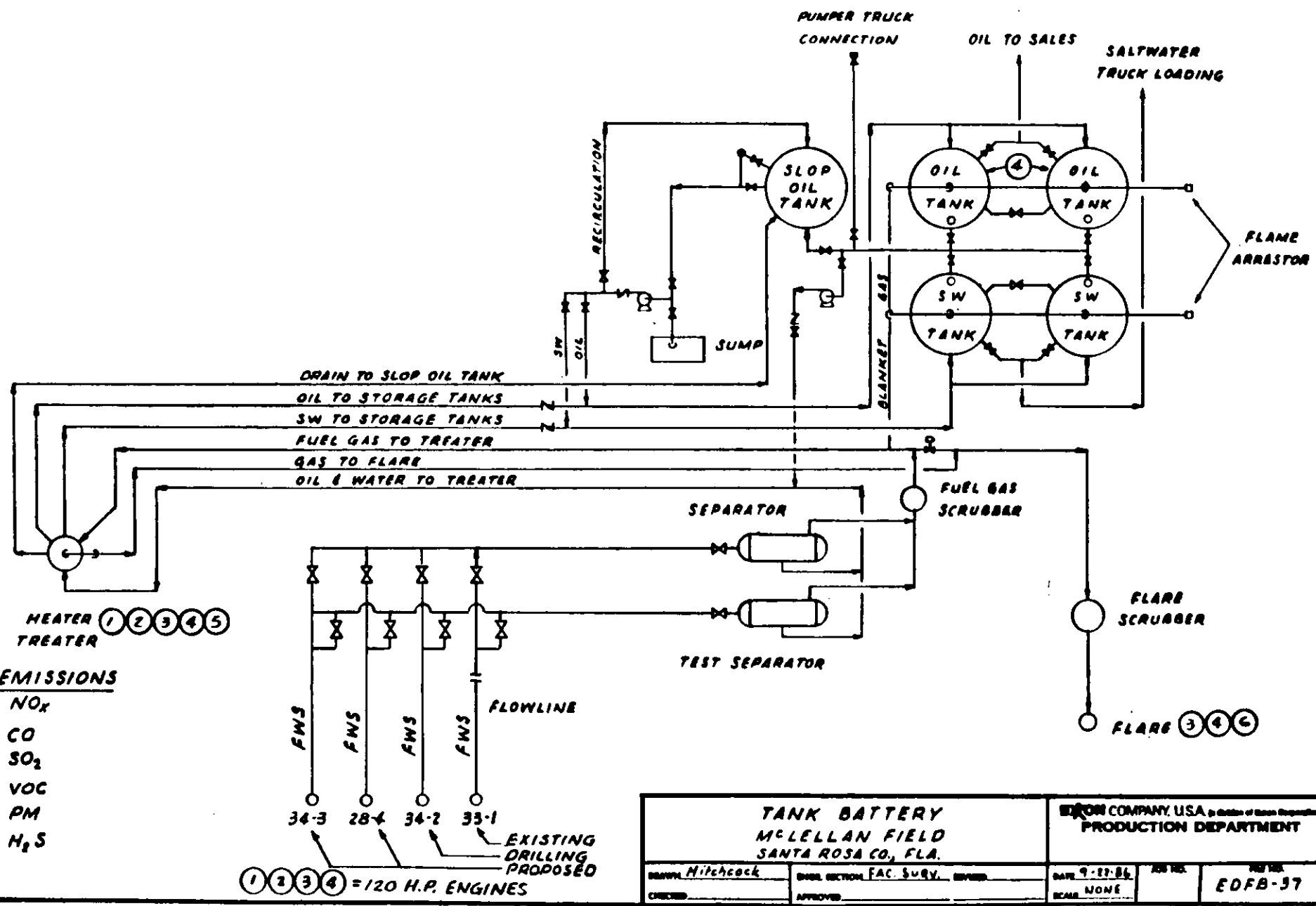
FLORIDA							FLORIDA						
	Index	Boating	Camping	Fishing	Landings	Picnicking		Index	Boating	Camping	Fishing	Landings	Picnicking
Alfred B. Macy Gardens	D-1	▲					Lake Griffin	J-5	▲	●			
Anastasia	H-3	●					Little Talbot Island	H-2	●				
Bahia Honda	H-13	●	●				Long Key	L-13	●				
Basin Bayou	E-4	●					Manatee Springs	G-4	●	●			
Bill Baggs (Cape Florida)	M-11	▲					Mike Ross (Gold Head Branch)	J-3	●	●			
Blackwater River	D-5	●					Myakka River	H-8	●	●			
Blackwater River St. For	D-5	●					Natural Bridge Battlefield	▲ D-2					
Blue Springs	H-5	▲	●				Ochlocknee River	C-2	▲	●			
Broward Beach	M-16	▲					O'Leary	G-3	▲	●			

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

STATE



AP 12000C



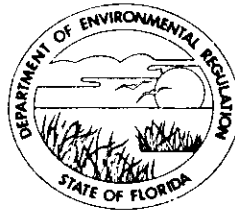
- EMISSIONS**
- ① - NO<sub>x</sub>
  - ② - CO
  - ③ - SO<sub>2</sub>
  - ④ - VOC
  - ⑤ - PM
  - ⑥ - H<sub>2</sub>S

① ② ③ ④ = 120 H.P. ENGINES

<b>TANK BATTERY</b> <b>McLELLAN FIELD</b> <b>SANTA ROSA CO., FLA.</b>		<b>BECHTEL COMPANY, USA</b> , a division of Bechtel Corporation <b>PRODUCTION DEPARTMENT</b>	
DRAWN: <i>Hitchcock</i>	ENGR. SECTION: <i>FAC. SURV.</i>	DATE: <i>9-27-86</i>	JOB NO.:
CHECKED:	APPROVED:	SCALE: <i>NONE</i>	REV. NO.:
		<b>EDFB-37</b>	

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

March 25, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Miller:

Re: Completeness Review for Applications to Construct/Modify  
Air Pollution Sources: Nos. AC 24-131270 & -131271

The department has received and reviewed your application packages dated February 25, 1987, and have deemed them incomplete. Please submit the following information to help further process your application:

1. Both acid plants C and D are separate sources each with a potential emissions increase of over 100 tons per year. Therefore, the processing fee is \$1000 for each source. Since you have forwarded \$100 to the department already, the amount you need to now submit is \$1900.
2. Please provide operating reports pertaining to sulfuric acid plants A, B, C, and D, for the past five years, including operating hours, rates and actual emissions of sulfur dioxide and sulfuric acid mist.
3. Do you propose to make any physical changes in the C and D acid plants as a part of the modification project?
4. Please state the latitude/longitude coordinates for the sources to be modified.

Mr. Marvin Miller  
Page Two  
March 25, 1987

If you have any questions, please call Pradeep Raval at (904)488-1344 or write to me at the above address.

Sincerely,

A handwritten signature in black ink, appearing to read "C. H. Fancy", written over a horizontal line.

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

CHF/PR/s

cc: J. Koogler  
B. Stewart

P 408 530 527

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Inc

Sent to	
Marvin Miller	
Occidental Chem. Agri. Prod., 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 3/25/87 AC 24-131270 -131271	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1.  Show to whom [redacted]

2.  Restricted Delivery.

3. Article Addressed to:  
Marvin Miller  
Occidental Chem. Agri. Prod., Inc.  
P.O. Box 300  
White Springs, FL 32096

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured	P 408 530 527
<input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD	
<input type="checkbox"/> Express Mail	

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
X

6. Signature - Agent  
X *Clarence Rogers*

7. Date of Delivery  
3-26-87

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT