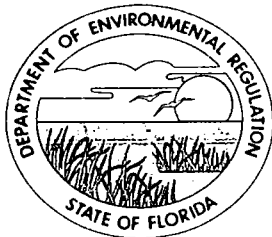


File Copy



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

August 2, 1989

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Hudson C. Smith
Occidental Chemical Corp.
P. O. Box 300
White Springs, FL 32096

Dear Mr. Smith:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for the installation of the soda ash storage and handling system for the pollyphos plant at the SRCC in Hamilton County, Florida.

Please submit any written comments 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/kt

Attachments

cc: B. Stewart, NE District
R. McNeill, P.E., OCC

Ready File }
Pradeep Raval } 7-31-89 RAN

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Occidental Chemical Corp.
Post Office Box 300
White Springs, Florida 32096

DER File No. AC 24-165588

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application 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 Corp. applied on May 30, 1989, to the Department of Environmental Regulation for a permit to install a soda ash storage and handling system at the Suwannee River Chemical Complex in 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 an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a 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. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

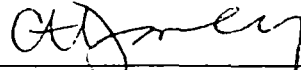
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applicant have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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:

B. Stewart, NE District
R. McNeill, P.E., OCC

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, 1989

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.

Martha Muse July 31, 1989
Clerk Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Occidental Chemical Corporation, P. O. Box 300, White Springs, Florida 32096, to install a soda ash storage and handling system for the pollyphos plant at the Suwannee River Chemical Complex in Hamilton County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

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:

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

Dept. of Environmental Regulation
Northeast District Office
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.

Technical Evaluation
and
Preliminary Determination

Occidental Chemical Corporation
White Springs, Hamilton County, Florida

Soda Ash Storage and Handling System

Permit Number: AC 24-165588

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

August 2, 1989

I. Application

A. Applicant

Occidental Chemical Corporation
Post Office Box 300
White Springs, Florida 32096

B. Project and Location

Occidental is proposing to install a soda ash storage and handling system for the existing pollyphos plant at the Suwannee River Chemical Complex (SRCC) in Hamilton County, Florida.

The UTM coordinates of the facility are Zone 17, 328.3 km East and 3368.8 km North.

C. Facility Category

Occidental's SRCC is classified in accordance with the Standard Industrial Classification (SIC) Code as Industry No. 2819, Industrial Chemicals-Sodium Polyphosphate. The Source Classification Code (SCC) is 3-01-070-02, Storage and Transfer, General Processes.

Occidental's application was received and deemed complete on May 30, 1989.

II. Project Description

Occidental is proposing to replace caustic soda in the pollyphos process with soda ash. Caustic soda will be retained as a back-up raw material. The handling of soda ash does not have the hazards associated with handling caustic soda and will additionally result in a cost reduction.

A pneumatic system will convey the soda ash from the railcar unloading hopper to a 330 ton storage silo and then transfer it to a 20 ton day tank (ready bin) as necessary. The ready bin will supply the soda ash to the process. It is expected that the annual soda ash usage will amount to 13,300 tons.

There will be particulate emissions from the vacuum pump associated with the storage silo and also from the ready bin. The proposed silo baghouse and the bin filter will be 99.98% efficient in controlling particulate emissions. The applicant has indicated that the railcar unloading system will be operated for no more than 1800 hours/year, while the transfer system to the ready bin will be operated for no more than 2700 hours/year. The total emissions are expected to be about 500 lb/year.

III. Rule Applicability

The proposed project will emit particulate matter and is subject to a preconstruction review in accordance with Chapters 17-2 and 17-4 of the Florida Administrative Code (F.A.C.) and Chapter 403 of the Florida Statutes.

The proposed project will be located in Hamilton County, an area designated as attainment for all the criteria pollutants in accordance with F.A.C. Rule 17-2.420.

The project will be within 100 km of Okefenokee National Wilderness Area, a Class I area, in accordance with F.A.C. Rule 17-2.440.

The proposed project is not subject to Prevention of Significant Deterioration (PSD) Review Requirements because the net emissions increase from the facility will be less than significant, in accordance with F.A.C. Rule 17-2.500(2)(d)4.

The proposed project is subject to F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

The proposed project is subject to F.A.C. Rule 17-2.610, General Particulate Emission Limiting Standards.

The proposed project is subject to emission testing and reporting requirements in accordance with F.A.C. Rule 17-2.700. The sources will be required to show compliance with the emission limits using EPA Method 9, in accordance with F.A.C. Rule 17-2.700(6)(b)(9), and 17-2.700(2)(c).

IV. Source Impact Analysis

A. Emission Limitations

The estimated emissions from the storage silo are 0.25 lb/hr and 450 lb/year, based on 0.02 gr/dscf exit gas loading and 1800 hours/year operation. The estimated emissions from the ready bin are 0.02 lb/hr and 54 lbs/yr, based on 0.02 gr/dscf exit gas loading and 2700 hours/year operation.

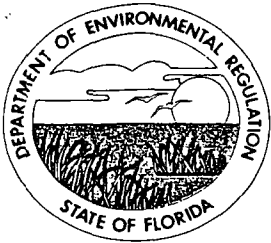
B. Air Quality Impacts

The technical evaluation of this project determined that ambient air monitoring or modeling would not be required to provide reasonable assurance that Florida's air quality standards would not be violated.

V. Conclusion

Based on the information provided by Occidental, the Department has reasonable assurance that the proposed construction of the soda ash storage and handling system for the pollyphos plant at SRCC as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Occidental Chemical Corp.
P. O. Box 300
White Springs, FL 32096

Permit Number: AC 24-165588
Expiration Date: Sept. 1, 1990
County: Hamilton
Latitude/Longitude: 30°26'27"
82°47'16"
Project: Soda Ash Storage and
Handling System

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 drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the construction of a soda ash storage and handling system consisting of a 330 ton storage silo, a 20 ton ready bin, and the associated vacuum railcar unloading and pneumatic transfer equipment. Particulate emissions from the storage silo and the ready bin will be controlled by a baghouse and an in-line filter respectively. The project is located at Occidental's Suwannee River Chemical Complex (SRCC) in Hamilton County, Florida.

The UTM coordinates are Zone 17, 328.3 km East, 3368.8 km North.

The source shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Occidental's application received May 30, 1989.
2. DER's memo-to-file dated June 19, 1989.
3. DER's Preliminary Determination dated August 2, 1989.

PERMITTEE:
Occidental Chemical Corp.

Permit Number: AC 24-165588
Expiration Date: September 1, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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 Corp.

Permit Number: AC 24-165588
Expiration Date: September 1, 1990

GENERAL CONDITIONS:

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 provide the Department with the following information:

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

PERMITTEE:
Occidental Chemical Corp.

Permit Number: AC 24-165588
Expiration Date: September 1, 1990

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

PERMITTEE:
Occidental Chemical Corp.

Permit Number: AC 24-165588
Expiration Date: September 1, 1990

GENERAL CONDITIONS:

b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 dates 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 corrected promptly.

SPECIFIC CONDITIONS:

1. The soda ash storage equipment may operate continuously, 8,760 hours/year. The silo vacuum pump operating hours shall not exceed 1800 hours/yr. The ready bin blower/exhaust fan operating hours shall not exceed 2700 hours/year.

2. The particulate matter emissions, based on an emission loading of 0.02 gr/dscf, shall not exceed the following:

<u>Source</u>	<u>lb/hr</u>	<u>lb/year</u>
Soda Ash Silo	0.25	450
Ready Bin	0.02	54

3. Visible emissions (VE) from the soda ash storage and handling system shall not exceed 5% opacity.

PERMITTEE:
Occidental Chemical Corp.

Permit Number: AC 24-165588
Expiration Date: September 1, 1990

SPECIFIC CONDITIONS:

4. The particulate emission control equipment shall be regularly maintained to operate properly.
5. A log shall be kept to record the operating hours of the vacuum pump, blower, and exhaust fan.
6. Initial and annual compliance tests shall be conducted using EPA Method 9 for VE. Annual tests will be required only if deemed necessary by the Department.
7. The permittee shall comply with all the applicable provisions of Chapters 17-2 and 17-4 of the Florida Administrative Code.
8. Any changes in the method of operation, raw material, equipment, or operating hours shall be submitted to DER's Northeast district office for approval.
9. The Northeast district office shall be notified in writing a minimum of 15 days prior to source testing. Written reports of the test results shall be submitted to the district office within 45 days of test completion.
10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).
11. An application for an operation permit must be submitted to the Northeast district office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. 17-4.220).

Issued this _____ day
of _____, 1989


STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

ATTACHMENTS AVAILABLE UPON REQUEST

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Hudson C. Smith V.P. & Gen. Mgr. Occidental Chemicals Corp. P.O. Box 300 White Springs, FL 32096	4. Article Number P 938 762 634
Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid) 
6. Signature Agent X <i>[Signature]</i>	
7. Date of Delivery 8-1-89	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 938 762 634
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to		Hudson C. Smith, VP & Gen Mgr	
Sheet and No.		Occidental Chemicals Corp	
P.O. Box 300		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: 7/31/89			
AC 24-165588			

PS Form 3800, June 1985