

OxyChem®

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June 21, 1994

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Mr. Preston Lewis
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Bureau of
Air Regulation

Dear Mr. Lewis

This is in response to Mr. Brown's letter of May 5, 1994, relative to the incompleteness determination for the A & B Pollyphos Reactor modifications. I apologize for the time it has taken to respond to Mr. Brown's letter. We have been reviewing alternative procedures internally, and with our consultant (Koogler and Associates), to determine the best and most environmentally acceptable method of proceeding.

It is our determination that the addition of a tail-gas scrubber, following the current scrubber, using a caustic scrubbing solution will allow us to reduce the total SO₂ emissions from each plant to less than eight pounds per hour. Koogler and Associates have modeled this release and determined that it will have no significant impact on any area. Modeling was performed using the EPA approved ISC2 model.

Installation costs for each of these tail-gas scrubbers is approximately \$220,000 each. While the final design is still being refined, OxyChem anticipates being able to submit a construction permit application by July 29, 1994. Since no significant impact occurs due to an emission rate change from 5 to 8 pounds SO₂ per hour, unless directed otherwise by the Department, we anticipate submitting this construction application to the Northeast District for processing.



Occidental Chemical Corporation

Agricultural Products Group

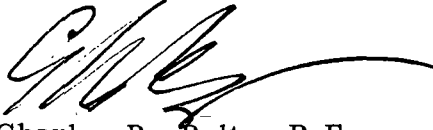
County Road 137, P. O. Box 300, White Springs, Florida 32096

904/397-8101

In view of the forgoing plan, we do not feel a direct response to Mr. Brown's letter of May 5, 1994, is required. In addition, we respectfully withdraw the application for permit modification filed by Koogler and Associates on April 14, 1994 on our behalf.

If I may be of any assistance in this matter, please call me at 904-397-8442.

Sincerely,



Charles B. Pults, P.E.
Sr. Environmental Engineer

c: V. J. Lloyd
R. E. McNeill
W. M. Miller
Dr. J. B. Koogler
R. Leetch, NED
J. Cole, NED