



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

May 5, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John B. Koogler Ph.D., P.E.
Koogler & Associates
Environmental Services
4014 NW 13th Street
Gainesville, Florida 32609

Dear Mr. Koogler:

RE: Occidental Chemical Corporation
Suwannee River Chemical Complex
Permit Modification Request for Pollyphos Reactors "A" & "B"
A024-226519

The Department received your April 14, 1994, letter requesting a modification (increase of SO₂ emissions for the pollyphos reactors "A" and "B") of the animal feed plant located at the Occidental Chemical Complex in Hamilton County, Florida.

In this request, you have offered to reduce the proposed increase of emissions of the pollyphos reactors "A" & "B" by a future decrease (future modes of operation involving the emissions from the pollyphos reactors and the sulfuric acid plant "A") in the facility-wide SO₂ emissions.

In addition, you also proposed to use allowable emissions (actual hours of operation) from the sulfuric acid plant "A" as credits in order to avoid PSD review. The information presented shows that the sulfuric acid plant "A" has been inoperational for the last three years. Therefore, actual creditable contemporaneous emission changes from the sulfuric acid plant "A" are zero (0).

Based on the information presented, we have determined your application is incomplete and subject to review under the PSD regulations.

Mr. John B. Koogler
May 5, 1994
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The following information and/or clarification is needed before a review of this application can continue:

1. Submit the PSD application processing fee of \$7500 and seven additional copies of the application. You may credit your previously submitted \$250 to the application fee.
2. Submit a Best Available Control Technology determination and the required PSD modeling and air quality related values (AQRV) analyses for SO₂ and any other pollutants whose emissions are increased by more than the significant emission rate.
3. Submit a laboratory analysis showing the sulfur content of the different types of rocks (Oxy, TG, IMC) that have been used at this facility.
4. What were the sulfur dioxide emissions tests data when Occidental was using 100% Oxy rocks and 50-50% Oxy and IMC rocks?
5. There is a discrepancy between the specific conditions in permits AC24-131271 and AO24-226519 regarding the production capacity and the SO₂ allowable emissions rates for the sulfuric acid plant "A". Please provide a copy of the document that modified the construction permit.
6. File data for permit No. PSD-FL-083 indicates that violations of the SO₂ 24-hour Florida Ambient Air Quality Standard were modeled by DEP in 1982 (DER letter dated June 25, 1982). As a remedy to correct these violations, Occidental agreed to lower the SO₂ emission limits of the pollyphos reactors "A" and "B" from 13.1 grams per second (104 lb/hr) to 0.63 grams per second (5 lb/hr). We cannot increase the SO₂ allowable emission rate of the pollyphos reactors "A" & "B" until BACT is complied with and we have reasonable assurance that the SO₂ ambient level are not going to be exceeded. Please recommend a BACT and provide modeling for all pollutants whose emissions, as a result of the proposed modification, increase by more than the significant emission rate.

The Department will resume processing your application after receipt of the requested information.

Mr. John B. Koogler
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Should you have any questions, please call Teresa Heron, Review Engineer, or Cleve Holladay, Meteorologist, or write to me at the above address.

Sincerely,



John C. Brown, Jr., P E
Administrator
Air Permitting and Standards
Bureau of Air Regulation

JB/TH/bjb

cc: Robert Leetch, NED
Jim Pennington, BAR
Vernon Lloyd, Occidental

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MAY 11 1994

Bureau of
Air Regulation

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. John B. Koogler, Ph.D., P.E.
Koogler & Associates
Environmental Services
4014 NW 13th Street
Gainesville, Florida 32609

4a. Article Number
P 872 563 613

4b. Service Type

<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

7. Date of Delivery
5/10/94

5. Signature (Addressee)
X Mason

6. Signature (Agent)

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

PS Form 3811, December 1991 ☆U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

PS Form 3800, JUNE 1991

P 872 563 613

Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Send to	Mr. John B. Koogler
Street and No.	4014 NW 13th Street
P.O. Box and ZIP Code	Gainesville, FL 32609
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	Mailed: 5/6/94 AO 24-226519