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BUREAU OF AIR REGULATION

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MEMORANDUM

TO: Joe Kahn, FDEP Tallahassee

FROM: Pradeep Raval

DATE: February 28, 2000

SUBJECT: PSD Determination for PCS Phosphate Operations

This is a request for DEP guidance on PSD applicability for PCS Phosphates' operations at Suwannee River Chemical Complex and Swift Creek Chemical Complex.

These two chemical plants, under common ownership (same SIC code), are each less than 2500 feet in length and width. Although the property between them is owned by PCS, the chemical complexes are separated by a distance in excess of four miles. The two chemical complexes are currently covered under a single Title V permit for the administrative convenience of both FDEP and PCS. The facilities continue to maintain separate water permits, etc. PSD permits, all issued prior to the Title V permitting, were issued individually for each site as the sites have been consistently treated as separate facilities for new source review purposes.

We would like to know if FDEP will continue to treat the two sites as separate facilities for PSD purposes, given that the pollutants to be evaluated for a couple of specific projects are fluorides and products of combustion of natural gas (and backup fuel oil).

It is our understanding that while EPA requires such facilities to be considered a single source for evaluating HAPs, there is no such EPA requirement for the PSD applicability of non-HAPs.

Please let me know your opinion on this matter at your earliest convenience.

Par...
C: Charlie Pults, PCS