



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

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

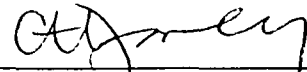
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 O'Neil 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.

John Thomas
7/31/89