

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

file 120- F1-064 U.SS. Agri-CR C

JAN 31 1983 DAORA

**REGION IV** 

REF: 4AW-AM

345 COURTLAND STREET ATLANTA, GEORGIA 30365

JAN 26 1983

Mr. Steven Smallwood, Chief Bureau of Air Quality Management Department of Environmental Regulation Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32301

Re: U.S.S. Agri—Chemicals Company Fort Meade Chemical Facility PSD Permit FL—064

Dear Mr. Smallwood:

On March 3, 1982, U.S.S. Agri-Chemicals' sulfuric acid plant #2 started production of sulfuric acid and on March 18, 1982, Sholtes and Koogler, environmental consultants, performed a contractor's performance guarantee test on this unit for U.S.S. Agri-Chemicals Company. This unit is regulated under PSD Regulation No. FL-064.

Mr. James H. Carroll, Environmental Engineer for U.S.S. Agri-Chemicals, submitted results of these tests to EPA on April 6, 1982, for consideration in using the results for determining compliance status. Shortly after this date unit #2 was shut down because of economic conditions and the lack of demand for the product.

We have reviewed the results of these tests submitted for compliance status on unit #2 and determined that they are not acceptable because there was not an official observer present or invited to attend the test. Also, testing procedures involved a modified Method 8 procedure, and these procedures had not been previously approved as outlined under 40 CFR 60.4 entitled "Performance Tests."

Discussions with Mr. Carroll on November 1, 1982, revealed that unit #2 has now been restarted and is presently operating at approximately 1/2 production. Mr. Carroll also informed us that they would be doing a performance test and continuous emissions monitor certification for sulfur dioxide in the near future.

Mr. Carroll was informed on November 1, 1982, during a phone conversation with Mr. Jim Littell of my staff that the Florida State Department of Environmental Regulation (DER) had now been delegated the NSPS and PSD testing responsibilities, and we would inform you of their intentions to do the above outlined testing. He also was informed that he should notify

the Florida State DER Regional Office of his company's intentions. We are making you aware of this to keep your staff informed, insuring a complete and smooth transfer of these responsibilities and also to offer you any assistance from my technical staff that may be necessary.

Sincerely yours,

James T. Wilburn, Chief Air Management Branch

Air & Waste Management Division