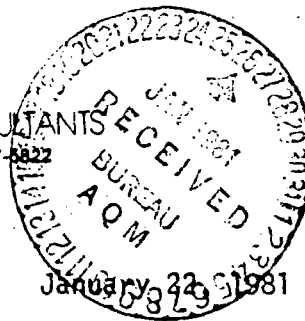




SHOLTES & KOOGLER, ENVIRONMENTAL CONSULTANTS  
1213 N.W. 6th Street Gainesville, Florida 32601 (904) 377-8822

SKEC 124-80-04



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

Subject: New Wales Chemicals, Inc.  
Polk County, Florida  
Sulfuric Acid Plants Nos. 4 and 5  
Rate Increase

Dear Mr. Smallwood:

This is in response to your letter of January 9, 1981, requesting clarification of information submitted to you in support of a request by New Wales Chemicals, Inc., to increase the production rate of the Nos. 4 and 5 sulfuric acid plants at the New Wales Chemical complex in Polk County. In your letter you requested clarification of the sulfur dioxide emission data used in the air quality review and clarification on the expected completion of construction dates for the Nos. 4 and 5 plants.

We reviewed the air quality modeling submitted to your office and discovered there were indeed some inconsistencies. These inconsistencies have been rectified and several of the air quality models rerun. To expedite your review I have summarized, in the attached table, the maximum hourly and annual average daily sulfur dioxide emission rates for all of the sulfur dioxide emitting sources at the New Wales Chemical Complex. These emission rates are representative of sulfur dioxide emissions from the various sources with the sources operating at the permitted maximum rated capacity, or in the case of the Nos. 4 and 5 sulfuric acid plants, at the proposed maximum rated capacity.

The revisions in the air quality modeling to rectify the inconsistencies in the emission data include revisions to CRSTER model runs 3/74 through 3/78 and revisions to PTMTPW model runs 14 through 17, 20 through 25 and 28. With the PTMTPW model runs, the modified runs are designated by the original number followed by the letter A (e.g., modified run 14 becomes run No. 14A). These revisions are incorporated in a revised Section 5.0 of the permit application support document submitted by New Wales Chemicals, Inc. We are also submitting as a separate document,

copies of computer print-outs for revised CRSTER runs 3/74 through 3/78 and PTMTPW runs 10 through 28A. If there are further questions regarding this air quality review, please feel free to contact me.

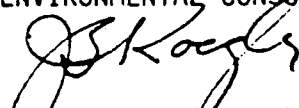
Regarding the completion of construction dates for the Nos. 4 and 5 sulfuric acid plants, it was originally anticipated that the completion of construction of the two plants would be June 30, 1983. As the construction project has progressed, it has become apparent to New Wales that both Nos. 4 and 5 sulfuric acid plants will be completed earlier than originally anticipated. It is now anticipated that the No. 4 sulfuric acid plant will be completed on September 1, 1981 and that the No. 5 sulfuric acid plant will be completed on December 1, 1981.

When the permit applications for the two sulfuric acid plants were submitted to your staff on December 17, 1980, both state and federal permit applications were submitted. The federal PSD application was submitted since FDER now has technical review responsibility for these applications. Subsequent to submittal, your staff forwarded the federal PSD application to EPA, Region IV with a request to determine whether the requested production rate increase would be handled as a new PSD application or a modification to the PSD approval granted to New Wales in May, 1980. I was informed on January 21, 1981, by Gordon Nixon of EPA by telephone that the request would be treated as a new PSD application. This determination is to be confirmed by letter with a copy to your office.

I trust the above will provide you with the information requested in your letter of January 9, 1981 and clarify the status of the federal review required for the production rate increase. If any other questions arise during the review of the permit applications, please contact us.

Very truly yours,

SHOLTES & KOOGLER  
ENVIRONMENTAL CONSULTANTS



John B. Koogler, Ph.D., P.E.

JBK:sc  
Enclosures

cc: Mr. R. E. Jones, Jr., V.P. New Wales Chemicals, Inc.  
Mr. Larry George, FDER  
Mr. Tom Rogers, FDER  
Mr. Joseph A. Baretincic, New Wales Chemicals, Inc. (w/enc)  
Mr. A. L. Girardin, New Wales Chemicals, Inc.