

NOV 10 1988

Mr. Jay Su
Plant Manager
Formosa Plastics Corporation
P.O. Box 400
Point Comfort, Texas 77978

Re: October 26, 1988 Project Meeting and EPA Models

Dear Mr. Su:

We appreciated the discussions and optimism expressed by you and Formosa regarding your decision to locate the proposed plant expansion in Point Comfort, Texas. This week we learned of the official decision.

At the meeting we discussed air, water and hazardous waste permitting. The project as described was changed in scope, eg. the cogeneration facility will be gas fed as well as the cracking facility, with long-term options for liquid feedstock. In addition, some processes are not completely set due to redesigns. Regardless of those activities, you did anticipate initiating the formal review process on or about November 8, 1988, with a submittal of Prevention of Significant Deterioration (PSD) and National Pollutant Discharge Elimination System (NPDES) permit applications.

We discussed aspects of those submittals. In particular we stated that we were confident our 8 month schedule could be met with timely exchanges of information between your company, the Texas Air Control Board for the air permitting portion of the process, and similar information support to EPA's NPDES program. You were advised to make a request to the Regional Administrator, with your NPDES permit application and Environmental Information Document (EID), for some allowance for construction prior to NPDES permit issuance.

The air permit will not be deemed complete initially. This is due to your need to finalize the redesigns and complete the ozone season monitoring initiated in June of 1988, which runs for 5 months. In addition, the company needs to perform the emission modeling. Our letter of October 7, 1988, to you, outlined our comments on the air dispersion modeling that Formosa Plastics planned.

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Since the October letter, and raised at our October 26 meeting, was the discovery that the Industrial Source Complex (ISC) version, 6.7, had errors and may cause erroneous data under certain conditions, eg. downwash. We have been working with the Office of Air Quality Planning and Standards (OAQPS) on the status of the problem and a correction has been made and the ISC revision is now 6.8. It will be available for your use November 10, 1988. Formosa Plastics should obtain and use ISC version 6.8. If problems with 6.8 materialize in the future, we will immediately notify you, or if found by your modelers, work with you on a resolution.

At this point I would like to inform you that Mr. Stanley Spruiell will be the primary permit engineer for PSD, and Mr. James Yarbrough will be the primary reviewer on modeling for the EPA. The Texas Air Control Board (TACB), has the principle lead and responsibility for the determination of permit completeness along with the administrative and technical evaluation of the PSD permit. All initial inquiries and applications should be directed to them first. The key individuals that EPA are working with are Ms. Karen Horne, principle TACB permit engineer, and Mr. ~~Copie~~ Durenberger, TACB lead on modeling. They can be contacted at (512) 451-5711.

We look forward to a smooth permitting process. If you have any questions, do not hesitate to contact me, or the named individuals, at (214) 655-7229.

Sincerely yours,

ORIGINAL SIGNED BY TONY WAYNE

Anthony P. Wayne
Chief
Air Enforcement Branch (6T-ET)

cc: Lawrence E. Pewitt, P.E., Director
Permits Division
Texas Air Control Board

bcc: Hathaway (6T)
Yarbrough (6T-A) ✓
Spruiell (6T-ET)
Pena (6E-FF)
Dehl (6W-PI)
Hepola (6T-E)
Truitt (6H-CE)
Charles (6X)