

**June 23, 2006**

**Terrell Johnson, Environmental Engineer  
OCI Wyoming, LP  
P.O. Box 513  
Green River, Wyoming 82935**

**RE: BART Eligibility**

**Dear Mr. Johnson:**

**The purpose of this letter is to respond to your June 19, 2006 letter contending that your facility is not “BART Eligible”. I have reexamined the history of the Air Quality Division's determination and find that the original reviewer made an error in calculating the “potential to emit” for from your three Combustion Engineering Boilers, #4, #5 and #6. Although each of these boilers currently have short term “pounds per hour” NO<sub>x</sub> emission limits, and these short term limits would total to more than 250 TPY if the units were all operated at these emission rates for a full 8760 hour year, I find that your Title V Operating Permit 30-119 does contain an enforceable cumulative annual NO<sub>x</sub> emission limit of 175.20 TPY for combined operation of these three boilers. Thus you are correct, and this emission total fails the third Step in the 40 CFR Part 51, Appendix Y “Guidelines for BART Determinations” with a potential to emit that is less than 250 tons per year of any single visibility impairing pollutant (other pollutant totals from these boilers are even lower than the NO<sub>x</sub> emission rate). And since none of the other emission sources at the OCI Big Island Plant fall under the applicability of the BART Guidance, the Air Quality Division agrees that OCI Wyoming, L.P. is not BART Eligible.**

**As we stated in our June 14<sup>th</sup> letter, since our screening shows that your facility was not “Subject to BART” anyway, the Air Quality Division will not be including your facility in the Wyoming SIP as part of our BART control strategies. Please recall that under the Regional Haze Rule however, the Air Quality Division still has an affirmative responsibility to explore and evaluate other control options in our effort to achieve “Reasonable Progress” toward the National Visibility Goal. Consequently we still suggest that you fully look at and understand all of the provisions of the Regional Haze rule in order to better prepare your organization for effective participation in the debate over appropriate control strategies for the State of Wyoming.**

**If you have any additional questions, please don't hesitate to call me at 307-777-6993.**

**Sincerely,**

**Lee Gribovicz, Regional Haze Manager  
Air Quality Division**

**cc: Tony Hoyt  
Robert Gill**

**Carl Diesel  
Bernie Dailey**

**Dave Finley  
Mike Stoll**