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OCCIDENTAL CHEMICAL COMPANY, FLORIDA OPERATIONS, Post Office Box 300, White Springs, Florida 32096, Telephone 904 397-8101

February 19, 1988

DER

FEB 22, 1988 (m)

BAQM

Mr. Ernie Frey
District Manager
Department of Environmental
Regulation
3426 Bills Road
Jacksonville, FL 32207

Dear Mr. Frey:

By this letter, Occidental Chemical Company is requesting a permit revision to allow operation at increased rates for the following plants:

- o "A" Sulfuric Acid A024-103966 FROM 800 TPD to 1000 TPD
- o "C" Sulfuric Acid A024-131271 FROM 2000 TPD to 2200 TPD
- o "D" Sulfuric Acid A024-131270 FROM 2000 TPD to 2250 TPD

Stack testing on these plants will be conducted at the elevated rates as soon as permission is received from your office and the results of these tests will be submitted as soon as they are available.

The basis for this request is an emissions trade-off between the "A", "B", "C", and "D" Sulfuric Acid plants. The "B" Sulfuric Acid plant is currently permitted for operation at 800 TPD and emissions of 23,200 lb/day of SO₂ and 400 lb/day of acid mist. Although this plant could be started to meet the demand for additional sulfuric acid it would be economically and environmentally more desirable to shift this additional production capacity to our plants which are already operating. Although this shift in production capacity will cause an increase in the total emissions from the operating plants, the shifting of the bulk of the production to the more modern and efficient "C" and "D" plants will result in a net decrease in the total emissions. This is summarized in the attached table.

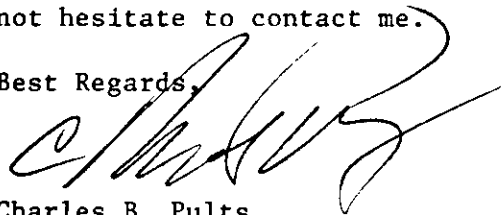
It is anticipated that there will be some modernization work performed at both "C" and "D" Acid plants within the next 12 to 18 months. After completion of that work it is anticipated that we will request permission to test and possibly modify the permits for operation at a 2300 TPD rate for each plant. This would complete the trade-off for production tonnage with the "B" Sulfuric Acid plant.

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If FDER approves these permit modifications Occidental Chemical will benefit economically by not having to start up the "B" Sulfuric Acid plant and all the people of the State of Florida will benefit by a reduction in the total permitted air emissions to the environment. As shown in the accompanying table, this is a net reduction of approximately 15,000 lb/day of SO₂ and 220 lb/day of acid mist.

If I may provide additional information concerning this request, please do not hesitate to contact me.

Best Regards,



Charles B. Pults
Environmental Engineer

psb

cc: M. J. Fitzsimmons, FDER, Jacksonville, FL
W. P. Stewart, FDER, Jacksonville, FL
R. P. Vogh, FDER, Gainesville, FL
R. E. McNeill, OXY
W. M. Miller, OXY
M. E. Pauley, OXY

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CHF/BT } 2/23/88 (MP)

TABLE 1
EMISSION RATE COMPARISONS

	CURRENT PERMITTED RATE			PROPOSED MODIFICATIONS		
	TPD	SO ₂ (lb/ton)	MIST (lb/ton)	TPD	SO ₂ (lb/ton)	MIST (lb/ton)
"A" Sulfuric	800	29 (23200 PPD)	0.50 (400 PPD)	1000	29 (2900 PPD)	0.50 (500 PPD)
"B" Sulfuric	800	29 (23200 PPD)	0.50 (400 PPD)	0	0	0
"C" Sulfuric	2000	4 (8000 PPD)	0.14 (280 PPD)	2200	4 (8800 PPD)	0.14 (308 PPD)
"D" Sulfuric	2000	4 (8000 PPD)	0.14 (280 PPD)	2250	4 (9000 PPD)	0.14 (315 PPD)

CURRENTLY PERMITTED:

All plants (A + B + C + D) operating = 5600 TPD H₂SO₄
 Maximum SO₂ Permitted = 62400 lb/day
 Maximum Mist Permitted = 1360 lb/day

REQUESTED MODIFICATIONS:

Plants (A + C + D) operating = 5450 TPD H₂SO₄
 Maximum SO₂ Permitted = 46800 lb/day
 Maximum Mist Permitted = 1123 lb/day

EMISSION DIFFERENCES:

By shifting production to the currently operating plants a **NET REDUCTION** in total emissions to the environment occurs.

SO₂ (Max) 62400 - 46800 = **15600 lb/day**
 Mist (Max) 1360 - 1123 = **237 lb/day**