P.M. 7.8.88 File Copy

Occidental Chemical Corporation

July 7, 1988

CERTIFIED RETURN RECEIPT

RECEIVED
JUL 11 1988
DER - BAQM

Mr. Ernest E. Frey
Florida Department of Environmental
Regulation
3426 Bills Road
Jacksonville, FL 32207

Re: Warning Notice No. AP-W-24-0012
"D" Sulfuric Acid Plant AC 24-146404

Dear Mr. Frey:

It is Occidental Chemical Corporation's position that, during the two periods cited (April 16, 1988 and June 22, 1988), the "D" Sulfuric Acid Plant was in compliance with its permit conditions at all times.

During the April 16 test, which was run during a 30 day test period at an allowed maximum rate of 2300 tons per day, the Department alleges that sulfuric acid mists were emitted at a rate of 25.2 lb./hr. A review of this test, which has been submitted to the Department previously, shows reported values of acid mist of 13.30 and 9.77 lb./hr. This is an average rate of 11.52 lb./hr. Allowable emissions for acid mist during the 30 day/2300 TPD test period was 14.38 lb./hr., not the 12.5 lb./hr. referred to in the Warning Notice. Only two runs were performed and reported during the test because Occidental did not consider this to be a compliance test but an in-plant performance test to gather operating information.

During the June 22 test the Department alleges that sulfur dioxide emissions exceeded the allowable rate of 317.87 lb./hr. The enclosed test report, which has not been submitted previously shows that, according to our calculations, the referenced test met the sulfur dioxide standards of 317.87 lb./hr.

As you are aware, Occidental uses the method to determine SO_2 and acid mist emissions that is described in 40 CFR 60.85(e). Occidental multiplies the emission rates determined by this method (lb/ton of acid) by the acid production rate to determine the mass emission rate (lb/hr) of SO_2 and acid mist. We have used this method since the early 1980's and the results calculated by this method have been reported to, and accepted by, the Department. The Department's representative, however, continues to calculate mass emission rates of SO_2 and acid mist by a method referenced in 40 CFR 60.85(d), a method that Occidental has demonstrated not to be appropriate for its sulfuric acid plants. It was through Occidental's

OxyChem.
Agricultural Products - Florida Operations
County Road 137, P.O. Box 300, White Springs, Florida 32096
(904) 397-8101

Occidental Chemical Corporation
Agricultural Products - Florida Operations
County Road 137, P.O. Box 300, White Springs, Florida 32096

WHITE SPRINGS FLA. JUL-5'89 P
U.S POSTAGE
0.25
6011940

OxyChem

Mr. Clair Fancy
Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8241

efforts, associated with the demonstration of inappropriate aspects of the method referenced in 40 CFR 60.85(d), that the alternate ("S" Factor) method of 40 CFR 60.85(e) was adopted by EPA.

Jim Pennington, Tallahassee BAQM, is currently working with EPA to resolve the question of the appropriateness of the use of the "S" Factor method by Occidental. He recently requested some additional information for submittal to EPA. That information will be mailed to him by July 8 with a copy to Mr. David McNeal of the Region IV EPA Office.

At some point near the end of Run #1 of the June 22 test the plant reduced the operating rate, unknown to the stack testing crew. This reduction was taken to correct a temperature problem in the plant. This reduction caused a decrease in the stack velocity and subsequently, a reduced volume of sample to be drawn through the meter. The actual volumes of Runs 2 & 3 were 38.4 and 37.8 cubic feet respectively. This is less than the 40.6 cubic feet required by 40 CFR 60. Because of the low meter volumes, this test was rescheduled and performed July 6, 1988. Based on preliminary calculations by Mr. Stan Mazur of FDER, the July 6 test results are satisfactory and indicate compliance with all permit conditions.

I am also enclosing, for your information, a copy of the SO_2 continuous monitor record and a copy of the daily log sheet with the O_2 readings for June 22, 1988. Reference to this information will further show that the "D" Sulfuric Acid Plant was in compliance with its permit conditions at all times during the period in question.

Please note that the FDER calculated value of 325.03 lb./hr. appears to be in error. I believe the correct value is 320.49 lb./hr. This is based on calculations made by your representative during the onsite inspection June 22.

If I may be of further service in helping to resolve this matter, please do not hesitate to contact me.

Best Regards,

Charles B. Putts
Environmental Engineer

psb

attachment

cc: Mr. W. P. Stewart, FDER, Jacksonville, FL w/attachment
Mr. Jim Pennington, FDER, Tallahassee, FL w/attachment
Mr. Clair Fancy, FDER, Tallahassee, FL w/o attachment
Ms. Teri Rhodes, FDER, Jacksonville, FL w/o attachment
Dr. John Koogler, Kooger & Associates w/o attachment

Copied: Pradeep Raval
Tom Rogers
CITF/B9
7-11-88