



file

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

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APR 29 1988

DER-BAQM

April 26, 1988

Mr. Bill Thomas  
Bureau of Air Quality Management  
Department of Environmental  
Regulation  
3426 Bills Road  
Jacksonville, FL 32207

Ref: "A", "C", and "D" Sulfuric Acid Plants

Dear Mr. Thomas:

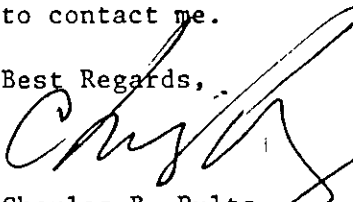
I would like to take this opportunity to thank you and all your staff for their work on the above referenced permits. Your timely consideration of this matter is appreciated.

In reference to these permits, we have one comment which concerns all three permits. Specific Condition 9 deals with emission testing and calculations. It is our suggestion that S. C. 9 be modified to include language which specifically states that 40 CFR 60 Subpart H Section 60.85(e) is an acceptable procedure for determining emissions from these three plants.

Over the years there have been protracted discussions between FDER, Occidental, and our consultants concerning the so-called "S" factor referenced in Section 60.85 (e). It is our opinion that, if this can be included in these new permits, this discussion can finally be laid to rest.

If I may be of any assistance in this matter, please do not hesitate to contact me.

Best Regards,



Charles B. Pults  
Environmental Engineer

psb

cc: Pradeep Ravel, FDER, Tallahassee, FL

Bill Stewart, NEDR  
CF/BT  
JBrown  
Pradeep. *PK*

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION



# Interoffice Memorandum

| FOR ROUTING TO OTHER THAN THE ADDRESSEE |             |
|---|-------------|
| TO: _____                               | LOCN: _____ |
| TO: _____                               | LOCN: _____ |
| TO: _____                               | LOCN: _____ |
| FROM: _____                             | DATE: _____ |

TO: File, AC 24-146400, Sulfuric Acid Plant A  
FROM: P. Raval *PR*  
DATE: April 26, 1988  
SUBJ: NSPS Applicability

The technical evaluation dated April 21, 1988, did not subject the above referenced acid plant to 40 CFR 60, Subpart H, NSPS for sulfuric acid plants, because the plant was capable of accomodating (and previously permitted at) 1000 TPD production rate without a physical modification.

It should be noted that the 200 TPD acid production capability transfer from Plant B to A was critical in bringing about the facility-wide emissions reduction of 2426 TPY for SO<sub>2</sub>, and 25 TPY for acid mist (accomplished by the shutting down of Plant B).

PR/plm