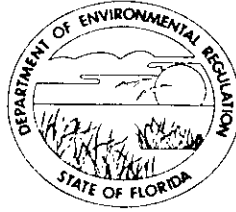


file

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

April 21, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Hudson C. Smith
Occidental Chemical Corporation
Post Office Box 300
White Springs, Florida 32096

Dear Mr. Smith:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for Occidental Chemical Corporation to install increased production capacity of A, C, and D Sulfuric Acid Plants, while shutting down plant B, at the Suwannee River Chemical Complex in Hamilton County, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/bm

Attachments

cc: B. Stewart, Northeast District
R. E. McNeill, P.E.

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. Restricted Delivery
 †(Extra charge)† †(Extra charge)†

3. Article Addressed to: Mr. Hudson C. Smith Occidental Chemical Corporation P.O. Box 300 White Springs, FL 32096	4. Article Number P 274 010 495 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>Charlene Rogers</i>	
7. Date of Delivery <i>4-22-88</i>	

Always obtain signature of addressee or agent and **DATE DELIVERED.**

PS Form 3811, Mar. 1987 * U.S.G.P.O. 1987-178-268 DOMESTIC RETURN RECEIPT

P 274 010 495

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

To: Mr. Hudson C. Smith Occidental Chemical Corporation Street and No P.O. Box 300	
P.O. State and ZIP Code White Springs, FL 32096	
Postage	3
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	5
Postmark or Date Mailed: 04/21/88 Permits: AC 24-146400, -402, -404	

* U.S.G.P.O. 1985-480-794
 PS Form 3800, June 1985

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Applications for Permits by:

Occidental Chemical Corp.
Post Office Box 300
White Springs, Florida 32096

DER File Nos. AC 24-146400
AC 24-146402
AC 24-146404

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits (copy attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Occidental Chemical Corporation, applied on February 22, 1988, to the Department of Environmental Regulation for construction permits to increase production capacity of Sulfuric Acid Plants A, C, and D, while shutting down plant B, at the Suwannee River Chemical Complex in Hamilton County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits were needed for the proposed work.

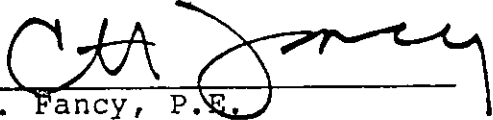
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the

Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

B. Stewart, Northeast District
R. E. McNeill, P.E.

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Occidental Chemical Corporation to install increased Sulfuric Acid production capacity at Plant A, C, and D, while shutting down plant B, at the Suwannee River Chemical Complex in Hamilton County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Northeast District Office
3426 Bills Road
Jacksonville, Florida 32207

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 4-21-88.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Martha J. Wise 4-21-88
Clerk Date

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

Preliminary Determination
and
Technical Evaluation

Occidental Chemical Corporation
Suwannee River Chemical Complex
White Springs, Hamilton County, Florida

Sulfuric Acid Plants

Permit Nos.
AC 24-146400, Plant A
AC 24-146402, Plant C
AC 24-146404, Plant D

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

April 20, 1988

I. Application

A. Applicant

Occidental Chemical Corporation
P. O. Box 300
White Springs, Florida 32096

B. Project and Location

The applicant proposes to modify the existing facility by increasing the sulfuric acid production capacity of the A, C and D plants at the existing Suwannee River Chemical Complex (SRCC) located in White Springs, Hamilton County, Florida. The project will involve an increase in the acid production of plant A from 800 tons per day (TPD) to 1000 TPD, plants C and D from 2000 TPD to 2300 TPD (each plant), and a simultaneous shut down of the older plant B. Pump, piping, and catalyst bed changes may be required in the proposed project.

The UTM coordinates of this facility are zone 17, 328.3 km East and 3368.8 km North.

C. Sources Reviewed

The four sources reviewed in this technical evaluation will be the A, B, C, and D Sulfuric Acid Plants located at SRCC.

Occidental applied for the modification of their current permit on February 22, 1988. The application was deemed complete on March 8, 1988.

D. Facility Category

Occidental's SRCC is classified under the Standard Industrial Classification (SIC) Code as group No. 20, Chemical and Allied Products, and Industry No. 2819, Sulfuric Acid Contact Process. The facility is also classified as a major one in accordance with Table 500-1 in Chapter 17-2 of the Florida Administrative Code (FAC). The Source Classification Code (SCC) is 3-01-023-08 (A and B, 98% conversion), and 3-01-023-04 (C and D, 99.5% conversion).

II. Project Description

A. Project

Sulfuric acid is an intermediate product in the manufacture of phosphoric acid. The A and B sulfuric acid plants installed originally are based on a single contact process whereas the C and D plants, built more recently, are based on the double contact process. Through this modification, Occidental

hopes to transfer the acid production capacity of the older B plant to the A, C and D plants. Sulfur dioxide (SO₂) and acid mist emissions are controlled by the single / double absorption process and mist eliminators, respectively. The proposed project will result in a net decrease in emissions of SO₂ and acid mist emissions. C and D plants are currently permitted under the Standards of Performance for New Stationary Sources (NSPS), 40 CFR 60, Subpart H. Plant A is permitted in accordance with Rule 17-2.600, Florida Administrative Code (FAC). The modified emission limits on A and B plants will be incorporated into construction permit conditions of Plant A to ensure federal enforceability.

The facility emission changes are tabulated below:

Plant	Permitted Emiss. ¹		Proposed Emiss. ¹		Net Change ¹	
	SO ₂	Acid Mist	SO ₂	Acid Mist	SO ₂	Acid Mist
A	4118	71	5292	91	1174	20
B	4118	71	0	0	(4118)	(71)
C	1420	50	1679	63	259	13
D	1420	50	1679	63	259	13
Total Net Change					(2426)	(25)

¹All figures are in tons per year

It is estimated that the overall NO_x emissions from the facility will not change (increases equal decreases).

B. Operating Hours and Rates

The maximum operating hours and rates will be:

Sulfuric Acid Plant	TPD (100% Acid)	Annual Operating Hours
A	1000	8760
B	0	0
C	2300	8760
D	2300	8760

Note: TPD = Tons per day.

III. Rule Applicability

The proposed modified sources will emit the pollutants sulfur dioxide (SO₂), sulfuric acid mist, and nitrogen oxides (NO_x), and are subject to a preconstruction review in accordance with Chapters 17-2 and 17-4 of the Florida Administrative Code (FAC) and Chapter 403 of the Florida Statutes.

The facility is located in Hamilton County, an area designated as attainment for all pollutants, in accordance with

Rule 17-2.420, FAC. The project is within 100 km of Okefenokee National Wilderness Area, designated as a Class 1 area, in accordance with Rule 17-2.440, FAC. The proposed modification will not be subject to Prevention of Significant Deterioration (PSD) Review Requirements since there will be a net decrease in the pollutants emitted, in accordance with Rule 17-2.500(2)(d)4., FAC.

The project is subject to Rule 17-2.520, FAC, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

Sulfuric acid plant A is subject to Source Specific Emission Limiting Standards in accordance with Rule 17-2.600(2)(a), FAC, for existing sulfuric acid plants. The standards limit SO₂ emissions to 29 lbs/ton of 100% acid, acid mist to 0.5 lb/ton 100% acid, and visible emissions (VE) to 10% opacity.

Plants C and D are subject to 40 CFR 60, Subpart H, NSPS for sulfuric acid plants, which limits SO₂ to 4 lbs/ton of 100% acid produced, acid mist to 0.15 lb/ton 100% acid, and VE to 10% opacity.

Compliance procedures currently observed will continue to be in effect. However, an initial compliance test will be required to show that the A, C and D acid plants can comply with the emission limiting standards at the higher operating rates. EPA Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources, in accordance with 40 CFR 60, Appendix A, will be required to determine compliance with the VE limits. Determination of compliance with SO₂ and acid mist limits will be as described in 40 CFR 60, Subpart H, for plants C and D. SO₂ and acid mist emissions test for plant A will be conducted using EPA Method 8, in accordance with Rule 17-2.700, FAC.

IV. Source Impact Analysis

A. Emission Limitations

Emissions from the following sources shall not exceed:

Acid Plant	SO ₂			Acid Mist			VE
	lb/T*	lb/hr	TPY	lb/T*	lb/hr	TPY	% opacity
A	29	1208	5292	0.5	21	91	10
B	0	0	0	0	0	0	NA
C	4	383	1679	0.15	14.4	63	10
D	4	383	1679	0.15	14.4	63	10

* Based on 100% sulfuric acid.

B. Ambient Air Analysis

The Department has evaluated the proposed emission changes at the Occidental facility for impact on ambient air quality. The net emission changes from the nearly identical A and B H₂SO₄ plants are reductions of 725 lbs SO₂/hr and 12.5 lbs/H₂SO₄ mist/hr. The nearly identical C and D H₂SO₄ plants increase their emissions in total by 100 lbs SO₂/hr and 4.8 lbs H₂SO₄ mist/hr. The facility wide emission change is a reduction of 625 lbs SO₂/hr and 7.7 lbs H₂SO₄ mist/hr. Since the emission increases are occurring through shorter stacks than the emission reductions, the Department used an air quality dispersion model to verify that the net ambient air quality impact is minimal.

The Department is satisfied that the proposed modification at the Occidental facility will not cause or contribute to a violation of an ambient air quality standard or allowed PSD increment.

V. Conclusion

Based on the information submitted by Occidental, the Department has reasonable assurance that the changes in the operating rates of the A, B, C and D sulfuric acid plants at the SRCC, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of an ambient air quality standard or PSD increment, or any other provisions of Chapter 17-2, FAC.