



KOOGLER & ASSOCIATES, *Environmental Services*

1213 NW 6th Street • Gainesville, Florida 32601 • 904/377-5822

File
AC 24-151270
- 131271

KA 102-86-04

April 17, 1987

Mr. Bill Thomas
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Occidental Chemical Agricultural Products Inc.
Proposed rate changes in the A, B, C and D sulfuric acid plants
at Occidental's Suwannee River Chemical Complex

Dear Bill:

On behalf of Gene McNeill and myself, I would like to express appreciation for the opportunity to meet with you, Pradeep Ravel, and Tom Rogers on April 16, 1987 to discuss the proposed rate changes in Occidental's four Suwannee River Chemical Complex (SRCC) sulfuric acid plants. We are continuing to review combinations of emission limits, operating times and production rates for the four sulfuric acid plants and will discuss these factors with you early during the week of April 20, 1987.

I am submitting with this letter, the results of air quality modeling that we discussed with you during our meeting on April 16, 1986 demonstrating that increasing the production rates of the C and D sulfuric acid plants from 1,800 tons per day to 2,000 tons per day (each plant) and reducing the production rates of the A and B sulfuric acid plants from 1,000 tons per day to 950 tons per day (each plant) will have no affect on ambient air quality. This modeling was conducted with Version V of the ISC-ST model using five years of meteorological data from Valdosta. The modeling considered only changes in emissions from the four sulfuric acid plants. If the Department wishes to conduct additional modeling, I have attached hereto stack parameters for the four sulfuric acid plants representing both present permitted and proposed permitted emission rates and stack parameters. The attached information will allow a more rigorous air quality evaluation of the proposed changes.

DER

APR 20 1987

BAQM

Mr. Bill Thomas
Florida Department of
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April 17, 1987

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If there are any questions regarding the information that is provided herein, please do not hesitate to contact me.

Very truly yours,

KOUGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:app
Enclosure

cc: Gene McNeill
Marvin Miller

Tom Pagros
Poultney Road 4-20-87 RAN

SUMMARY OF IMPACTS ON AIR QUALITY RESULTING FROM CHANGING RATES OF "C" AND "D" H₂SO₄ PLANTS FROM 1800 TPD TO 2000 TPD AND RATES OF "A" AND "B" H₂SO₄ PLANTS FROM 1000 TPD TO 950 TPD

YEAR (1)	SO ₂ IMPACT (μg/m ³) (2)		
	ANNUAL	3-HR	24-HR
1972	< 0	0.05	0.005
1973	< 0	0.05	0.004
1974	< 0	0.06	0.004
1975	< 0	0.05	0.003
1976	< 0	0.06	0.004

(1) VALDOSTA GA METEOROLOGICAL DATA YEAR

(2) SO₂ IMPACT CALCULATED WITH ISC-ST V MODEL

STACK PARAMETERS REPRESENTING
PROPOSED RATE CHANGES IN H₂SO₄ PLANTS
OCCIDENTAL CHEM. AG. PRODUCTS, INC.
SRCC - WHITE SPRINGS, FLORIDA

Plant	Emission Rate (g/sec)	Stack		Stack Gas	
		Ht (m)	Dia (m)	Vel (m/s)	Temp (°K)
A/B permitted(1)	-152.25	61.0	1.80	15.50	350
A/B proposed(2)	+144.64	61.0	1.80	14.73	350
C/D permitted(3)	-37.80	45.7	1.59	28.70	356
C/D proposed(4)	+42.00	45.7	1.59	31.89	356

- (1) 1000 tpd @ 29 lb SO₂/ton
- (2) 950 tpd @ 29 lb SO₂/ton
- (3) 1800 tpd @ 4 lb SO₂/ton
- (4) 2000 tpd @ 4 lb SO₂/ton

42,301 50 SHEETS 3 SQUARE
 42,302 100 SHEETS 3 SQUARE
 42,303 200 SHEETS 3 SQUARE
 NATIONAL

4/17/87



OCCIDENTAL CHEMICAL AGRICULTURAL PRODUCTS, INC.

A SUBSIDIARY OF OCCIDENTAL CHEMICAL CORPORATION
POST OFFICE BOX 300 WHITE SPRINGS, FLORIDA 32096

CHECK NO. 010058

MESA UNITED BANK
OF GRAND JUNCTION
GRAND JUNCTION, COLORADO 81501

82-91/1021

DATE: 3/31/87 PAY **PAYED 1850 AND 00 CTS** ****1800.00****

TO THE ORDER OF

Department of Environment Regulation
Twin Towers Office Building
2600 Blair Stone Rd
Tallahassee, FL 32301-8241

OCCIDENTAL CHEMICAL AGRICULTURAL PRODUCTS, INC.

NOT VALID AFTER 180 DAYS

BY *[Signature]*

AS DISBURSING AGENT(S) FOR THE COMPANY

⑈00010058⑈ ⑆102100918⑆ 001 8550⑈

DETACH BEFORE DEPOSITING

THIS CHECK IS IN PAYMENT OF THE FOLLOWING

DATE	THIS CHECK IS IN PAYMENT OF THE FOLLOWING	AMOUNT
3/31/87	Permit Fees Co. 020200	\$1800.00
	DER Hand Delivered. 4-2-87 BAM	
	APR 02 1987	
	BAQM Permit #: AC 24-131270 -131271	
		Receipt # 76150 + 200.00 3-4-87 2000.00

OCCIDENTAL CHEMICAL AGRICULTURAL PRODUCTS, INC. WHITE SPRINGS, FL 32096

CHECK NO. 010058

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No 76156

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Occidental Chemical Agricultural Products Inc. Date April 2, 1987

Address P.O. Box 300, White Springs, FL 32096 Dollars \$ 1800.00

Applicant Name & Address Same as above

Source of Revenue See Receipt # 76150 (\$200.00); total received: \$ 2000.00

Revenue Code 001031 Application Number AC 24-131270, -131271

By *[Signature]*