

# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 28, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Smith:

Re: Amendment to Construction Permit Nos. AC 24-15083 and 15084

This is in reply to your request for revision of the above referenced construction permits for Occidental's Polyphos "A" and "B" Plants. The Department's review of this request indicates that the visible emission limits should be revised as long as there is no increase in particulate emissions. Therefore, the following shall be changed:

Specific Condition No. 3:

Present: VE 20% Opacity.

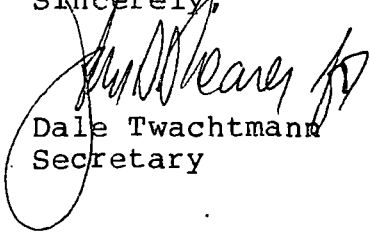
Amended: VE 40% Opacity.

Attachment to be Incorporated:

Occidental Chemical Company's letter to DER dated January 18, 1988.

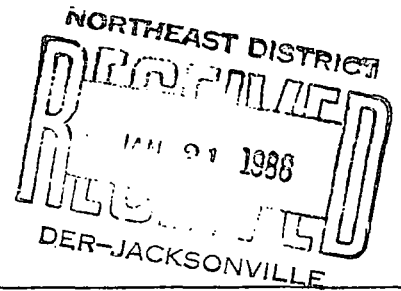
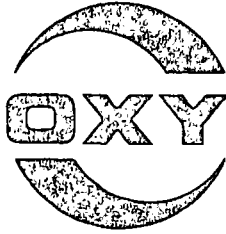
A copy of this letter must be attached to the referenced construction permit and shall become a part of that permit.

Sincerely,

  
Dale Twachtmann  
Secretary

DT/plm

cc: J. Cole, N.E. District  
Charles B. Pults, Occidental



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

January 18, 1988

Mr. W. P. Stewart, P.E.  
Supervisor, Air Section  
Department of Environmental  
Regulation  
3426 Bills Road  
Jacksonville, FL 32207

Ref: Pollyphos "A" & "B"  
Permit Nos. A024-31725 & A024-63294

Dear Mr. Stewart:

As we discussed after your recent letter concerning the visible emission (VE) results for the Pollyphos "A" test conducted October 14, 1987, I am resubmitting the list of test data for Pollyphos "A" and Pollyphos "B".

As you know, Occidental's original request for a VE variance was dated October 11, 1983. At various times during the intervening years we have submitted, and resubmitted, various data to answer FDER staff questions concerning this variance. A great deal of that correspondence contained detailed explanations as to why this particular phenomenon is occurring at these two plants. Therefore, I will not go into that detail in this letter.

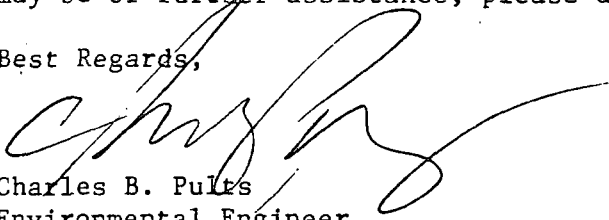
The attached list is a compilation of compliance tests conducted on these two plants since September 1983. Please note that during that period only one particulate failure occurred, and that was only 0.3 lb./hr. Subsequent investigation revealed a problem with the pollution abatement equipment. It was corrected and a successful retest was conducted.

The average particulate emission rate for Pollyphos "A" is 76.1% of the allowable. The average particulate emission rate for Pollyphos "B" is 66.9% of the allowable. For the same period the V.E. percentage averaged 150% of the allowable.

Page 2  
January 18, 1988

It is our desire to resolve this matter in the best interests of both FDER and Occidental. I believe we have shown, through past correspondence, that this variance, when granted, will not cause environmental damage or increased particulate loading to the region. If I may be of further assistance, please do not hesitate to contact me.

Best Regards,



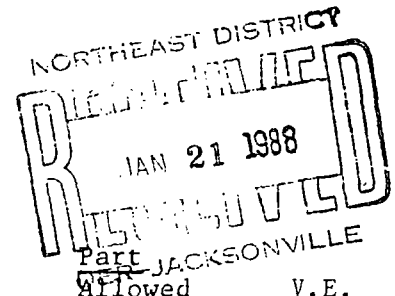
Charles B. Pulte  
Environmental Engineer

psb

cc: Ernie Frey, FDER, Jacksonville, FL  
R. P. Vogh, FDER, Gainesville, FL  
W. M. Miller, OXY  
M. E. Pauley, OXY

ATTACHMENT "A"

"A" POLLYPHOS REACTOR

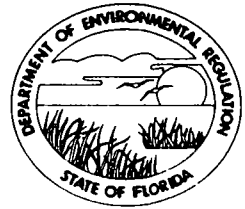


<u>Date</u>	<u>Rate</u>	<u>F</u>	<u>F Allowed</u>	<u>Part.</u>	<u>Allowed</u>	<u>V.E.</u>
9/14/83	7.36	0.91	2.04	10.21	12.38	24.8
6/21/84	9.12	1.37	2.50	12.5	14.14	36.4
4/10/85	7.93	1.35	2.20	11.82	12.96	40
10/9/85	8.78	0.71	2.43	7.64	13.81	43.8
4/23/86	7.75	0.44	2.15	7.16	12.78	14.2
10/2/86	8.39	1.15	2.32	13.71	13.42	35.4
3/11/87	8.26	1.02	2.29	10.09	13.29	35.4
5/06/87	8.59	1.18	2.38	9.34	13.62	*
10/14/87	8.31	0.99	2.30	8.67	13.34	27.4
AVG.	8.28	1.01	2.29	10.13	13.31	32.18

"B" POLLYPHOS REACTOR

11/21/83	8.4	0.45	2.35	6.62	13.53	*
07/25/84	7.98	1.43	2.21	11.47	13.01	*
05/31/85	8.05	1.36	2.23	11.63	13.08	40
11/20/85	8.45	0.66	2.34	7.12	13.48	40
05/21/86	9.86	0.99	2.50	10.18	14.84	35
04/01/87	9.24	0.39	2.50	6.2	14.25	13.7
10/01/87	8.29	1.11	2.30	10.69	13.32	13.7
AVG.	8.62	0.91	2.39	9.13	13.65	28.48

\*V. E. Results not available



# Interoffice Memorandum

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

*Steve Smallwood*

TO: Dale Twachtmann  
FROM: Howard L. Rhodes *HLR*  
SUBJ: Modification of Permit Conditions  
DATE: June 28, 1988

Attached for your approval and signature is a letter that will amend the visible emission limits for the Occidental Chemical Company's Polyphos "A" and "B" Plants with no increase in particulate emissions. The Bureau recommends that the permit amendment be approved.

HLR/aqm/jr *HLR*

Attachment

**RECEIVED**  
JUL 1 1988

Office of the Secretary

**RECEIVED**

JUL 05 1988

DER - BAQM

**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.  **Registered** how to whom delivered, date, and addressee's address.  **Restricted Delivery**  
 †(Extra charge)† †(Extra charge)†

3. Article Addressed to:  Mr. Hudson C. Smith General Manager Occidental Chemical Company Post Office Box 300 White Springs, FL 32096	4. Article Number  P 702 175 472
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> <b>Certified</b> <input type="checkbox"/> COD <input type="checkbox"/> Express Mail
Always obtain signature of addressee or agent and <b>DATE DELIVERED</b> .	
5. Signature — Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X <i>Clarence Rogers</i>	
7. Date of Delivery 7-11-88	

PS Form 3817, Mar. 1987

\* U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

P 702 175 472  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

Sent to Mr. Hudson C. Smith, Occidental	
Street and No. Chem. Co. P.O. Box 300	
P.O., State and ZIP Code White Springs, FL 32096	
Postage	S
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	S
Postmark or Date Mailed: 7-7-88 Permit: AC 24-15083 AC 24-15084	

PS Form 3800, June 1985