

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

November 9, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles B. Pults
Occidental Chemical Corporation
P. O. Box 300
White Springs, Florida 32096

Dear Mr. Pults:

Re: Pollyphos Plant Testing, Permit No. AO 24-145590

The Department has received and reviewed your request to test the Pollyphos "B" reactor and the "B" cooler at increased rates of 18 TPH and 15 TPH respectively.

DER will grant a 30 day time period, ending on December 16, 1988, allowing you to conduct the necessary tests at higher throughput rates so long as allowable emissions are not exceeded. If the tests are successful and you consequently decide to make changes to the current operation you may need to submit construction permit applications for the affected sources.

If you have any questions please call Pradeep Raval at (904) 488-1344 or write to me at the above address.

Sincerely,

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

CHF/plm

cc: B. Stewart, NE District



Interoffice Memorandum

NORTHEAST DISTRICT, JACKSONVILLE

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
To: _____	LOCYN: _____
To: _____	LOCYN: _____
To: _____	LOCYN: _____
FROM: _____	DATE: _____

TO: Clair Fancy, BAQM
Bill Thomas, BAQM

FROM: W. P. Stewart *WPS*

DATE: October 20, 1988

SUBJECT: Hamilton County - AP
Occidental Chemical, SR.
Pollyphos Plant

RECEIVED
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DER-BAQM

file

Attached is an October 17 request to test "B" reactor at an increased input rate of 18 TPH (current rate is 9.03 TPH) and "B" cooler at an increased input rate of 15 TPH (current rate is 7.5 TPH). Based on Process Wt. equations, the allowable PM emissions rate would increase 31.5 TPY from "B" reactor and 28.2 TPY from "B" cooler.

The request did not address whether there are plans for a similar increase for "A" reactor and "A" cooler or how much of an increase to the feed prep unit would be required if the test request leads to a permit modification request.

Based on all of the above, per processing procedures, this request requires a CAPS response.

WPS:jck

Enclosure

cc: Marvin Miller, Occidental



Occidental Chemical Corporation



October 7, 1988

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

Ref: Permit No. A024-145590 (Pollyphos)

Dear Mr. Stewart:

By this letter, Occidental requests permission to increase the input rate to the Pollyphos "B" reactor to 18 TPH for a test period of 30 days beginning October 24, 1988. This increase will allow testing of a new burner design which, it is believed, will allow an increase in the production rate of the reactor.

This modification consists of replacing the burner elements in the reactor with smaller diameter elements. Instead of the current 37 elements there will be approximately 220 elements after the modification. This will result in a more even heating in the reactor and a smaller zone of combustion. This will allow a greater bed depth of material to pass through the reactor which, in turn, will allow the higher production rate.

It is anticipated that no changes will be required in the quantity of fuel burned per hour or in the air flow to the reactor. Therefore, the previously reported fuel and air flow data will not be changed. Also, it is anticipated that no changes will be necessary in the scrubbers or cyclones since the air flow rates will not be changed.

In addition to the rate increase in the reactor feedrate, a subsequent increase in the cooler feedrate will be necessary. We are requesting an increase to 15 TPH for the "B" Cooler for the duration of this test.

The Feed Prep area currently has the capacity to handle the increased rate. However, if these tests prove successful, its rate will also need to be increased.

We believe that these increases can be accomplished with no increase in fluoride emissions. Therefore, we are not asking that the fluoride emission rate be modified for this test period. Particulate, however, will need to be increased commensurate with the increased input rates in accordance with the appropriate equations in FAC 17-2.

OxyChem®

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


Occidental Chemical Corporation

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We will conduct several "plant" stack tests during the 30 day test period to verify the operation of the various scrubbers and cyclones. So that there is no misunderstanding in the future, these plant test will be abbreviate runs and are not intended to be used as compliance tests. If the modifications prove to be successful and feasible, we will run a set of compliance-type stack tests for the Pollyphos facility and they will be submitted with an application for permit modification.

If you should have further questions concerning this matter, please do not hesitate to contact me.

Best Regards,



Charles B. Pults
Environmental Engineer

psb

cc: W. M. Miller
M. E. Pauley
Dick Larimer
Jerry Chia

