

### 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

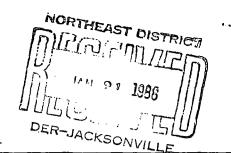
Dale Twachtmann

Sec/retary

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. Pults

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

					Part MCKS	ONVILLE
Date	Rate	<u>F</u>	F Allowed	Part.	Part JACKS	<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" POLLYPOHS 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

NORTHEAST DISTRICT

## State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION



# Interoffice Memorandum

	For Routing To Other Than The Addressee		
	To: Location:		
CLAND	To: Location:		
Tork Illing	Jo. Location:		
1 Maywell	From: Date:		

TO: Dale Twachtmann

FROM: Howard L. Rhodes

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

Attachment



RECEIVED

JUL 0 5 1988

DER - BAQM

SENIDER: 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. XX: how to whom delivered, date, and addressee's address.  2. Restricted Delivery †(Extra charge)†					
3. Article Addressed to:	4. Article Number				
Mr. Hudson C. Smith General Manager Occidental Chemical Company Post Office Box 300	P 702 175 472  Type of Service:  Registered Insured  COD  Express Mail				
White Springs, FL 32096	Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .				
5. Signature – Addressee X 6. Signature – Agent X Marinee Rozero	8. Addressee's Address (ONLY if requested and fee paid)				
7. Date of Delivery					
PS Form 38 ¼, Mar. 1987 ★ U.S.G.P.O. 1987-178-268	DOMESTIC RETURN RECEIPT				

## 702 175 472 RECEIPT FOR CERTIFIED MAIL NO INSURANCE COVERAGE PROVIDED NOT FOR INTERNATIONAL MAIL

(See Reverse)			
Sent to Mr. Hudson C. Smit	h,	Occid	enta
Street and No. P.O. Box 300	(	Chem.	Co.
P.O. State and ZIP Code White Springs, FL	320	96	
Postage	s		1 
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	2		

PS Form 3800, June 1985

AC 24-15084