

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.

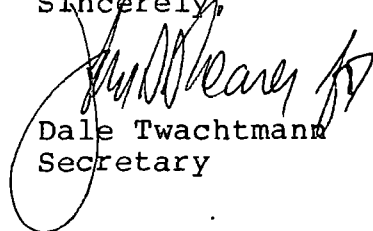
Amended: VE 40% Opacity.

Attachment to be Incorporated:

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

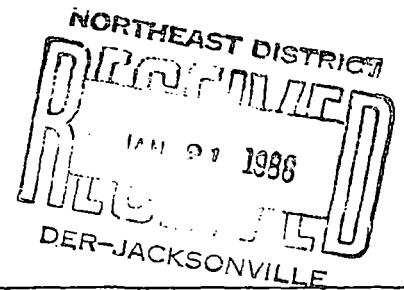
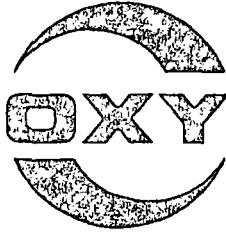
A copy of this letter must be attached to the referenced construction permit and shall become a part of that permit.

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.

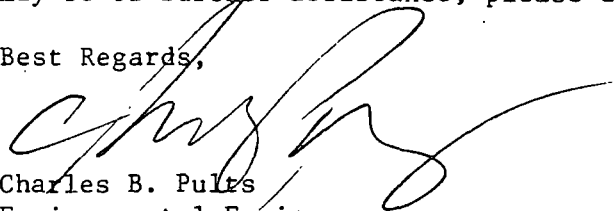
The attached list is a compilation of compliance tests conducted on these two plants since September 1983. Please note that during that period only one particulate failure occurred, and that was only 0.3 lb./hr. Subsequent investigation revealed a problem with the pollution abatement equipment. It was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

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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,



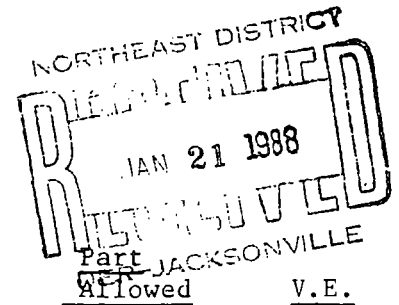
Charles B. Pults
Environmental Engineer

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

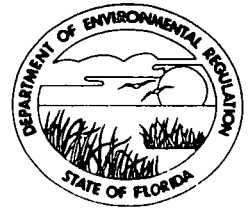


<u>Date</u>	<u>Rate</u>	<u>F</u>	<u>F Allowed</u>	<u>Part.</u>	<u>Allowed</u>	<u>V.E.</u>
9/14/83	7.36	0.91	2.04	10.21	12.38	24.8
6/21/84	9.12	1.37	2.50	12.5	14.14	36.4
4/10/85	7.93	1.35	2.20	11.82	12.96	40
10/9/85	8.78	0.71	2.43	7.64	13.81	43.8
4/23/86	7.75	0.44	2.15	7.16	12.78	14.2
10/2/86	8.39	1.15	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

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JUL 05 1988

DER - BAQM

