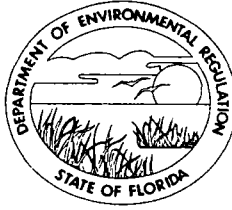


STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

July 9, 1987

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 No. AC 24-35248

This is in reply to your May 22, 1987, letter requesting revision of construction permit No. AC 24-35248 for Occidental's Dical Acid Preparation Plant.

The Department's review of this request indicates there will be no increase in permitted emissions. Therefore, the following shall be changed and added:

Specific Condition No. 3:

Present: Testing of emissions must be accomplished at an input of at least 90% of 17.6 TPH of 100% P<sub>2</sub>O<sub>5</sub>.

Amended: Testing of emissions must be accomplished at an input rate of at least 90% of the maximum capacity of the four acid defluorination batch tanks, or 117,000 gallons of acid, except that in no event shall the input rate exceed 35.6 TPH of 100% P<sub>2</sub>O<sub>5</sub>.

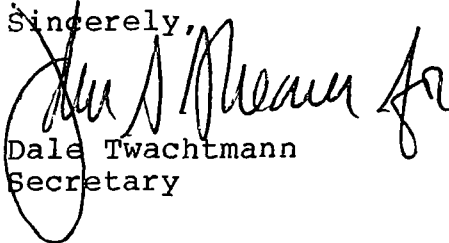
Attachment to be Incorporated:

3. Occidental Chemical Company's letter to DER dated May 22, 1987.

Mr. W. Marvin Miller  
Page Two  
July 9, 1987

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

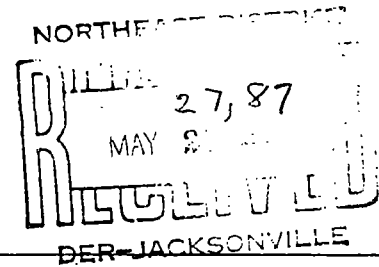
Sincerely,

  
Dale Twachtmann  
Secretary

DT/ks

cc: J. Cole  
W. Marvin Miller, Occidental

ATTACHMENT 3



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

May 22, 1987

Mr. Johnny Cole  
Department of Environmental  
Regulation  
3426 Bills Road  
Jacksonville, FL 32207

RE: Rate increase request for Dical  
Acid Prep - Permit No. A024-65096

Dear Mr. Cole:

Recent modifications to this facility allow an increase in rate, or stated another way a decrease in the time required for fluoride removal from the acid. This rate increase has been accomplished primarily by the installation of stainless steel heat exchangers in place of the original carbon heat exchangers. Heat transfer efficiency is enhanced resulting in decreased "batch" time.

Another variable which directly affects the time necessary to defluorinate the acid is the initial fluoride concentration of the acid. The greater the initial fluoride concentration the longer period of time that is necessary to complete the process. In order to accommodate this variability in the production rate, language may be included in the permit which allows acceptable compliance testing (less than 90% of the permitted rate) at lower production rates.

The plant is now permitted for 17.6 TPH of 100%  $P_2O_5$  input. By this letter we are requesting that the permitted production rate be increased to 35.6 TPH. The attached compliance test dated April 8, 1987, demonstrates that the plant can be operated at 37.7 TPH with emission rates well below the permitted rate.

We appreciate your consideration of this matter. If you have any questions or need additional information, please call our office.

Sincerely,

W. Marvin Miller  
Environmental Coordinator

psb

Attachment

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION



# Interoffice Memorandum

TO: Dale Twachtmann

THRU: Howard Rhodes *HR*

FROM: Clair Fancy *CF*

DATE: July 9, 1987

SUBJ: Amendment of Construction Permit No. AC 24-35248

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: \_\_\_\_\_ Locn: \_\_\_\_\_  
To: \_\_\_\_\_ Locn: \_\_\_\_\_  
To: \_\_\_\_\_ Locn: \_\_\_\_\_  
From: \_\_\_\_\_ Date: \_\_\_\_\_

**RECEIVED**

JUL 10 1987

Office of the Secretary

Attached for your approval and signature is a letter that will amend the above referenced construction permit for the Occidental Chemical Company's Dical Acid Prep Plant with no increase in permitted emissions. The Bureau recommends that the permit amendment be approved.

CF/JR/s

attachment

P 274 007 735

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to Hudson C. Smith Occidental Chemical Co.	
Street and No. 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: 07/16/87 AC 24-35248	

PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 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 service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to: Hudson C. Smith  
General Manager  
Occidental Chemical Company  
Post Office Box 300  
White Springs, Florida 32096

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 274 007 735

Always obtain signature of addressee or agent and **DATE DELIVERED.**

- Signature - Addressee  
X
- Signature - Agent  
X Clarence Rogers
- Date of Delivery  
7-20-87
- Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT