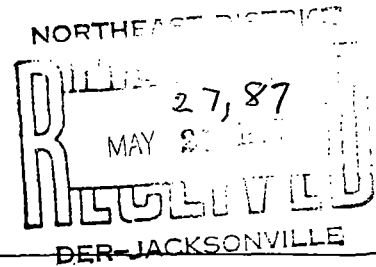


AC 24-35248



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% P₂O₅ 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