

November 25, 1991

Mr. Johnny Cole
Florida Department of Environmental
Regulation
Northeast District
7825 Baymeadows Way, Suite B-200
Jacksonville, FL 32256-7577

Subject: Green Superphosphoric Acid Plant

Dear Johnny:

As discussed with you, I am transmitting the attached "Application to Construct" together with a proprietary disclosure which we have marked "Confidential".

This process was first permitted by the Southwest District office of FDER on March 1, 1989, under Permits AC53-138041 and A053-157886. The basic process has since been patented and will be licensed to the Occidental Chemical Corporation.

Occidental intends to install a unit similar in production rate and configuration at its White Springs facility.

I will be pleased to answer any questions you may have.

Sincerely,

OCCIDENTAL CHEMICAL CORPORATION

A handwritten signature in cursive script that reads "W. W. Atwood".

W. W. Atwood
Environmental Special Projects Manager

WWA:gmc

enclosures



Occidental Chemical Corporation

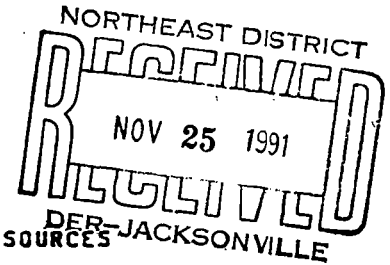
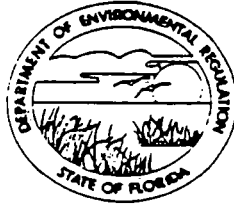
Agricultural Products - Florida Operations

County Road 137, P.O. Box 300, White Springs, Florida 32096

904/397-8101

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



APPLICATION TO ~~OPERATE~~/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Green Superphosphoric Acid Plant New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Occidental Chemical Corporation COUNTY: Hamilton

Identify the specific emission point source(s) addressed in this application (i.e. Line
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Green SPA Plant

SOURCE LOCATION: Street U. S. 41, North of White Springs City White Springs

UTM: East (17) 321.1 North 3369.8

Latitude 30 ° 26 ' 56 "N Longitude 82 ° 51 ' 40 "W

APPLICANT NAME AND TITLE: J. B. Munroe, Vice President, Operations

APPLICANT ADDRESS: P. O. Box 300, White Springs, FL 32096

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Occidental Chemical Corporation

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: *J. B. Munroe*

J. B. Munroe, Vice President, Operations
Name and Title (Please Type)

Date: 11/25/91 Telephone No. 904/397-8101

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed 

John B. Koogler, Ph.D., P.E.

Name (Please Type)

Koogler & Associates, Environmental Services

Company Name (Please Type)

4014 N.W. 13th Street, Gainesville, FL 32609

Mailing Address (Please Type)

Florida Registration No. 12925 Date: 11/20/91 Telephone No. (904) 377-5822

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Attachments A & B

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction February 1992 Completion of Construction February 1993

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Scrubber for fluoride emission control is estimated to cost \$50,000.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
 if power plant, hrs/yr _____ ; if seasonal, describe: _____
Annual operating factor of 100% (8760 hr/yr) used for permitting. Typical annual
operating factor will be 85%.

F. If this is a new source or major modification, answer the following questions.
 (Yes or No) New minor source.

- | | |
|---|-----------|
| 1. Is this source in a non-attainment area for a particular pollutant? | <u>NO</u> |
| a. If yes, has "offset" been applied? | <u>-</u> |
| b. If yes, has "Lowest Achievable Emission Rate" been applied? | <u>-</u> |
| c. If yes, list non-attainment pollutants. _____ | <u>-</u> |
| 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. | <u>NO</u> |
| 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. | <u>NO</u> |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? | <u>NO</u> |
| 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? | <u>NO</u> |
| H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? | <u>NO</u> |
| a. If yes, for what pollutants? _____ | <u>-</u> |
| b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted. | |

Attach all supportive information related to any answer of "Yes". Attach any justifi-
 cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
H ₃ PO ₄ (SPA)	F	0.3	54000	2
Oxidant (1)	None	-	(1)	1
(1) See proprietary disclosure attached.				

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 54000 + Oxidant
2. Product Weight (lbs/hr): 54000 + Oxidant

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
NO _x	13.5	59.1*	NA	NA	13.5	59.1	5
Fluorides	0.2	0.99	NA	NA	45.4	198.8	5
* See Attachment C for offsetting emissions and net emission increase.							

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Scrubber (specific scrubber not yet selected)	Fluoride	99.5	NA	Estimate*
* Based on performance of similar cross-flow packed scrubber at Occidental.				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
None			

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Scrubber water from a pond will be recirculated.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 65 ft. Stack Diameter: 1.5 ft.
 Gas Flow Rate: 4380 ACFM 4150 DSCFM Gas Exit Temperature: 80 °F.
 Water Vapor Content: 3 % Velocity: 41.3 FPS

SECTION IV: INCINERATOR INFORMATION
 (Not Applicable)

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer: _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____
 Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

**SECTION V: SUPPLEMENTAL REQUIREMENTS
(ATTACHMENT D)**

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

(NOT APPLICABLE)

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

- C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

- D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION
(NOT APPLICABLE)

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? Yes No
- b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
2. Surface data obtained from (location) _____
3. Upper air (mixing height) data obtained from (location) _____
4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.
2. _____ Modified? If yes, attach description.
3. _____ Modified? If yes, attach description.
4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ₂	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

- F. Attach all other information supportive to the PSD review.
- G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.
- H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT A



Occidental produces fertilizer grade superphosphoric acid (SPA) under permits A024-170300 covering SPA Plants A and B at the Suwannee River Complex and A024-186309 for SPA Plants C and D at the Swift Creek Complex.

Carbon particles entrained in Occidental SPA result in a black product satisfactory for many uses; however, a "decolorized" SPA has marketing advantages, particularly for domestic sales. Therefore, it is planned to use a proprietary process, licensed from others, to effect a color change in the SPA from black to green using an oxidant.

The oxidant, added to hot SPA, promotes a reaction with the carbon resulting in an off-gas containing fluorides and nitrogen oxides. The fluorides will be controlled by scrubbing. The oxidation/reaction process which includes oxidant recovery and recirculation will maintain nitrogen oxide levels, with offsets, below the significant net emissions increase of 40 tons per year. The emission rate, based on a currently permitted unit, will be approximately 0.5 pounds of nitrogen oxide per ton of SPA,

FARMLAND:
 $\frac{29.1 \text{ lb/hr NOx}}{27 \text{ TPH SPA}}$
 $= 1.07 \text{ lb NOx}$
TON SPA
?

It is planned to install this process modification to treat approximately 20% of the SPA production capacity.

The plant will operate in full compliance with all applicable state and federal air regulations.

ATTACHMENT B



The proposed facility will result in the emission of 59.1 tons per year of NO_x (reported as NO₂) and 0.99 tons per year of fluoride. No other regulated pollutants (See Table 17-2,500-2,FAC) will be emitted from the facility.

The emission of NO_x will be partially off-set by the permanent shut down of the B Sulfuric Acid Plant located at the Suwannee River Chemical Complex (Permit A024-103964). The NO_x off-sets will total 33.2 tons per year; resulting in a net NO_x emission increase from the proposed project of 25.9 tons per year. This emission increase is less than the 40 ton per year de minimis increase for NO_x defined by Rule 17-2.500(2)(e)2, FAC. The off-sets for NO_x are documented in Attachment C to this application.

The fluoride emissions from the proposed facility will be 0.99 ton per year; a rate less than the 3.0 tons per year de minimis emission increase for fluorides defined by Rule 17-2.500(2)(e),FAC.

As there will not be a significant increase in the emission rate of any pollutant regulated under the act, the proposed facility will not be classified as a modification to a Major Facility (Rule 17-2.500(2)(d)4.a.(ii),FAC. The project may be permitted as a minor source in accordance with Rule 17-2.500(2)(d)4.b,FAC.

ATTACHMENT C



NOx EMISSIONS OFFSET FROM
EXISTING "B" H2SO4 PLANT
A024-103964

TEST DATA

Date - 6/86
Production Rate - 43.1 ton/hr (1035 tpd)
Stack Gas Flow - 106,310 dscf/ton of acid

ANNUAL PRODUCTION

Year	Hours of Operation (hr/yr)	Acid Production (tons/yr)
1986	6,496	264,136
1985	8,366	330,861
Average	7,431	297,498

NOx EMISSIONS OFFSET

Annual = 106,310 dscf/ton H2SO4
x 297,498 tons/yr
x (2.1×10^{-6}) lb NOx/dscf* x 1/2000
= 33.2 tons NOx/yr as NO₂

*Emission factor from IMC-New Wales permit application for Third (H2SO4) Train Expansion (file with FDER-Tallahassee).

NET NOx EMISSION INCREASE

Proposed Increase - 59.1 tpy
Emission Offset - 33.2 tpy
Net Emission Increase - 25.9 tpy

ATTACHMENT D



SECTION V
SUPPLEMENTAL INFORMATION

I. Process Input and Production Rate

Process Input

H3PO4 (as SPA)	-	54,000 lb/hr (@ 70% P ₂ O ₅)
<u>Oxidant</u>	-	<u>Proprietary</u> (See attached disclosure)
Total	-	54,000 lb/hr + Oxidant

Production Rate

H3PO4 (as Oxidized SPA)	-	54,000 lb/hr
<u>Oxidization products</u>	-	<u>Proprietary</u> (See attached disclosure)
Total	-	54,000 lb/hr + products

Annual Production Capacity

Emission estimates and maximum annual production are based on annual operating factor of 100%. Because of maintenance, the actual operating factor will typically be 85%.

Process Input Rate	=	27 tons SPA/hr
Annual Production	=	27 tph SPA x 8760 hr/yr
	=	236,520 tpy SPA
		x 0.7 ton P ₂ O ₅ per ton SPA
	=	165,564 tpy P ₂ O ₅

2/3. Controlled and Uncontrolled Emissions

Nitrogen Oxides (as NO₂)

Emission Factor - 0.5 lb NO_x/ton SPA (from Farmland Industries, Inc. test data submitted to SW District FDER office).

SPA Feed Rate - 27 tph

NO_x Emissions (controlled and uncontrolled)

= (0.5 lb NO_x/ton SPA)(27 ton SPA/hr)

= 13.5 lb NO_x/hr

x 8760/2000

= 59.1 tpy (See Attachment C for Emission Summary with offsetting emissions)

Fluorides

Emission Factor - 2.4 lb/ton P₂O₅ (from Farmland Industries, Inc. permit application submitted to FDER-Tallahassee)

P₂O₅ Feed Rate = 27 ton SPA/hr x 0.7 lb P₂O₅/lb SPA

= 18.9 ton P₂O₅/hr

Fluoride Emissions (Uncontrolled)

= (2.4 lb F/ton P₂O₅)(18.9 ton P₂O₅/hr)

= 45.4 lb F/hr

x 8760/2000

= 198.8 tpy

Fluoride Emissions (Controlled)

Control efficiency = 99.5% (typical for fluoride scrubber)

= 45.4 (1 - 0.995)

= 0.2 lb F/hr

x 8760/2000

= 0.99 tpy

4. Control Equipment

Fluoride emissions will be controlled with a cross-flow packed scrubber similar to those used by Occidental to control fluoride emissions from phosphoric acid and superphosphoric acid plants. The design details of the scrubber have not been finalized at this time; however, the efficiency of the type of scrubber proposed has been proven. When the details of the scrubber have been developed, they will be forwarded to the Department.

5. Efficiency of Control Equipment

NOx - Not applicable

Fluoride - Designed at 99.5% based on performance of similar scrubbers at Occidental.

6. Process Flow Diagram - See Attachment E

7. Location Map - See Attachment F

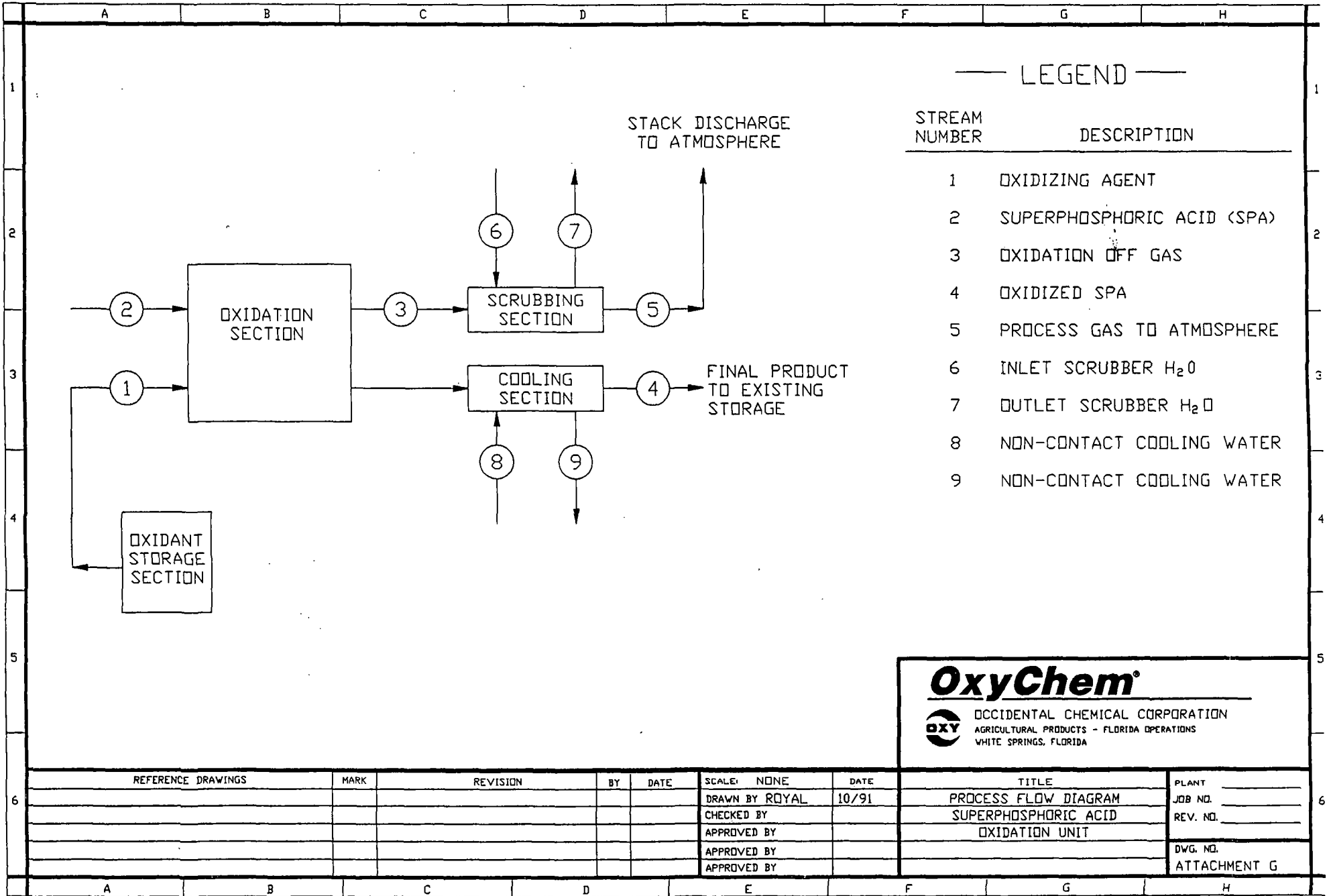
8. Site Map - See Attachment G

9. Application Fee - \$2000 per 17-4.050(4); with offsets

10. Not Applicable.

ATTACHMENT E





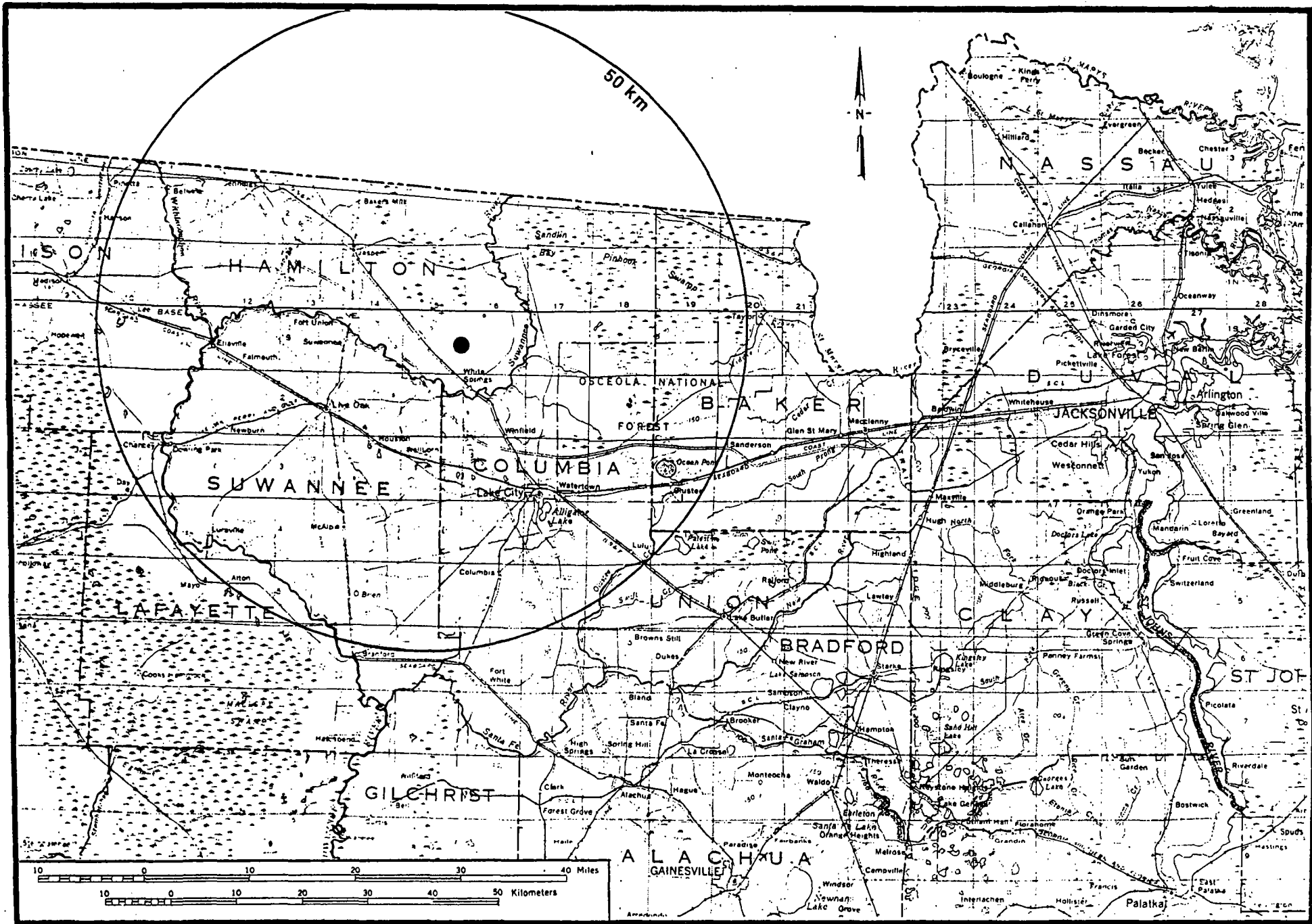
OxyChem[®]

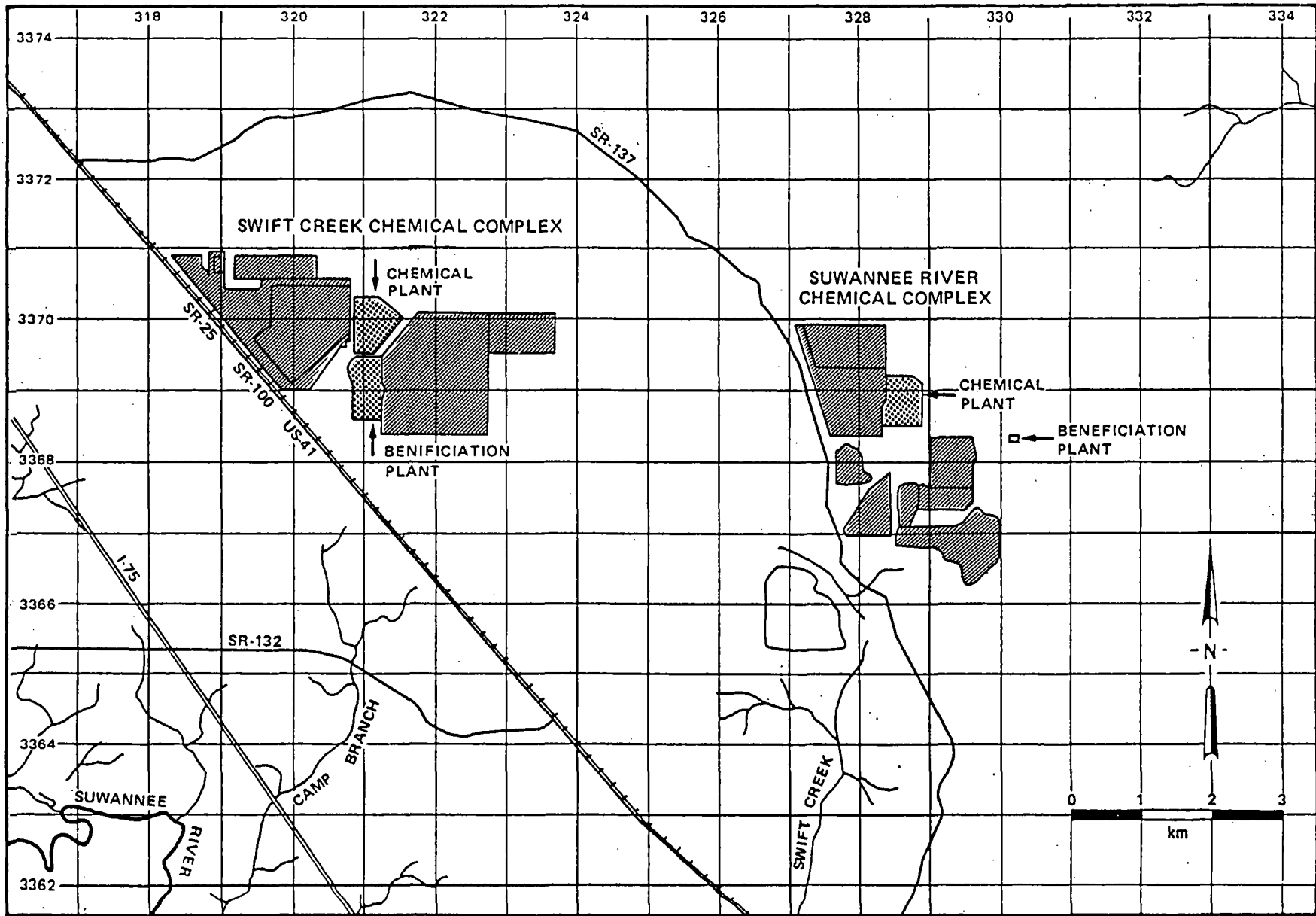
OCCIDENTAL CHEMICAL CORPORATION
 AGRICULTURAL PRODUCTS - FLORIDA OPERATIONS
 WHITE SPRINGS, FLORIDA

REFERENCE DRAWINGS	MARK	REVISION	BY	DATE	SCALE: NONE	DATE	TITLE	PLANT
					DRAWN BY ROYAL	10/91	PROCESS FLOW DIAGRAM	JOB NO. _____
					CHECKED BY		SUPERPHOSPHORIC ACID	REV. NO. _____
					APPROVED BY		OXIDATION UNIT	DWG. NO. _____
					APPROVED BY			ATTACHMENT G
					APPROVED BY			

ATTACHMENT F







ATTACHMENT G



Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. Barry Andrews, DARM, BAR

2.

3.

4.

Remarks:

The enclosed ACP for
Oxy Green SPA Plant is
being sent for a
processing decision.

Wes Atwood said that the
ACP needs to be determined
complete by the end of 1991
to comply w/ FAC Rule
17-2.500(2)(e)3.

From

Johnny L. Cole

Date

11-26-91

Phone SC

880 4310 x378