

PM
11-19-86
Gainesville, FL

Postmasters # 608741

Ka

KOOGLER & ASSOCIATES, *Environmental Services*

1213 NW 6th Street • Gainesville, Florida 32601 • 904/377-5822

KA 102-82-03

November 19, 1986

BY FEDERAL EXPRESS

Mr. C. H. Fancy
Deputy Chief, Bureau of
Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Subject: Occidental Chemical Agricultural Products Inc.
Prilled Sulfur Storage and Handling Facility
Permit AC24-119008

Dear Mr. Fancy:

We have reviewed the Technical Evaluation and Preliminary Determination for the subject prilled sulfur storage and handling facility proposed by Occidental Chemical Agricultural Products Inc. (Occidental) for their Swift Creek Chemical Complex. On behalf of Occidental, I would like to request one minor modification to a specific condition of the proposed construction permit.

Specific Condition No. 6 of the proposed permit states:

A minimum of 90 days prior to receiving sulfur pellets, the permittee shall submit adequate proof of the solid sulfur being "standard sulfur pellets" as defined in Rule 17-2.100(179), FAC, and details of the water spray system (referred to in the permit application), to the Central Air Permitting (CAPs) and to the DER's district office for approval.

Occidental both recognizes and agrees that any solid sulfur received at the proposed prilled sulfur storage and handling facility must meet the specification for "standard sulfur pellets" defined in Rule 17-2.100(179), FAC and recognizes and agrees that a water spray system, as proposed in the permit application for the subject permit, is to be installed and operable prior to receiving any solid sulfur at the Swift Creek Chemical Complex. Occidental feels, however, that the 90 day

DER

NOV 20 1986

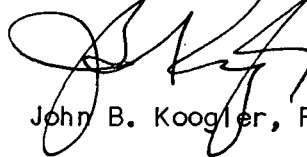
period between the time that test results demonstrating compliance with "standard sulfur pellet" specifications are submitted to the Department and the time Occidental can receive the prilled sulfur is excessive and requests that the notification period be reduced to 15 days. The primary reason for requesting this modification is to allow Occidental to react in a timely manner, if necessary, to opportunities in the sulfur market. Occidental will still, in accordance with Specific Condition No. 6, submit details of the proposed water spray system to the Department 90 days prior to receiving prilled sulfur since these details will be available at least that far in advance of the time prilled sulfur can be received.

Occidental recognizes that it has the responsibility to conduct, or to have conducted, the necessary tests to certify that any sulfur pellets being considered for delivery to the Swift Creek Chemical Complex satisfy the specifications of the "standard sulfur pellets". Once Occidental receives the results of these tests and is able to commit to a contract for the sulfur, they would like to begin receiving the sulfur as soon thereafter as possible. Occidental feels that the proposed 15 day period is adequate time for the Department to review the results of the tests demonstrating compliance with the specifications of the "standard sulfur pellets" and to be assured that the conditions of the subject permit are being complied with.

We appreciate your consideration of this request and will provide any additional information that you might require related to this matter.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:app

cc: Mr. D. T. Sawyer
Mr. W. M. Miller
Mr. W. W. Atwood
Mr. J. D. B. Kuersteiner