

**AGRICO**

Division of Freeport-McMoRan Resource Partners

Agrico Chemical Company  
P. O. Box 1110  
Mulberry, FL 33860  
(813) 428-1431

**RECEIVED****NOV 17 1989****DER-BAQM**

November 14, 1989

Mr. Pradeep Raval  
Permitting Engineer  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: **Proposed Permit No. AC53-167779, Molten Sulfur  
Storage and Handling System, South Pierce Plant**

Dear Pradeep:

The proposed permit and Technical Evaluation and Preliminary Determination for the above-referenced source was received under cover of correspondence dated November 6, 1989. As discussed during our telephone conversations of November 13 and 14, we wish to submit comments on these documents and to recommend clarification of several specific conditions of the proposed permit.

Our comments are as follows:

1. In the Project Description (Section II) of the Technical Evaluation and Preliminary Determination, reference is made to the four vents on the truck pit - two of which have forced ventilation at a rate of 1350 cfm each. We wish to point out that this ventilation rate is based on a specification sheet supplied by the fan manufacturer and has never actually been measured. We suggest that the language be revised to reflect the ventilation rate as an approximation.
2. Specific Condition No. 2 imposes a maximum molten sulfur throughput rate on a daily and annual basis and refers to a "combined maximum permitted sulfuric acid production rate".

Mr. Pradeep Raval  
November 14, 1989  
Page Two

In fact, our sulfuric acid plant operating permits, A053-101764 and A053-145510, do not impose maximum production rates, but allow production rates to increase above design capacity as long as the emission limitations imposed by the permits are not exceeded. The subject permit would effectively limit sulfuric acid production rates by limiting the throughput of molten sulfur. We object to this limitation since sulfuric acid production rates are addressed by separate and independent permits. To avoid the possibility of the molten sulfur throughput maximum being exceeded and subsequently being interpreted as a permit violation, we request that the limits imposed by this condition be revised to allow for sulfuric acid production rates which may be required to meet product demand.

Based on our conversations we agreed to the following language:

The molten sulfur throughput rate shall neither exceed 1507 tons per day (TPD) average (1580 TPD maximum), nor 550,000 tons per year (TPY), based on the combined sulfuric acid production capacity of about 4620 TPD 100% sulfuric acid for the two plants.

3. Specific Condition No.3 establishes the compliance test method as EPA method 9, for visible emissions. We request that the duration of each test be specified as thirty (30) minutes.

You also agreed to include additional language which recognizes that the tank and pit filling is not continuous. We would agree to assure a minimum of one filling during each VE test.

Mr. Pradeep Raval  
November 14, 1989  
Page Three

We appreciate the opportunity to submit these comments and have made the necessary arrangements to have "Notice Of Intent To Issue" published as required. We will forward an Affidavit of Publication as soon thereafter as possible. Should you have any questions or wish to discuss this matter further, please do not hesitate to call.

Thank you.

Sincerely,



Phillip A. Steadham  
Environmental Chemist

xc: S.L. Presnell  
D.L. Chamberlain  
D.W. Dudley  
F.J. Muntz

*copy to Pradeep's file 11/20/89*



Agrico Chemical Company  
P. O. Box 1110  
Mulberry, FL 33860  
(813) 428-1431

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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

August 24, 1989

C.H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: South Pierce Molten Sulfur Storage and Handling  
Facility, AC53-16779

Dear Mr. Fancy:

In response to your August 18, 1989 request for additional information on the above-referenced construction permit application, we submit the following:

1. The currently permitted sulfuric acid manufacturing design capacity at South Pierce is 83.3 TPH of 100% H<sub>2</sub>SO<sub>4</sub> for each of two plants, or 166.6 TPH total. However, our permit allows the actual production rate to increase above this amount as long as the emission limitations specified by the permit are not exceeded. The corresponding molten sulfur requirement for the design capacity of 166.6 TPH 100% H<sub>2</sub>SO<sub>4</sub> would be 54.31 TPH sulfur. The corresponding molten sulfur requirement for any production rate is given by the following equation:

$$\begin{aligned} \text{Molten Sulfur required} &= \text{Production Rate (TPH)} \\ &\quad \times 0.326 \text{ (tons S/ton H}_2\text{SO}_4\text{)} \end{aligned}$$

2. Emissions from molten sulfur delivery vehicles were included in the emission estimates for the truck and rail receiving pits. These were presented in the subject permit application.



Agrico Chemical Company  
P. O. Box 1110  
Mulberry, FL 33860

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of the return address

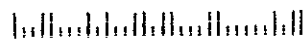
**CERTIFIED**

P 895 312 636

**MAIL**

Mr. C.H. Fancy, P.E.  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RETURN RECEIPT REQUESTED



Mr. C.H. Fancy  
August 24, 1989  
Page Two

3. There are no other source/equipment/process within or associated with the sulfur facility at South Pierce.
4. The physical dimensions of the sulfur pits and tanks at South Pierce are:
  - a) Truck pit: 83 feet x 24 feet x 5.5 feet
  - b) Rail pit: 45 feet x 7 feet x 5.5 feet
  - c) Storage tanks (2): 32 feet(diameter) x 24 feet(height)

Should you require any additional information, please do not hesitate to call.

Sincerely,

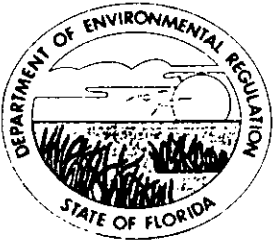


Phillip A. Steadham  
Environmental Chemist

PAS:sm  
8/24/89

xc: S. Presnell  
D. Lynch

copied: P. Raval  
A. Kuna, SW Dist.  
CHF/BT



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

August 18, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. S. L. Presnell  
Agrico Chemical Company - S. Pierce  
P. O. Box 1110  
Mulberry, Florida 33860

Dear Mr. Presnell:

Re: Agrico - S. Pierce Sulfur Facility Permitting, AC 53-167779

The Department has received your application dated July 18, 1989, and deemed it incomplete. Please submit the following information including all assumptions, calculations and reference material:

1. What is the currently permitted sulfuric acid manufacturing capacity of Agrico's South Pierce facility and the corresponding molten sulfur requirement?
2. Provide estimates of any expected emissions from the molten sulfur delivery vehicles.
3. Please submit air emission estimates for any other source/equipment/process within (or associated with) the sulfur facility which has not yet been permitted by DER.
4. Verify the physical dimensions (length x width x depth) of the sulfur pits located in the sulfur facility.

If you have any questions, please call Pradeep Raval at (904) 488-1344 or write to me at the above address.

Sincerely,

*C. H. Fancy*  
for C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/PR

cc: B. Thomas, SW District  
D. Lynch, P.E., Agrico

# Agrico

A Division of  
Freeport-McMoRan Resource Partners

Agrico Chemical Company  
State Road 630  
Bartow, FL 33830

P. O. Box 1110  
Mulberry, FL 33860  
(813) 428-1423

July 18, 1989

Mr. Pradeep A. Raval, Engineer  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Re: Molten Sulfur Storage and Handling Facility -  
Construction Permit Application For South Pierce

Dear Pradeep:

Enclosed is a construction permit application with the appropriate processing fee for the above-referenced sources, which consist of a tank receiving pit, a rail receiving pit, and two storage tanks.

Should you have any questions following your receipt and review of the enclosed application and attachments, please do not hesitate to call.

Thank you.

Sincerely,



Phillip A. Steadham  
Environmental Chemist

PAS:sm  
7/18/89

xc: S. Presnell  
D. Chamberlain  
W. W. Forman

1031

RECEIVED  
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1989 JUL 21 AM 10:48



P 938 762 655

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1985

Sent to <b>Mr. S. L. Presnell, Agrico</b>	
Street and No <b>P. O. Box 1110</b>	<b>Chemical Co.</b>
P.O. State and ZIP Code <b>Mulberry, FL 33860</b>	
Postage	\$
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	\$
Postmark or Date  <b>Mailed: 8-18-89</b> <b>Permit: AC 53-167779</b>	

<p><b>SENDER:</b> Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.</p> <p>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 additional service(s) requested.</p> <p>1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge)      2. <input type="checkbox"/> Restricted Delivery (Extra charge)</p>	
<p>3. Article Addressed to:</p> <p><b>Mr. S. L. Presnell</b> <b>Agrico Chemical Company, S. Pierce</b> <b>P. O. Box 1110</b> <b>Mulberry, FL 33860</b></p>	<p>4. Article Number</p> <p><b>P 938 762 655</b></p>
<p>Type of Service:</p> <p><input type="checkbox"/> Registered      <input type="checkbox"/> Insured  <input checked="" type="checkbox"/> Certified      <input type="checkbox"/> COD  <input type="checkbox"/> Express Mail      <input type="checkbox"/> Return Receipt for Merchandise</p>	
<p>Always obtain signature of addressee or agent and <b>DATE DELIVERED</b>.</p>	
<p>5. Signature - Address</p> <p>X <i>Ray Hallaway</i></p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent</p> <p>X</p>	
<p>7. Date of Delivery</p> <p><b>8-21-89</b></p>	
<p>PS Form 3811, Mar. 1988      * U.S.G.P.O. 1988-212-865      <b>DOMESTIC RETURN RECEIPT</b></p>	