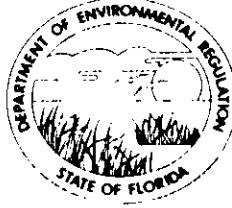


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

February 23, 1984

Mr. James T. Wilburn, Chief
Air Management Branch
Air & Waste Management Division
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Wilburn:

RE: Agrico Chemical Company's proposed wet prilled sulfur
handling facility in South Pierce, AC 53-55780

I wish to bring to your attention that Agrico Chemical Company proposes to modify its existing facilities at South Pierce, Polk County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, has reviewed the proposed construction and, after initially issuing an intent to deny, determined after review of additional information that reasonable assurance had been given, with certain permit conditions. Public notices of both the intent to deny and the Department's more recent position are attached.

These notices have been mailed to you for your information and in accordance with regulatory requirements. You need take no action unless you wish to comment on the proposed construction. If you have any questions, please feel free to call Mr. Bill Thomas or myself at (904)488-1344.

Sincerely,

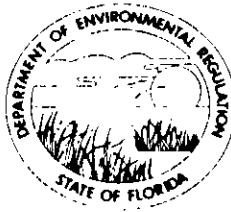
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Enclosure

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

February 23, 1984

Mr. Ron Fahs
State A-95 Coordinator
Florida State Planning and
Development Clearinghouse
Office of Planning and Budget
The Capitol
Tallahassee, Florida 32301


Dear Mr. Fahs:

RE: Agrico Chemical Company's proposed wet prilled sulfur
handling facility in South Pierce, AC 53-55780

I wish to bring to your attention that Agrico Chemical Company proposes to modify its existing facilities at South Pierce, Polk County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, has reviewed the proposed construction and, after initially issuing an intent to deny, determined after review of additional information that reasonable assurance had been given, with certain permit conditions. Public notices of both the intent to deny and the Department's more recent position are attached.

These notices have been mailed to you for your information and in accordance with regulatory requirements. You need take no action unless you wish to comment on the proposed construction. If you have any questions, please feel free to call Mr. Bill Thomas or myself at (904)488-1344.

Sincerely,

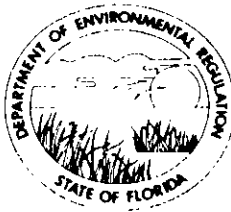

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Enclosure

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

February 23, 1984

Mr. James Duane
Central Florida Regional
Planning Council
Post Office Drawer 208
Bartow, Florida 33830


Dear Mr. Duane:

RE: Agrico Chemical Company's proposed wet prilled sulfur
handling facility in South Pierce, AC 53-55780

I wish to bring to your attention that Agrico Chemical Company proposes to modify its existing facilities at South Pierce, Polk County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, has reviewed the proposed construction and, after initially issuing an intent to deny, determined after review of additional information that reasonable assurance had been given, with certain permit conditions. Public notices of both the intent to deny and the Department's more recent position are attached.

These notices have been mailed to you for your information and in accordance with regulatory requirements. You need take no action unless you wish to comment on the proposed construction. If you have any questions, please feel free to call Mr. Bill Thomas or myself at (904)488-1344.

Sincerely,

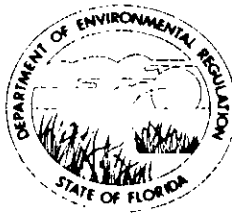

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Enclosure

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

February 23, 1984

Polk County Board of County
Commissioners
Post Office Box 60
Bartow, Florida 33830

Dear Commissioners:

RE: Agrico Chemical Company's proposed wet prilled sulfur
handling facility in South Pierce, AC 53-55780

I wish to bring to your attention that Agrico Chemical Company proposes to modify its existing facilities at South Pierce, Polk County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, has reviewed the proposed construction and, after initially issuing an intent to deny, determined after review of additional information that reasonable assurance had been given, with certain permit conditions. Public notices of both the intent to deny and the Department's more recent position are attached.

These notices have been mailed to you for your information and in accordance with regulatory requirements. You need take no action unless you wish to comment on the proposed construction. If you have any questions, please feel free to call Mr. Bill Thomas or myself at (904)488-1344.

Sincerely,

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

CHF/pa

Enclosure

PEEPLES, EARL, REYNOLDS & BLANK

PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW

L. GRANT PEEPLES
WILLIAM L. EARL
ROBERT N. REYNOLDS, P.A.
ROBERT H. BLANK
PAUL H. AMUNDSEN
WILLIAM F. TARR
SANTIAGO G. LEON
NINA S. KOLE
ELIZABETH M. WEAVER
—
MOORE & WILLIAMS, P.A.
TALLAHASSEE, FLORIDA
COUNSEL

January 30, 1984

ONE BISCAYNE TOWER, SUITE 3636
TWO SOUTH BISCAYNE BOULEVARD
MIAMI, FLORIDA 33131
(305) 358-3000

306 EAST COLLEGE AVENUE
POST OFFICE BOX 1169
TALLAHASSEE, FLORIDA 32302
(904) 222-2156

REPLY TO:
Miami

Mr. Steve Smallwood
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Re: Agrico South Pierce Sulphur Permit (Permit
Application #AC53-55780)

Dear Mr. Smallwood:

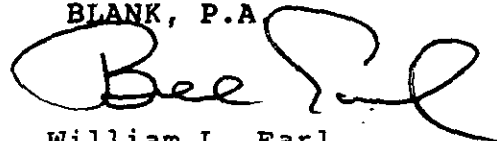
Enclosed please find additional information and preliminary emission factor data developed by TRC. These data relate to the 3% moisture levels proposed at South Pierce in terms of both a theoretical laboratory moisture condition (uniformly distributed 3% moisture) and moisture distributions averaging 3% but varied to represent drain down and unevenly distributed moisture levels believed to exist in actual commercial handling situations.

TRC believes that moisture retention and distribution within prilled sulphur piles or truck or railcar loads are key factors in determining a realistic emission factor for prilled sulphur. More detailed data at additional moisture levels and testing conclusions will be presented in a formal written report submitted in the Department's rulemaking proceeding.

Please call if you have any questions on this. Our technical experts are available to discuss this matter with you or any members of your staff.

Very truly yours,

PEEPLES, EARL, REYNOLDS &
BLANK, P.A.



William L. Earl
For the Firm

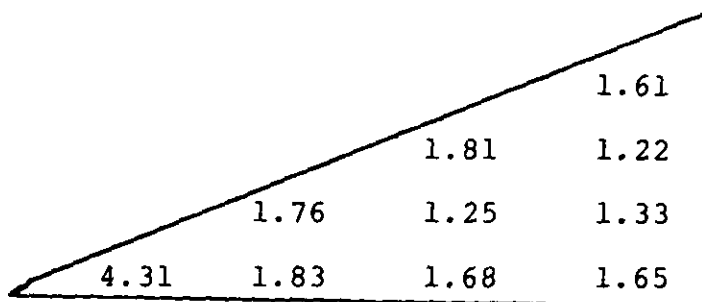
cc: Mr. Claire Fancy
Mr. Ed Huck
Mr. John Bottcher

Comparison of Emission Results
For Different Moisture Content Distributions
For Handled Wet-Formed Prilled Sulfur
At 3% Moisture Content By Weight

Run #	Surface Moisture Content Distribution (% by weight)	Average Surface Moisture Content (% by weight)	Emission Results (lbs/ton)
15	Uniform Laboratory Moisture	3.06	0.092
23	Uniform Laboratory Moisture	3.08	0.258
28	Uniform Laboratory Moisture	3.08	0.229
29	Uniform Laboratory Moisture	3.08	0.232
	Distributed Moisture		
35	4.22 - 2.90 - 2.52	3.20	0.323
37	4.22 - 2.90 - 2.52	3.20	0.311
39	4.22 - 2.90 - 2.52	3.19	0.316
	Distributed Moisture		
36	4.11 - 0.88 - 3.96	3.09	1.74
38	4.11 - 0.88 - 3.96	3.05	2.04
40	4.11 - 0.88 - 3.96	2.97	2.64

Cross-Section of 100 Pound
Pile of Wet-Formed Prilled Sulfur* One Hour
After Spraying With Approximately 8% Water By Weight

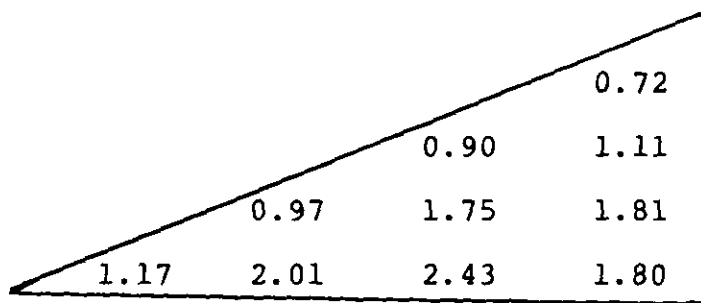
Surface Moisture Contents (% by Weight)



*The surface moisture content of the pile before spraying was approximately 1.5% which had been obtained by uniform mixing. 1.5% is an approximate delivered material moisture content by weight as reported by Canadian experts and supported the Faustian tests reported by Agrico Chemical Company.

Cross-Section of 100 Pound
Pile of Wet-Formed Prilled Sulfur*
20 Hours After Spraying With
Approximately 8% Moisture by Weight

Surface Moisture Contents (% by Weight)



*The surface moisture content of the pile before spraying was approximately 1.5% which had been obtained by uniform mixing. 1.5% is an approximate delivered material moisture content by weight as reported by Canadian experts and supported the Faustian tests reported by Agrico Chemical Company.

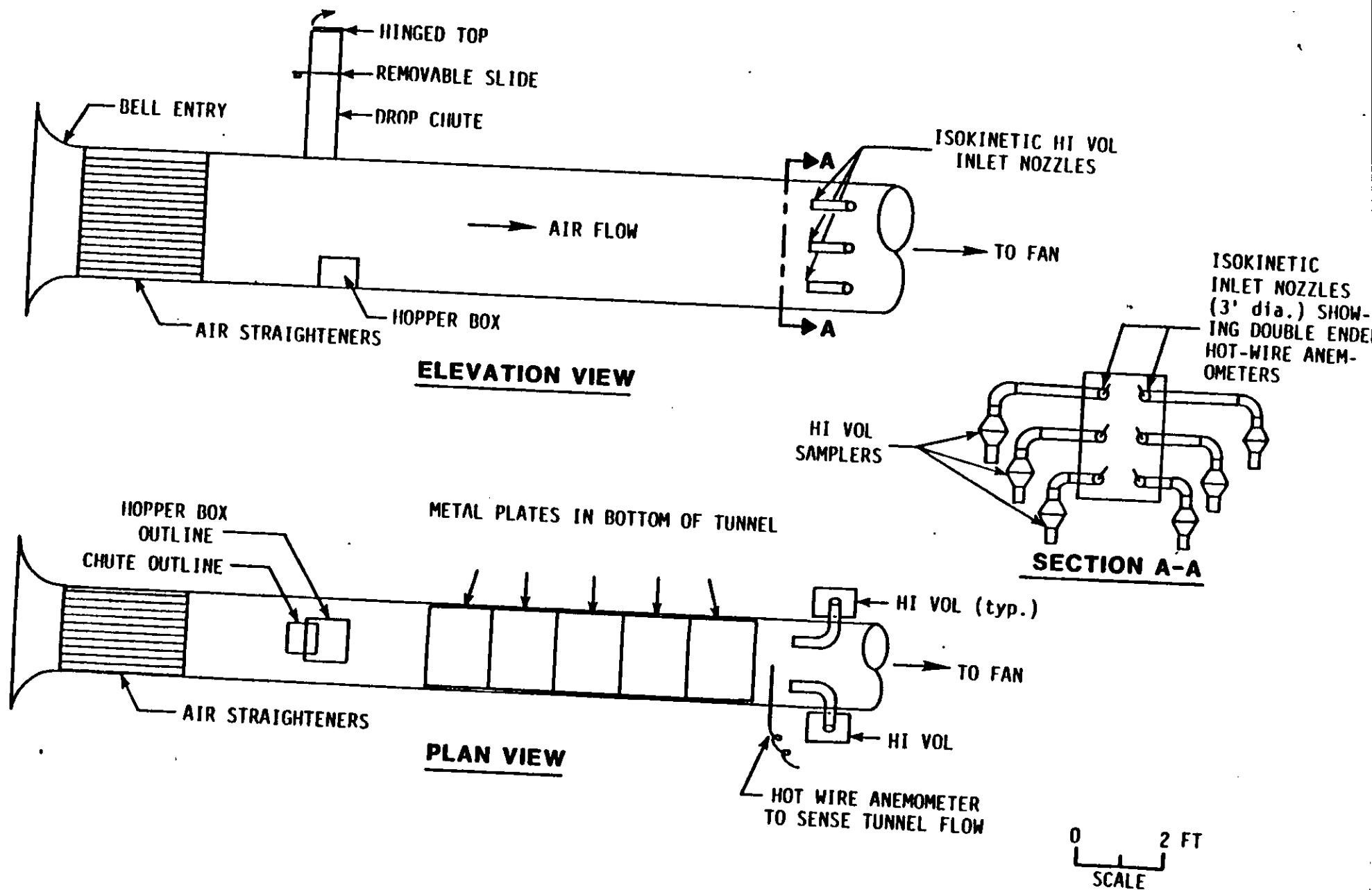


Figure 1. Schematic diagram of wind tunnel used to measure dust emission factors for handled wet-formed prilled sulfur.