

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

RECEIVED

March 19, 1992

Division of Air  
Resources Management

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Preston Lewis  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Comments on Draft Permits  
AC53-201152 and AC53-199112 (PSD-FL-179)

Dear Mr. Lewis:

The following comments are submitted on the proposed permits referenced above. In addition, we also submit proof of publication of the Notice of Intent to Issue Permits associated with this project.

1. Permit No. AC53-201152: -  
Molten Sulfur Storage and Handling System

- a) A typographical error concerning the storage capacity of the truck pit should be corrected to reflect 670 ST instead of 600 ST in the project description on page 1 of the above permit.
- b) We feel the language of Specific Condition No. 8 is overly broad and, as a practical matter, would require Agrico to notify the Department of routine maintenance and/or replacement of equipment with identical specifications. We suggest the notification be triggered by any change which would reasonably be expected to result in an increase in emissions.

2. Permit No. AC53-199112:  
Sulfuric Acid Plants Nos. 10 and 11

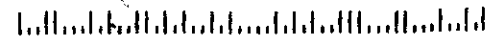
A typographical error concerning the sulfuric acid production rate should be corrected in Specific Condition No. 7 on page 6 from TPH to TPD.



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We also request the wording in Specific Condition No. 7 be amended to allow adequate time to troubleshoot and fine tune the plants to achieve the permitted production rates. The following language is suggested:

The compliance tests shall be conducted at 90 to 100% of the permitted capacity (2430-2700 TPD sulfuric acid production) and within 60 days after operating the plant at a rate above 2200 TPD. The Department's Southwest District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to that office within 45 days of test completion.

Our experience has shown us that operational adjustments and fine tuning efforts of complex processes such as the production of sulfuric acid, are not immediate and in some instances may require extended operation to be realized or the desired effect to be evaluated. We anticipate the 60-day compliance test requirement will allow adequate time to achieve normal, stable operation at the higher permitted rate. The 60-day test requirement also conforms to the minimum federal requirements in 40 CFR 60.8(a) regarding performance testing.

Prior to shutdown of the plants for the installation of new equipment, we will continue to operate under the existing operating permits for Unit 10 and 11, Permit Nos. A053-176685 and A053-145510, respectively. These permits allow production to exceed 2000 TPD for each plant as long as the hourly emission limits at the 2000 TPD rate are met. The 2200 TPD rate would be indicative of a production rate achievable only after the proposed plant modifications.

We feel the amended language of Specific Condition No. 7 would allow adequate time to achieve normal operation at the higher production rates and also address the Department's concern of operation for an extended period of time after achieving stable production rates without conducting performance tests.

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We appreciate your consideration of these comments and request they be included in the final permit. As always, if you have any questions, please do not hesitate to call.

Sincerely,



Phillip A. Steadham  
Environmental Superintendent

PAS/fbb

xc: Dr. John Koogler (Koogler & Associates)  
Mr. Pradeep Raval (Koogler & Associates)  
Mr. S. L. Presnell  
Mr. K. W. Watkins  
Mr. R. A. Woolsey

*H. Harps*

*C. Holladay*

*B. Thomas, SW Dist*

*J. Harper, EPA*

*C. Shauer, NPS*