

**AGRICO**

Division of Freeport-McMoRan Resource Partners

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RECEIVED  
OCT 16 1992

Bureau of  
Air Regulation

October 14, 1992

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

Re: Modification of No. 10 and No. 11 Sulfuric Acid Plants  
South Pierce Plant - Permit No. AC53-199112 (PSD-FL-179)

Dear Mr. Fancy:

On April 17, 1992, the Department of Environmental Regulation issued the above-referenced permit which authorized certain modifications to the existing No. 10 and No. 11 sulfuric acid plants located at the Agrico Chemical Company South Pierce facility in Polk County, Florida. These modifications were associated with an increase in sulfuric acid production capacity and included a waste heat recovery and co-generation project.

In June 1992, Unit No. 11 was shut down for the necessary construction. However, because of funding constraints and equipment availability during construction, the modifications to the No. 11 plant were determined to be most efficiently and economically completed in a two-phased construction approach. The modifications that have been made included all activities authorized by the construction permit except for installation of a new waste heat boiler. It is requested that the Department allow Agrico to install the new boiler at the next scheduled turnaround in early 1994. However, the subject construction permit will expire on January 1, 1994. In order that we preserve the ability to complete the second phase of construction, we request the construction permit be extended for two years until January 1, 1996. This will allow ample time to complete the construction with flexibility for changes in the turnaround schedule or equipment delivery.

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As the installation of the boiler will begin in approximately 15 months, it is anticipated that DER's recent BACT determination is valid for the entire project (40 CFR 52.21(j)(4)).

As you may recall, the construction permit authorized maximum production capacity to increase to 2,700 TPD. However, until the construction described above is completed, the maximum achievable production rate by Unit No. 11 will be limited to 2,200 TPD. A compliance test at the 2,200 TPD rate has shown the facility to be in full compliance with the applicable emission limiting standards. A Certificate of Completion of Construction noting the deviation described above is being prepared and will be submitted to the Southwest District Office to obtain an operating permit.

In August 1992, Unit No. 10 was shut down and all modifications authorized by the construction permit were completed. The facility is currently operating at 2,700 TPD and a compliance test has been conducted, the results of which show the facility to be in full compliance with the applicable emission limiting standards. A Certificate of Completion of Construction is being prepared and will be submitted to the Southwest District Office to obtain an operating permit.

As stated previously, all construction and modifications to Unit No. 10 were completed. Preliminary indications are that the facility may be capable of operating at production rates slightly higher than 2,700 TPD. The construction permit limits the maximum production rate of each sulfuric acid plant (Nos. 10 and 11) to 2,700 TPD (5,400 TPD for both plants). Due to the fact that the Unit No. 11 plant will be limited to 2,200 TPD until installation of the boiler, we request the Department to consider a minor modification to the construction permit which would allow Unit No. 10 to temporarily operate above 2,700 TPD to compensate for the lower sulfuric acid production rate of Unit No. 11 until the construction on Unit No. 11 is completed in early 1994. Realistically, we believe Unit No. 10 capable of operating at production rates in the range of 2,800 to 2,900 TPD. The facility will conduct a compliance test at the maximum rate and would, at no time, exceed the 5,400 TPD production rate allowed for both plants combined.

In summary, Agrico requests that Permit No. AC53-199112 be extended two years until January 1, 1996 to allow completion of construction of Unit No. 11 and that Unit No. 10 be allowed to operate at production rates above 2,700 TPD on a temporary basis until Unit No. 11 construction is completed early in 1994. Agrico would agree to demonstrate compliance at the higher production rate and would not, at any time, exceed the

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combined production rate or total emission limits authorized by the permit. In addition, from discussions with appropriate personnel, representatives of the Southwest District in Tampa have been informed of these requests and have indicated that they have no objections.

Should you have any questions or need additional information regarding these requests, as always, please do not hesitate to call. Thank you.

Sincerely,



Phillip A. Steadham  
Environmental Superintendent

PAS/fbb

xc: Dr. John B. Koogler  
Mr. Bill Thomas - DER (Southwest District)  
Mr. T. P. Fowler  
Mr. R. W. Howe  
Mr. S. L. Presnell  
Mr. V. A. Snow  
Mr. K. W. Watkins  
Mr. R. A. Woolsey  
L. HANKS