



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

To: Willard M. Hanks, Air BAR, Tallahassee

Thru: J. Harry Kerns *JK* for W.C. Thomas

From: Gary A. Maier, Air Permitting, Tampa *Gary A. Maier*

Date: July 23, 1991

Subject: AC53-199112, Agrico Chemical Company,  
Sulfuric Acid Plants #10 and #11.

Pursuant to Clair Fancy's letter dated July 5, 1991, the Southwest District Air Section reviewed the above referenced permit application. Agrico Chemical Company is proposing a project which appears to be essentially identical to a project proposed by Royster (AC41-173305, processing by Teresa Heron). The Royster application, submitted on December 1, 1989, was never made complete because the applicant failed to satisfactorily respond to questions raised by this office and Tallahassee.

The proposed process, developed by Monsanto, is different from typical sulfuric acid production plants. To our knowledge, this new process has never operated in the USA. In my opinion, the literature reports regarding the success of foreign operations are conflicting. The Southwest District Office respectfully requests BAR to ask for the following additional information in an incompleteness letter to Agrico.

- (1) The application does not contain process flow diagrams for the proposed modified facility. Although figures 3-1A and 3-1B purport to be process flow diagrams, they are, in actuality, plant equipment layout diagrams. Please request Agrico to submit process flow diagrams for the actual (not typical) proposed modified facility..
- (2) The plant equipment layout diagrams (figures 3-1A and 3-1B) seem to indicate that drying towers will be utilized. Please ask Agrico to confirm that the drying towers will be utilized in the proposed modified facility. Utilization of the drying towers should be reflected in the process flow diagrams requested above.

- (3) Please request Agrico to provide the Department with reasonable assurance that the efficiency of the converters will not be degraded while operating at the proposed new process conditions and higher process rates. The answer to this question must
  - (a) completely describe the process streams that each converter was originally designed to handle,
  - (b) completely describe the process streams that each converter will handle in the proposed modified facility, and
  - (c) explain why the differences between (a) and (b) will not degrade converter efficiency.
  
- (4) Please request Agrico to provide the Department with reasonable assurance that the efficiency of the absorbers will not be degraded while operating at the proposed new process conditions and higher process rates. The answer to this question must
  - (a) completely describe the process streams that each absorber was originally designed to handle,
  - (b) completely describe the process streams that each absorber will handle in the proposed modified facility, and
  - (c) explain why the differences between (a) and (b) will not degrade absorber efficiency.
  
- (5) Please request Agrico to provide the Department with reasonable assurance that the efficiency of the mist eliminators will not be degraded while operating at the proposed new process conditions and higher process rates. The answer to this question must
  - (a) completely describe the process streams that each mist eliminator was originally designed to handle,
  - (b) completely describe the process streams that each mist eliminator will handle in the proposed modified facility, and
  - (c) explain why the differences between (a) and (b) will not degrade mist eliminator efficiency.

If you have any questions, my Suncon number is 552-7612, extension 408.

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) <i>WILLARD HANKS</i>	Initial
	Date
2. <i>Bureau of Air Regulation Tallahassee</i>	Initial
	Date
3.	Initial
	Date
4.	Initial
	Date

REMARKS:

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

*Gary Maier*

DATE

*7-23-91*

PHONE *Success*

*552-7612*

*ext 408*