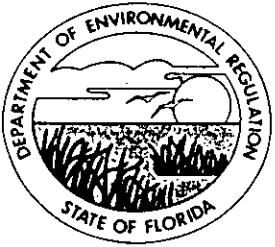


Willard's



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

August 26, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Selwyn Presnell, Environmental Manager
Agrico Chemical Company
Post Office Box 1110
Mulberry, Florida 33860

Dear Mr. Presnell:

PSD-FL-179

Re: AC 53-201152, Molten Sulfur Storage and Handling System

The Department has made a preliminary review of your application for permit to modify the molten sulfur storage and handling system at Agrico Chemical Company's South Pierce plant. Before this application can be processed, the Department will need the following information:

1. Please clarify the process rate for this system. The 150,000 lbs/hr process rate for sulfur listed in Section III B. of the application is not equivalent to the maximum process rate of 2,050 TPD listed in Attachment II.
2. What is the basis of the pollutant concentrations listed in Attachment 1? What is the ventilation rate for the system?
3. Please provide a copy of the Koogler and Enviroplan data that the 0.2 grains/dscf sulfur particle concentration is based on.
4. What is the basis of the equilibrium concentrations for H₂S, SO₂, and VOC? What is the relationship between the equilibrium concentrations, concentrations in Attachment 1, and the emission estimates?
5. Please provide a copy of the 3 references for emission estimates prepared by Dr. John B. Koogler.
6. What is the basis for the wind induced ventilation for the 5 vents on the storage tanks (Attach. 3c, 4.c.)?

Mr. Selwyn Presnell
Page 2 of 2

We will resume processing the application after the requested information is received. If you have any questions on this matter, please write to me or call Willard Hanks at 904-488-1344.

Sincerely,



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/WH/plm

c: Bill Thomas, SW Dist.
Pradeep Raval, P.E.