AGRICULTURAL OPERATIONS • MINERALS DIVISION
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Section 10/404 Permit Copy

INTERNATIONAL MINERALS & CHEMICAL CORPORATION

June 24, 1980

Mr. W. K. Hennessey, District Manager
State of Florida
Department of Environmental Regulation
7601 Highway 301 North
Tampa, Florida 33610

Dear Mr. Hennessey:

International Minerals and Chemical Corporation has recently finalized plans to construct a 50,000 ton anhydrous ammonia transfer and storage facility at its Port Sutton location in Hillsborough County. Anhydrous ammonia is to be shipped from IMC's ammonia plant in Sterlington, Louisiana by means of waterborne transportation, off-loaded at the Port and stored in a low temperature storage tank. The ammonia will then move by ground transportation or through the existing ammonia pipeline to our New Wales Chemical operation in Polk County.

No air emissions are normally anticipated from the facility and a flare will be provided on the emergency vent system which would decompose any ammonia vented to the atmosphere. The flare will be mounted on top of the stair tower approximately 150 feet above ground.

Remote manual and automatic shut-off of transfer pumps and loading arms will be provided to stop spills in the event of a leak in the transfer system. Provisions will be made to drain lines without a spill, if necessary, for maintenance.

Dock modifications at the Port Sutton slip include removal of existing wooden platforms, access ramps and one deteriorated existing concrete dolphin in the dock area now used as a facility standby station. New dock construction will consist of four breasting dolphins, access way, and pier for mounting of the ammonia unloading arm, housing for storage of dock related safety equipment and operations area.

No dredging or major change in sea bottom elevations are planned even though dock design will handle the proposed 43 foot channel depth. Sixteen pre-drilled holes for tension piles will be flushed out to ensure good sheer resistance between limestone and concrete. This may cause some turbidity in an immediate 50 foot radius. The dock building activities should cause little disturbance or pollution of sea water or bottom. Extreme care will be taken with IMC inspections to ensure against oil spills from contractor equipment.

A two brackish water well system will be constructed with one serving as a back-up if the primary well fails. The average water flow for refrigerating, condensing, and warming the ammonia for pipeline injection is calculated to be approximately 1,200 gallons per minute. This flow can vary from less than 500 gallons per minute to 2,300 gallons per minute, depending upon whether the pipeline is run continuously or on a batch basis as is now being done. Water will be piped from the well through product heaters with a partial side stream routed through ammonia condensing exchangers and be discharged to the existing dryer scrubber effluent pond. Discharge to waters of the State will occur through the presently permitted outfall. Instrumentation will be provided to detect any ammonia leakage into this otherwise non-contact water flow. The water well system will also be utilized to supply flushing water in the product heater areas, compressor areas, and rail truck unloading areas.

Preliminary discussions with your staff have indicated the following:

1. No air emission permit will be required because of the sealed nature of the system and the emergency flare as provided.

2. Because only the quantity and not the quality of the water will be affected, no modification will be necessary for our current water discharge permit (No. I029-20853).

3. IMC was issued a permit #29-16015-3E from the Department of Environmental Regulation on December 22, 1978, to extend the existing fender system on an adjacent dock utilized for phosphate rock loading. During my initial contact with Mr. Fred Crabill, he indicated that this permit was in effect for five years and might possibly be modified to include the proposed additional work.

I would appreciate confirmation or discussion on these points, as well as your assistance in defining any other permits which might be required for the proposed construction. Please let me know if you need any additional information.

We appreciate the cooperation received from your staff in the past and I would like to repeat that you have a standing invitation to visit any phase of our operations to better familiarize yourself with the rather complex phosphate industry.

Yours truly,

R. S. Hearon