



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX 377-7158

KA 230-97-01

July 1, 1997

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JUL 07 1997

**BUREAU OF
AIR REGULATION**

Mr. A. A. Linero
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Comments on Draft Permit
Mulberry Phosphates, Inc.
Sulfuric Acid Plant
1050048-002-AC, PSD-FL-238

Dear Mr. Linero:

The following comments are submitted in response to FDEP's Intent to Issue the above referenced permit. Both comments address Specific Condition No. 11 of the draft permit.

1. Suggested wording to address fugitive emissions from the sulfuric acid plant, developed by FDEP's Southwest District Office over time, is presented in Attachment 1.
2. The following wording is suggested in order to provide operational and maintenance flexibility, without compromising FDEP's intent:

"...air filtering equipment, or equivalent, shall be used to rejuvenate the existing catalyst."

If you have any further questions, please call Pradeep Raval or me.

Very truly yours,

KOUGLER & ASSOCIATES

Steven C. Cullen, P.E.

SCC:par
Enc.

c: Ivan Nance, MP

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BUREAU OF

AIR

cc: C. Holladay, BAR
EPA
NPS
POLK CO.
JWD

PERMITTEE

Mulberry, FL

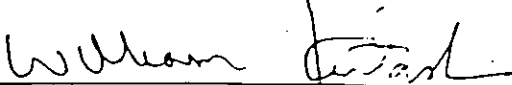
PERMIT/EXPIRATION

Permit No.: [REDACTED]
County: Polk
Expiration Date: 11/22/96
Project: Sulfuric Acid Plant [REDACTED]

Specific Conditions:

- * 17. This permit acknowledges that leaks of sulfur dioxide and sulfur trioxide, or other fugitive process emissions that do not pass through a stack, may occur as part of routine operations. Best operational practices to minimize these emissions shall be adhered to and shall include regular inspections and the prompt repair or correction of any leaks or other fugitive emissions.
18. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 17-2.610(3), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.
19. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 17-2.620(2), F.A.C.].
20. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-2, or any other requirements under federal, state or local law. [Rule 17-2.210, F.A.C.].
21. Submit to the Department, each calendar year, on or before March 1, an emission report for this source for the preceding calendar year containing the following information pursuant to Subsection 403.061(13), F.S.:
- (A) Annual amount of materials and/or fuels utilized;
 - (B) Annual emissions (note calculation basis);
 - (C) Any changes in the information contained in the permit.
22. Two applications to renew this operating permit shall be submitted to the Southwest District Office of the Department at least 60 days prior to the expiration date of this permit (i.e. no later than September 23, 1996). [Rule 17-4.090(2), F.A.C.].

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

MULBERRY  CORPORATION

Mulberry Phosphates, Inc. • Piney Point Phosphates, Inc. • Nu-Gulf Industries, Inc.

**REGISTERED MAIL -
RETURN RECEIPT REQUESTED**

RECEIVED

JUN 30 1997

BUREAU OF
AIR REGULATION

25 June 1997

Mr. Cleve Holladay
Bureau of Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: FEDP Permit No. 1050048-002-AC (Sulfuric Acid Plant)
Mulberry Phosphates, Inc.

1050-F1-238

Dear Sir:

Find accompanying this letter a "Proof of Publication" from The Ledger for the Public Notice of Intent to Issue Air Construction Permit Modification. The notice was published on 19 June 97.

Should further information or response be required, please contact our offices.

Very truly yours,


Ivan Nance
Corporate Environmental Manager

/vg

Enclosure

cc: J. Cullen, K.E. Assoc.
R. Harwood, Polk Co
EPA
NPS
SWD