



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

KA 124-94-05

March 14, 1995

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

Subject: Polk County-AP  
IMC-Agrico Company  
South Pierce Plant  
Permit Amendment Requests

Dear Mr. Linero:

During recent discussions with FDEP staff, the subject of air permit conditions had come up. Based on those discussions, it is our understanding that all emission limitations in current permits must either be based on a standard, or reflect emission limits requested by a permittee to avoid a specific rule applicability (e.g. PSD, etc.). Any emission limit which is not supported by this criteria can be removed from the permit.

It is anticipated that the removal of such emission limitations from current operation permits and source construction permits will facilitate Title V permit application compilation by IMC-Agrico as well as the compilation of Title V permit conditions by FDEP. Thus, only valid applicable requirements will remain in the source permits.

IMC-Agrico has several air operation (and the preceding construction permits which contain emission limitations outside of the above FDEP criteria. Often, emission estimates/fuel specifications stated in the application for information purposes were then imposed as permit limitations. As a result, we are requesting FDEP to amend the permits tabulated below. A discussion on these permits is provided in the attachments. The attachment number corresponds to the item number in the table below.

In accordance with FDEP protocol, the request for permit amendment is being submitted to the office where the permit was issued. For permits issued by FDEP's Tampa office, a request for amendment is simultaneously being submitted to that office. The amendment request for construction permits issued by the Bureau of Air Regulation (BAR) is being sent to your attention. The permit listing below, however, includes all the permits to be amended so that both the FDEP District and the BAR offices are aware of the scope of the permit amendments.

Mr. A. A. Linero  
Florida Department of  
Environmental Protection

March 14, 1995  
Page 2

It is requested that the following permits be amended:

Item	Unit/Operation	Operation Permit No.	Construction Permit No.	Other Permit No.
	Auxiliary Boiler	A053-186772 (D)	AC53-27465 (D)	A053-108906(D)
	GTSP Plant	A053-235041 (D)	AC53-2184 (D)	
1.	SAP 10	A053-221846 (DT)	AC53-199112 (T)	
1.	SAP 11	A053-220555 (DT)	AC53-199112 (T)	

NOTES:

- (D) Operation permit amendment expected from FDEP District office.  
(DT) Permit amendment expected from FDEP District office after the construction permit amendment is issued by BAR in Tallahassee.  
(T) Construction permit amendment expected from BAR in Tallahassee.

A check in the amount of \$250 (permit amendment processing fee) is enclosed.

Thank you for your kind assistance. If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

John E. Koogler, Ph.D., P.E.

JBK:par

c: C.D. Turley, IMC-Agrico  
G. Kissel, FDEP Tampa

*Handwritten:* J. A. A.

*Handwritten:* E. A. A. A. A. A.

*Handwritten:* A. A. A. A. A.

*Handwritten:* A. A. A. A. A.



(ATTACHMENT 1)

Unit/Operation : Sulfuric Acid Plants 10 & 11

Permit No. : AC53-199112, PSD-FL-179

Amendment Request

The above referenced permit contains an emission limitation for nitrogen oxides. To our knowledge, the NOx limit in the permit is not based on a regulatory standard, nor does it reflect a limitation requested by IMC-Agrico to avoid a specific rule applicability (e.g. PSD, etc.).

Therefore, it is requested that the construction permit be amended as follows:

Page 5, Specific Condition No. 4:

Delete this specific condition which contains emission limits for NOx.

Page 6, Specific Condition No. 6:

Delete the NOx testing requirement from this specific condition and the corresponding reference to EPA Method 7E.

