



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 124-96-03

February 3, 1997

1050059
PSD-FL-179A
RECEIVED
FEB 05 1997
BUREAU OF
AIR REGULATION

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

Subject: Additional Information for
Sulfuric Acid Plants 10 & 11
IMC-Agrico Company - South Pierce Plant
Polk County, Florida

Dear Mr. Holladay:

This is a follow up to Pradeep Raval's telephone conversations with Mr. Al Linero and yourself regarding the Department's request for additional information dated December 18, 1996.

Some background information will provide a clearer perspective of the proposed project. Sulfuric acid plants Nos. 10 and 11 have been physically modified to increase the sulfuric acid production rate and to enhance heat recovery under permit No. PSD-FL-179. At the time of that FDEP review, the potential production rate of the modified plants was estimated to be 2700 tpd, each, based on information from the contractor. Having completed the modifications and operated the plants for some time now, IMC-Agrico recognizes that the potential acid production rate of the modified plants was underestimated.

IMC-Agrico is able to project, based on past operation and compliance test results (already submitted to FDEP), that the plants will be able to operate at the higher production rate without any major equipment changes. Minor changes may be required, e.g. piping, ducting, pumps, etc. Please note that equipment changes would not affect the rule applicability for this project under the PSD and NSPS regulations.

Given the above background information, it is anticipated that the following responses will adequately address the issues raised by FDEP.

1. The application does not contain an updated flow diagram for the proposed modified facility. Although Figure 2-3 states that it is a flow diagram, it is in actuality a plant equipment layout diagram. Please submit an updated process flow diagram for the actual proposed modified facility.

RESPONSE:

The diagram submitted to FDEP shows the actual process flow relative to the existing equipment. It does need to be clarified, however, that the resulting air emissions from the sulfuric acid plant are exhausted from the "stack" shown on the diagram. As the existing process and equipment remains unchanged, an updated process flow diagram is not necessary.

2. The application indicates increases in production rates with no replacement or addition of major process equipment. If future projects are anticipated to reliably achieve or take advantage of the higher permitted rates, they should be scoped out and described at this time. Please provide a more detailed description of changes required to piping, pumps, ducts, fans, catalyst change schedules, etc. to handle the higher process rate. Alternatively, please provide reasonable assurance (eg. process or mechanical engineers certification) that the present plant can achieve the planned production rates without improvements.

RESPONSE:

These issues are addressed in the introductory paragraphs on the previous page.

3. What effects will the higher process rates have on actual emissions and actual emissions per unit of product? Will any improvements be made in the secondary absorbers and demisters to maintain or improve pollution control (whether or not emissions are within permitted limits)?

RESPONSE:

As the proposed increases in process rates are not expected to affect actual emissions per unit of product, it can be projected that the proposed increases in process rates will result in corresponding, proportionate increases in actual emissions.

No changes to the secondary absorbers or the demisters are anticipated for the proposed project. This issue is addressed in the introductory paragraphs on the previous page.

4. Do plant historical data, literature, or equipment provider information suggest that BACT emission limits lower than 4 pounds of SO₂ and 0.15 pounds of SO₃ per ton of product can be achieved? If not, why not?

RESPONSE:

The dual absorption process is capable of reducing sulfur dioxide emission rates to less than 4.0 pounds per ton of acid. However, in an effort to maximize production, most plants in the fertilizer industry tend to run at emission levels close to the permitted rates. As the catalyst ages, the production level is gradually reduced to keep the emissions within permitted levels. Thus, an initial emission reduction could be accomplished, at the cost of acid production, and even then only during periods immediately following turnarounds. That strategy would be ineffective as the catalyst ages and emissions per ton of product correspondingly increase.

EPA and FDEP have taken into consideration this very issue in five recent BACT determinations for double absorption sulfuric acid plants and concluded in each case that the emission limits of 4.0 pounds of sulfur dioxide and 0.15 pounds of sulfuric acid mist per ton of 100 percent sulfuric acid are practical and appropriate.

5. What facilities will use the additional sulfuric acid produced by the modified plants? Where are these facilities located?

RESPONSE:

The additional sulfuric acid will be sold to Sulfuric Acid Trading Company (SATCO) and, at times, to other sulfuric acid customers located in north and central Florida. Other IMC-Agrico facilities consuming sulfuric acid include the New Wales Plant and the Nichols Plant, both located in Polk County.

6. The Air Quality Related Values Analysis (AQRV) is incomplete. IMC did not estimate total (cumulative) pollutant concentrations and loadings at Chassahowitzka. Without this information, it is impossible to evaluate the potential AQRV impacts. To estimate cumulative pollutant concentrations, IMC should add its modeled pollutant impact to background pollutant concentrations, including predicted impacts from sources permitted but not yet operating.

RESPONSE:

The cumulative pollutant concentration levels at Chassahowitzka are estimated, presented below, as suggested by FDEP. However, such an analysis is not meaningful for the proposed project given the predicted insignificant ambient air impacts and given a distance in excess of 100 kilometers from the Class I area.



The estimated cumulative Class I Area pollutant concentrations are as follows:

Pollutant	Class I Area Air Impacts (ug/m3)				Ambient Air Std.
	Source Impact(1)	Other Sources(2)	Backgrd. Conc.(3)	Cumulative Impact (4)	
Sulfur Dioxide					
3-hour	0.81	26.1	86	112.9	1300
24-hour	0.15	6.4	23	29.6	260
Annual	0.013	0.26	5	5.3	60
Nitrogen Oxides					
Annual	0.004	1.91	0.01	1.9	100

NOTES:

- (1) Impacts based on the source modeling results previously submitted to FDEP by IMC-Agrico.
- (2) Impacts of other recently permitted facilities (see PSD-FL-229, 234), in the vicinity of Chassahowitzka.
- (3) 1994 air monitoring values, Chapter 5, Air Quality and Air Quality Related Values in the Chassahowitzka National Wildlife Refuge and Wilderness Area (November, 1996), U.S. Fish and Wildlife Service.
- (4) Estimated cumulative impacts.

As the conservatively projected cumulative Class I Area impacts are well below the ambient air standards, no adverse impacts are expected on the Class I Area AQRVs.

7. Please address the comments contained in the attached correspondence from the National Park Service.

RESPONSE:

The only additional issue raised by the National Park Service (NPS) was the cumulative Class I PSD increment consumption analysis for sulfur dioxide for the 3-hour and the 24-hour periods. This issue is of interest to the NPS because the predicted sulfur dioxide impacts from the proposed project for those averaging periods were above the NPS significant impact



Mr. Cleve Holladay
Florida Department of
Environmental Protection

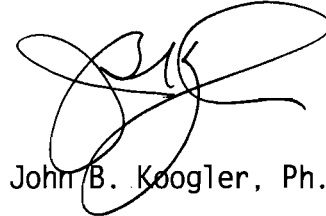
February 3, 1997
Page 5

guidelines. It should be noted that the predicted source impacts are below the Class I significant impact levels proposed by EPA. Not only are the predicted impacts insignificant, but they are projected from a source over a 100 kilometers from the Class I Area using a model which provides a very conservative estimate of impacts beyond 50 kilometers (ISC-ST). Taking all these factors into consideration, it is anticipated, based on conversations with the NPS, EPA and FDEP, that additional Class I area analyses are not warranted for the proposed project.

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

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:par

c: C. Dave Turley, IMC-Agrico

cc: Holladay



Memorandum

Florida Department of
Environmental Protection

TO: Howard Rhodes

THROUGH: C. H. Fancy *CAF*

FROM: A. A. Linero / Martin Costello *mc*

DATE: January 11, 1996

SUB: South Pierce SAP Plants No. 10 and 11
AC53-199112(A) / PSD-FL-179(A)
Request to re-issue expired construction permit with
corrections

al

Attached for your review and approval is a permit which re-issues and amends the expired construction permit to remove the NO_x limits and testing requirements from the above referenced sulfuric acid plants. The specific conditions which imposed limits and testing requirements for NO_x on these sulfuric acid plants were apparently not based on state or federal rule requirements, public health concerns, or third party considerations. The emission limits may have been based on the data provided in the application.

If you have any questions, we I will be glad to discuss the details.

AAL/mc/t



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

January 10, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. D. Turley
Environmental Coordinator
IMC-Agrico Company
Post Office Box 1035
Mulberry, Florida 33860

Dear Mr. Turley:

Re: South Pierce SAP Plants No. 10 and 11
AC53-199112(A) / PSD-FL-179(A)
Amendment/Re-issued Construction Permit

Attached is the re-issued/amended construction permit for the above referenced sulfuric acid plants. This action removes the NO_x limits and testing requirements from the above referenced permit.

Please submit any comments you may have concerning the Department's action to Mr. A. A. Linero, P.E., at the above address. If you have any questions, please call Mr. Martin Costello or Mr. Linero at (904) 488-1344.

Sincerely,

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

CHF/mc/t

cc: Jerry Kissel, SWD
Jewell Harper, EPA
Roy Harwood, Polk Co.
John Koogler

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
C.D. Turley, Env. Coord.
IMC-Agenco Co.
P O BOX 1035
Mulberry, FL 33860

4a. Article Number
2 127 633 146

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
1-19-96 JZ

5. Signature (Addressee)
[Signature]

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
[Signature]

Thank you for using Return Receipt Service.

2 127 633 146



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
C.D. Turley	
IMC-Agenco	
Mulberry FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
SAP 10 + 11	
PSD-FI- 1-12-96	
179(A)	

PS Form 3800, March 1993



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
IMC-Agrico Chemical Company
Post Office Box 1035
Mulberry, FL 33860

Permit Number: AC 53-199112(A)
PSD-FL-179(A)
Expiration Date: 12/30/96
Project: Sulfuric Acid Plants
Nos. 10 and 11

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4, 62-210 through 297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the amendment of the construction permit AC 53-199112 which expired December 31, 1995 to remove the nitrogen oxide standard and testing requirements from Specific Conditions 4 and 6.

The IMC-Agrico facility is located on S.R. 630 near Fort Meade, Polk County, Florida. The UTM coordinates of this facility are Zone 17, 407.5 km East and 3071.3 km North.

The project shall be constructed/operated in accordance with the attached request, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Original construction permit AC53-199112 issued April 17, 1992
2. Extension of AC53-199112 dated November 18, 1993.
3. Correction of AC53-199112 dated April 21, 1992.
4. Request to amend AC53-199112 dated March 14, 1995

PERMITTEE:
IMC-Agrico Chemical Company

Permit Number: AC 53-199112 (A)
Expiration Date: 12/30/96

SPECIFIC CONDITIONS:

1. This permit supersedes permit AC53-199112 / PSD-FL-179 dated April 17, 1992, and its revisions: 1) Extension of AC53-199112 dated November 18, 1993 and 2) Correction of AC53-199112 dated April 21, 1992.
2. The provisions of permit AC53-199112 / PSD-FL-179 dated April 17, 1992, and its revisions referenced above are incorporated into this air construction permit except for the following changes:

Specific Condition No. 4:

From:

Nitrogen oxides emissions from each plant shall not exceed 0.12 lb/ton of 100% sulfuric acid produced, 13.5 lbs/hr, and 59.1 tons/yr.

To:

For PSD purposes only: Nitrogen oxides emissions from each plant are estimated to be 0.12 lb/ton of 100% sulfuric acid produced, 13.5 lbs/hr, and 59.1 tons/yr.

Specific Condition No. 6:

From:

A continuous emission monitor shall be used to monitor sulfur dioxide emissions from each plant in accordance with 40 CFR 60, Subpart H (July 1, 1991), Standards of Performance for Sulfuric Acid Plants. Initial and annual compliance tests shall be conducted using: EPA Method 7E for nitrogen oxides, EPA Method 8 for sulfur dioxide and acid mist, and EPA Method 9 for visible emissions as described in 40 CFR 60, Appendix A (July 1, 1991).


PERMITTEE:
IMC-Agrico Chemical Company

Permit Number: AC 53-199112(A)
Expiration Date: 12/30/96

TO:

A continuous emission monitor shall be used to monitor sulfur dioxide emissions from each plant in accordance with 40 CFR 60, Subpart H (July 1, 1991), Standards of Performance for Sulfuric Acid Plants. Initial and annual compliance tests shall be conducted using: EPA Method 8 for sulfur dioxide and acid mist, and EPA Method 9 for visible emissions as described in 40 CFR 60, Appendix A (July 1, 1991). An initial stack test shall be conducted using EPA Method 7E for nitrogen oxides to confirm the 0.12 lbs (NOx)/ton (100% acid) emission factor.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**


Howard L. Rhodes, Director
Division of Air Resources
Management



**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

December 5, 1995

RECEIVED

DEC 7 1995

BUREAU OF
AIR REGULATION

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

**Re: Sulfuric Acid Plant Unit Nos. 10 and 11
Construction Permit No. AC53-199112(A)
EPA No. PSD-FL-179 (A)
Permit Nos. AO53-221846 and AO53-220555
AIRS ID No. 1050055
Unit ID Nos. 004 and 005
South Pierce Plant**

Dear Mr. Linero:

Enclosed is the Affidavit of the Notice of Intent to Issue Permit Amendment published in the Lakeland Ledger newspaper on Wednesday, November 29, 1995.

If I may be of further assistance in the matter, please do not hesitate to notify me.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. M. Baretincic".

J. M. Baretincic
Director
Environmental Services

xc: E. M. Newberg

Enclosure

cwk

AFFIDAVIT OF PUBLICATION**THE LEDGER**
Lakeland, Polk County, Florida

Case No

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Nelson Kirkland, who on oath says that he is Classified Advertising Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

.....Notice of Intent to Issue Permit.....

in the matter of

.....AC53-199112(A)/PSD-FL-179(A).....

in the

Court, was published in said newspaper in the issues of

.....November 29;.....

.....1995.....

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed

Nelson Kirkland
Nelson Kirkland
Classified Advertising Manager

by Nelson Kirkland who is
personally known to me

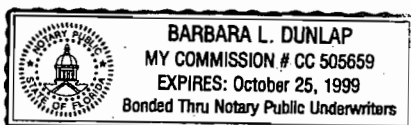
Sworn to and subscribed before me this29th.....

day ofNovember..... A.D. 19.....95.....

(Seal)

Barbara L. Dunlap
Notary Public

My Commission Expires10-25-99.....

Order #
303656STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTIONNOTICE OF INTENT TO ISSUE PERMIT
AC53-199112 (A)/PSD-FL-179 (A)

The Department of Environmental Protection (Department) gives notice of its intent to issue an amended construction permit for two existing sulfuric acid plants to IMC-Agrico Company, P.O. Box 1035, Mulberry, Florida, 33860 in Polk County. The changes from the original permit consist of removing the nitrogen oxides (NO_x) emission limit and test requirement from AC53-199112/PSD-FL-179 Specific Conditions Nos. 4 and 6 for Sulfuric Acid Plants Nos. 10 and 11 at IMC-Agrico's South Pierce facility located at its phosphate fertilizer manufacturing facility on S.R. 630 near Fort Meade, Polk County, Florida.

These sulfuric acid plants do not emit significant amounts of NO_x. Removal of the limits will not result in increased emissions or ground level concentrations of NO_x.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m.; Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
8407 Laurel Fair Circle
Tampa, Florida 33619

Polk County ESD
330 W. Church Street
Bartow, Florida 33830

Any person may send written comments on the proposed action to Administrator, New Source Review Section, at the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road - Mail Station 5505, Tallahassee, Florida 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such request must be submitted within 30 days of this notice.

F575 - 11-29-1995

Memorandum

Florida Department of
Environmental Protection

TO: C. H. Fancy

FROM: A. A. Linero *aa Linero* 11/14

DATE: November 14, 1995

SUB: South Pierce SAP Plants No. 10 and 11
AC53-199112(A) / PSD-FL-179(A)
Request to re-issue expired construction permit with
corrections

Attached for your review and approval is a permit which re-issues and amends the expired construction permit to remove the NO_x limits and testing requirements. The specific conditions which imposed limits and testing requirements for NO_x on these sulfuric acid plants were not based on state or federal rule requirements nor were they based on public health or welfare concerns.

If you have any questions, Martin Costello and I will be glad to discuss the details.

AAL/mc/t



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 14, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dave Turney
Environmental Coordinator
IMC-Agrico Company
Post Office Box 1035
Mulberry, Florida 33860

Dear Mr. Turney:

Re: South Pierce SAP Plants No. 10 and 11
AC53-199112(A) / PSD-FL-179(A)
Request to Amend/Re-issue Construction Permit

Attached is one copy of the proposed re-issued/amended construction permit, Intent to Issue, and Notice of Intent to Issue (for publication by IMC-Agrico) for the above referenced emissions unit.

Please submit any comments you may have concerning the Department's proposed action to Mr. A. A. Linero, P.E., at the above address. If you have any questions, please call Mr. Martin Costello or Mr. Linero at (904) 488-1344.

Sincerely,

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

CHF/mc/t

cc: Jerry Kissel, SWD
Jewell Harper, EPA
Roy Harwood, Polk Co.
John Koogler

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Dave Turney, Encl. Card.
 LMC-Asico Co.
 P.O. Box 1035
 Mulberry, FL 33860

4a. Article Number
 Z 127 632 569

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
 11-21-95

5. Signature (Addressee)

6. Signature (Agent)
 [Signature]

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ★U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Is your RETURN ADDRESS completed on the back of this form? **Yes**

Thank you for using Return Receipt Service.

Z 127 632 569

Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

UNITED STATES POSTAL SERVICE

Sent to
 Dave Turney
 Street and No.
 LMC-Asico
 State and ZIP Code
 Mulberry, FL

Postage \$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing to Whom & Date Delivered

Return Receipt Showing to Whom, Date, and Addressee's Address

TOTAL Postage & Fees \$

Postmark or Date
 11-15-95
 AC 53-199112(A)
 PSD-FI-179(A)

PS Form 3800, March 1993

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF INTENT TO ISSUE PERMIT
AC53-199112(A) / PSD-FL-179(A)

The Department of Environmental Protection (Department) gives notice of its intent to issue an amended construction permit for two existing sulfuric acid plants to IMC-Agrico Company, P.O. Box 1035, Mulberry, Florida, 33860 in Polk County. The changes from the original permit consist of removing the nitrogen oxides (NO_x) emission limit and test requirement from AC53-199112/PSD-FL-179 Specific Conditions Nos. 4 and 6 for Sulfuric Acid Plants Nos. 10 and 11 at IMC-Agrico's South Pierce facility located at its phosphate fertilizer manufacturing facility on S.R. 630 near Fort Meade, Polk County, Florida.

These sulfuric acid plants do not emit significant amounts of NO_x. Removal of the limits will not result in increased emissions or ground level concentrations of NO_x.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
8407 Laurel Fair Circle
Tampa, Florida 33619

Polk County ESD
330 W. Church Street
Bartow, Florida 33830

Any person may send written comments on the proposed action to Administrator, New Source Review Section, at the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road - Mail Station 5505, Tallahassee, Florida 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit Amendment
IMC-Agrico Company
P.O. Box 1035
Mulberry, FL 33860

DEP File No. AC53-199112(A)
PSD-FL-179(A)

Polk County

INTENT TO ISSUE

The Department of Environmental Protection (Department) gives notice of its intent to re-issue an expired construction permit for Sulfuric Acid Plant (SAP) No. 10 and 11 at IMC-Agrico's South Pierce facility located on SR 630 in Polk County, Florida.

On March 16, 1995 the Bureau of Air Regulation received a request to amend the construction permit for the No. 10 and 11 SAPs. The applicant, IMC-Agrico Company, requested that the Department remove the emission limit and testing for NO_x from air construction permit number AC53-199112 / PSD-FL-179 Specific Condition No. 4 and 6. The applicant stated that the NO_x limit was not based on a regulatory standard, nor does it reflect an emission limitation requested by IMC-Agrico to avoid a specific rule applicability.

The two sulfuric acid plants were originally permitted in 1974 with a capacity of 2,000 TPY of acid. On June 28, 1991, the applicant submitted an application to increase the capacity of each of the existing acid plants to 2,700 TPY. The project triggered PSD review for sulfur dioxide and sulfuric acid mist. The project resulted in a net increase of NO_x emissions of 36.2 TPY which was below the significant emission rate for PSD review of NO_x.

EPA issued permit PSD-FL-061 in 1981 which involved constructing a new sulfuric acid plant at the South Pierce facility when it was owned by Agro Chemical Company. More than significant increases of NO_x emissions from the new sulfuric acid plant were projected in EPA's review but no limits were established for NO_x. The new sulfuric acid plant was never built.

The Department intends to remove the NO_x limit and test requirement from AC53-199112 / PSD-FL-179 Specific Condition No. 4 and 6 since these requirements were not based on a regulatory standard, nor do they reflect an emission limitation requested by IMC-Agrico to avoid a specific rule applicability such as PSD.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Ad. L. Fancy, P.E.
C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE PERMIT** all copies were mailed by certified mail before the close of business on 11-15-95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Kym O'Brien
Clerk

11-15-95
Date

Copies furnished to: Jerry Kissel, SWD
Jewell Harper, EPA
Roy Harwood, Polk Co.
John Koogler



Department of Environmental Protection

DRAFT

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
IMC-Agrico Chemical Company
Post Office Box 1035
Mulberry, FL 33860

Permit Number: AC 53-199112(A)
PSD-FL-179(A)
Expiration Date: 11/30/96
Project: Sulfuric Acid Plants
Nos. 10 and 11

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4, 62-210 through 297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the amendment of the construction permit AC 53-199112 which expired December 31, 1995 to remove the nitrogen oxide standard and testing requirements from Specific Conditions 4 and 6.

The IMC-Agrico facility is located on S.R. 630 near Fort Meade, Polk County, Florida. The UTM coordinates of this facility are Zone 17, 407.5 km East and 3071.3 km North.

The project shall be constructed/operated in accordance with the attached request, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Original construction permit AC53-199112 issued April 17, 1992
2. Extension of AC53-199112 dated November 18, 1993.
3. Correction of AC53-199112 dated April 21, 1992.
4. Request to amend AC53-199112 dated March 14, 1995

PERMITTEE:
IMC-Agrico Chemical Company

Permit Number: AC 53-199112 (A)
Expiration Date: 11/30/96

DRAFT

SPECIFIC CONDITIONS:

1. This permit supersedes permit AC53-199112 / PSD-FL-179 dated April 17, 1992, and its revisions: 1) Extension of AC53-199112 dated November 18, 1993 and 2) Correction of AC53-199112 dated April 21, 1992.
2. The provisions of permit AC53-199112 / PSD-FL-179 dated April 17, 1992, and its revisions referenced above are incorporated into this air construction permit except for the following changes to AC53-199112 / PSD-FL-179:

Specific Condition No. 4:

From:

Nitrogen oxides emissions from each plant shall not exceed 0.12 lb/ton of 100% sulfuric acid produced, 13.5 lbs/hr, and 59.1 tons/yr.

To:

For PSD purposes only: Nitrogen oxides emissions from each plant are estimated to be 0.12 lb/ton of 100% sulfuric acid produced, 13.5 lbs/hr, and 59.1 tons/yr.

Specific Condition No. 6:

From:

A continuous emission monitor shall be used to monitor sulfur dioxide emissions from each plant in accordance with 40 CFR 60, Subpart H (July 1, 1991), Standards of Performance for Sulfuric Acid Plants. Initial and annual compliance tests shall be

PERMITTEE:
IMC-Agrico Chemical Company

Permit Number: AC 53-199112(A)
Expiration Date: 11/30/96

DRAFT

conducted using: EPA Method 7E for nitrogen oxides, EPA Method 8 for sulfur dioxide and acid mist, and EPA Method 9 for visible emissions as described in 40 CFR 60, Appendix A (July 1, 1991).

TO:

A continuous emission monitor shall be used to monitor sulfur dioxide emissions from each plant in accordance with 40 CFR 60, Subpart H (July 1, 1991), Standards of Performance for Sulfuric Acid Plants. Initial and annual compliance tests shall be conducted using: EPA Method 8 for sulfur dioxide and acid mist, and EPA Method 9 for visible emissions as described in 40 CFR 60, Appendix A (July 1, 1991). An Initial compliance test shall be conducted using EPA Method 7E for nitrogen oxides to confirm the 0.12 lbs (NOx)/ton (100% acid) emission factor.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes, Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Agrico Chemical Company
Post Office Box 1110
Mulberry, Florida 33860

Permit Number: AC 53-199112

PSD-FL-179

Expiration Date: Jan. 1, 1994*

County: Polk

Latitude/Longitude: 27°45'52"N
81°56'19"W

Project: Sulfuric Acid Plants
Nos. 10 & 11 - Production Increases
to 2700 TPD Per Plant (5400 TPD
total)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modifications to the existing Nos. 10 and 11 sulfuric acid plants that will increase each plant's production to 2700 TPD 100% sulfuric acid (5400 TPD total for both plants). The plant modifications include installing a new turbogenerator, using more efficient economizer units, replacing the tower and acid coolers with heat recovery systems, and adding more catalyst to the converters. These sources are located at the permittee's South Pierce phosphate fertilizer manufacturing facility on SR 630 near Fort Meade, Polk County, Florida 33841. The UTM coordinates of this facility are Zone 17, 407.5 km E and 3071.3 km N.

*This permit is void if construction does not commence within 18 months of its issuance, if construction is discontinued for more than 18 months, or if construction is not completed and the modified plant placed in operation within a reasonable time.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Agrico's application received June 28, 1991.
2. DER's letter dated June 26, 1991.
3. Koogler & Associates' letter dated October 22, 1991.
4. Koogler & Associates' letter dated February 27, 1992.
5. Koogler & Associates' letter dated April 10, 1992.
6. U.S. Department of Interior's letter dated April 10, 1992

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-199112
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or

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PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-199112
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-199112
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-199112
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The maximum production rate of each of the sulfuric acid plants (Nos. 10 & 11) shall not exceed 2700 tons per day based on 100% H_2SO_4 (5400 TPD for both plants).

2. Sulfur dioxide emissions from each plant shall not exceed 4 lbs/ton of 100% sulfuric acid produced, 450.0 lbs/hr, and 1971.0 tons/yr.

3. Sulfuric acid mist emissions from each plant shall not exceed 0.15 lb/ton of 100% sulfuric acid produced, 16.9 lbs/hr, and 73.9 tons/yr.

4. Nitrogen oxides emissions from each plant shall not exceed 0.12 lb/ton of 100% sulfuric acid produced, 13.5 lbs/hr, and 59.1 tons/yr.

The nitrogen oxides limits are subject to revision if sufficient test data indicate that the emission factor is improper.

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-199112
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

5. Visible emissions from each plant shall not exceed 10% opacity.

6. A continuous emission monitor shall be used to monitor sulfur dioxide emissions from each plant in accordance with 40 CFR 60, Subpart H (July 1, 1991), Standards of Performance for Sulfuric Acid Plants. Initial and annual compliance tests shall be conducted using: EPA Method 7E for nitrogen oxides, EPA Method 8 for sulfur dioxide and acid mist, and EPA Method 9 for visible emissions as described in 40 CFR 60, Appendix A (July 1, 1991).

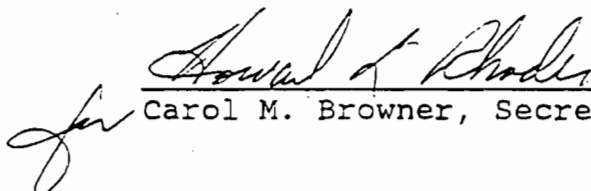
7. The compliance tests shall be conducted at 90 to 100% of the permitted capacity (2430 - 2700 TPH sulfuric acid production) and within 30 days after operating the plant at a rate above 2000 TPH. The Department's Southwest District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to that office within 45 days of test completion.

8. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

9. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. The operation permit application shall include a set of conditions acceptable to the Department for sequential startup/shutdown of the permittee's sulfuric acid plants. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 17 day
of April, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


for Carol M. Browner, Secretary

John; for your
review.

BEST AVAILABLE COPY
ATTACHMENT 2: Extension for AC
Florida Department of

Environmental Protection

OK
JS

NOTE: 2 Separate permit
now 131005.

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 18, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. M. Baretincic
Director - Environmental Services
IMC Agrico Company
P. O. Box 2005
Mulberry, Florida 33860-1200

Re: AC53-199112 (Modification of No. 10 & 11 Sulfuric Acid
Plants)

Dear Mr. Baretincic:

The Department received your November 12 letter requesting an extension of the subject permit. The request is acceptable and the permit is amended as shown:

Permit No. AC 53-199112

Current Expiration Date: January 1, 1994
New Expiration Date: July 1, 1995

This letter shall become an attachment to this permit.

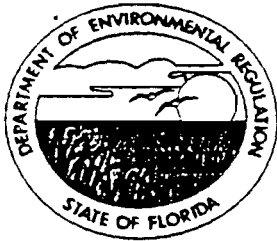
A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

Mr. J. M. Baretincic
AC 53-222859
Permit Amendment
November 18, 1993
Page 2 of 3

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

April 21, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Selwyn Presnell
Agrico Chemical Company
P. O. Box 1110
Mulberry, Florida 33860

Dear Mr. Presnell:

Re: Permit No. AC 53-199112/PSD-FL-179

As discussed in the April 17, 1992, Final Determination for the referenced permit, Specific Condition No. 7 should read:

The compliance tests shall be conducted at 90 to 100% of the permitted capacity (2430 - 2700 TPD sulfuric acid production) and within 60 days after operating the plant at a rate above 2200 TPD. The Department's Southwest District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to that office within 45 days of test completion.

A copy of this letter shall be attached to Permit No. AC 52-199112/PSD-FL-179 and shall become a part of that permit.


A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Sincerely,


for STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/WH/plm

c: Bill Thomas, SWD
Jewell Harper, EPA

John Koogler, P.E.
Chris Shaver, NPS

BEST AVAILABLE COPY



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:dar

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

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(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.