



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**  
 4014 NW THIRTEENTH STREET  
 GAINESVILLE, FLORIDA 32609  
 352/377-5822 • FAX/377-7158

KA 124-94-06

November 21, 1997

**RECEIVED**  
 NOV 24 1997

Department of Environmental Protection  
 SOUTHWEST DISTRICT  
 BY \_\_\_\_\_

Mr. A. A. Linero  
 Florida Department of  
 Environmental Protection  
 Southwest District Office  
 3804 Coconut Palm Drive  
 Tampa, FL 33619-8318

1050057-005-AC  
 PSD-FL-204

**RECEIVED**

DEC 08 1997

BUREAU OF  
 AIR REGULATION

Subject: IMC-Agrico Company (Nichols)  
 DAP Plant  
 Permit Extension Request  
 Permit No. AC53-232681, PSD-FL-204

Dear Mr. Linero:

This is to request an extension of the current permit expiration date of January 1, 1998 to June 1, 1998.

The extension is requested in order to maintain a valid permit while FDEP's Tampa office reviews the Completion of Construction information, to be submitted shortly.

Enclosed is a check in the amount of \$50 (permit extension fee).

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: S. Arif - BAR

AREA: SWD

Cash Receiving Application  
Collection Point Log Remittance

Tot: CRAF006A  
\$50.00

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SYSSREMT: 218695    Type: CP            Recvd Date: 24-NOV-1997    Status: RECEIVED  
 SYSSRCPT: 176271    PNR:                    Check #: 502                Amount:                    50.00  
 SSN/FEI#:                                Name: JOHM B. KOOGLER, P.A.  
     First:                                Middle:                    Title:                    Suf:  
 Address1: D/B/A KOOGLER & ASSOCIATES                    Short Comments:  
 Address2:    L-IMC-AGRICO CO.-NICHOLS  
     City: GAINESVILLE                    ST: FL    Zip: 32609-                    Country:

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-----> P A Y M E N T (S) <-----

Distr	CL	Object	Payment	Reference#	Applic/ Fund	S T A CO
SYSSPAYT	Area..	Code/Description.....	Amount.....			
226647	SWD	002222 AIR CONSTRUCT	\$50.00		ARM PFTF	

COMMIT FREQUENTLY

\$50.00 Payment total

Press <TAB> to accept Collection Point or enter F&A.

Count: \*1

<Replace>

IMAGESafe logo in light gray tone is not present on back of document - Do not cash.

JOHN B. KOOGLER, P.A.  
DBA KOOGLER & ASSOCIATES  
4014 N.W. 13TH ST., 352-377-5822  
GAINESVILLE, FL 32609

502

63-2/630  
00320

11/21 1997 \$

PAY TO THE ORDER OF

Florida Dept of Environmental Protection

\$ 50.00

Fifty and 00/100

DOLLARS

**FIRST UNION**  
First Union National Bank  
of Florida  
Gainesville, Florida  
24 Hour Information Service  
1-800-735-1012

FOR IMC DAD Nichols Extension

David Lee Jones

⑈000502⑈ ⑆063000021⑆ 2132000456902⑈

GUARDIAN & SAFETY  
©CLARKE AMERICAN BA

PRE ?

Ray - this should  
be sent to Tom  
for processing. All  
sent from check  
& attached letter.  
J. Russel 12/1/97  
check has been  
processed in SUND  
(see attached). approx.  
forwarded to TKL  
Ray  
12/3



VIA FAX (904/922-6979) ✓ 12/12/96 L.

**RECEIVED**

DEC 16 1996

December 12, 1996

BUREAU OF  
AIR REGULATION

Mr. Al Linero  
Florida Department of Environmental  
Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RE: Request for PSD Permit Extension  
DAP Plant - Nichols  
Permit No. AC 53-23055, PSD-FL-204**

Dear Mr. Linero:

As discussed earlier today regarding the above referenced request, current economic conditions have resulted in a temporary curtailment of operations at the Nichols Plant Phosphoric Acid and Sulfuric Acid production units. Only the DAP Plant is operating.

The phosphoric acid available to feed the DAP Plant is in limited supply from other IMC-Agrico facilities. DAP production rates are limited to about 60% - 70% of capacity.

Should you have any questions, please contact me at 941/428-7106.

Thank you.

Yours truly,

P. A. Steadham  
Chief Environmental Services  
Concentrates

PAS:lmr

(pas96)



VIA FAX ✓ 12/11/96 L.

December 11, 1996

**RECEIVED**

DEC 16 1996  
BUREAU OF  
AIR REGULATION

Mr. Martin Costello  
Florida Department of Environmental  
Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RE: DAP 2 Plant, East Train AIRS No. 1050059, Unit 045, A053-215386**  
**DAP 2 Plant, West Train AIRS No. 1050059, Unit 046, A053-215387**

Dear Mr. Costello:

Based on your conversation with C. D. Turley on December 11, 1996, the attached emissions information is submitted in support of our request to apply the permitted operating hours for the DAP 2 Plant as a total limitation rather than individually to each train. The change will allow approximately 110 hours of extra operation of the West Train while the East Train will operate approximately 425 hours less than the individual limit of 7,920 hours per year.

The most recent compliance test results were 1.18 lbs/hr of fluoride (3.5 lbs./hr allowed) and 2.05 lbs/hr of particulate matter (14.1 lbs/hr allowed). Considering the worst case for the additional 110 hours, the West Train fluoride emission is 0.06 tons/year and the particulate emission is 0.11 tons/year. This is well below the PSD significant increase levels.

As indicated to you, this request is being made to prevent downtime for the end of this year. For planning purposes, we need to know the acceptability of this request as soon as possible. This limit will be reached at the end of December.

Your assistance in this matter is greatly appreciated.

Yours truly,

A handwritten signature in cursive script, appearing to read "Phillip A. Steadham".

P. A. Steadham  
Chief Environmental Services  
Concentrates

cc: G. Reynolds  
Mr. Costello

PAS:lmr  
Attachment

## DAP 2 Increased Emissions Calculations

### DAP 2 West Emissions Data from March 7, 1996

Fluoride test results = 1.18 lbs/hr.

Particulate test results = 2.05 lbs/hr.

Emissions increase based on an additional operating time of 110 hours.

Fluoride,  $1.18 \text{ lbs/hr} \times 110 \text{ operating hours} / 2000 \text{ lbs/ton} = 0.06 \text{ tons}$ .

Particulate,  $2.05 \text{ lbs/hr} \times 110 \text{ operating hours} / 2000 \text{ lbs/ton} = 0.11 \text{ tons}$ .

## TRANSMIT CONFIRMATION REPORT

NO. : 003  
RECEIVER : 904 922 6979  
TRANSMITTER : IMC-Agrico Main Office  
DATE : DEC 11'96 17:13  
DURATION : 01'16  
MODE : STD  
PAGES : 03  
RESULT : OK



**IMC-Agrico Company**  
New Wales Plant  
P.O. Box 2000  
Mulberry, Florida 33860

Telephone No. 941-428-2500  
Fax No. 941-428-7190

## **FAX MESSAGE**

<b>TO: Martin Costello</b> Fla. Dept. Of Env. Prot.	<b>Fax No. (904) 922-6979</b>
<b>FROM: Phil A. Steadham</b>	<b>Telephone No. 941-428-7106</b> <b>Fax No. 941-428-7190</b>
<b>DATE: 12/11/96</b>	<b>Total Number of Pages Faxed:</b> <b>(Including Cover Sheet) 3</b>

**Comments:**