



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 9, 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: Nichols Plant - Permit Nos. AC53-230355, PSD-FL-204
Request to Remove NO_x Limits and Test Requirements
Sulfuric Acid Plant No. 1

The Department is in receipt of the March 14, 1995 letter from Dr. John Koogler, requesting a permit modification to remove the nitrogen oxides NO_x emission limits and test requirement from the above referenced permit.

On March 15, 1995 the Bureau of Air Regulation received a request to amend the above referenced permit for Sulfuric Acid Plant No. 1 located at the IMC-Agrico Company phosphate fertilizer chemical manufacturing facility on C.R. 676 near Nichols, Florida. The Department was asked to remove the emission limit and testing requirements for NO_x from air construction permit number AC53-230355/PSD-FL-204 Specific Conditions Nos. 4 and 6. The applicant stated that the NO_x limit in the permit 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 Department's files show that in 1981, when the facility was owned by Conserv Company, two 750 TPD acid plants were replaced with a 2000 TPD acid plant/electrical generation plant which resulted in a net decrease in NO_x emissions. On April 28, 1993 the Department's Bureau of Air Regulation received a PSD permit application to increase production of the existing sulfuric acid plant No. 1 from 2,000 TPD to 2,500 TPD of acid. The proposed project also included increased capacity of the molten sulfur storage and feed system as well as the diammonium phosphate (DAP) plant. The application indicated that PSD review was applicable only to sulfur dioxide, sulfuric acid mist, particulate matter, and

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fluorides. Although emission increases for NO_x were calculated as 12 TPY which is less than the significant emissions rate for PSD review a NO_x emission limitation was incorporated into the final permit issued April 18, 1994 (AC 53-230355).

The Department has evaluated your request and will remove the NO_x emission limit provided there will not be an increase in either lb/hr or tons/yr of NO_x emission rates from Sulfuric Acid Plant No. 1. Consequently, the following changes to AC 53-230355, PSD-FL-204 are established:

SPECIFIC CONDITION No. 4

FROM:

4. Nitrogen oxides, (NO_x) emissions from the plant shall not exceed 0.12 lb/ton of 100% H₂SO₄ produced, 12.5 lbs/hr, and 54.8 tons/yr. The nitrogen oxides limits based on a general emission factor, are subject to revision if sufficient test data indicate that the emission factor is improper.

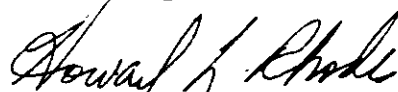
TO:

4. For PSD Purposes only: Nitrogen oxides, (NO_x) emissions from the plant are calculated to be 0.12 lb/ton of 100% H₂SO₄ produced, 12.5 lbs/hr, and 54.8 tons/yr. The nitrogen oxides emission rates based on a general emission factor, are subject to revision if sufficient test data indicate that the emission factor is improper.

Specific Condition 6 required an initial compliance test for NO_x. This testing requirement is intended to confirm the emission factor used in Specific Condition 4 and is not intended to carry forth in the operating permit. Specific condition 6 will not be changed.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC53-230355/PSD-FL-204.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **PERMIT AMENDMENT** and all copies were mailed by certified mail before the close of business on 11-14-95 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.

Kenneth J. Ober 11-14-95
Clerk Date

Copies to be furnished to:

John Koogler, P.E.
Jerry Kissel, SWD
Iwan Choronenko, EPCHC
Jewell Harper, EPA

HLR/mc

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- The Return Receipt will show to whom the article was delivered and the date delivered.

- 1. Addressee's Address
 - 2. Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
 Dave Turney, Enr. Coord.
 LMC-AgriCo Co.
 P.O. Box 1035
 Mulberry, FL 33860

4a. Article Number
 2 127 632 568

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

7. Date of Delivery
 11/17/95

5. Signature (Addressee)
Dave Turney

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

6. Signature (Agent)

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

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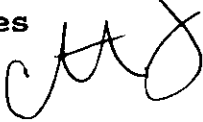
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Street <i>LMC AgriCo</i>	
City, State and ZIP Code <i>Mulberry FL</i>	
Postage	\$
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TOTAL Postage & Fees	\$
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<i>AC 53-230355</i>	
<i>PSD-FL-204</i>	
<i>SAP #1</i>	

PS Form 3800, March 1993

Florida Department of
Environmental Protection

Memorandum

CLAIR

TO: Howard Rhodes
FROM: C. H. Fancy 
DATE: November 9, 1995
SUBJECT: IMC-Agrico Company - Nichols Facility
Permit Amendment - AC53-230355/PSD-FL-204

Attached for your review and approval is a permit amendment. The Department did not receive comments on this action after the notice was published.

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

CHF/mc

Attachment