



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAR -7 1994

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

MAR 10 1994

4APT-AEB

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

OFFICE OF THE SECRETARY

SUBJ: IMC-Agrico Company, Nichols, Polk County, Florida
(PSD-FL-204)

Dear Mr. Fancy:

This is to acknowledge receipt of your revised technical evaluations, preliminary determinations, and draft Prevention of Significant Deterioration (PSD) permits for the above referenced facility by copies of your two letters to Mr. John A. Brafford of IMC-Agrico Company, both dated January 13, 1993. The major modification proposed consists of increases in both sulfuric acid plant and diammonium phosphate (DAP) plant production rates. Sulfuric acid production will increase from 2,000 tons per day (TPD) to 2,500 TPD of 100% acid. DAP production will increase from 80 tons per hour (TPH) to 100 TPH. The sulfur throughput rate to the existing molten sulfur storage and handling facility will increase from 275,000 tons per year (TPY) to 365,000 TPY.

As discussed between Mr. Preston Lewis of your staff and Mr. Stan Kukier of my staff on February 16, 1994, several editorial changes have been incorporated into the original preliminary determination package dated October 28, 1993, by the Florida Department of Environmental Protection. A list which describes all of the changes will be faxed to EPA-Region IV by Mr. Syed Arif also of your staff. Mr. Arif indicated that the public comment period for this preliminary determination package has not yet commenced. A review of the revised package and previous preliminary determination package dated October 28, 1993, shows that the technical evaluations and BACT emission limits for the proposed modification are unchanged. Mr. Lewis indicated that there are no emissions increases associated with the revised preliminary determination package.

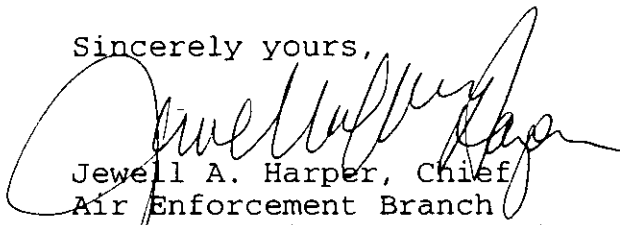
We agree with your previous determination that double absorption process technology and high efficiency mist eliminators represent BACT for the IMC-Agrico facility sulfuric acid plant SO₂ and sulfuric acid mist emissions. No physical modifications to the existing material handling system will be required to handle the additional sulfur throughput. A wet scrubber system consisting of a multi-stage combination of both venturi and packed bed crossflow scrubbers may also be considered representative of BACT for DAP plant reactor/granulator, dryer, and cooler particulate and fluoride emissions. Weak phosphoric acid and plant pond water are utilized as scrubbing mediums in the venturi and packed section scrubbers, respectively. Modifications to existing DAP process equipment will not be required. Both particulate and fluoride BACT emission rate limits, 0.41 lb/ton P₂O₅ and 0.0417 lb/ton P₂O₅, respectively, are substantially lower than those originally proposed by the applicant. The above emission rate limits are based on the results of DAP plant compliance stack testing performed between 1980 and 1993.

Mr. Lewis also indicated that the air quality analysis presented by the applicant is unchanged.

The IMC-Agrico Company chemical fertilizer facility sulfuric acid plant will be subject to the requirements of 40 CFR Part 60, Subpart H - Standards of Performance for Sulfuric Acid Plants. The IMC-Agrico Company chemical fertilizer facility diammonium phosphate plant will be subject to the requirements of 40 CFR Part 60, Subpart V - Standards of Performance for the Phosphate Fertilizer Industry: Diammonium Phosphate Plants.

Thank you for the opportunity to comment on this revised package. If you have any questions, please contact Mr. Stan Kukier of my staff at (404) 347-5014.

Sincerely yours,



Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: S. Arif
C. Holladay
B. Thomas, SW Dist.
J. Koopler, K & A
G. Benzjak, NPS

RECEIVED

MAR 1 1994

Bureau of
Air Regulation

be met); however, the actual emissions data submitted by the applicant indicate that lower limits are achievable. We understand that past actual emission levels may not be achievable at the higher production rates, but this and other facilities in Florida have consistently demonstrated that levels lower than the NSPS are feasible. The BACT Clearinghouse only reflects BACT determinations, not actual achieved levels. In order to prevent continued inflation of BACT levels, we believe it is reasonable to establish allowable permit conditions that reflect the actual capabilities of the units. We request FDEP revise the proposed permit conditions to require IMC-Agrico to meet actual achievable emission rates, as demonstrated during compliance tests, or over a reasonable amount of operating time.

Regarding fuel oil use; to be consistent with recent FDEP BACT determinations (Piney Point Phosphates, Florida Power Company's Polk County facility), we believe 0.05 percent, not 0.5 percent, sulfur content is BACT.

Air Quality Modeling Analysis

The Class I Air Quality modeling analysis to predict impacts of SO₂ emissions from the proposed expansion of the H₂SO₄ plant was performed correctly. Sulfur dioxide emissions from the proposed expansion of the DAP plant were included by IMC in a previous cumulative inventory and analysis.

The modeling was first performed with the EPA Industrial Source Complex Short Term (ISCST2) dispersion model to assess if increased SO₂ emissions from the H₂SO₄ plant would significantly impact Chassahowitzka WA. The ISCST2 modeling was performed for 5 years (1985-1989), using surface meteorology from Tampa, Florida, and upper air meteorology from Ruskin, Florida. This initial screening analysis indicated that the emissions increase would significantly impact Chassahowitzka WA for the 3-hour and 24-hour averaging periods, but not for the annual averaging period.

Therefore, the SO₂ emissions from the proposed expansion of the H₂SO₄ plant were modeled with the EPA MESOPUFF II model. This analysis was conducted with 1986 meteorological data. The cumulative MESOPUFF II analysis of 136 other PSD sources indicated that the SO₂ emissions from the expanded H₂SO₄ plant would be below the Service significant impact levels of 0.48 µg/m³, and 0.07 µg/m³ for the 3-hour and 24-hour averaging periods, respectively, and therefore would not significantly contribute to the modeled Class I SO₂ increment violations. The cumulative analysis does indicate that there are numerous and large violations of the short term SO₂ Class I increment with the highest 24-hour concentration being 7.13 µg/m³.

We have previously expressed our concern regarding SO₂ increment consumption at Chassahowitzka WA, and IMC-Agrico's analysis indicates that this concern is justified. We are pleased that your Department has proposed a meeting/workshop with us to discuss, among other things, a cumulative increment analysis for the Chassahowitzka WA. We hope that this analysis will identify PSD sources, which are significant increment consumers during periods of increment violation.

We modeled the impact to Chassahowitzka WA from the proposed increase in F emissions with the ISCST2 model, using 5 years (1982-1986) of Tampa, Florida, meteorological data. The maximum modeled F concentrations are 0.00146 µg/m³, 0.00041 µg/m³, and 0.00001 µg/m³ for the 8-hour, 24-hour and annual averages, respectively.

The visibility analysis performed with the EPA VISCREEN model indicates that there should be no impact of a coherent visible plume at Chassahowitzka WA.

Air Quality Related Values Analysis

IMC-Agrico summarized gaseous SO₂ effects on vascular plants, and we agree that there is low potential for vascular plant injury due to SO₂ emissions from their project. We disagree with IMC-Agrico's statement (permit application, p. 61) that EPA established the SO₂ annual ambient air quality standard at 80 µg/m³, because this was the lowest average concentration for which chronic injury occurs to vegetation. This primary standard, like all the primary standards, was set at a level to protect human health.

IMC-Agrico did not address SO₂ effects on nonvascular plants, such as lichens. Some lichen species are sensitive to concentrations of SO₂ as low as 20 µg/m³. We hope to survey the lichens of Chassahowitzka WA, and will provide species information to permit applicants when available.

IMC-Agrico briefly addressed impacts on soil. We agree that soils that are daily inundated by the tide are unlikely to be affected by sulfate deposition. However, we continue to be concerned that thin upland organic soils at Chassahowitzka WA may be oxidized by addition of sulfate. As we have discussed with your Department, we hope to obtain information on these soils to determine their sensitivity.

Fluoride deposition to the Chassahowitzka WA is predicted to be low, and thus the potential for F injury to vegetation and wildlife is low.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our refuges. If you have any questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at telephone number 303/969-2071.

Sincerely yours,



James W. Pulliam, Jr.
Regional Director

cc: L. Brief
C. Holladay
B. Thomas, SW Dist
J. Harper, EPA
Z. Novak, Pold Es.
D. Koozler, P.E.
CNF/JB/PL



RECEIVED

FEB 25 1994

Bureau of
Air Regulation

FEDERAL EXPRESSED

February 24, 1994

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: Molten Sulfur Storage & Handling Facility
Permit No. AC 53-230355
Nichols Plant**

Dear Mr. Fancy:

Enclosed is a copy of the Affidavit of Publication for the above-referenced permit to increase the production rate.

This Affidavit is being sent after the seven days publication requirement time of the Department. An error was made by the Lakeland Ledger on returning the Affidavit in a timely matter and was not received by IMC-Agrico until February 23, 1994.

If you should have any questions, please do not hesitate to contact me.

Sincerely,

J. M. Baretincic
Director
Environmental Services

Enclosure

xc: J. A. Brafford

JMB:ck
(jmbck#1)

S. Crisp
C. Holladay
B. Thomas, SW Dist.
G. Harper, EPA
G. Beatty, NPS

AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No.

STATE OF FLORIDA)
COUNTY OF POLK)

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

Notice of intent

in the matter of

increase production

in the

Court, was published in said newspaper in the issues of

February 3;

1994

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

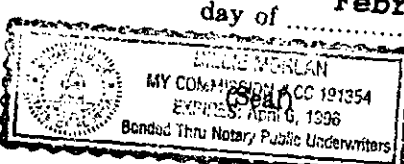
[Handwritten Signature]
Controller

by Tharon Honeycutt who is personally known to me.

Sworn to and subscribed before me this 3rd

day of February

A.D. 19 1994



[Handwritten Signature]
Notary Public

BILLIE MORLAN

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT
The Department of Environmental Protection gives notice of its intent to issue a permit to IMC-Agrico Company, P. O. Box 1035, Mulberry, Florida 33860. The permit will allow the applicant to modify (increase production) of the existing molten sulfur storage and handling facility on the sulfuric acid plant at IMC-Agrico Company phosphate fertilizer manufacturing plant on County Road 676 near Nichols, Polk County, Florida. The two sources will be consolidated into one permit (AC 53-230355). The modification to the sulfuric acid plant requires a Best Available Control Technology (BACT) determination for sulfur dioxide and acid mist. The ambient air impact of the emissions increase for sulfur dioxide from the proposed project are predicted to be less than significant for the annual averaging time. The ambient air impact of the combined sulfur dioxide emissions from this facility and other sources in the area, plus a background concentration, is 239 ug/m³ for the 24-hour averaging time; and 685 ug/m³ for the 3-hour averaging time. The PSD increments for sulfur dioxide consumed by this facility and other sources in the Class II area are predicted to be less than significant for the annual averaging time; 26 ug/m³ for the 24-hour averaging time or 29% of the available increment; and 100 ug/m³ for the 3-hour averaging time or 20% of the available increment. The sulfur dioxide emissions from this modification will have no significant impact in the Class I Chasowitka National Wilderness Area. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, 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, 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 Notice. 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 publication of this notice in the Office of General Counsel of 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 28-3.207, F.A.C.

The application 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 Park Court
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
6424 Central Palm Drive
Tampa, Florida 33619-8218

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. 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.

D-188 -- 2-3-1994

File Copy



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 17, 1994

Mr. Stan Kukier
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Kukier:

Re: IMC-Agrico Company, Polk County, Florida
(PSD-FL-204)

The attached comments were submitted by Koogler & Associates in response to the initial Technical Evaluation and Preliminary Determination (TEPD) that was submitted on October 28, 1993.

A revised TEPD was issued on January 13, 1994 that incorporated most of their comments. The changes mostly included editorial changes and did not affect the BACT determination. The following is an item by item explanation of the language accepted by the Department as proposed in the attached comments.

Modification of SAP

1. Agree as proposed.
2. Agree as proposed.
3. Agree as proposed.
4. Agree as proposed.
5. Agree with addition underlined.

"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".

6. Agree as proposed.
7. Agree as proposed.

Modification of DAP

1. Agree as proposed.
2. Agree as proposed.
3. Agree with deletions struck through and additions underlined.

Mr. Stan Kukier
February 17, 1994
Page 2 of 2

"The maximum emissions for fluorides and particulate matter (PM/PM₁₀), based on FDEP's evaluation of past test data are stated in Table 1. The total emission rates shall not be exceeded, however, the allocation of the emission rates may be amended-if warranted adjusted based on the results of future sufficient emission tests conducted at the higher production rates".

4. Agree as proposed.
5. Agree with deletions struck through and additions underlined.

"... Should the air dispersion modeling predict an exceedance of the annual ammonia ARC, the allowable ammonia emission rates for the DAP plant ~~will be determined by FDEP using the same evaluation approach as is used in the case of similar pollutants with no corresponding ambient air standards~~ shall be reduced to a level that prevents the exceedance of the annual ammonia ARC (100 ug/m³)".

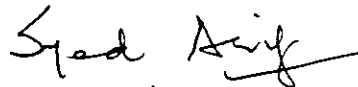
6. Agree with deletions struck through.

"Fugitive emissions from the process, ~~conveying and storage equipment~~ shall be controlled by sealing and/or venting all particulate matter and fumes from the equipment to the pollution abatement system, ~~where practical~~".

7. Agree as proposed.
8. Agree as proposed.
9. Agree as proposed.
10. Agree as proposed.
11. Agree as proposed.
12. Agree as proposed.

If there are any questions on the above, feel free to call me at (904) 488-1344.

Sincerely,



Syed Arif
Engineer
Bureau of Air Regulation

SA/bjb

Attachment



KOUGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

KA 123-93-01

November 23, 1993

RECEIVED

NOV 25 1993

Division of Air
Resource Management

Mr. John C. Brown, Jr.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Comments on FDEP Intent to Issue Permit
IMC-Agrico Company
Modification of SAP at Nichols Facility
Permit File Nos. AC53-230355, PSD-FL-204

Dear Mr. Brown:

The following comments are submitted in response to the FDEP Intent to Issue Permit, dated October 28, 1993, to IMC-Agrico for an increase in the production rate of the Sulfuric Acid Plant at the Nichols facility.

COMMENT ON THE NOTICE

1. Certain wording changes would help to make the NOTICE OF INTENT TO ISSUE PERMIT more accurate. Suggested wording is provided below:

"...The ambient air impact of the emissions increase for sulfur dioxide from the proposed project are predicted to be less than significant for the annual averaging time. The ambient air impact of the combined sulfur dioxide emissions from this facility and other sources in the area, plus a background concentration, are 239 ug/m³ for the 24-hour averaging time; and 685 ug/m³ for the 3-hour averaging time. The PSD increments for sulfur dioxide consumed by this facility and other sources in the Class II area ..."

COMMENTS ON THE TECHNICAL EVALUATION

2. In SECTION I.C. and I.D. on Page 2, it should be clarified that it is the sulfur feed from the molten sulfur storage and handling system to the sulfuric acid plant which will be increased from 275,000 to 365,000 tons per year; and up to 41 TPH will be the sulfur feed to the sulfuric acid plant. The maximum molten sulfur receiving and handling rates for the molten sulfur storage and handling system are different from the maximum sulfur feed rates to

the sulfuric acid plant. The currently permitted maximum molten sulfur receiving and handling rates for the molten sulfur storage and handling system are 400 TPH, 2800 TPD and 305,000 TPY.

3. In SECTION II on Page 4, the reference to fluorides is not applicable.

COMMENTS ON THE DRAFT PERMIT

4. On Page 1 of 8, it should be clarified that the modification will allow a maximum molten sulfur feed rate to the sulfuric acid plant of 1,000 TPD and 365,000 TPY. The maximum molten sulfur receiving and handling rates for the molten sulfur storage and handling system are different from the maximum sulfur feed rates to the sulfuric acid plant. The currently permitted maximum molten sulfur receiving and handling rates for the molten sulfur storage and handling system are 400 TPH, 2800 TPD and 305,000 TPY.
5. In Specific Condition (SC) No. 4, Page 5 of 8, the nitrogen oxides emission limit is based on a general emission factor. As the actual plant-specific emissions may be different, a provision for revision of the emission limit should be added to the SC. The following wording, similar to that in past FDEP permits for sulfuric acid plants, is suggested:

"The nitrogen oxides limits, based on a general emission factor, are subject to revision if test data indicate that the emission factor is improper."
6. In Specific Condition (SC) No. 9, Page 6 of 8, the same comment regarding molten sulfur feed rate, applies as discussed in COMMENT No. 4.
7. In SC No. 16, Page 7 of 8, the reference to sequential start-up of sulfuric acid plants does not apply to the Nichols facility which has only one sulfuric acid plant.

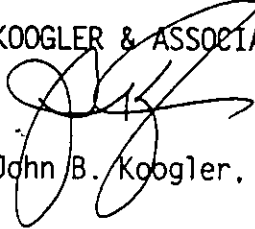
Mr. John C. Brown, Jr.
Florida Department of
Environmental Protection

November 23, 1993
Page 3

If you have questions, please do not hesitate to give me call.

Very truly yours,

KOGLER & ASSOCIATES


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

JBK:pr

c: J. Girardin, IMC-Agrico





KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 123-93-01

November 23, 1993

Mr. John C. Brown, Jr.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Comments on FDEP Intent to Issue Permit
IMC-Agrico Company
Modification of DAP Plant at Nichols Facility
Permit File Nos. AC53-232681, PSD-FL-204

Dear Mr. Brown:

The following comments are submitted in response to the FDEP Intent to Issue Permit, dated October 28, 1993, to IMC-Agrico for an increase in the production rate of the Diammonium Phosphate Plant at the Nichols facility.

COMMENT ON THE TECHNICAL EVALUATION

1. In SECTION I.D. on Page 2, the annual tons of VOC emissions should read 0.07 under Actual, and 0.03 under Net Increase.

COMMENTS ON THE DRAFT PERMIT

2. In Specific Condition (SC) No. 1, Page 5 of 7, the reference to a "No. 5" DAP plant should be replaced with just "DAP Plant." Also the maximum P_2O_5 feed rate should read 48.4 tons per hour, in accordance with the permit application.
3. In SC No. 3, Page 5 of 7, a provision needs to be included which would allow for the amendment of the fluoride and particulate matter emission allocations based on test data at the higher production rates. The following wording is suggested:

"The maximum emissions for fluorides and particulate matter (PM/PM10), based on FDEP's evaluation of past test data, are stated in Table 1. The total emission rates shall not be exceeded, however, the allocation of the emission rates may be amended if warranted based on the results of future emission tests conducted at the higher production rates."

Also, should the PM/PM10 TPY numbers in Table 1 be 35.9, 41.6, 7.9, and 85.4 (instead of 35.7, 41.3, 8.0, and 85.0), to correspond to the lbs/hr emission numbers?

4. In SC No. 4, Page 6 of 7, it is requested that the testing for PM/PM10 and fluorides, be allowed to be conducted over a consecutive 5-day period for each emission point, in accordance with the provisions of Florida Administrative Code (FAC) Rule 17-297.310. From a practical aspect, it should be noted that conducting three one-hour runs for the pollutants on three stacks, involves a great amount of testing and set-up time alone. The testing timeframes should also allow flexibility to test around weather or equipment problems.
5. In SC No. 5, Page 6 of 7, it is requested that the testing for ammonia be allowed to be conducted over a consecutive 5-day period for each emission point, in accordance with the provisions of Florida Administrative Code (FAC) Rule 17-297.310, as discussed in COMMENT No. 4.

It is also requested that the permit allow ammonia testing using the EPA draft method or an equivalent method which meets FDEP approval for the purpose of gathering ammonia emission data.

Regarding ammonia modeling, the following wording is suggested at the end of SC No. 5, to reflect current FDEP permitting guidelines for ammonia:

"..Should the air dispersion modeling predict an exceedance of the annual ammonia ARC, the allowable ammonia emission rates for the DAP plant will be determined by FDEP using the same evaluation approach as is used in the case of similar pollutants with no corresponding ambient air standards."

6. In SC No. 8, Page 6 of 7, it is requested that the following wording be added to the SC to make it reasonable and practical:

"Fugitive emissions from the process, conveying and storage equipment shall be controlled by sealing and/or venting all particulate matter and fumes from the equipment to the pollution abatement system, where practical."

7. In SC No. 9(b), Page 6 of 7, the following wording is suggested to conform to the requirements in 40CFR60.233:

"The permittee shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in tons/hour of phosphorous-bearing feed using a monitoring device which meets the requirements of Paragraph (a) above and then by proceeding according to Section 60.224(b)(3)."

8. In SC No. 9(c), Page 7 of 7, the following wording is suggested to conform to the requirements in 40CFR60.233:

"The permittee shall calibrate, maintain and operate a monitoring device which continuously measures and permanently records the total pressure drop across each scrubber system. The monitoring device shall have an accuracy of $\pm 5\%$ over its operating range."

The remaining wording in SC 9(c) should be deleted, as it is repeated in SC No. 10.

9. In SC No. 10, Page 7 of 7, it is requested that the SC allow ammonia testing using the EPA draft method or an equivalent method which meets FDEP approval.

COMMENTS ON THE DRAFT BACT DETERMINATION

10. The control technology requested by the applicant should reflect the existing scrubbing equipment, which is:

"Venturi acid scrubbing, for R/G; and venturi reclaim water scrubbing, for cooler and dryer."

Accordingly, it is requested that the same correction be made in the BACT determined by the Department.

11. The discussion on the content of Table 1 in COMMENT No. 3 above, is applicable to Table 1 presented in the BACT determination.
12. The language in the BACT Determination Rationale may need to be changed in view of COMMENT No. 10.



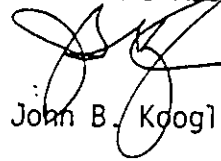
Mr. John C. Brown, Jr.
Florida Department of
Environmental Protection

November 23, 1993
Page 4

If you have questions, please do not hesitate to give me call.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:pr

c: J. Girardin, IMC-Agrico





FEDERAL EXPRESSED

February 16, 1994

RECEIVED

FEB 17 1994

Bureau of
Air Regulation

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: Diammonium Phosphate Plant
Permit No. AC 53-232681
Nichols Plant**

Dear Mr. Fancy:

Enclosed is a copy of the Affidavit of Publication for the above-referenced permit to increase the production rate.

If you should have any questions, please do not hesitate to contact me.

Sincerely,

J. M. Baretincic
Director
Environmental Services

Enclosure

JMB:ck
(jmbck#1)

xc: J. A. Brafford
D. Crisp
C. Holladay
B. Thomas
G. Harper
D. Rasmussen
EPA
NPS



QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

5270077271

22531 5270077271 124

RECIPIENT'S COPY

From (Your Name) Please Print IMC-AGRICO COMPANY - NEW WALES PART		Your Phone Number (Very Important) (813)-428-253	To (Recipient's Name) Please Print C. H. FANCY, P.K.	Recipient's Phone Number (Very Important)	
Company IMC-AGRICO COMPANY - NEW WALES PART		Department/Floor No.	Company FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	Department/Floor No.	
Street Address 1000 W. 2nd Street		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) TWIN TOWERS OFFICE BLDG.			
City OLDSBORO	State FL	ZIP Required 33580	City 2600 BLAIR STONE ROAD	State FL	
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.)		IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address City State ZIP Required			
PAYMENT 1 <input checked="" type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No 4 <input type="checkbox"/> Bill Credit Card		5 <input type="checkbox"/> Cash/Check			
4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES WEIGHT in Pounds Only YOUR DECLARED VALUE	
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 51 <input type="checkbox"/> YOUR PACKAGING 16 <input type="checkbox"/> FEDEX LETTER 56 <input checked="" type="checkbox"/> FEDEX LETTER* 12 <input type="checkbox"/> FEDEX PAK* 52 <input type="checkbox"/> FEDEX PAK* 13 <input type="checkbox"/> FEDEX BOX 53 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE 54 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY Government Overnight (Restricted for authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE Freight Service (For packages over 150 lbs) 70 <input type="checkbox"/> OVERNIGHT FREIGHT 80 <input type="checkbox"/> TWO-DAY FREIGHT** <small>(Confirmed reservation required) *Declared Value Limit \$500 **Call for delivery schedule</small>		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE Lbs 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		Total Total Total DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> lbs L x W x H Received At: 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input checked="" type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station	Emp. No. Date Federal Express Use <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: X Date/Time Received FedEx Employee Number REVISION DATE 2/92 PART #137204 FXEM 8/92 FORMAT #128 126 © 1991-92 FEDEX PRINTED IN U.S.A.
7 Release Signature:					

AFFIDAVIT OF PUBLICATION

THE LEDGER Lakeland, Polk County, Florida

Case No.....

STATE OF FLORIDA)
COUNTY OF POLK)

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

Notice of Intent

in the matter of

Diammonium

in the

Court, was published in said newspaper in the issues of

February 10;

1994

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.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT
The Department of Environmental Protection gives notice of its intent to issue a permit to IMC-Agrico Company, P.O. Box 1035, Mulberry, Florida 33860 to increase the production rate of the Diammonium Phosphate plant at their facility in Nichols, Polk County, Florida. A determination of Best Available Control Technology (BACT) was required. The proposed project is subject to Prevention of Significant Deterioration regulations and federal new source performance standards. The project will increase total allowable diammonium phosphate production at the IMC-Agrico Company facility by 25% and is not expected to result in significant deterioration of the environment. No PSD Class I or II increments are consumed by this project. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, 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, 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 Notice. 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 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, F.A.C.

The application 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 Park Courtyard
Tallahassee, Florida 32301
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. 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.
D-210 - 2-10: 1994

IDENTIFICATION: Signed *Tharon Honeycutt*

Controller

Personal Knowledge Passport

Driver's License Military

ID# _____

Sworn to and subscribed before me this 10th

day of February A.D. 19 94

Billie Morlan
Notary Public

BILLIE MORLAN

