



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

KA 123-93-01

November 23, 1993

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NOV 20 1993

Division of Air
Resources 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.



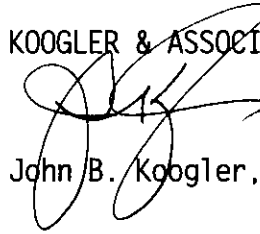
Mr. John C. Brown, Jr.
Florida Department of
Environmental Protection

November 23, 1993
Page 3

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

Very truly yours,

KOGLER & ASSOCIATES

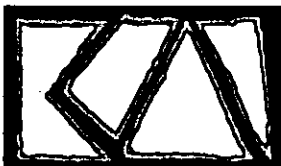


John B. Koogler, Ph.D., P.E.

JBK:pr

c: J. Girardin, IMC-Agrico





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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:

I can rephrase this
When the actual stack is
done. If the number is above
the A.R.C. whatever the toxics
guideline says.

For whatever is being used at
If adjustment sooner, use numbers now
If later, then use later numbers.

odor + threshold is higher
Health effect
Welfare related issue

"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.



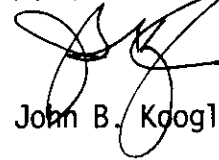
Mr. John C. Brown, Jr.
Florida Department of
Environmental Protection

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





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KA 123-93-01

November 5, 1993

RECEIVED

NOV 10 1993

Division of Air
Resources Management

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Extension of Time to
File a Petition

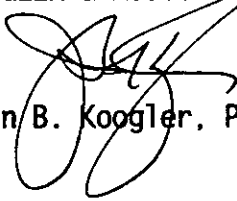
Dear Mr. Congden:

Attached is a request for an extension of time to file for a hearing in accordance with Rule 17-103.070, FAC.

If you have any questions concerning this request, please do not hesitate to contact Pradeep Raval or myself.

Very truly yours,

KOUGLER & ASSOCIATES


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

JBK:par
Enc.

c: Mr. Preston Lewis, FDEP
Mr. Jerry Girardin, IMC-Agrico

S. Arif
C. Halladay
B. Thomas SWD
A. Haepler, EPA
G. Rumyak, NPS
J. Novak, Polk Co

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application
for Air Permit by

IMC-Agrico Company
P.O. Box 1035
Mulberry, FL 33860

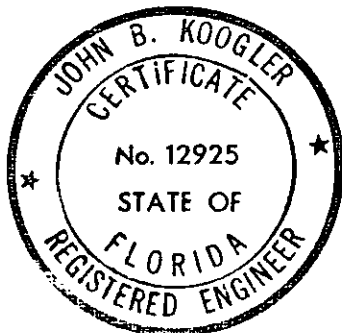
DEP File Nos. AC53-232681
and PSD-FL-204
Polk County - AP

MOTION FOR EXTENSION OF TIME


The Applicant, IMC-Agrico Company, by and through its undersigned Engineer of Record and pursuant to Rule 17-103.070, FAC, requests the Secretary of DEP to grant a 90-day extension of time in which to file a petition. The additional time will allow IMC-Agrico Company, to submit additional information to FDEP on the above referenced project review.

Mr. Preston Lewis, of FDEP, has indicated that he has no objection to such an extension.

Dated the 5th day of November 1993 in Gainesville, Alachua County, Florida.



Koogler & Associates
Environmental Services

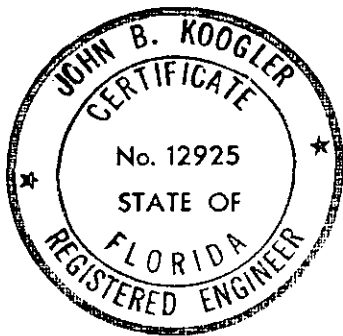


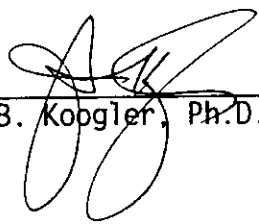
John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(904) 377-5822
Engineer of Record for
IMC-Agrico Company



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, OGC, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Preston Lewis, FDEP Air Permitting Section, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Jerry Girardin, IMC-Agrico Company, P.O. Box 1035, Mulberry, Florida 33860, by FAX and by U.S. Mail, this 5th day of November 1993.





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





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GAINESVILLE, FLORIDA 32609
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FYE and
Copy of necessary
[Signature]

FAX TRANSMITTAL FORM

TO: *Anton Lewis*

FROM: *John Kogler*

PROJECT: *123-90-01*

SENT BY: *Kenby*

DATE: *11/5/93*

FAX PHONE: 904-377-7158

The text being transmitted consists of *6* pages PLUS
this one.

REMARKS: _____

