

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION



# Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: \_\_\_\_\_ LOCTN: \_\_\_\_\_  
To: \_\_\_\_\_ LOCTN: \_\_\_\_\_  
To: \_\_\_\_\_ LOCTN: \_\_\_\_\_  
FROM: \_\_\_\_\_ DATE: \_\_\_\_\_

TO: Clair Fancy  
THRU: Dan Williams *DW*  
FROM: Bill Thomas *BT*  
DATE: October 10, 1986

OCT 23 1986

Dept. of Environmental Reg.  
Office of General Counsel

SUBJECT: IMCC, New Wales; Request to Establish Higher Visible Emission Standards; A053-53026 & A053-68867

Attached is IMCC's request to establish higher V.E. standards at their New Wales Multifos and AFI plants. This request is being forwarded for your consideration and processing.

IMCC's request for higher V.E. standards is warranted. However, we cannot agree or disagree with their recommended standards at this time. Prior to setting new standards, this office needs time to investigate and make recommendations. I suggest that S.W. District compliance personnel observe simultaneous stack and V.E. tests at each stack on at least two occasions. This would also include a control device inspection to assure optimum operating conditions. Considering semi-annual stack testing requirements and IMCC's operating schedule, this program could well exceed a year.

I suggest that you respond to IMCC's request; advise them of our need to make a study; and request that they coordinate future stack testing with this office to facilitate the study.

WCT/js

Attachment

cc: C.S. Lee

NEW WALES OPERATIONS  
P.O. Box 1035 • Mulberry, Florida 33860  
Telephone: (813) 428-2531

D. H. R.  
SEP 18 1986

SOUTH WEST DISTRICT  
TAMPA



INTERNATIONAL MINERALS & CHEMICAL CORPORATION  
September 15, 1986

Mr. W. C. Thomas, P.E.  
State of Florida  
Department of Environmental Regulation  
7601 Highway 301 N.  
Tampa, Florida 33610-9544

Re: REQUEST FOR RELIEF ON OPACITY REQUIREMENTS ON  
A053-53026 (MULTIFOS) and A053-68867 (AFI)

Dear Bill:

As reviewed with you and your staff on September 10, 1986, New Wales Operations has had occasional problems with high opacity on its AFI and Multifos plant stacks.

Ongoing discussions with the DER have led both parties to conclude that the problem certainly is not one of poor scrubber efficiency and violation of the particulate emission limits. The attached data is submitted to verify this conclusion. We have made every attempt to control our combustion efficiency and have even used natural gas as fuel during the last year of test data.

Based upon the attached data, IMC, New Wales Operations, would suggest that our permits be revised to allow for a 45% VE limit on Multifos and a 50% VE limit on AFI.

Since Regulation 17.1.600(37)(a) does not establish specific VE limits for phosphate processing, IMC New Wales Operations is hereby requesting DER relief under the authority granted in 17.2.610(2)(a). This relief is requested on the grounds that the data demonstrates that (a) the scrubbers are operating properly; (b) combustion control and fuel switching have not solved the problem; and (c) no violations of particulate emission standards are occurring with VE meant only to be a surrogate indicator.

Sincerely,

J. M. Baretincic  
Manager - Environmental Services  
and Quality Control

JMB/bs  
057

**BEST AVAILABLE COPY**

**VE vs PARTICULATE DATA**

**Multifos A053-53206  
Compliance Tests 8/83 - 11/85**

Test Date	% VE	Measured Particulate Emissions		Allowed Particulate Emissions	ACFM	Production Rate		
		lbs/day	lb/hr	lbs/day		TPH	PWT lb/hr	lb/d
11/8/85	33	262	10.9	552	53,100	20.0	23	552
9/24/85	31	144	12.0	392	40,175	11.5	16.3	392
1/17/85	20	190	7.9	574	29,215	21.3	23.9	574
2/16/84	39	211	8.8	435	36,529	13.6	18.1	435
8/30/83	32	436	18.2	540	50,871	20.0	23	552

**AFI A053-68867**

**Tests performed when poor stack conditions noticed 11/84 - 8/86**

Test Date	% VE	Measured Particulate Emissions		Allowed Particulate Emissions	ACFM	Production Rate		
		lbs/day	lb/hr	lbs/day		TPH	PWT lb/hr	lb/d
08/6/86	*20-25	122	10.2	786	157,113	54	32.8	786
4/29/86	**49.7	345	28.8	872	146,522	103	36.3	872
7/28/85	50	490	20.4	838	146,161	80	34.9	838
4/10/85	55	683	28.5	831	146,870	76	34.6	831
3/19/85	55	623	26.0	842	146,829	82	35.0	841
1/02/85	50	634	26.4	828	126,017	75	34.5	829
11/14/84	50	527	22.0	789	134,536	55	32.9	789

**Most Recent AFI Compliance Test**

8/28/86	36	495	20.6	840	152,428	82	35.3	841
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\*DER visual estimate  
\*\*DER actual measurement

DER  
DEC 06 1985  
BAQM



INTERNATIONAL MINERALS & CHEMICAL CORPORATION

November 27, 1985

Mr. W. A. Thomas  
Florida Department of Environmental  
Regulation  
Bureau of Air Quality Management  
2600 Blairstone Rd.  
Tallahassee, FL 32601

Dear Bill:

AC53-22671 began operating on November 4, 1985 loading GTSP. Due to current economic conditions we plan to shut it back down immediately. During its brief operating time it has only operated for a total of 60 hours and loaded 10 rail cars and 18 trucks. Because of the low loadout rate and the brief operating time, I have been unable to obtain compliance tests which would allow us to submit a request for an operating permit. It now appears that this loadout facility will now be down for at least 7 months.

IMC-New Wales Operations is hereby requesting that the Department extend the construction permit expiration date from 12/31/85 until 12/31/86.

As I explained in our phone conversation of 11/27/85, we do not like to have to request this extension. I would much prefer to have the unit operate and allow us to do the required compliance tests. Unfortunately this is not possible at this time, hopefully conditions will change in the near future and we can resolve this issue.

Thanks for your consideration in this matter and if you have any questions, please give me or Joe Baretincic a call.

Sincerely,

A. L. Girardin, III  
Environmental Services Supervisor

ALG:rc  
(071)

- cc: J. M. Baretincic  
J. A. Brafford  
E. R. Butfiloski  
W. J. Hoge  
D. K. Larsen  
E. M. Newberg  
C. A. Pflaum  
W. C. Thomas, DER-Tampa

12-10-85  
Asked Bill Thomas, Tampa,  
to handle as District  
issued permit.

W.C.