AC53-75926
PAID SEP 26 1983

D.E.R.
SEP 26 1983
SOUTHWEST DISTRICT
TAMPA

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [ ] New[1] [x] Existing[1]

APPLICATION TYPE: [x] Construction [ ] Operation [x] Modification

COMPANY NAME: IMC, New Wales Operations COUNTY: Polk

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) AFI Granulation Plant Stack with Crossflow Scrubbers

SOURCE LOCATION: Street Highway 640 @ County Line Rd. City Mulberry

UTM: East 396.7 North 3079.4

Latitude ____ ° ____ ' ____ "N Longitude ____ ° ____ ' ____ "W

APPLICANT NAME AND TITLE: T. H. Traylor, Vice President & General Manager

APPLICANT ADDRESS: P.O. Box 1035, Mulberry, FL. 33860

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of IMC, New Wales Operations

I certify that the statements made in this application for a construction, modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: T H Traylor

T. H. Traylor, Vice President & General Mgr.
Name and Title (Please Type)

Date: 9/20/83 Telephone No. (813) 428-2531

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

(Affix Seal)

CRAIG A. PFLAUM * CERTIFICATE NO. 18595 * STATE OF FLORIDA * REGISTERED PROFESSIONAL ENGINEER

Signed: Craig A Pflaum PE

Craig A. Pflaum, P.E.
Name (Please Type)

IMC, New Wales Operations
Company Name (Please Type)

P.O. Box 1035, Mulberry, FL. 33860
Mailing Address (Please Type)

Florida Registration No. 18595 Date: 9/20/83 Telephone No. (813) 428-2531

[1]See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

IMC plans to use the existing Animal Feed Ingredient Plant to produce DAP in addition to AFI products. This will require permitting of this facility as a fluoride emitter. Stack tests performed during a test run show full compliance with NSPS for DAP Plants.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction NA Completion of Construction NA

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

System for emission control exists as originally installed at a cost of $2,500,000.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC53-5043 issued 6/7/76, expiration on 12/30/78.

AO53-7025 issued 8/22/78, expiration on 8/15/83.

AO53-68867 issued 6/21/80, expiration on 5/30/88.

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? ____ Yes x No

F. Normal equipment operating time: hrs/day 24 ; days/wk 6.6 ; wks/yr 50 ; if power plant, hrs/yr ____ ; if seasonal, describe: DAP production will only occur for 15 weeks of each year with fluoride emissions of less than 3 TPY.

G. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
   a. If yes, has "offset" been applied?
   b. If yes, has "Lowest Achievable Emission Rate" been applied?
   c. If yes, list non-attainment pollutants.
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI.
3. Does the State "Prevention of Significant Deterioriation" (PSD) requirements apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? Yes (DAP production)
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? No

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

	Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
		Type	% Wt		
	P_2O_5 & $CaCO_3$	----------	----------	100 TPH	Granulator
	P_2O_5 & NH_3	----------	----------	80 TPH	Granulator
*	P_2O_5 & NH_3	F^-	1.0	80 TPH	Granulator

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 200,000 & 160,000

2. Product Weight (lbs/hr): 200,000 & 160,000

C. Airborne Contaminants Emitted:

	Name of Contaminant	Emission[1]		Allowed Emission[2] Rate per Ch. 17-2, F.A.C.	Allowable[3] Emission lbs/hr	Potential Emission[4]		Relate to Flow Diagram
		Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
*	Fluorides	2.23	2.81	0.06 lbs/ton P_2O_5	2.23	NA		Stack
	Particulates	36.1	142.0	Process Wt.	36.1	NA		Stack

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles[5] Size Collected (in microns)	Basis for Efficiency (Sec. V, It[5])
Davy Powergas	Part.	99	3-5	Design
Venturi/Cross	*F^-			Meets NSPS
flow Scrubbers				

[1] See Section V, Item 2.

[2] Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. – 0.1 pounds per million BTU heat input)

[3] Calculated from operating rate and applicable standard

[4] Emission, if source operated without control (See Section V, Item 3)

[5] If Applicable

* DAP Production only

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
#6 Fuel Oil	.5600 PPH	7200 PPH	135

*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis:

Percent Sulfur: 2.5 Percent Ash: _____

Density: 8 lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb 149,600 BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Liquid waste to cooling pond.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 172 ft. Stack Diameter: 8 ft.

Gas Flow Rate: 130,000 ACFM Gas Exit Temperature: 120° °F.

Water Vapor Content: 5-10 % Velocity: 50 FPS

SECTION IV: INCINERATOR INFORMATION

NOT APPLICABLE

Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ days/week _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner [ ] Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

SECTION V: SUPPLEMENTAL REQUIREMENTS

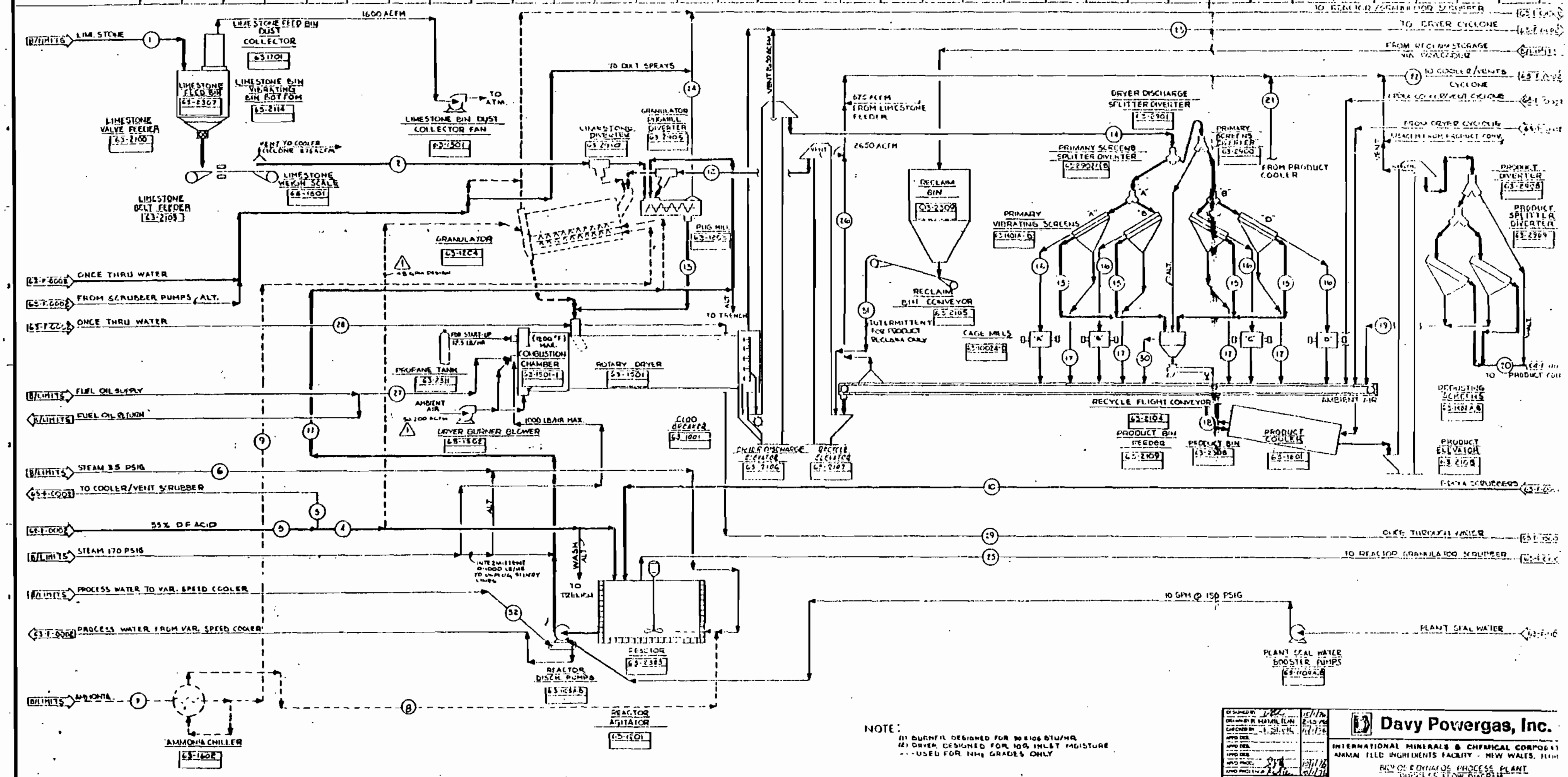
Please provide the following supplements where required for this application.

1. Total process input rate and product weight – show derivation.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.,) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.).
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8½" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8½" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

BEST AVAILABLE COPY

STREAM Nº	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
DESCRIPTION	LIMESTONE TO FEED BIN	LIMESTONE TO PUGMILL	TOTAL PHOSPHORIC ACID FEED	PHOS ACID TO REACTOR	PHOS ACID TO COOLER/VENTS SCRUBBERS	L.P. STEAM TO REACTOR	TOTAL AMMONIA FEED	AMMONIA TO REACTOR	AMMONIA TO GRANULATOR	SCRUBBER LIQUOR TO REACTOR	SLURRY TO PUGMILL	RECYCLE TO PUGMILL	PUGMILL DISCHARGE	DRYER ELEVATOR DISCHARGE	PRODUCT FOR PRIMARY SCREEN	OVERSIZE FOR PRIMARY SCREEN
AVERAGE MATERIAL FLOW	STPH	STPH	GPM	GPM	GPM	LB/HR	GPM	GPM	GPM	GPM	GPM	STPH	STPH	STPH	STPH	STPH
BIOFOS (21% P 15% Ca)	60	250	118	118	0	5000	0	0	0	93	210	114	207	256	51	15
DYNAFOS(DIBEXP 17% Ca)	60	58.8	151	151	0	5100	0	0	0	102	219	110	5.5	256	51	15
COMPOSITION																
% Ca	38.8	38.8	—	—								16.5-20.5				
% P	—	—	55	55							40	16.6-45.5				
% H2O (FREE)	0.5	0.5	—	—								2.0	16.80	1.0	1.0	1.0
% F	0.05 MAX	0.05 MAX	0.24 MAX	0.24 MAX	0.24 MAX							0.20-0.107				
PRESSURE PSIG (IN H2O)	ATM	ATM	60	60	60	35	235	235	235	75	100	ATM	ATM	ATM	ATM	ATM
TEMPERATURE °F	100	100	150-200	150-200	150-200	281	110	110	110	140	220	180-210	180	200-230	200-230	200-230
SP GRAVITY (LBS/FT³)	(80)	(80)	1.75	1.75	1.75	(0.117)	0.6	0.6	0.6	1.1	1.5	(50-60)	(55-65)	(55-60)	(60-62)	(60-65)
VISCOSITY CP	—	—	7-15	7-15	7-15	0.15	0.1	0.1	0.1	1.0	6-100	—	—	—		
DESIGN MATERIAL FLOW	60	60	180	180	59	9000	90	55	45	223	550	550	750	550	66	27

STREAM Nº	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
DESCRIPTION	FINES FOR PRIMARY SCREEN	PRODUCT TO COOLER	FINES FROM FINISHING SCREENS	PRODUCT TO [illegible]	GASES FROM COOLER	GASES TO COOLER/VENTS CYCLONE	GASES TO DRYER CYCLONE	GASES FROM PUGMILL	GASES FROM REACTOR	GASES FROM RECYCLE FLIGHT CONVEYOR	NO 6 FUEL OIL TO BURNER	ONCE THRU WATER TO DRYER FEED CHUTE	ONCE THRU WATER TO BASE OF STACK	PRODUCT RECYCLE	PRODUCT RECLAIM	PROCESS WATER TO VAR SPEED COOLER
AVERAGE MATERIAL FLOW	STPH	STPH	STPH	STPH	ACFM	ACFM	ACFM	ACFM	ACFM	ACFM	GPM	GPM	GPM	STPH	STPH	GPM
BIOFOS (21% P 15% Ca)	20	64	3	51.76	44,700	71,500	87,000	24,200	5000	11,500	68	100	100	29.4	0	15
DYNAFOS(DIBEXP 17% Ca)	20	60	4	72.20	44,700	71,500	62,000	29,500	5000	11,500	63	100	100	15.8	0	15
COMPOSITION																
% Ca				15.5-20.5												
% P				45.4-45.5												
% H2O (FREE)	1.0	2.0	1.0	1.0												
% F				0.18-0.09												
PRESSURE PSIG (IN H2O)	ATM	ATM	ATM	ATM	(-2)	(-5)	(-8)	(-1)	(-1)	(-4)	200	17	25	ATM	ATM	20
TEMPERATURE °F	200-230	200-230	120	120	162-191	163	250	150	220	140	120	115	125	200-230	AMBIENT	115
SP GRAVITY (LBS/FT³)	(60-66)	(60-66)	(50-60)	(60-60)	(0.060)	(0.062)	(0.060)	(0.060)	(0.022)	(0.061)	0.9	1.0	1.0	(50-60)	(60-60)	1.0
VISCOSITY CP											28	0.7	0.7			1.0
DESIGN MATERIAL FLOW	40	150	80	150	44,700	71,500	84,000	29,500	14,000	11,500	11.0	150	150	350	75	30



NOTE:
(1) BURNER DESIGNED FOR 90 x 10⁶ BTU/HR
(2) DRYER DESIGNED FOR 10% INLET MOISTURE
--- USED FOR NH₃ GRADES ONLY

NO.	DESCRIPTION	ISSUE	PURPOSE	REV.	DATE
2	GEN. REVISION	D	FOR DESIGN & CONSTRUCTION	2	
1	GEN REV & HOLDS REMOVED	C	FOR DESIGN & CONSTRUCTION	1	
		B	FOR DESIGN & CONSTRUCTION	0	10/12/76
		A	FOR CLIENT APPROVAL	C	1/21/76

REFERENCE DRAWINGS — REVISIONS — DRAWING HISTORY

DRAWN BY R. HAMILTON

Davy Powergas, Inc.

INTERNATIONAL MINERALS & CHEMICAL CORPORATION
ANIMAL FEED INGREDIENTS FACILITY - NEW WALES, FLORIDA
BIOFOS & DYNAFOS PROCESS PLANT
PROCESS FLOW DIAGRAM

ISSUED FOR CONSTRUCTION

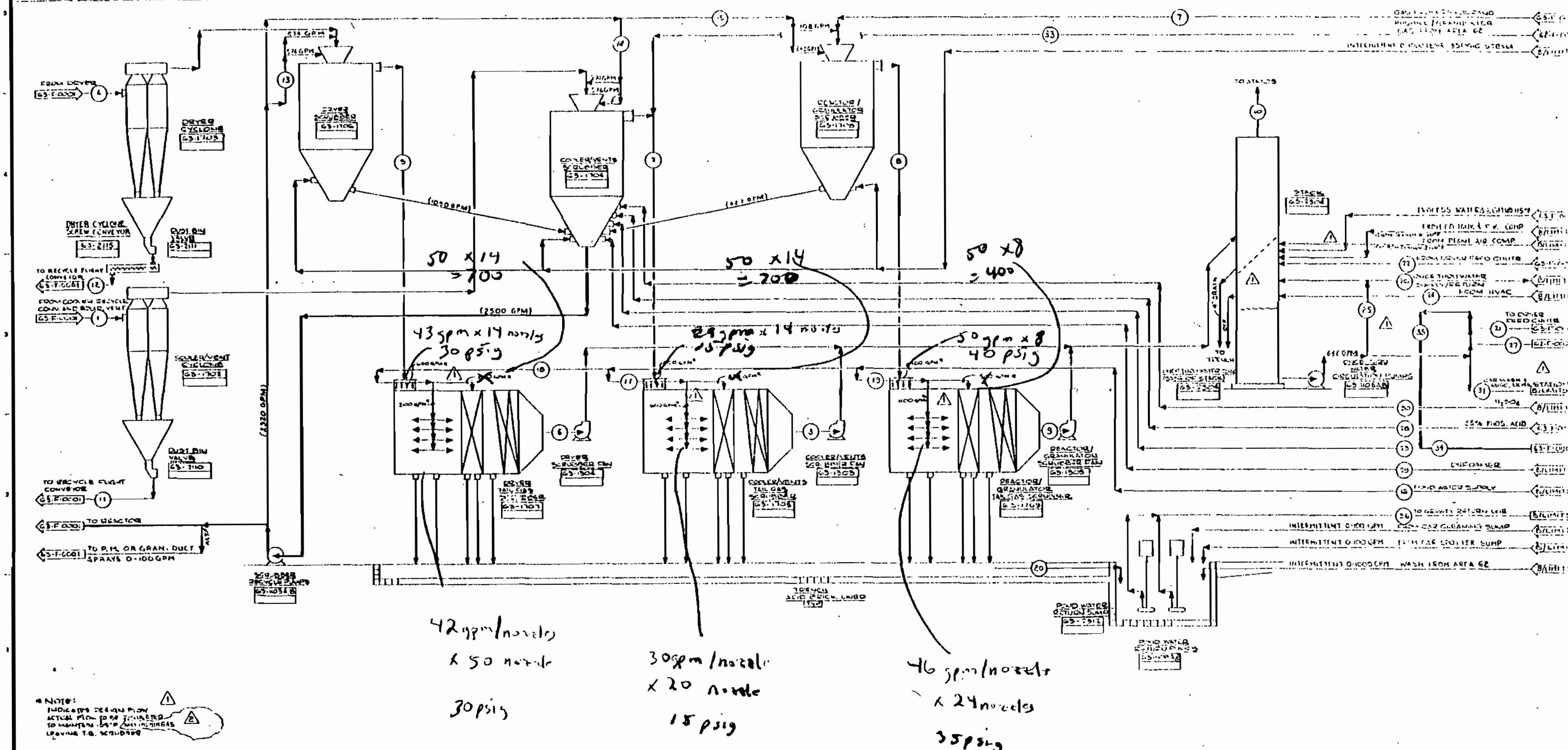
PROJECT NO. 4241 DRAWING NO. 63-F-0001

BEST AVAILABLE COPY.

STREAM NUMBER	1	2	3	4	5	6	7	8	9	10	11	12
DESCRIPTION	GAS TO COOLER/VENTS CYCLONE	GAS FROM COOLER/VENTS SCRUBBER	GAS FROM COOLER/VENTS TAIL GAS SCRUBBER	GAS TO DRYER CYCLONE	GAS FROM DRYER SCRUBBER	GAS FROM DRYER TAIL GAS SCRUBBER	GAS FROM REACTOR AND PUGMILL/GRANULATOR	GAS FROM REACTOR/GRANULATOR SCRUBBER	GAS FROM REACTOR/GRANULATOR TAIL GAS SCRUBBER	EXHAUST GAS FROM STACK	DUST FROM COOLER/VENTS CYCLONE	DUST FROM DRYER CYCLONE
AVG MATERIAL FLOW	ACFM	ACFM	ACFM	ACFM	ACFM	ACFM	ACFM	ACFM	ACFM	ACFM	STPH	STPH
BIOFOS (21% P, 15% Ca)	71,500	77,000	15,000	82,000	74,800	53,100	27,300	25,900	17,600	141,000	78.1	39.1
DYNAFOS (18.5% P, [illegible]% Ca)	71,500	77,000	15,000	82,000	74,800	55,100	33,000	25,600	20,400	145,500	78.1	39.1
SPECIFIC GRAVITY (LB/FT³)	(.062)	(.065)	(.065)	(.050)	(.055)	(.065)	(.056)	(.060)	(.074)	(.069)	(55-60)	(50-60)
PRESSURE PSIG (IN H₂O)	(-5.0)	(22.3)	(-3.0)	(-2.0)	(-26.0)	(-29.0)	(-2.0)	(-14.0)	(-24.0)	ATM	ATM	ATM
VISCOSITY CP	-	-	-	-	-	-	-	-	-	-	-	-
TEMPERATURE °F	163	117	105	250	150	105	185	160	105	110	[illegible]	150
DESIGN FLOW	71,500	77,000	15,000	64,000	81,600	58,100	33,000	30,000	26,400	145,500	55.1	39.4

STREAM NUMBER	13	14	15	16	17	18	19	20	21	22	23	24
DESCRIPTION	SCRUBBER LIQUID TO DRYER SCRUBBER	SCRUBBER LIQUID TO COOLER/VENTS SCRUBBER	SCRUBBER LIQUID TO REACTOR/GRANULATOR SCRUBBER	POND WATER TO TAIL GAS SCRUBBER	POND WATER TO COOLER/VENTS TAIL GAS SCRUBBER	POND WATER TO DRYER TAIL GAS SCRUBBER	POND WATER TO REACTOR/GRANULATOR TAIL GAS SCRUBBER	POND WATER FROM TAIL GAS SCRUBBERS	ONCE THRU WATER TO DRYER FEED CHUTE	ONCE THRU WATER FROM DRYER FEED CHUTE	ONCE THRU WATER TO VENTURI	WATER FROM HVAC
AVG MATERIAL FLOW	GPM	GPM	GPM	GPM	GPM	GPM	GPM	GPM	GPM	GPM	GPM	GPM
BIOFOS (21% P, 15% Ca)	850	650	350	6667	1257	3500	2000	7000	100	100	0	52
DYNAFOS (18.5% P, [illegible]% Ca)	850	650	350	6667	1257	3500	1500	7000	100	100	0	52
SPECIFIC GRAVITY (LB/FT³)	1.1	1.1	1.1	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
PRESSURE PSIG (IN H₂O)	35	35	35	55	55	55	55	ATM	77	ATM	77	ATM
VISCOSITY CP	1.0	1.0	1.5	1.0	1.0	1.0	1.0	0.7	0.7	0.7	0.7	0.7
TEMPERATURE °F	140	140	140	90	90	90	90	110	115	125	115	120
DESIGN FLOW	560	960	400	7100	1500	3500	2000	7000	150	150	160	52

STREAM NUMBER	25	26	27	28	29	30	31	33	34	35
DESCRIPTION	ONCE THRU WATER RETURN	ONCE THRU WATER SUPPLY	ONCE THRU WATER TO AREA 62	PHOS ACID TO SCRUBBER	DEFOAMER	H_2SO_4	ONCE THRU WATER TO WASH STATIONS	FUMES FROM AREA 62	ONCE THRU WATER TO PUG MILL DUCT	MAKE-UP WATER TO PROCESS
AVG MATERIAL FLOW	GPM	GPM	GPM	GPM	GPH	GPM	GPM	ACFM	GPM	GPM
BIOFOS (21% P, 15% Ca)	0	757	49	0	0-15	0	0-150	2200	110	110
DYNAFOS (18.5% P, [illegible]% Ca)	0	757	25	0	0-15	0	0-150	2200	117	117
SPECIFIC GRAVITY (LB/FT³)	1.0	1.0	1.0	1.75	0.9	1.8	1.0	(.061)	1.0	1.0
PRESSURE PSIG (IN H₂O)	77	30	77	60	40	20	77	(-7.5)	77	77
VISCOSITY CP	0.7	0.7	0.7	15-7	100	10	0.7	-	0.7	0.7
TEMPERATURE °F	115	115	115	150-200	AMBIENT	110	115	120	115	115
DESIGN FLOW	115	550	250	59	15	10	150	2200	160	160



NOTE: ⚠1 INDICATES DESIGN FLOW. ACTUAL FLOW TO BE ADJUSTED TO MAINTAIN 125°F MAXIMUM GAS LEAVING T.G. SCRUBBER ⚠2

NO.	TITLE

REFERENCE DRAWINGS

ZONE	REV.	DESCRIPTION
	2	GEN. REVISION
	1	GEN. REVISION/HEAT LOADS REVISED

REVISIONS

ISSUE	PURPOSE	REV.	DATE
D	FOR DESIGN & CONSTRUCTION	2	
C	FOR DESIGN & CONSTRUCTION	1	11/6/77
B	FOR DESIGN & CONSTRUCTION	0	10/18/76
A	FOR CLIENT APPROVAL	0	10/1/76

DRAWING HISTORY

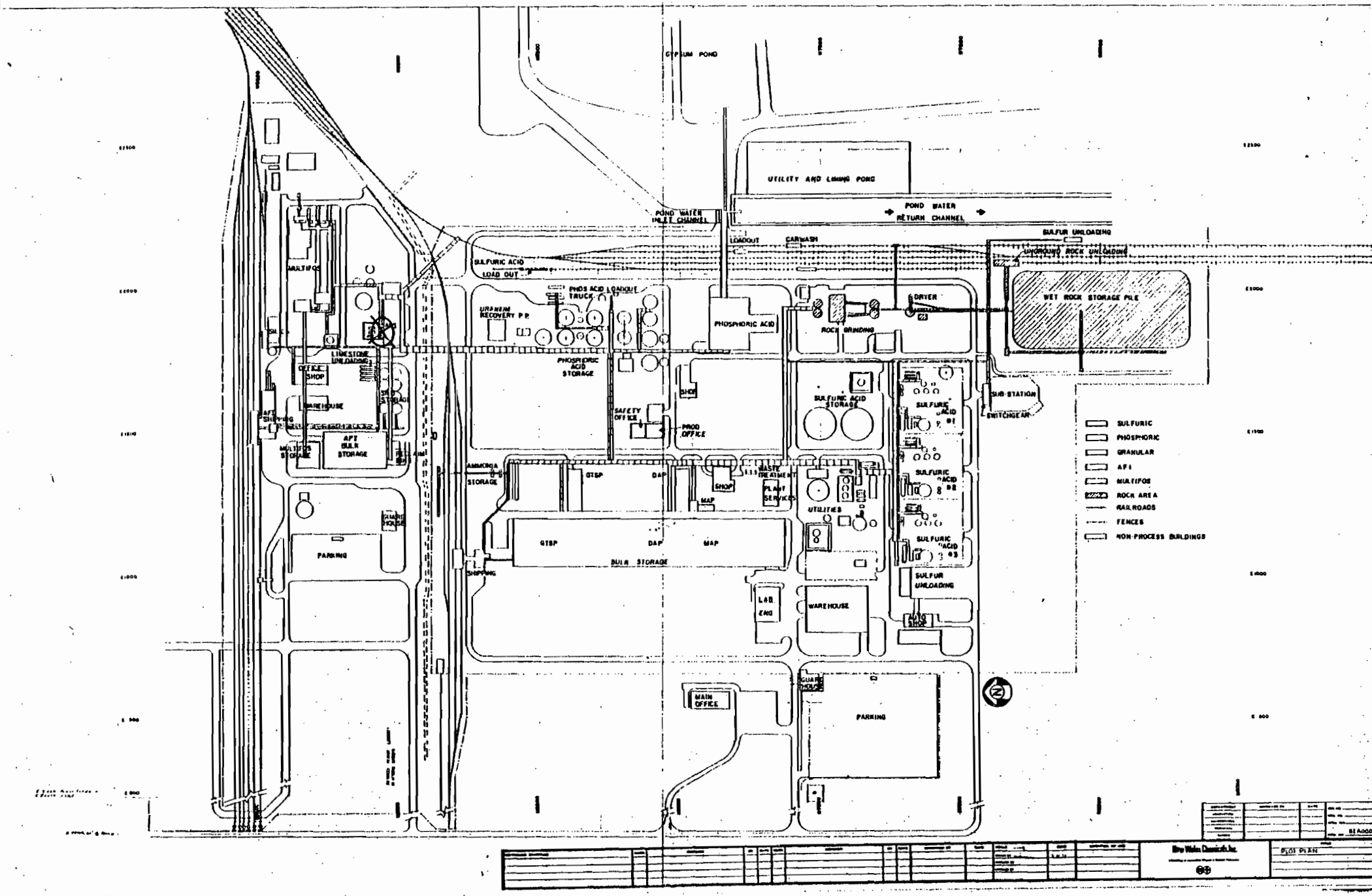
Davy Powergas, Inc.

INTERNATIONAL MINERALS & CHEMICAL CORPORATION
ANIMAL FEED INGREDIENTS FACILITY · NEW WALES, FLA.
⚠ BIOFOS & DYNAFOS SCRUBBING PROCESS FLOW DIAGRAM

ISSUED FOR CONSTRUCTION

PROJECT NO. 4241 · DRAWING NO. 63-F-0002

SCALE NONE



C. A. CAMPBELL
Vice President, Phosphate Operations

INTERNATIONAL MINERALS & CHEMICAL CORPORATION

February 22, 1982

Mr. T. H. Traylor
Vice President and General Manager
New Wales Operations
Post Office Box 1035
Mulberry, FL 33860

Dear Mr. Traylor:

This letter is your authorization to sign, on behalf of New Wales Operations, various applications for permits from the Florida Department of Environmental Regulations, the U.S. Environmental Protection Agency and other applicable agencies.

Very truly yours,

C. A. Campbell

t

Post Office Box 3807 • Lakeland, Florida 33802 • (813) 646-5061


DER
SEP 26 1983
SOUTHWEST DISTRICT
TAMPA

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610-9544

September 28, 1983

Mr. J. M. Baretincic
International Minerals &
Chemicals Corporation
Post Office Box 1035
Mulberry, FL 33860

Re: DAP Production in AFI Plant, IMCC Letter 9/21/83

Dear Mr. Baretincic:

This is to authorize IMCC-New Wales to produce DAP in the AFI plant during the period October 10-30, 1983, as requested in the above subject letter. During the run, IMCC must comply with applicable DER rules.

Fluoride emissions shall not exceed .06 lbs. of F per ton of P_2O_5 input or 2.23 lbs. of F per hour. Particulate emissions shall not exceed 36.1 lbs. per hour. Visible emissions shall not exceed 20% opacity. One compliance test is required for fluorides, particulates and opacity.

Your application for a construction modification permit to produce DAP in the AFI plant is being forwarded to CAPS in Tallahassee for processing.

Please contact me if you have any questions.

Sincerely,

W. C. Thomas, P.E.
District Engineer
Air Programs

WCT/scm

cc: CAPS

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) CAPS - DER Tallahassee	INITIAL	
	DATE	
2.	INITIAL	
	DATE	
3.	INITIAL	
	DATE	
4.	INITIAL	
	DATE	

REMARKS:

INFORMATION
- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION
- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: Bill Thomasson

DATE 9/28/83

PHONE

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

INTERNATIONAL MINERALS & CHEMICAL CORPORATION

September 21, 1983

Mr. W. C. Thomas, P.E.
Florida Department of Environmental Regulation
7601 Highway 301 North
Tampa, Florida 33610

Dear Mr. Thomas:

Enclosed is a request for a construction/modification permit to allow IMC, New Wales Operations, to produce diammonium phosphate fertilizer in the existing Animal Feed Ingredient Granulation Plant, AO53-68867.

As you are aware, IMC, as well as the other phosphate producers in the area, is experiencing severe marketing difficulties at the present time. The major difficulty continues to be the inability to generate additional product sales. This has led to the continued shutdown of new facilities which represent 50% of our present production level.

In light of these conditions, permission was obtained from your department to make a trial run producing DAP in the AFI facility, and a production run was made in August. As a result of this test run, we are now asking that AFI be permitted to operate as a normal feed ingredient plant and also be allowed to produce DAP using undefluorinated acid for a maximum of 15 weeks per year.

The production of DAP in the AFI Plant will result in the emission of fluoride. Stack tests during the production run in August show that the plant can remain well within the NSPS of 0.06 lbs. of fluoride per ton of input P_2O_5 as required for our primary DAP plants. Tests of particulate emissions are also well within the existing permitted levels. Operation of the plant at the requested level of 80 TPH for the 15 weeks with calculated emissions for fluoride based on the 0.06 rule will insure that the annual emissions of fluoride will be less than three tons per year, which is below the de minimus level.

In the meantime, while this application is being considered, IMC is requesting permission to produce DAP in the AFI facility beginning October 10 and ending October 30.

Thank you for your consideration in this matter and we will look forward to hearing from you regarding these requests.

Sincerely,

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

JMB/bs

cc: A. L. Girardin - w/att

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