

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

February 15, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. A. Brafford
Vice President and General Manager
International Minerals & Chemical Corp.
New Wales Operations
P. O. Box 1035
Mulberry, Florida 33860

Dear Mr. Brafford:

RE: File No. AC 53-099108

The Bureau of Air Quality Management has made a preliminary review of your January 31, 1985, application for permit to increase the production of the No. 3 phosphoric acid plant. We need more information to process this application. Please complete the application by supplying the information requested below.

1. What has been the actual production and emissions from the No. 3 phosphoric acid plant? Include the maximum hourly and annual rates at which the plant has been operated.
2. What will the additional phosphoric acid be used for? Please estimate the indirect increase in emissions from the sulfuric acid plants, gypsum stack/cooling pond, fertilizer manufacturing, storage, and shipping facilities caused by the higher production of the No. 3 phosphoric acid plant.
3. Please provide a plot plan and process flow diagram for the No. 3 phosphoric acid plant, including the clarification area, that shows the process equipment and which equipment is controlled by each air pollution control device.
4. Please recommend distribution of the allowable fluoride emissions among the different scrubbers in this plant.
5. Describe all air pollution control devices used in the plant and list their stack flow characteristics and operation parameters (pressure drop, water pressure, scrubber water flow, etc.).

Mr. J. A. Brafford
Page Two
February 15, 1985

6. Does the No. 3 phosphoric acid plant use wet or dry phosphate rock?

As soon as the information requested above is received, we will resume processing your application. If you have any questions on the information requested, please call Willard Hanks at (904)488-1344.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/WH/s

cc: B. Thomas
A. L. Girardin

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



INTERNATIONAL MINERALS & CHEMICAL CORPORATION

February 22, 1985

Mr. C. H. Fancy P.E.
B.A.Q.M.
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

DER
FEB 25 1985
BAQM

Dear Mr. Fancy:

In response to your inquiry of 2/5/85 regarding our request to increase the permitted rate of our third phosphoric acid plant, the following is submitted.

1. This plant began actual operation in July, 1984. Since that time plant rates have shown maximum hourly rates as high as 84.4 tons per hour. Compliance stack sampling for the operating permit showed that during the three tests the maximum emission rate for this plant was 1.19 lbs F/hr or 28.5 lbs F/day. Annual production rates for this plant will depend on product demand.
2. Current phosphoric acid production is approximately 76 percent of permitted capacity. The increase in permitted capacity for third train will not mean an increase in acid production rates at this time, it only means we will make more phosphoric acid in the new plant than we originally planned and less acid in the old plants. Production efficiencies recorded for the new acid plant indicates that the new plant is more efficient. Producing more acid in the new plant gives us a better return on our investment. No emission increases would be anticipated at this time from our other facilities.

3. **Attachments.** No. 1 is an aerial photo showing the entire complex with the phosphoric acid plants and clarification circled to show their relative position to each other. No. 2 is an aerial photo of the clarification circuit with each vessel marked with respect to its contents. No. 3 is the aerial photo of the three phosphoric acid plants with a circle indicating the position of the third train scrubber. No. 4 is a rough flow diagram of the phosphoric acid process clearly indicating that we are using wet rock and not dry rock to make phosphoric acid. No's. 5, 6, and 7 are piping and instrumentation drawings of the phosphoric acid production process and scrubber employed at the third train phosphoric acid unit.
4. We do not wish to modify the distribution of the fluoride emissions. The original distribution, with respect to the clarification scrubber allotments, will remain as agreed upon by IMC in their negotiations with the DER S.W. District.
5. This plant operates one emission control device, which is a Davy designed crossflow scrubber. Stack gas flow is approximately 25,000 ACFM, with a dry bulb temperature of 110 degrees F, and a water flow rate to the scrubber of 2100 gpm. This unit is a packed bed scrubber utilizing Teller designed packing material and cooling pond water for scrubbing. The final stage is a cyclonic scrubber which then vents to the stack. As indicated in the P&ID for this unit, this scrubber vents both the attack system and the filter as well as other auxillary equipment.
6. In 1980 New Wales received a PSD Permit to construct several new facilities. Several of these facilities emit particulate matter and we agreed to convert to a 100 percent wet rock grinding facility to offset this additional particulate emissions. With the completion of the construction in 1980 of the PSD permitted facilities, IMC

New Wales Operations surrendered to the DER all of the operating permits for our dry rock operations. Since that time and to this date, we operate only a wet rock system with no intention of reverting to the use of dry rock for the production of phosphoric acid.

In as much as you intend to consider actual versus potential emissions, the highest actual emissions to date are 28.5 lbs F/day. Potential emissions at the 2000 TPD rate using the .02 rule are 41.01 lbs F/day (under the .02 rule the actual allowable would be 43.01 lbs F/day, under the agreement regarding the clarification scrubber 43.01 minus the 2.0 lbs daily allotted to clarification reduces the maximum allowable at third train to 41.01 lbs F/day). Using the permitted operating time of 330 days per year and the 14.47 lbs F/day difference in emissions, our potential fluoride emissions will increase by 2.39 TPY, which is still within the de minimus level of 3.0 TPY for fluoride.

I hope this information satisfies your concerns, if not, please let me know because we would like to resolve this issue as soon as possible.

A. L. Guardin III

ALG:rc
(034)

- Attachments (6): 82-C-0156
82-C-0160
82-C-0162
03-F-0301
03-F-0303
03-F-0305

cc: J. M. Baretincic
D. K. Larsen

Proposed input

2151 TPD P_2O_5 ~ 43.02 lb F/D
2.0 lb/d for clarif.

41.02 lb F/D from H_3PO_4
- 28.5 Actual

12.52

There is no time limit
on No. 3 PLT. - Can operate
full time.

? $\frac{14.47 \text{ lb F/D} \times 365 \text{ D/yr}}{2000} = 2.64 \text{ TPY Increase}$

$\frac{41.02 - 28.5}{2000} \times 365 = 2.28 \text{ TPY Increase}$

new std = $\frac{41.02}{2151} = 0.0191 \text{ lb F / TP}_{2O_5} \text{ IN}$

IMC

D) Is PSD triggered by a series of small emission increases, when we finally cross over the significant level?

$$\text{allowable F}_{\text{emission (lb/TP}_{2\text{O}_5\text{ IN}})} = \frac{(\text{TP}_{2\text{O}_5\text{ IN/hr}})(.02) - R}{(\text{TP}_{2\text{O}_5\text{ IN/hr}})}$$

@ Max input 2151 TP₂O₅/D, allowable
F_{emission} is 0.0191 lb F / TP₂O₅ IN

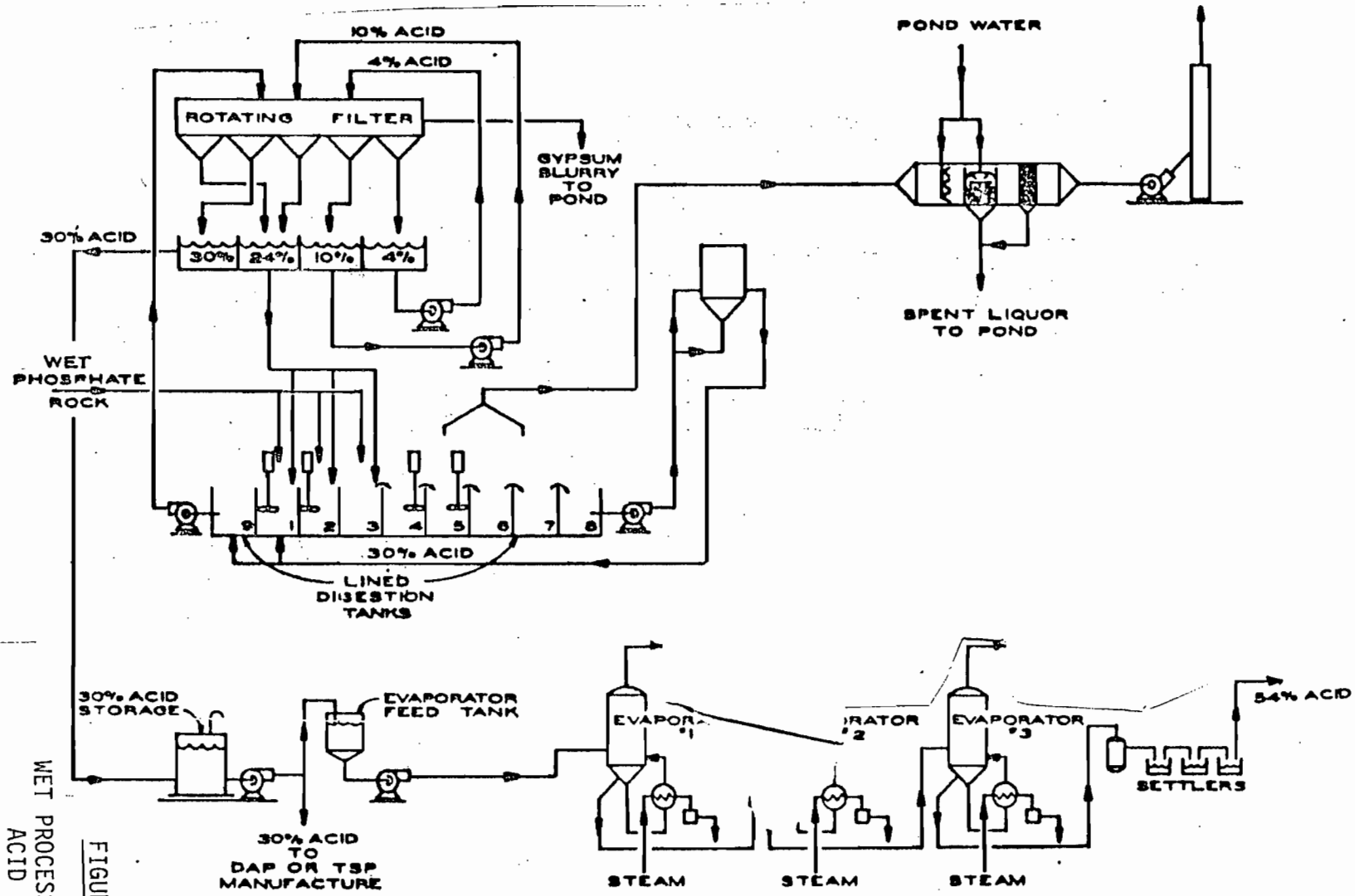


FIGURE 3-1

WET PROCESS PHOSPHORIC ACID PROCESS
NEW WALES CHEMICAL COMPANY
POLK COUNTY, FLORIDA



INTERNATIONAL MINERALS & CHEMICAL CORPORATION

April 4, 1985

Bill Thomas
Fl. Dept. of Env. Regulation
BAQM
2600 Blair Stone Rd.
Tallahassee Fl, 32301

Dear Bill,

As I explained by phone this morning, I am sending you page 9D of today's Lakeland Ledger to verify publication of the Department's notice of intent to authorize an increase in the permitted production rates of the #3 Phos Acid plant. We have in the past had problems getting the Ledger to supply us with the affidavit of publication for these notices. This copy of the paper is being sent to satisfy your requirement of proof of publication within seven days of publishing and I will send you a copy of the affidavit when we receive it.

Thanks for your time in this matter and if you need any information with respect to this permit please let me know.

Sincerely

A. L. Girardin III

DER
APR 8 1985
BAQM

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency
Action on Permit Application

The Department gives notice of its intent to issue a permit to International Minerals & Chemical Corporation, New Wales Operations, to authorize an increase in production of the No. 3 phosphoric acid plant that is located near the intersection of Highway 640 and County Line Road in Polk County.

Maximum allowable production of the No. 3 phosphoric acid plant will be increased from 1,500 to 2,000 TPD P₂O₅. Fluoride emissions will increase by up to 2.3 TPY.

A Best Available Control Technology determination was not required for the proposed project. The 24-hour ambient air impact of the fluoride emissions is estimated to increase by 2 ug/m³, which is less than 0.1 percent of the published TWA value.

Persons 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 conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida, 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation, and Department's intent for the proposed project are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

Dept. of Environmental Regulation
SW District
7601 Highway 301 N
Tampa, Florida 33610
Dept. of Environmental
Regulation
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any person may send written comments on the proposed action to Mr. Clair Fancy at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

5/2/85

Clair Fancy
Department of Environmental Regulation
2600 Blairstone
Tallahassee, Florida 32301

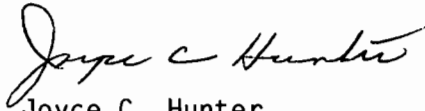
DER
MAY 6 1985
BAQM

Dear Mr. Fancy:

This letter is registration of concern over the current status of air pollution and the request to increase fluoride output at New Wales Plant in Polk County, adjacent to the Pinecrest/Lithia residential area. (Public Notice attachment)

These signatures were garnered in a short period, and with some more time, many signatures can be added. We desperately need relief under current conditions and are alarmed at the prospect of increased levels of fluoride in the air.

Sincerely,



Joyce C. Hunter
Rt.2 Box 704
Lithia, Florida 33547

DER
MAY 31 1985
BAQM

We, the undersigned feel that we must speak out against the environmental deterioration in our community.

The New Wales plant is polluting air, depositing residue upon us, pumping water from under us and has reduced property desirability and value. Complaints and questions are disqualified or disputed.

We recognize, New Wales' right to operate, but question their close proximity to habitation.

To further explain your concern, call Janet Roth, IMCC New Wales, at 646-5061.

NAME:

ADDRESS:

Mrs Tommy Conlitt

Callie Hunter

Joe D Hunter

H.C. Tucker

Scott Carbett

Joyce Hunter

Chris Tucker

Theresa Eisele

Mervin Digger

Dorothy E. Hunter

Johnny Hunter

Diane Jones

Corneilus McRuff

Dwanda Smith

Udine McDonald

Mrs J. H. Walker

Linda McDonald

Fine M. Donald

Rt 2 Box 13 Lithia, Fla. 33547

Rt 2 Box 14 Lithia, Fla. 33547

Rt 2 Box 14 Lithia, Fla. 33547

Rt 2 Box 16 Lithia, Fla. 33547

Rt 2 Box 13 Lithia, Fla. 33547

Rt 2 Box 704 Lithia, Fla. 33547

Rt 2, Box 16, Lithia, Fla. 33547

Rt 1- Box 324 Lithia, Fla. 33547

Rt 2 Box 696 Lithia, FL 33547

Rt 2 Box 698 Lithia, FL 33547

Rt 2 Box 699 Lithia, FL 33547

Rt 2 Box 680 Lithia, FL 33547

Rt 2. Box 162 Lithia FL 33547

Rt 2 Box 193 Lithia

Rt 2 Box 197 Lithia

Rt 2 Box 197 Lithia

Rt 2 Box 190 Lithia

Rt 2 Box 190 Lithia

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NAME:

ADDRESS:

Barbara Patel
Robert Roben
Dwayne Thomas
Carolyn Lewis
Harvey L. Shuman
Mildred L. Shuman
Carmen Davis
Rick Davis
Dorothy Raster
Alberta Tutten
Shirley Japp
Judy L. Rogers
Vickie O. Rogers
Doris Tutten
Eddie Tutten
Martha J. Peuce
James D. Peuce
Lois Hunter

Rt 2 Box 300 Lithia Fla
Rt 2 Box 300 Lithia Fla
Rt 2 Box 229 Lithia Fla.
Rt 2 Box 117 Lithia Fla 33547
Rt 2 Box 117 Lithia Fla. 33547
Rt 2, Box 117 Lithia Fla 33547
Box 154 Lithia FL 33547-0154
Rt 2 Box 95C Lithia Fla
Rt 2 Box 123 Lithia Fla.
Rt 2 Box 121A Lithia Fla
Rt 2 Box 91 Lithia Fla 33547
Rt 2 Box 91 Lithia Fla 33547
Rt 2 Box 105 Lithia Fla
Rt 2 Box 108 Lithia Fla
Rt 2 Box 119 Lithia Fla
Rt 2 Box 119 Lithia Fla
Rt 2 Box 704 Lithia Fla.

MAY 6 1985

BAQM

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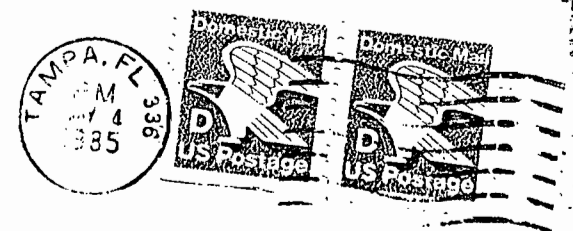
NAME:

ADDRESS:

James M. Maxwell
 Mollie A. Maxwell
 Bessie Mae Hunter
 Otis W. Hunter
 Mary O. Hunter
 Gregory W. Hunter
 Helen Griffin
 Wilbur H. Griffin
 R L Johnson
 W.K. McClendon Jr.
 Melba H. Kabrich
 Annie Mae Hill
 Lawrence Tidwell
 Margaret Tidwell
 Charl Carbett

P.O. 418 Lithia, Fla Keysville Road
 P.O. Box 418 Lithia, Fl. Keysville Rd.
 Rt 1 Box 36 Lithia, Fla.
 Rt 1 Box 36 Lithia, Fla.
 Rt 1 Box 36 Lithia, Fla.
 Rt 1, Box 36 Lithia, Fla.
 Rt 2 Box 763 Lithia, Fla.
 Rt 2 Box 763 Lithia, Fla.
 Rt 2 Box 754 Lithia, Fla.
 P.O. BOX 599 LITHIA, FLA.
 Rt 2, Box 738, Lithia, Fl 33547
 Rt 2 Box 747 Lithia Fl. 33547
 Rt. 2, Box 681, Lithia
 Rt. 2, Box 681, Lithia
 Rt 2, Box 13 Lithia

Joyce Hunter
Rt.2 Box 704
Lithia, Florida 33547



Clair Fancy
Department of Environmental Regulation
2600 Blirstone
Tallahassee, Florida 32301

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

May 31, 1985

DER
MAY 31 1985
BAQM

Joyce C. Hunter
Route 2, Box 704
Lithia, Florida 33547

Re: International Mining and Chemical Company,
New Wales Plant

Dear Ms. Hunter:

Thank you for the comments submitted in response to the International Minerals and Chemicals Company permit notice. The Department's air permitting staff has considered your comments in conjunction with the processing of the application, but has declined to change their intent on the matter. In response to your comments, the air staff has provided me with the following comments, which I now forward to you.

1. Data available to the Department shows the plant is in compliance with the air pollution control regulations, although the GTSP storage building is operating under a variance. In fact, since many phosphate fertilizer plants are currently operating below capacity, many are emitting air pollutants at less than their permitted rate.

2. All ambient air quality standards are being met in the vicinity of the plant. In fact, due to a variety of causes, ambient air quality in Hillsborough and Polk counties has improved over the past few years. Although it is possible that short term, local air pollution episodes could occur around this plant, as with any major source of air pollution. The Department has no data to indicate that they are typical or that they occur with any frequency.

3. The Department is requiring the No. 3 phosphoric acid plant to comply with all existing state and federal air pollution control regulations, including new source performance standards for phosphoric acid plants. The higher production rate of IMCC's No. 3 phosphoric acid plant will result in approximately a two percent increase in permitted fluoride emissions from the plant. Conservative modeling estimates indicate that the increase in fluoride concentrations will be minor, and certainly not such as to pose any adverse health effects.

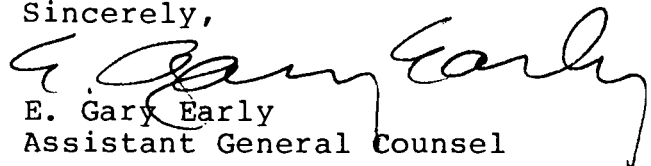
4. The Southwest Florida Water Management District (SWFWMD) has legal jurisdiction on well water usage. Phosphoric acid plants primarily use recycled process water in their operations. The IMCC plant currently has a permit from SWFWMD to pump water for its operation. To the best of the Department's knowledge, IMCC has not applied to increase the amount authorized by its current consumptive use permit.

5. The Department lacks the authority under Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-2 to consider adjacent property values in the permitting process. However, the Department will continue to insist that IMCC's plant meet all state and federal air pollution control regulations.

6. The construction permit, as originally proposed, will require IMCC's No. 3 phosphoric acid plant to comply with all state and federal air pollution control regulations. In a meeting between the District and the residents near this plant, odors from the plant were mentioned. Because of the resident's concern about odors, a new Specific Condition has been added to the construction permit that will prohibit this source from emitting air pollutants that contribute to objectionable odors.

Based on the above factors, the final action of the Department will still be to issue the permit as approved, with the specific condition regarding odors. I hope this explanation has helped ease some of your concerns.

Sincerely,



E. Gary Early
Assistant General Counsel

EGE/plb

cc: Willard Hanks ✓
Bill Thomas

ROUTING AND TRANSMITTAL SLIP	ACTION NO
	ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) <i>Bill Thomas - BAQM</i>	Initial
	Date
2. <i>Patty Fy/ File</i>	Initial
	Date
3.	Initial
	Date
4.	Initial
	Date

DER
MAY 31 1985
BAQM

REMARKS:
fzi

INFORMATION	
<input type="checkbox"/>	Review & Return
<input type="checkbox"/>	Review & File
<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	
DISPOSITION	
<input type="checkbox"/>	Review & Respond
<input type="checkbox"/>	Prepare Response
<input type="checkbox"/>	For My Signature
<input type="checkbox"/>	For Your Signature
<input type="checkbox"/>	Let's Discuss
<input type="checkbox"/>	Set Up Meeting
<input type="checkbox"/>	Investigate & Report
<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	Distribute
<input type="checkbox"/>	Concurrence
<input type="checkbox"/>	For Processing
<input type="checkbox"/>	Initial & Return

FROM:
Dary Early's office

DATE
5-31-85

PHONE

ROUTING AND TRANSMITTAL SLIP	ACTION NO
	ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) <i>Willard Hawks - BAQM</i>	Initial
	Date
2.	Initial
	Date
3.	Initial
	Date
4.	Initial
	Date

REMARKS:
fzi

INFORMATION	
<input type="checkbox"/>	Review & Return
<input type="checkbox"/>	Review & File
<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	
DISPOSITION	
<input type="checkbox"/>	Review & Respond
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<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	Distribute
<input type="checkbox"/>	Concurrence
<input type="checkbox"/>	For Processing
<input type="checkbox"/>	Initial & Return

FROM:
Dary Early's office

DATE
5-31-85

PHONE

DER
APR 17 1985
BAQM

AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No

Attach Notice Here

STATE OF FLORIDA)
COUNTY OF POLK)

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

Notice

in the matter of

Proposed Agency Action

in the

Court, was published in said newspaper in the issues of

April 4; 1985

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 postoffice 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
Controller

Sworn to and subscribed before me this 5th

day of April A.D. 1985..

(Seal)

Charles M. Hillman
Notary Public

Notary Public, State of Florida at Large

My Commission Expires June 1, 1987

My Commission Expires

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency
Action on Permit Application

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Tampa, Florida 33610
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

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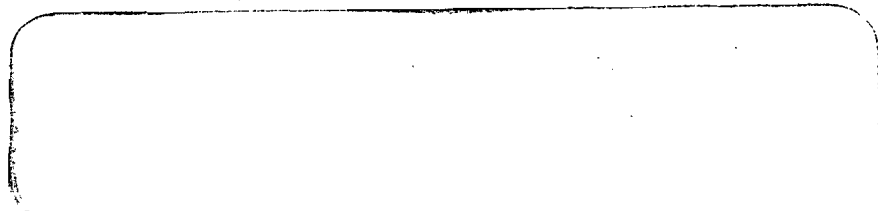
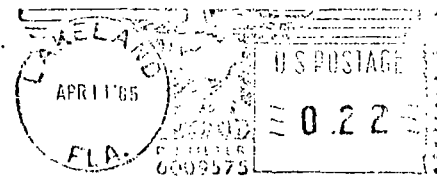
8-132 - 44; 1985

The Ledger

P.O. Box 408, Lakeland, Florida 33802



GIVE
United States



DER
APR 17 1985
BAQM

LAW OFFICES

HOLLAND & KNIGHT

406 THIRTEENTH STREET WEST
P. O. Box 1669
BRADENTON, FLORIDA 33506
(813) 746-7107

110 EAST BROWARD BLVD.
P. O. Box 14005
FORT LAUDERDALE, FLORIDA 33302
(305) 525-1000

92 LAKE WIRE DRIVE
P. O. DRAWER B W
LAKELAND, FLORIDA 33802
(813) 682-1161

1200 BRICKELL AVENUE
P. O. Box 015441
MIAMI, FLORIDA 33101
(305) 374-8500

255 SOUTH ORANGE AVENUE
P. O. Box 1526
ORLANDO, FLORIDA 32802
(305) 425-8500

2033 WOOD STREET
P. O. DRAWER 49768
SARASOTA, FLORIDA 33578
(813) 365-3321

BARNETT BANK BLDG.
P. O. DRAWER 810
TALLAHASSEE, FLORIDA 32302
(904) 224-7000

600 NORTH FLORIDA AVE.
P. O. Box 1288
TAMPA, FLORIDA 33601
(813) 223-1621

PLEASE REPLY TO: Tallahassee
August 9, 1985

888 SEVENTEENTH STREET, N. W.
SUITE 400
WASHINGTON, D. C. 20006
(202) 955-5550

CABLE ADDRESS
HND KNIGHT TPA
H&K MIA
TELEX 5-2630-TAMPA
TELEX 52-2233-MIAMI

Mr. Clair H. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
AUG 9 1985
BAQM

Re: International Minerals and Chemical
Corporation -- Permit No. AC53-099108

Dear Clair:

In accordance with our previous discussions, IMC requests that Specific Condition No. 7 of the referenced construction permit be modified to make specific reference to the rules which form the basis for insertion of the condition in the permit. I believe that language along the following lines would be acceptable:

In accordance with the provisions of Florida Administrative Code Rules 17-2.100(28) and 17-2.620(2), the No. 3 phosphoric acid plant shall not discharge air pollutants which cause or contribute to an objectionable odor.

Please let me know if you find this acceptable. Thank you for your cooperation.

Sincerely,

HOLLAND & KNIGHT

Lawrence N. Curtin
Lawrence N. Curtin

8/12
*Willard -
comment on
permit.
Clair*

LNC/jrh