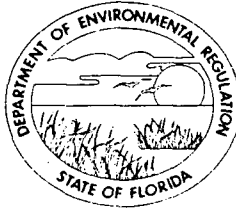


To: Willard

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610BOB GRAHAM
GOVERNORVICTORIA J. TSCHINKEL
SECRETARYDR. RICHARD D. GARRITY
DISTRICT MANAGER

January 17, 1985

Mr. John A. Brafford
Vice President & General Manager
IMCC, New Wales Operation
Post Office Box 1035
Mulberry, FL 33860

also 96804
96803
92685

Modification of Conditions
Permit No. A053-49080

DER

MAR 4 1985

BAQM

Dear Mr. Brafford:

The following modifications are made to the above referenced permit.

A. Change the description of the operation on page 1 to read:

For operation of the phosphoric acid clarification and storage area; including 3, 30% acid tanks; 3, 40% acid clarifiers with aging tanks; 1, 40% acid tank; 5, 54% acid tanks and 2, acid filters; with emissions thru a vertical packed bed scrubber utilizing contaminated cooling pond water.

B. Delete Specific Conditions No. 2 and No. 4.

C. Add Specific Conditions No. 2 and No. 4 as follows:

2. Testing of emissions shall be accomplished with all permitted tanks, clarifiers and filters in normal operation.
4. This point is a part of the phosphoric acid facility consisting of three phosphoric acid plant scrubber stacks and this acid clarifier-storage area scrubber stack. Maximum allowable fluoride emissions from this stack consist of 8 lbs./day allocated from the phosphoric acid facility and an 8 lb./day filter allowance, totaling 16 lbs./day or 0.7 lbs./hr.

DEPARTMENT OF ENVIRONMENTAL REGULATION

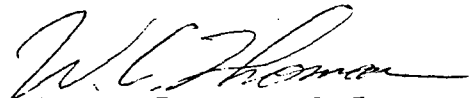
ROUTING AND TRANSMITTAL SLIP		ACTION NO.
		ACTION DUE DATE
1. TO: (NAME, OFFICE, LOCATION)	INITIAL	
<i>Willard Hawks - CAPS</i>	DATE	
2.	INITIAL	
<i>Tallahassee</i>	DATE	
3.	INITIAL	
	DATE	
4.	INITIAL	
	DATE	
REMARKS:	INFORMATION	
	<input type="checkbox"/> REVIEW & RETURN <input type="checkbox"/> REVIEW & FILE <input type="checkbox"/> INITIAL & FORWARD	
<p><i>Transmittal Conditions for</i> <i>AO 53-96804</i> <i>96803</i> <i>92685</i> <i>and 49080</i></p> <p><i>Hope this clarify the No 3 PA.</i> <i>Job</i></p> <p>DER MAR 4 1985 BAQM</p>	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 & REPT	
	<input type="checkbox"/> INITIAL & FORWARD	
	<input type="checkbox"/> DISTRIBUTE	
	<input type="checkbox"/> CONCURRENCE	
	<input type="checkbox"/> FOR PROCESSING	
<input type="checkbox"/> INITIAL & RETURN		
FROM:	DATE	
<i>Rot G.</i>	<i>3/28/85</i>	
	PHONE	

Mr. John A. Brafford
Mulberry, Florida

Page Two
January 17, 1985

This letter must be attached to your permit and becomes a part
of that permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. C. Thomas".

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

WCT/js

1 M.C.C. - New Water, Meet 12/5/84

Barehincic, Girardin, McDonald,
Garrett, Thomas

Topic I

Allowable emissions resolved according
to attached sketch.

Topic II

Existing oper. permit will be
modified to include MAP production

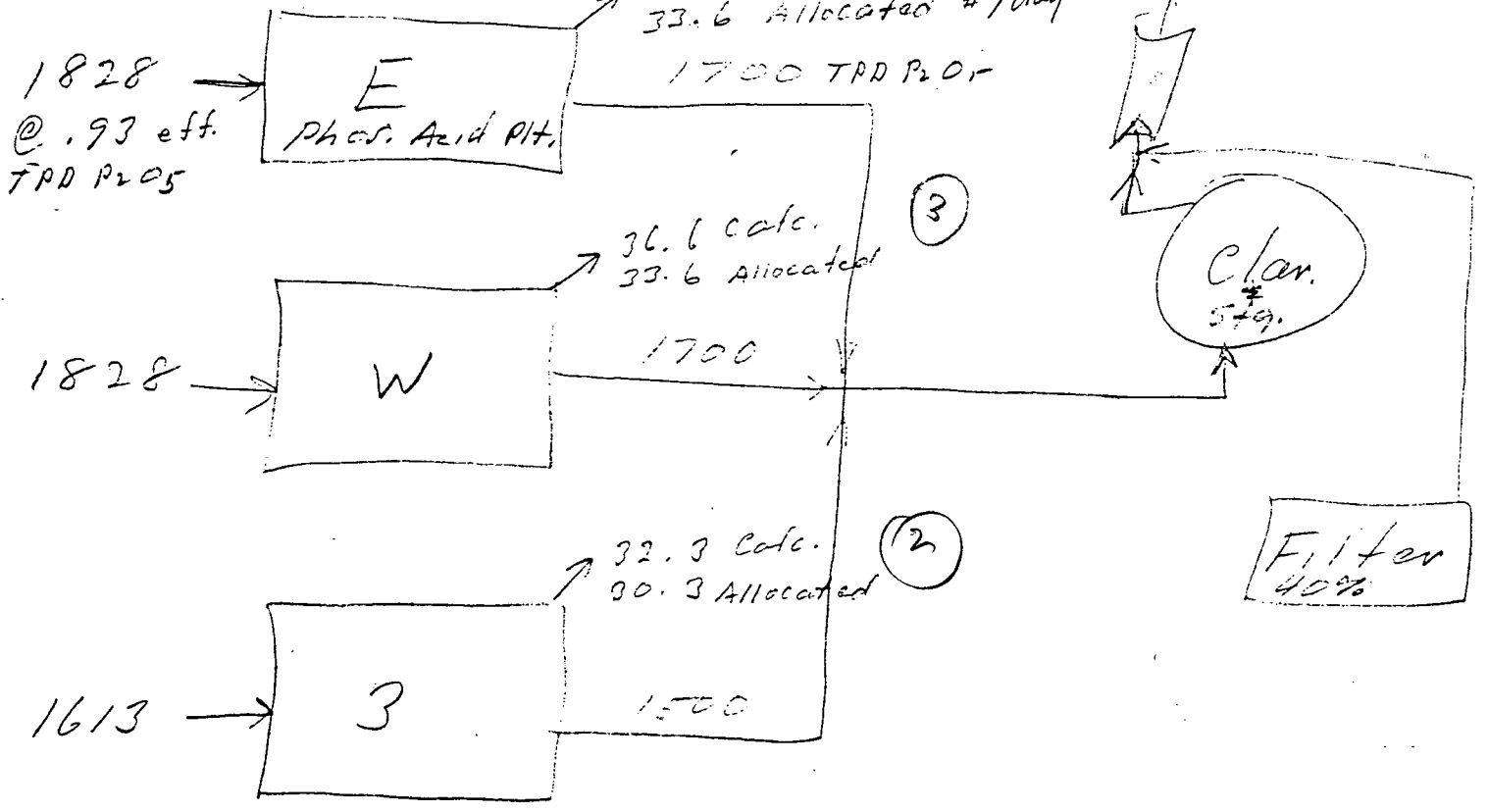
Topic III

The requested change will require
a const. permit modification to be
processed in Tallahassee. Whether
a public notice is required is un-
resolved. Bill Thomas will attempt
to phone answer to IMCC this
week.

WJ

33.6 #/day F
 .0184 #/ton P₂O₅

From
 phos. acid → ← 16. #/day
 * 8. #/day
 From
 Blue
 Sky



IMCC New Water
 Phos. Acid Permitting Basis
 12/5/84
 WGT

* According to rule, a BACT is needed to establish the allowable F emission number for the phos. acid filters. Because the allowance is so small, 8 lbs. has been allocated rather than going BACT process.

PERMITTEE:
IMCC, New Wales Operations

Permit/Certification No.: A053-96804
Project: East Phosphoric Acid Plant

Specific Conditions (continued)

2. Approved compliance stack testing of emissions must be conducted within approximately 10% of the permitted capacity of 1828 TPD P₂O₅ input. A compliance test submitted at operating levels less than 90% of permitted capacities will automatically constitute an amended permit at the lesser rate plus 10% until another test (showing compliance) at 90% of a higher capacity is submitted. Failure to submit the input rates or operation at conditions during testing which do not reflect actual operating conditions may invalidate the data (Section 403.161(1)(c), Florida Statutes).
3. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.
 - (A) Annual amount of materials and/or fuels utilized.
 - (B) Annual emissions (note calculation basis).
 - (C) Any changes in the information contained in the permit application.
4. The maximum permitted operating time is 24 hours per day, 7 days per week, 52 weeks per year.
5. The maximum allowable fluoride emissions from the East Phosphoric Acid facility shall not exceed 0.02 lb./ton of P₂O₅ input (Section 17-2.600(3)(a)1., F.A.C.) or 36.6 lb./day at 1828 ton/day P₂O₅ input. The permittee has allocated 33.3 lb./day to the plant scrubber stack and 3.0 lb./day to the clarifier scrubber stack. At lesser operating rates, fluoride emissions from the plant stack shall not exceed 0.018 lb./ton P₂O₅ input.
6. This facility is subject to the New Source Performance Standards (NSPS) established for phosphoric acid plants (40 CFR 60, Subpart T) which is adopted by reference in Section 17-2.660(2), F.A.C. and shall comply with all the requirements therein.
7. The applicant shall calibrate, maintain, and operate a monitoring device which can be used to determine the mass flow of phosphorus-bearing feed material to the process. The monitoring device shall have an accuracy of ± 5 percent over its operating range.

PERMITTEE:
IMCC, New Wales Operations

Permit/Certification No.: A053-96804
Project: East Phosphoric Acid Plant

SPECIFIC CONDITIONS (con't):

8. The applicant shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in tons/hr. of phosphorus bearing feed using a monitoring device for measuring mass flow rate which meets the requirements of the above paragraph (7) and then by proceeding according to 60.204(d)(2), Subpart T, Standard of Performance of the Phosphate Fertilizer Industry: Wet Process Phosphoric Acid Plant.
9. The applicant shall calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the process scrubber system. The monitoring device shall have an accuracy of ± 5 percent over its operating range.
10. The Department of Environmental Regulation shall be notified in writing 15 days prior to any compliance test.
11. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Section 17-2.610 (3), F.A.C.. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

Issued this 21 day of Jan
1988.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


Richard D. Garrity, Ph.D.
District Manager

TO: The Files
THRU: Bill Thomas *WTS*
FROM: Bob Garrett
DATE: January 14, 1984
SUBJECT: IMC, New Wales application for permit renewal for their West Phosphoric Acid Plant Scrubber, Polk County - AP

IMC, at their New Wales Chemical plant, has applied for a renewal to A053-61050 covering their West Phosphoric Acid Plant operating at 1700 TPD, P₂O₅ content. Fluorides are the airborne emissions of any magnitude and are controlled by a wet scrubber system. Concentrated emissions from the attack tanks are fed thru cross flow sprays at the beginning of the scrubber. Flow from the vacuum tanks, cooler, and condenser bypass the spray section to join a Tellerette pocked bid filter to a stack.

Condition No. 7 on permit 61050 requires emissions from a new clarifier (storage tanks) scrubber be divided among the acid producers for its allocation of emission limits. At a meeting held on 12/5/84 with plant officials, the District agreed to subtract 3 lbs. F/day from this Plant's allocation of 36.6 lbs./day for 33.6 lbs./day or 1.4 lbs. F/hr.

A stack test on 1/13/84 at 1682 TPD production registered 0.767 lbs. F/hr. or within the allocated compliance. I recommend issuing permit A053-96803 for 5 years testing for fluorides on 6 month intervals.

PERMITTEE:
IMCC, New Wales Operations

Permit/Certification No.: A053-96803
Project: West Phosphoric Acid Plant

Specific Conditions (continued)

2. Approved compliance stack testing of emissions must be conducted within approximately 10% of the permitted capacity of 1828 TPD P_2O_5 input. A compliance test submitted at operating levels less than 90% of permitted capacities will automatically constitute an amended permit at the lesser rate plus 10% until another test (showing compliance) at 90% of a higher capacity is submitted. Failure to submit the input rates or operation at conditions during testing which do not reflect actual operating conditions may invalidate the data (Section 403.161(1)(c), Florida Statutes).

3. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

4. The maximum permitted operating time is 24 hours per day, 7 days per week, 52 weeks per year.

5. The maximum allowable fluoride emissions from the East Phosphoric Acid facility shall not exceed 0.02 lb./ton of P_2O_5 input (Section 17-2.600(3)(a)1., F.A.C.) or 36.6 lb./day at 1828 ton/day P_2O_5 input. The permittee has allocated 33.3 lb./day to the plant scrubber stack and 3.0 lb./day to the clarifier scrubber stack. At lesser operating rates, fluoride emissions from the plant stack shall not exceed 0.018 lb./ton P_2O_5 input.

6. This facility is subject to the New Source Performance Standards (NSPS) established for phosphoric acid plants (40 CFR 60, Subpart T) which is adopted by reference in Section 17-2.660(2), F.A.C. and shall comply with all the requirements therein.

7. The applicant shall calibrate, maintain, and operate a monitoring device which can be used to determine the mass flow of phosphorus-bearing feed material to the process. The monitoring device shall have an accuracy of ± 5 percent over its operating range.

PERMITTEE:
IMCC, New Wales Operations

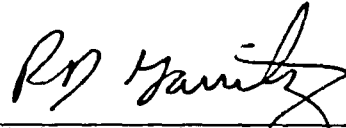
Permit/Certification No.: A053-96803
Project: West Phosphoric Acid Plant

SPECIFIC CONDITIONS (con't):

8. The applicant shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in tons/hr. of phosphorus bearing feed using a monitoring device for measuring mass flow rate which meets the requirements of the above paragraph (7) and then by proceeding according to 60.204(d)(2), Subpart T, Standard of Performance of the Phosphate Fertilizer Industry: Wet Process Phosphoric Acid Plant.
9. The applicant shall calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the process scrubber system. The monitoring device shall have an accuracy of ± 5 percent over its operating range.
10. The Department of Environmental Regulation shall be notified in writing 15 days prior to any compliance test.
11. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Section 17-2.610 (3), F.A.C.. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

Issued this 21 day of Jan
1981.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


Richard D. Garrity, Ph.D.
District Manager

TO: File
THRU: Bill Thomas *WJ*
FROM: Bob Garrett *RRG*
DATE: October 30, 1984
SUBJECT: IMCC, New Wales Operation - AP
Phosphoric acid plant No. 3, Polk County
A053-92685

IMCC, at the New Wales facility, constructed a new ~~87~~ TPH phosphoric acid plant under AC53-19051. Because of the sudden market down-turn, this plant was not operated until recently. This plant is equipped with all the requirements of an NSPS source and employs a packed bed cross flow scrubber with a final entrainment separator.

A stack test on 8/9/84 showed fluoride emissions of 1.12 lbs/hr. at a P₂O₅ feed rate of 1710 tons/day. At this rate, they are allowed 1.42 lbs F/hr., or 0.02 lbs/ton P₂O₅. The permitted rate is 1500 TPD which allows 1.34 lbs F/hr emissions, but according to an agreement at the conference on 12/5/84, 0.08 lbs F/hr must be subtracted from this total as an allowance for the clarification scrubber. Then, phos. acid No. 3 is allowed 1.26 lbs F/hr.

BASIS: prod. 1500 TPD P₂O₅
93% recovery
1613 TPD P₂O₅

Allowable F emissions
32.3 lb. F/day
1.34 lb. F/hr total

Clarification: 2 lbs. F/day or 0.08 lb. F/hr

I recommend we issue permit A053-92685 for 5 years, incorporating NSPS requirements and stack testing for fluoride every 6 months during production periods.

BG/rw *Allocate allowable F emissions*
30.3 lb./day to plant stack
2.0 lb./day to clarifier stack (separate permit)

PERMITTEE:
IMCC, New Wales Operations

Permit/Certification No.: A053-92685
Project: No. 3 Phosphoric Acid Plant

Specific Conditions (continued)

2. Approved compliance stack testing of emissions must be conducted within approximately 10% of the permitted capacity of 1613 TPD P_2O_5 input. A compliance test submitted at operating levels less than 90% of permitted capacities will automatically constitute an amended permit at the lesser rate plus 10% until another test (showing compliance) at 90% of a higher capacity is submitted. Failure to submit the input rates or operation at conditions during testing which do not reflect actual operating conditions may invalidate the data (Section 403.161(1)(c), Florida Statutes).
3. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.
 - (A) Annual amount of materials and/or fuels utilized.
 - (B) Annual emissions (note calculation basis).
 - (C) Any changes in the information contained in the permit application.
4. The maximum permitted operating time is 24 hours per day, 7 days per week, 52 weeks per year.
5. The maximum allowable fluoride emissions from the No. 3 Phosphoric Acid facility shall not exceed 0.02 lb./ton of P_2O_5 input (Section 17-2.600(3)(a)1., F.A.C.) or 32.3 lb./day at 1613 ton/day P_2O_5 input. The permittee has allocated 30.3 lb./day to the plant scrubber stack and 2.0 lb./day to the clarifier scrubber stack. At lesser operating rates, fluoride emissions from the plant stack shall not exceed 0.019 lb./ton P_2O_5 input.
6. This facility is subject to the New Source Performance Standards (NSPS) established for phosphoric acid plants (40 CFR 60, Subpart T) which is adopted by reference in Section 17-2.660(2), F.A.C. and shall comply with all the requirements therein.
7. The applicant shall calibrate, maintain, and operate a monitoring device which can be used to determine the mass flow of phosphorus-bearing feed material to the process. The monitoring device shall have an accuracy of ± 5 percent over its operating range.

PERMITTEE:
IMCC, New Wales Operations

Permit/Certification No.: A053-92685
Project: No. 3 Phosphoric Acid Plant

SPECIFIC CONDITIONS (con't):

8. The applicant shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in tons/hr. of phosphorus bearing feed using a monitoring device for measuring mass flow rate which meets the requirements of the above paragraph (7) and then by proceeding according to 60.204(d)(2), Subpart T, Standard of Performance of the Phosphate Fertilizer Industry: Wet Process Phosphoric Acid Plant.
9. The applicant shall calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the process scrubber system. The monitoring device shall have an accuracy of ± 5 percent over its operating range.
10. The Department of Environmental Regulation shall be notified in writing 15 days prior to any compliance test.
11. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Section 17-2.610 (3), F.A.C.. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

Issued this 21 day of Jan
1981.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


Richard D. Garrity, Ph.D.
District Manager

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

August 19, 1985

Certified Mail - Return Receipt Requested

Mr. J. A. Brafford
Vice-President and General Manager
International Minerals and Chemicals Corporation
New Wales Operations
Post Office Box 1035
Mulberry, Florida 33860

Dear Mr. Brafford:

Re: Modification of Conditions - Permit No. AC53-099108

The department is in receipt of Mr. Curtin's August 9, 1985, letter requesting that a specific condition in the construction permit for IMCC's No. 3 phosphoric acid plant be reworded to reference the regulations. The request is acceptable and the specific condition is reworded as noted below:

Original Specific Condition

7. The No. 3 phosphoric acid plant shall not discharge air pollutants which cause or contribute to an objectionable odor.

Revised Specific Condition

7. In accordance with Rule 17-2.620(2), FAC, International Minerals and Chemical Corporation shall not cause, suffer, allow or permit the discharge of air pollutants from the No. 3 phosphoric acid plant which cause or contribute to an objectionable odor. Rule 17-2.100, FAC, defines an objectionable odor as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonable interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

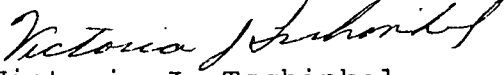
Attachment to be Incorporated:

5. Mr. Lawrence N. Curtin's letter dated August 9, 1985.

A copy of this letter must be attached to the referenced construction permit and shall become a part of that permit.

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

Sincerely,


Victoria J. Tschinkel
Secretary

cc: Bill Thomas
Lawrence N. Curtin

Attachment: August 9, 1985 letter



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
To: _____ LOCTN: _____
To: _____ LOCTN: _____
FROM: _____ DATE: _____

TO: Victoria J. Tschinkel

FROM: Clair Fandy

DATE: August 19, 1985

SUBJECT: Modification of Conditions

RECEIVED
AUG 22 1985

Office of the Secretary

Attached for your approval and signature is a letter that will modify a specific condition in construction permit No. AC53-099108 that was issued for IMCC's No. 3 phosphoric acid plant. The modification is a change in the wording of the specific condition to make it more consistent with the language used in the regulations.

The Bureau recommends this modification be approved.

Attachment: Draft letter

CHF/WH/p

DER

AUG 23 1985

BAQM