



PML
4-16-87
Atlanta, Ga.

FILE 587
AC 53-118671

United States Department of the Interior
FISH AND WILDLIFE SERVICE
75 SPRING STREET, S.W.
ATLANTA, GEORGIA 30303

April 14, 1987

DER
APR 20 1987
BAQM

Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Thomas:

We appreciate the opportunity to review and comment on the Technical Evaluation and Preliminary Determination of the No. 2 Diammonium Phosphate (DAP) Plant air quality permit modification by International Minerals and Chemical Corporation (IMCC), New Wales Operations in Polk County, Florida. The IMCC facility is located in western Polk County near the intersection of State Highway 640 and the Hillsborough/Polk County line approximately 110 km southeast of Chassahowitzka National Wildlife Refuge (NWR), a class I air quality wilderness area.

The Environmental Protection Agency (EPA) issued a Prevention of Significant Deterioration (PSD) air quality permit to IMCC for the construction of the No. 2 DAP plant on May 5, 1980. On April 2, 1986, Sholtes and Koogler, Environmental Consultants, submitted an application for a permit to construct air pollution sources which requested higher allowable nitrogen oxides (NO_x) emissions for IMCC's No. 2 DAP plant. The emissions of the other regulated pollutants (particulate matter, fluoride, and sulfur dioxide) are not being changed by the requested modification. In the original permit for the No. 2 DAP plant, the EPA specified a NO_x limit of 0.21 lb/MMBtu from the gas/oil fired dryers. In a 1985 compliance test, when the dryers were fired with No. 6 fuel oil, IMCC measured NO_x emissions at 0.71 lb/MMBtu. Consequently, IMCC requested the Florida Department of Environmental Regulation (DER) to increase the allowable NO_x limit to 1 lb/MMBtu. Based on their Best Available Control Technology (BACT) analysis, the DER is proposing to raise the NO_x limit from 0.21 to 0.6 lb/MMBtu, resulting in a 76.4 ton_x per year increase in NO_x emissions. Based on the above background information and our own technical analysis, we offer the following comments concerning the BACT, air quality, and air quality related values (AQRV) analysis of the IMCC modification.

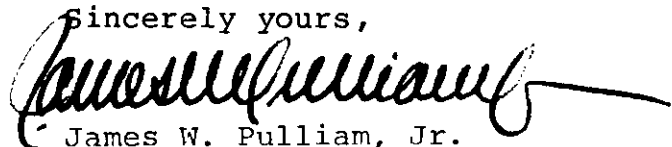
We agree with the DER that the 0.6 lb/MMBtu limitation represents BACT when IMCC's dryers are oil fired, however, we recommend the DER retain the 0.2 lb/MMBtu rate as the limit for gas firing. The proposed permit modification only specifies the 0.6 lb/MMBtu limitation, which would allow IMCC to emit at this higher rate when either gas or oil is fired in the dryers. Dual permit limits would require IMCC to meet a lower NO_x limit if gas were fired in the dryers in the future.

The Industrial Source Complex Long-Term (ISCLT) air quality dispersion model was used to perform the impact analysis. Since only the pollutant NO_x is subject to review and there is only an annual National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (100 ug/m³), we agree that the use of this model is appropriate. Dispersion modeling completed by the applicant predicts that the ambient concentration level of NO₂ at the Department's BACT emission limit (0.6 lb/MMBtu) will increase by a maximum of 0.3 ug/m³. The modeling also showed the maximum concentration level due to the entire No. 2 DAP plant, including the previously permitted emissions, to be 0.5 ug/m³. The maximum annual average concentration of NO₂ due to the entire New Wales facility was predicted to be 2.7 ug/m³. When this concentration is added to the maximum existing monitored NO₂ level in urban Hillsborough County of 54 ug/m³, the result of 56.7 ug/m³ is less than the NAAQS of 100 ug/m³. The ambient levels of NO₂ near the rural New Wales facility after the modification are expected to be less than 56.7 ug/m³.

Based on the predicted NO₂ concentration values, the information provided in the Technical Evaluation and Preliminary Determination, and the distance of the facility from Chassahowitzka NWR, we do not anticipate an adverse impact to AQRV's of the refuge.

If you have any questions, please do not hesitate to call Wayne King of our Air Quality Division at 303/236-8765.

Sincerely yours,



James W. Pulliam, Jr.
Regional Director

Copies:

Bill Thomas

Willard Hanks

Tom Rogers

Barry Andrews

4-20-87 WH



central florida regional planning council

PM
4-7-87
Bartow, FL

File Copy

DER

APR 09 1987

BAQM

April 7, 1987

Mr. Bill Thomas
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: BACT Determination for Permit AC53-23546
IMCC New Wales No. 2 DAP Plant

Dear Mr. Thomas:

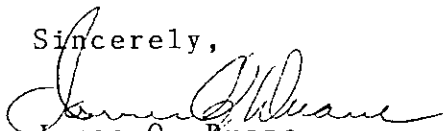
The Central Florida Regional Planning Council staff received the notice of proposed agency action referred to above and reviewed the permit application and supporting documents. Based upon the information submitted and the timing of the notice, this Council has substantive reservations concerning the Department's proposed course of action.

This office was given unclear notice by the BAQM. The letter of transmittal was dated twelve days prior to its receipt by Council staff, and taken with the fact that the notice of intent to issue was sent to IMCC eight days prior to the date of the Council's notice, the 14 day period for filing of petitions, and the thirty day period for comment were both effectively abrogated.

This Council's primary concern is the BACT determination itself. Air quality is looked upon as a regional resource that is to be protected and improved where possible in Central Florida. It appears that degradation of the ambient air quality will result from the issuance of this permit. The principal of a BACT determination is to only include consideration of the economic factor along with other factors; it is not to exclude all other considerations.

The Council would ask for a reconsideration.

Sincerely,


James Q. Duane
Executive Director

DDN/mcs

xc: Lee Walton



PM
4-6-87
Atlanta, GA

File Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

APR 06 1987

4APT-APB/eaw

DER

APR 08 1987

BAQM

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

Re: International Minerals and Chemical Corp. (PSD-FL-114)

Dear Mr. Fancy:

This is to acknowledge the receipt of your preliminary determination on the modification by the above-referenced corporation on the No. 2 DAP plant in Polk County, Florida. The preliminary determination for the modification will not be subject to review under the Region IV Overview of State Programs policy.

However, there are comments concerning the determination, specifically in regard to the modeling analysis that we would like for you to address:

1. There was no quantitative emission data for nearby sources.
2. There was no explanation for the omission of the downwash option in the air quality analysis.
3. The air quality data used in the modeling was not grandfathered under the UNAMAP-5 models.

We suggest that additional modeling be done using the UNAMAP-6 for comparison. Please address the above concerns in preparing the final determination and submit copies of the final determination and permit when they are issued.

If you have any questions, please call Mr. Gary Ng at (404) 347-2904 or Mr. Lew Nagler at (404) 347-2864.

Sincerely,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

(cc) Tom Rogers
Willard Harris? 4-8-87 134

Your copy



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: Bill Thomas

THRU: Larry George *LG*

FROM: Tom Rogers *TR*

DATE: March 31, 1987

SUBJ: IMC New Wales

I have reviewed the IMC report produced by Koogler and Associates, the cover letter of which is attached. The purpose of the report was to determine if the No. 1, 2, and 3 sulfuric acid plants would cause or contribute to a violation of the SO₂ ambient air quality standard when these plants are run at a production rate of 2700 tons per day each. Based on this report, I concur with IMC's conclusion that no violation is expected.

TR/ks

PM
3-26-87
Gainesville, FL

F. L. Cozy

Ka

KOOGLER & ASSOCIATES, *Environmental Services*

1213 NW 6th Street • Gainesville, Florida 32601 • 904/377-5822

KA 124-85-01

March 26, 1987

DER

MAR 27 1987

BAQM

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: IMC/New Wales
Technical evaluation and preliminary determination for
air permit AC53-118671
No. 2 DAP plant

Dear Mr. Fancy:

I would like to comment briefly on the Best Available Control Technology (BACT) determination which is part of the Technical Evaluation and Preliminary Determination for a proposed modification to the No. 2 DAP plant at the IMC/New Wales operations in Polk County, Florida. I have already discussed my comments with Mr. Barry Andrews of your staff and am providing this letter only as a record to the permitting file.

In reviewing the BACT determination, it appeared to us that the total annualized cost for the installation of low NO_x burners and the annual cost per ton of NO_x controlled were low. We also suspected that the annualized cost reported for each ton of NO_x controlled as a result of modifications to combustion chamber on the DAP dryer might be low. We discussed our concerns with Barry Andrews and he confirmed that an error had been made in calculating these costs. By this letter, we are requesting that the corrected annual costs be calculated and entered into the permit file.

I would also like to clarify another matter that appears in the BACT determination. This is with reference to the stated NO_x emission reduction of 100 tons per year that might be realized if low NO_x burners were installed or if a modification was made to the DAP dryer combustion chamber. The point that I would like to clarify is that the 100 ton per year reduction in NO_x emissions was approximately the difference between the NO_x emission rate that IMC/New Wales originally requested and an emission rate thought to be achievable through the use of low NO_x burners or combustion chamber modifications. The potential NO_x emission reduction between the NO_x emission rate negotiated by IMC/New Wales and

Mr. C. H. Fancy
Florida Department of
Environmental Regulation

March 26, 1987

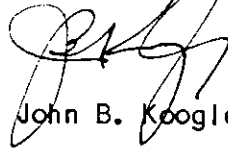
Page 2

the Department and the emission rate thought to be achievable by the use of low NOx burners or combustion chamber modifications is in the range of 76 tons per year. I wanted this point clarified in the event that there are questions regarding the cost analysis in the BACT determination some time in the future.

If there are any questions regarding my comments, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:app

cc: Mr. Barry Andrews
Mr. Joe Baretincic
W. HANKS

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

PM
3-16-87
Mulberry, FL

DER
MAR 18 1987
BAQM



INTERNATIONAL MINERALS & CHEMICAL CORPORATION

March 16, 1987

Mr. W. C. Thomas
State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Bill:

Enclosed is a copy of the Affidavit of Publication of the notice regarding our application to increase NO_x emission at DAP-2.

If you have any questions regarding this Affidavit of Publication, please let me know.

Sincerely,

A handwritten signature in cursive script that reads 'J. M. Baretincic'.

J. M. Baretincic
Director - Environmental Services

JMB/bs
059
Attachment

cc. SW Dist 3/18/87 WH
Willard " "

AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Stephen DeWitt, who on oath says that he is Controller 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

March 7, 1987

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

Stephen P. DeWitt

Controller

Sworn to and subscribed before me this 9th

day of March A.D. 1987

(Seal)

George M. Williams
Notary Public

My Commission Expires

Attach Notice Here

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

The Department of Environmental Regulation gives notice of its intent to issue a permit to International Minerals and Chemical Corporation to increase the allowable nitrogen oxides emissions from their existing N. 2 Diammonium Phosphate plant. This plant is located in Polk County near the intersection of SR 640 and County Line Road. A determination of best available control technology (BACT) was required.

This application was reviewed under Florida Administrative Code Rule 17.2500, Prevention of Significant Deterioration. Emissions of nitrogen oxides will increase by 76.4 tons per year. The allowable emissions of other pollutants are not being increased. The department has completed a study of the potential ambient air impact due to this increase in emissions. Based on this study, the department has reasonable assurance that the increase in emissions of nitrogen oxides will not cause or contribute to an exceedance of the ambient air quality standard for this pollutant. No PSD increment is established for nitrogen oxides.

Persons who 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 shall constitute 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 position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model 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.

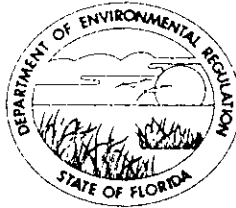
The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Dept. of Environmental Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301
Bartow Public Library
315 Parker Street
Bartow, Florida 33830

Any person may send written comments on the proposed action to Mr. Bill Thomas 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.

K584 37: 1987

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 6, 1987

Mr. James Duane
Central Florida Regional
Planning Council
Post Office Box 208
Bartow, Florida 33830


Dear Mr. James:

RE: Preliminary Determination - International Minerals and
Chemical Corporation, New Wales Operations - Polk County

I wish to bring to your attention that International Minerals and Chemical Corporation, New Wales Operations proposes to modify its existing facility in Polk County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, under the authority delegated by the U.S. Environmental Protection Agency, has reviewed the proposed construction under Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21) and reached a preliminary determination of approval, with conditions, for this construction.

Please also be aware that the attached Public Notice announcing the preliminary determination, the availability of pertinent information for public scrutiny and the opportunity for public comment will be published in the near future in a newspaper of general circulation in Polk County. This notice has been mailed to you for your information and in accordance with regulatory requirements. You need take no action unless you wish to comment on the proposed construction. If you have any questions, please feel free to call Mr. Bill Thomas or myself at (904)488-1344.

Sincerely,


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

CHF/pa
Enclosure

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

The Department of Environmental Regulation gives notice of its intent to issue a permit to International Minerals and Chemical Corporation to increase the allowable nitrogen oxides emissions from their existing No. 2 Diammonium Phosphate plant. This plant is located in Polk County near the intersection of SR 640 and County Line Road. A determination of best available control technology (BACT) was required.

This application was reviewed under Florida Administrative Code Rule 17-2.500, Prevention of Significant Deterioration. Emissions of nitrogen oxides will increase by 76.4 tons per year. The allowable emissions of other pollutants are not being increased. The department has completed a study of the potential ambient air impact due to this increase in emissions. Based on this study, the department has reasonable assurance that the increase in emissions of nitrogen oxides will not cause or contribute to an exceedance of the ambient air quality standard for this pollutant. No PSD increment is established for nitrogen oxides.

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The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610

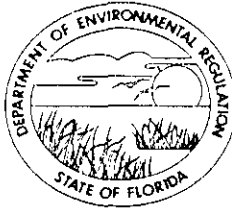
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Bartow Public Library
315 Parker Street
Bartow, Florida 33830

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 6, 1987

Chairman, Polk County Board of
County Commissioners
Post Office Box 60
Bartow, Florida 33830


Dear Commissioners:

RE: Preliminary Determination - International Minerals and
Chemical Corporation, New Wales Operations - Polk County

I wish to bring to your attention that International Minerals and Chemical Corporation, New Wales Operations proposes to modify its existing facility in Polk County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, under the authority delegated by the U.S. Environmental Protection Agency, has reviewed the proposed construction under Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21) and reached a preliminary determination of approval, with conditions, for this construction.

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Sincerely,


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

CHF/pa
Enclosure

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

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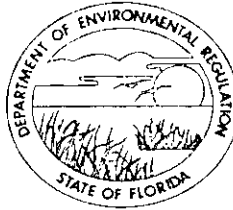
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DEPARTMENT OF ENVIRONMENTAL REGULATION

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2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 6, 1987

Mr. Ron Fahs
State A-95 Coordinator
Florida State Planning and
Development Clearinghouse
Office of Planning and Budget
The Capitol
Tallahassee, Florida 32301

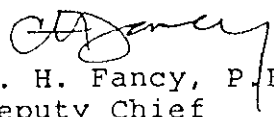
Dear Mr. Fahs:

RE: Preliminary Determination - International Minerals and
Chemical Corporation, New Wales Operations - Polk County

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Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
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CHF/pa
Enclosure

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

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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 shall constitute 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 position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model 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 is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610

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

Bartow Public Library
315 Parker Street
Bartow, Florida 33830

Any person may send written comments on the proposed action to Mr. Bill Thomas 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.