

RECEIVED

OCT 31 1995

BUREAU OF
AIR REGULATION

MEMORANDUM

TO: Martin Costello, FDEP
FROM: Pradeep Raval
DATE: October 30, 1995
SUBJECT: Extension of 90 Day Time Limit
IMC-Agrico Company

This is a follow up to our telephone conversation today regarding waiver of the 90 day limit for IMC-Agrico Company's application for permit amendments.

As it is anticipated that the pending issues on this subject will be resolved soon, the attached waiver extension is granted until November 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. D. Turley, IMC-Agrico





Lawton Chiles
Governor

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment 1

Applicant's Name: IMC-Agrico Company

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 30th day of November 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT)

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

ATTACHMENT 1

LIST OF PERMIT AMENDMENTS SUBJECT TO
WAIVER OF THE 90 DAY TIME LIMIT

IMC-AGRICO COMPANY
POLK COUNTY, FLORIDA

Item	Unit/Operation	Construction Permit No.
<u>NEW WALES PLANT</u>		
1.	SAP 1	AC53-192221
1.	SAP 2	AC53-192221
1.	SAP 3	AC53-192221
1.	SAP 4	AC53-192221
1.	SAP 5	AC53-192221
<u>SOUTH PIERCE PLANT</u>		
1.	SAP 10	AC53-199112
1.	SAP 11	AC53-199112
<u>NICHOLS PLANT</u>		
1.	DAP Dryer	AC53-232681
2.	SAP 1	AC53-230355



RECEIVED

SEP 27 1995

Bureau of
Air Regulation

MEMORANDUM

TO: Marty Costello, FDEP
FROM: Pradeep Raval
DATE: September 26, 1995
SUBJECT: Extension of 90 Day Time Limit
IMC-Agrico Company

This is a follow up to our telephone conversation today regarding waiver of the 90 day limit for IMC-Agrico Company's application for permit amendments.

As it is anticipated that the pending issues on this subject will be resolved soon, the attached waiver extension is granted until October 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. D. Turley, IMC-Agrico



ATTACHMENT 1

LIST OF PERMIT AMENDMENTS SUBJECT TO
WAIVER OF THE 90 DAY TIME LIMIT

IMC-AGRICO COMPANY
POLK COUNTY, FLORIDA

Item	Unit/Operation	Construction Permit No.	
<u>NEW WALES PLANT</u>			
1.	SAP 1	AC53-192221	
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1.	SAP 3	AC53-192221	
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1.	SAP 10	AC53-199112	
1.	SAP 11	AC53-199112	
 <u>NICHOLS PLANT</u>			
1.	DAP Dryer	AC53-232681	PSD-FL-204
2.	SAP 1	AC53-230355	PSD-FL-204





Lawton Chiles
Governor

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment I

Applicant's Name: IMC-Agrico Company

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida..Department of Environmental Regulation.

This waiver shall expire on the 30th day of October 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT) _____

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

MEMORANDUM

TO: Marty Costello, FDEP
FROM: Pradeep Raval
DATE: August 24, 1995
SUBJECT: Extension of 90 Day Time Limit
IMC-Agrico Company

This is a follow up to our conversation yesterday regarding waiver of the 90 day limit for all the IMC-Agrico Company permit amendment applications.

As it is anticipated that the pending issues on this subject will be resolved soon, a waiver extension is granted until September 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. D. Turley, IMC-Agrico



ATTACHMENT 1

LIST OF PERMIT AMENDMENTS SUBJECT TO
WAIVER OF THE 90 DAY TIME LIMIT

IMC-AGRICO COMPANY
POLK COUNTY, FLORIDA

Item	Unit/Operation	Construction Permit No.
<u>NEW WALES PLANT</u>		
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1.	SAP 10	AC53-199112
1.	SAP 11	AC53-199112
<u>NICHOLS PLANT</u>		
1.	DAP Dryer	AC53-232681 PSD-FL-204
2.	SAP 1	AC53-230355 PSD-FL-204





Lawton Chiles
Governor

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment I

Applicant's Name: IMC-Agrico Company

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida..Department of Environmental Regulation.

This waiver shall expire on the 30th day of September 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT)

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



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 124-95-02

August 21, 1995

RECEIVED

AUG 23 1995

Bureau of
Air Regulation

Mr. Clair H. Fancy
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information for
Permit Amendment Request
IMC-Agrico Company

Dear Mr. Fancy:

This is in response to your letter dated June 7, 1995, and discussions last week between Martin Costello and Pradeep Raval regarding the permit amendments for several IMC-Agrico sources. The information provided below is in the order of the amendments evaluated by FDEP.

NEW WALES PLANT

Sulfuric Acid Plants 1-5, PSD-FL-170

1. Please provide the EPA Suggested Emissions Netting Procedure (page A. 44 of NSR Workshop Manual), to demonstrate that net emissions of NO_x were below the significant levels at the time of the proposed modifications from PSD-FL-170.

RESPONSE:

Using an abbreviated version of the netting procedure outlined in the NSR Workshop Manual, utilized by FDEP in PSD-FL-170, the revised net NO_x emissions increase based on 1991-1994 emission data available from source sampling (average for the period) is as follows:

Actual Emissions

SAP 1: NO_x = 985,500 tpy acid x 0.079 lb NO_x/ton acid x ton/2000lbs
= 38.9 tpy

SAP 2: NO_x = 985,500 tpy acid x 0.083 lb NO_x/ton acid x ton/2000lbs
= 40.9 tpy

SAP 3: $\text{NO}_x = 985,500 \text{ tpy acid} \times 0.072 \text{ lb NO}_x/\text{ton acid} \times \text{ton}/2000\text{lbs}$
 $= 35.5 \text{ tpy}$

SAP 4: $\text{NO}_x = 1,003,750 \text{ tpy acid} \times 0.073 \text{ lb NO}_x/\text{ton acid} \times \text{ton}/2000\text{lbs}$
 $= 36.6 \text{ tpy}$

SAP 5: $\text{NO}_x = 1,003,750 \text{ tpy acid} \times 0.079 \text{ lb NO}_x/\text{ton acid} \times \text{ton}/2000\text{lbs}$
 $= 39.6 \text{ tpy}$

Proposed Emissions

Assume that the emissions from all five plants reflect the highest NOx emission rate from above (1991-1994 test data reference period).

SAP 1-5: $\text{NO}_x = 5,292,500 \text{ tpy acid} \times 0.083 \text{ lb NO}_x/\text{ton acid} \times \text{ton}/2000\text{lbs}$
 $= 219.6 \text{ tpy}$

Net Emissions

As there were no other contemporaneous NOx emissions, the net emissions increase is simply the difference in the actual and proposed emissions:

SAP 1-5: $\text{NO}_x = 219.6 - (38.9 + 40.9 + 35.5 + 36.6 + 39.6) \text{ tpy}$
 $= 28.1 \text{ tpy}$

This net emissions increase is less than the PSD significant emission level of 40 tpy.

DAP 2 East & West Trains

The request for amendment of AC53-118671, for DAP 2 (East & West Trains), is hereby withdrawn.

SOUTH PIERCE PLANT

Sulfuric Acid Plants 10 & 11, PSD-FL-179

Using FDEP's abbreviated netting procedure (conducted above), the revised net NOx emissions increase based on 1991-1994 emission data available from source sampling (average for the period) is as follows:

No justification that emissions at time of PSD-FL-179 are represented by '91-'94 data - Also don't have test data from previous attempts



Actual Emissions

SAP 10: $\text{NO}_x = 730,000 \text{ tpy acid} \times 0.092 \text{ lb NO}_x/\text{ton acid} \times \text{ton}/2000\text{lbs}$
 $= 33.6 \text{ tpy}$

SAP 11: $\text{NO}_x = 730,000 \text{ tpy acid} \times 0.086 \text{ lb NO}_x/\text{ton acid} \times \text{ton}/2000\text{lbs}$
 $= 31.4 \text{ tpy}$

Proposed Emissions

Assume that the emissions from both plants reflect the highest NO_x emission rate from above (1991-1994 test data reference period).

SAP 10-11: $\text{NO}_x = 1,971,000 \text{ tpy acid} \times 0.092 \text{ lb NO}_x/\text{ton acid} \times \text{ton}/2000\text{lbs}$
 $= 90.7 \text{ tpy}$

Net Emissions

As there were no other contemporaneous NO_x emissions, the net emissions increase is simply the difference in the actual and proposed emissions:

SAP 10-11: $\text{NO}_x = 90.7 - (33.6 + 31.4) \text{ tpy}$
 $= 25.7 \text{ tpy}$

This net emissions increase is less than the PSD significant emission level of 40 tpy.

NICHOLS PLANT

DAP Dryer, AC53-232681, PSD-FL-204

The request for amendment of AC53-232681, for the DAP Plant, is hereby withdrawn, except for clarification of Specific Condition No. 5.

As worded currently, SC No. 5 requires performance testing for ammonia and subsequent air dispersion modeling of the emissions to demonstrate compliance with the FDEP Air Reference Concentration (FARC). IMC-Agrico, FDEP and EPA staff are all aware of the shortcomings of the draft ammonia sampling method and its positive bias for a source such as the DAP plant. In response to FDEP's suggestion, IMC-Agrico is willing to conduct the required (one-time) ammonia sampling. However, it is requested that the requirement to conduct air dispersion modeling be deleted from SC No. 5 as that effort is not justified given the bias in the ammonia emission rate measurement.

*Should submit
test data*



Mr. Clair H. Fancy
Florida Department of
Environmental Protection

August 21, 1995
Page 4

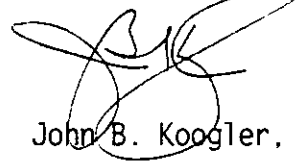
Furthermore, FDEP's air toxics guidance indicates that a FARC can be exceeded so long as the pollutant emissions are controlled using BACT. In the case of the DAP Plant, the pollution controls presently in place constitute BACT pursuant to FDEP's BACT determination for PSD-FL-204.

Given the reasons stated above, it is requested that no sampling be required for ammonia. If a one-time test is required, then no subsequent air dispersion modeling should be required.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:par

c: Dave Turley, IMC-Agrico
Jerry Girardin, IMC-Agrico
Gerald Kissel, FDEP Tampa



MEMORANDUM

RECEIVED

JUN 27 1995

Bureau of
Air Regulation

TO: Marty Costello, FDEP
FROM: Pradeep Raval
DATE: June 22, 1995
SUBJECT: Extension of 90 Day Time Limit

This is a follow up to our conversation this week regarding waiver of the 90 day limit for IMC-Agrico Company's application for permit amendments.

As it is anticipated that the pending issues on this subject will be resolved soon, the attached waiver extension is granted until August 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. D. Turley, IMC-Agrico





Lawton Chiles
Governor

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment 1

Applicant's Name: IMC-Agrico Company

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 30th day of August 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT)

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

ATTACHMENT 1

LIST OF PERMIT AMENDMENTS SUBJECT TO
WAIVER OF THE 90 DAY TIME LIMIT

IMC-AGRICO COMPANY
POLK COUNTY, FLORIDA

Item	Unit/Operation	Construction Permit No.	
<u>NEW WALES PLANT</u>			
1.	SAP 1	AC53-192221	
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1.	SAP 3	AC53-192221	
1.	SAP 4	AC53-192221	
1.	SAP 5	AC53-192221	
<u>SOUTH PIERCE PLANT</u>			
1.	SAP 10	AC53-199112	
1.	SAP 11	AC53-199112	
<u>NICHOLS PLANT</u>			
1.	DAP Dryer	AC53-232681	PSD-FL-204
2.	SAP 1	AC53-230355	PSD-FL-204





Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

June 7, 1995

John B. Koogler, Ph.D., P.E.
Koogler & Associates Environmental Services
4014 Northwest Thirteen Street
Gainesville, Florida 32609

Dear Dr. Koogler:

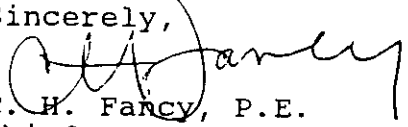
Subject: Requests to Remove NO_x Limits and Testing Requirements
from Sulfuric Acid Plants, IMC-Agrico (PSD-FL-170) and
Farmland Hydro (PSD-FL-143)

Additional information is requested to aid the Department in making a final determination on the above requests. You indicated that based on stack test data, the subject emissions units should not have required PSD review for NO_x. Please provide the EPA Suggested Emissions Netting Procedure (page A.44 of NSR Workshop Manual), to demonstrate that net emissions of NO_x were below significant levels at the time of the proposed modifications from the above referenced PSD permits.

Please evaluate the sulfuric acid plants prior to the above referenced modifications (each PSD permit listed above), for PSD applicability. For the five sulfuric acid plants at the IMC-Agrico New Wales facility, please provide the dates of initial construction and apply the emissions netting procedure for each of these units that were installed after August 7, 1980 to determine PSD applicability at the time these units were installed. For the Farmland Hydro No. 5 SAP, please consider the initial construction and later modification to increase production to 2,400 TPD as phased projects which should be counted together for PSD applicability purposes.

If you have questions, please contact Martin Costello at (904)488-1344 or write to me at the above address.

Sincerely,


C. H. Fancy, P.E.
Chief

Bureau of Air Regulation

CHF/mc/c

cc: Martin Costello ✓

MEMORANDUM

TO: Marty Costello, FDEP
FROM: Pradeep Raval
DATE: June 2, 1995
SUBJECT: Waiver of 90 Day Time Limit

This is a follow up to our conversation this week regarding waiver of the 90 day limit for IMC-Agrico Company's application for permit amendments.

As it is anticipated that the pending issues on this subject will be resolved soon, the attached waiver is granted until June 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. D. Turley, IMC-Agrico

RECEIVED

JUN 2 1995

Bureau of
Air Regulation





Lawton Chiles
Governor

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment 1

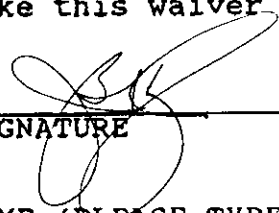
Applicant's Name: IMC-Agrico Company

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

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This waiver shall expire on the 30th day of June 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT)

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

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JUN 2 1995

ATTACHMENT 1

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WAIVER OF THE 90 DAY TIME LIMIT

IMC-AGRICO COMPANY
POLK COUNTY, FLORIDA

Item	Unit/Operation	Construction Permit No.
<u>NEW WALES PLANT</u>		
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JUN 2 1995

Bureau of
Air Regulation

