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Return Receipt Requested

October 28, 1996

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

RE: DAP II Plant
Permit No. AC53-118671
AIRS ID No. 1050059
Unit ID No. 45 and 46
New Wales Plant

Dear Mr. Fancy:

This letter is to follow-up on the personal conversation with C. D. Turley on September 24, 1996 regarding the operating hours for the above-referenced permit.

As you suggested, we have reviewed our files. In addition, our consultant, Koogler & Associates, has reviewed the FDEP permit files in Tallahassee. Nothing was discovered in the review of the construction permits for this plant that indicates that the hours were considered separately. Each Train in the plant is limited to 7920 hrs/yr. These Trains are identical. They were apparently considered individually because of the manner in which permit applications are structured.

Under current conditions, the West Train achieves a higher operating efficiency than the East Train. In this current year, the West Train is likely to be able to exceed the 7920 hour limit. The East Train will not approach the limit even if it could operate 100% of the remaining year. The attached table illustrates this fact.

IMC-Agrico Company requests a change in the hourly operating limit in Specific Condition No. 1 of construction permit No. AC53-118671 from **"each plant will not operate over 7920 hours per year"** to **"the plant, both production trains, will not operate over 15,840 hours per total."** This change will not alter the modeled impact of this plant from the construction permit review. A check in the amount of \$50 is included for the modification fee.

Mr. Fancy
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As a second issue, the application calculations were based on an operating factor of 95%. We were unable to determine the basis of the final 7920 hour limit which corresponds 90%. Please advise, based on your review of this, as how we should proceed to request this permit correction also.

Thank you for your attention in this matter. If you need additional information, please contact C. D. Turley at 941-428-7153.

Sincerely,

A handwritten signature in cursive script that reads "Phillip A. Steadham".

P. A. Steadham
Chief Environmental
Services - Concentrates

Enclosure

cwk
pas96



IMC-AGRICO COMPANY
 P.O. BOX 2005 MULBERRY, FLORIDA 33860
 OPERATING ACCOUNT

The Northern Trust Company
 Chicago, IL 60610
 Payable through
 Northern Trust Bank/DuPage
 Oak Brook, IL
 70-2382
 719

CHECK NO. 131467

DATE		
MONTH	DAY	YEAR
10	11	96

▶▶▶▶▶ **PAY ONLY 50.00**
 FIVE ZERO CTSCTS

■ FIFTY DOLLARS AND 00 CENTS *****

PAY TO THE ORDER OF

VOID OVER \$50.00

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
 2600 BLAIR STONE RD
 TALLAHASSEE FL 32399

Authorized Signature

000131467 10719238281000056405

THE ORIGINAL DOCUMENT HAS A REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW WHEN CHECKING THE ENDORSEMENT.

NO. 131467 F53568 IMC-AGRICO CO. P.O. BOX 2005 MULBERRY, FL. 33860

INVOICE DATE			INVOICE NUMBER	REFERENCE NUMBER	PURCHASE ORDER NO.	INVOICE AMOUNT	DISCOUNT	NET PAYABLE
MONTH	DAY	YEAR						
10	09	96	CK REG100996	877-040M		50.00		50.00
						50.00	.00	50.00

IMC-Agrico New Wales DAP II Plant Projected Operation for 1996

Available hours

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
744	672	744	720	744	720	744	744	720	744	720	744	
								6552	Remaining hours to 8760:			2208

DAP #2 East Train

Operating Hours									Hrs at projected operating factor			total		
676	586	592	579	553	483	646	691	659	684	662	684	2031		
								5465						
Operating Factor									Unused hours			Remaining hours to 7920:	2455	
90.86%	87.20%	79.57%	80.42%	74.33%	67.08%	86.83%	92.88%	91.47%	92%	92%	92%			
								Average operating factor:		83.40%				
											East unused hours to shift:	424		

DAP #2 West Train

Operating Hours									Hrs at projected operating factor			total		
687	650	693	639	624	624	695	706	681	684	662	684	2031		
								5999						
Operating Factor									Unused hours			Remaining hours to 7920:	1921	
92.34%	96.73%	93.15%	88.75%	83.87%	86.67%	93.41%	94.89%	94.55%	92%	92%	92%			
								Average operating factor:		91.59%				
											Projected hours over 7920:	110		
											Remaining hours to 7920 with shifted hours from East:	2345		