



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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KA 124-94-04

March 14, 1995

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

Subject: Polk County-AP
IMC-Agrico Company
New Wales Plant
Permit Amendment Requests

Dear Mr. Linero:

During recent discussions with FDEP staff, the subject of air permit conditions had come up. Based on those discussions, it is our understanding that all emission limitations in current permits must either be based on a standard, or reflect emission limits requested by a permittee to avoid a specific rule applicability (e.g. PSD, etc.). Any emission limit which is not supported by this criteria can be removed from the permit.

It is anticipated that the removal of such emission limitations from current operation permits and source construction permits will facilitate Title V permit application compilation by IMC-Agrico as well as the compilation of Title V permit conditions by FDEP. Thus, only valid applicable requirements will remain in the source permits.

IMC-Agrico has several air operation (and the preceding construction) permits which contain emission limitations outside of the above FDEP criteria. Often, emission estimates/fuel specifications stated in the application for information purposes were then imposed as permit limitations. As a result, we are requesting FDEP to amend the permits tabulated below. A discussion on these permits is provided in the attachments. The attachment number corresponds to the item number in the table below.

In accordance with FDEP protocol, the request for permit amendment is being submitted to the office where the permit was issued. For permits issued by FDEP's Tampa office, a request for amendment is simultaneously being submitted to that office. The amendment request for construction permits issued by the Bureau of Air Regulation (BAR) is being sent to your attention. The permit listing below, however, includes all the permits to be amended so that both the FDEP District and the BAR offices are aware of the scope of the permit amendments.

It is requested that the following permits be amended:

Item	Unit/Operation	Operation Permit No.	Construction Permit No.	Other Permit No.
	AFI Plant	A053-223229 (D)	AC53-5043 (D)	
	DAP 1	A053-185648 (D)	AC53-33850 (D)	
1.	DAP 2 East Train	A053-215386 (DT)	AC53-118671 (T)	AC53-23546(T) → 251.5 D/L/112x STD.
1.	DAP 2 West Train	A053-215387 (DT)	AC53-118671 (T)	AC53-23546(T)
	GTSP Plant	A053-206082 (D)	AC53-211264 (D)	AC53-47664(D)
	Multifos Plant	A053-206083 (D)	AC53-40084 (D)	
2.	SAP 1	A053-204057 (DT)	AC53-192221 (T)	} NOx STD - PSD
2.	SAP 2	A053-204058 (DT)	AC53-192221 (T)	
2.	SAP 3	A053-204059 (DT)	AC53-192221 (T)	
2.	SAP 4	A053-204060 (DT)	AC53-192221 (T)	
2.	SAP 5	A053-204061 (DT)	AC53-192221 (T)	
	Standby Boiler	A053-218795 (D)	AC53-2030 (D)	A053-137315(D)

NOTES:

- (D) Operation permit amendment expected from FDEP District office.
- (DT) Permit amendment expected from FDEP District office after the construction permit amendment is issued by BAR in Tallahassee.
- (T) Construction permit amendment expected from BAR in Tallahassee.

A check in the amount of \$500 (permit amendments processing fee) is enclosed.

Thank you for your kind assistance. 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: C.D. Turley, IMC-Agrico
- G. Kissel, FDEP Tampa

*In Reply, please
 refer to
 the
 permit
 number
 and
 the
 permit
 type.*

