NEW WALES OPERATIONS
P.O. Box 1035 • Mulberry, Florida 33860
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INTERNATIONAL MINERALS & CHEMICAL CORPORATION

March 31, 1986

Mr. Clair Fancy
State of Florida
Department of Environmental Regulations
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

On Thursday, March 27, Jerry Girardin of my staff spoke with Willard Hanks regarding the permitting of our #2 DAP Plant. This plant is currently operating under Construction Permit #AC53-23546 and the plant has been tested for compliance for all applicable emission limits. During the testing, it was discovered that the NO $_{\rm X}$ emissions were in excess of the permitted levels. IMC immediately contracted with a consultant, John Koogler, to investigate this matter and determine what would be necessary to resolve the problem.

Due to the NO_{X} emissions, IMC has not been able to file for an operating permit on the #2 DAP Plant. IMC has been testing emissions from this source since the original compliance tests were performed. These tests have been run at normal intervals and will continue to be performed to insure compliance with limits as specified in the Construction Permit.

In November 1985, IMC submitted a request for an extension of the Construction Permit until June 30, 1986. In Jerry's conversation with Willard, Willard believes that NO_{X} review will be subject to a full PSD review. This requires a new Construction Permit application which will be submitted to your office on April 7, 1986. Assuming that a letter of incompleteness might be required, the current permit will expire before the new one can be issued. Willard is, therefore, suggesting that IMC write and request that your office grant another extension to the existing Construction Permit.

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In line with Willard's recommendation, IMC is hereby requesting that the Department grant us an extension of AC53-23546. It would be appreciated if the expiration date date could be extended until December 31, 1986. With this extension, you would have ample time to review the new Construction Permit application without our being concerned about the current permit expiring.

We will be happy to answer any questions you may have. Thank you for your consideration regarding this request.

Sincerely,

. M. Baretincic

Manager - Environmental Services

and Quality Control

JMB/bs 028 Enclosure

cc: W. C. Thomas - DER Tampa

J. B. Koogler - Tampa

W. Hanks - DER Tallahassee

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