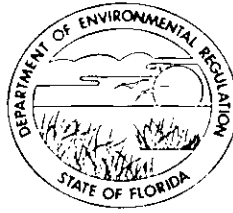


STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

January 25, 1985

Mr. James T. Wilburn
U.S. - EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

RE: PSD-FL-034

Dear Mr. Wilburn:

Attached is a request from International Minerals and Chemical Corporation to modify the construction permits that were issued for their New Wales diammonium phosphate plants.

The department has reviewed their request and concluded that it would allow more flexibility in the company's operations of these sources and not change the impact their emissions will have on the environment. We have modified the state permit as shown in the attached letter.

We request your agency review this request and modify the federal permit that was issued for it.

Sincerely,

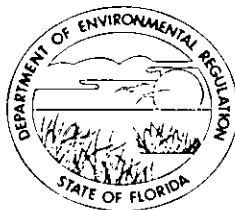
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/WH/s
attachment: IMC letter
DER letter

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

January 24, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas L. Craig
Vice President and General Manager
International Minerals and Chemical Corp.
Post Office Box 1035
Mulberry, Florida 33860

Dear Mr. Craig:

Re: Modification of Conditions - Permit No. AC 53-23546

The department is in receipt of your December 12, 1984, letter that requested the limits on production capacity of the two DAP plants be made more flexible. This request is acceptable to the department and the specific conditions of state permit No. AC 53-23546 are modified as noted below:

Present Specific Conditions

1. Maximum production rate of each plant will be 70 TPH DAP (140 TPH DAP for both plants) and the plants will not operate over 7,920 hours per year. The cooler will be allowed to operate 8,760 hours per year.
2. The maximum allowable discharge through the 6 foot diameter, 120 foot high stacks serving each train will be:

Pollutant	Maximum Emission Rate	Maximum Emission
Particulate	0.5 lbs/ton P_2O_5 feed or 14.1 lbs/hr whichever is less	56 TPY
Fluoride	0.060 lbs/ fluoride/ton P_2O_5 feed or 2.1 lbs/hr whichever is less	9 TPY
Sulfur Dioxide	0.7 lbs/ton P_2O_5 feed or 22 lbs/hr whichever is less	87 TPY

Mr. Thomas L. Craig

Page Two

January 24, 1985

The maximum allowable discharge of particulate from the bag filters serving the cooler will be 0.01 grains/DSCF and 4.5 lbs/hr which is 17.8 TPY.

12. Before construction permit expires, the DAP plant will be sampled for particulate, fluoride, and sulfur dioxide while operating at permitted capacity (+10%) with the dryer burning oil containing 2.5% sulfur (+10%). Test procedures will be EPA reference methods 1, 2, 3, 5, 6 and 13A or 13B as published in 40 CFR 60, Appendix A, dated July 1, 1978, or other state approved methods. The permittee shall notify the Bureau of Air Quality Management 30 days in advance of the compliance test and shall submit a test plan for approval. P₂O₅ input, pH of the scrubber solution and pressure drop across the scrubbers will be normally operated and reported, along with test data and results, to the Department.

Revised Specific Conditions

1. Maximum production for both plants shall not exceed a total of 140 TPH DAP and each plant will not operate over 7,920 hours per year. The cooler will be allowed to operate 8,760 hours per year.
2. The maximum allowable discharge from the plants will be:

Pollutant	Max. Emission Rate for each plant	Total Max. Emission for both plants
Particulate	0.5 lbs/ton P ₂ O ₅ feed	28.2 lb/hr and 112 TPY
Fluoride	0.060 lbs/ton P ₂ O ₅ feed	4.2 lbs/hr and 16.6 TPY
Sulfur Dioxide	0.7 lbs/ton P ₂ O ₅ feed	44 lbs/hr and 174 TPY

The maximum allowable discharge of particulate from the bag filter serving the cooler will be 0.01 grain/dscf and 4.5 lbs/hr which is 17.8 TPY.

Mr. Thomas L. Craig
Page Three
January 24, 1985

12. Prior to obtaining a permit to operate, the east DAP plant and, within 30 days of start-up, the west DAP plant shall be sampled for particulate, fluoride, and sulfur dioxide while operating at their maximum capacity with the dryer burning oil containing 2.5% sulfur (+10%). The maximum capacity of each plant shall be restricted in the permit to operate at the capacity that the compliance tests were conducted. The company shall also maintain logs of the actual production of each plant and the total production from both plants shall not exceed 140 TPH DAP. Test procedures will be EPA reference methods 1, 2, 3, 5, 6, and 13A or 13B as published in 40 CFR 60, Appendix A, or other state approved methods. The permittee shall notify the Southwest District office 15 days in advance of the compliance test and shall submit a test plan for approval. P_2O_5 input, pH of the scrubber solution, and pressure drop across the scrubbers will be normally operated and reported, along with the data and results, to the Department.


Attachments to be Incorporated

Mr. A. L. Girardin's letter dated November 30, 1984.

A copy of this letter must be attached to the reference construction permit and shall become a part of that permit.

By copy of this letter, the department is referring your request to the Environmental Protection Agency. Before the DAP plants can be operated at the higher capacities, the Environmental Protection Agency will have to approve your request and modify federal permit No. PSD-FL-034.

Sincerely,


Victoria J. Tschinkel
Secretary

VJT/ks

cc: J. T. Wilburn, EPA
D. Williams, SW District

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- 1. Show to whom, date and address of delivery.
- 2. Restricted Delivery.

3. Article Addressed to:
 Mr. Thomas L. Craig
 International Minerals & Chem
 P. O., Box 1035
 Mulberry, FL 33860

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured	0155815
<input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD	
<input type="checkbox"/> Express Mail	

Always obtain signature of addressee or agent and
DATE DELIVERED.

5. Signature - Addressee
 X *Al Burns*

6. Signature - Agent
 X *DK*

7. Date of Delivery
2-6-85

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

No. **0155815**
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO			
Mr. Thomas Craig			
STREET AND NO.			
P. O., STATE AND ZIP CODE			
POSTAGE	\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	SPECIAL DELIVERY	¢	
	RESTRICTED DELIVERY	¢	
	OPTIONAL SERVICES RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY		¢	
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY		¢	
TOTAL POSTAGE AND FEES	\$		
POSTMARK OR DATE			
2/4/85			

PS Form 3800, Apr. 1976