

October 4, 1979

CERTIFIED MAIL

Mr. Thomas L. Craig
Vice President and General
Manager
New Wales Chemicals, Inc.
Post Office Box 1035
Mulberry, Florida 33860

Dear Mr. Craig:

We have received and reviewed for completeness, your application No. AC 23546 filed on September 6, 1979 for construction of a new DAP plant near Mulberry. It has been found to be incomplete in a number of respects.

A. Due to your proposed location within the area of influence of the Hillsborough County particulate nonattainment area, information is needed to establish whether or not the increase in particulate emissions from the new construction will result in a significant impact on the particulate nonattainment area. This information is necessary to establish applicability of the exemption of 17-2.17(1)(c)2c. from the nonattainment rule of 17-2.17(5). If qualification for this exemption is not established, then information required by 17-2.17(5) must be submitted, including recommendation of LAER for each source, acceptable emission offsets and a list of all sources that are owned or controlled by IMC within the State of Florida together with certification that all of those sources are in compliance with all applicable state air rules or on an approved compliance schedule to meet the applicable rules.

B. Additionally, if your facility is subject to the nonattainment rules of 17-2.17, fugitive particulate matter must be addressed pursuant to 17-2.17(3)(b)2.b., otherwise the requirements of 17-2.05 will apply.

C. Since your existing facility is a "major emitting facility" and the addition you propose would increase emissions,

Mr. Thomas L. Craig
Page Two
October 4, 1979

(the addition would, in itself, increase emissions by enough to constitute a major emitting facility) you will need to provide the Department with information on all potential and allowable emissions from the facility, and the changes in these potential and allowable emissions that would occur if your project is approved. Also under the state PSD rule (17-2.04) you need to recommend BACT for each source (if LAER is not already required pursuant to 17-2.17), and provide the Department with adequate assurance that total allowable emissions will not cause any ambient violations and that increases will not cause exceedance of applicable PSD increments.

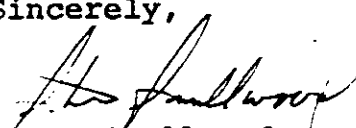
Ⓛ In addition to the information needed to answer the above general questions, specific answers to various technical questions are also needed in order for the Department to fully evaluate your application. These items are set forth in the attached report "Technical Discrepancies, New Wales Chemicals Construction Application number AC 23546".

It may be in your interest to meet with the individuals within the Bureau of Air Quality Management who have the responsibility of reviewing, processing and recommending issuance or denial of the construction permits you have requested. We will be glad to meet with you to assist you in filing a complete application, and to work with you in any way possible to expedite the processing of your applications.

For your information, I have attached a copy of 17-2 FAC as amended on June 20, 1979. The June 20, 1979 revisions became effective July 19, 1979.

Should you have any questions, please contact me at (904)488-1344.

Sincerely,


Steve Smallwood, PE III
Bureau of Air Quality
Management

SS:jr enclosure

TECHNICAL DISCREPANCIES

NEW WALES CHEMICALS CONSTRUCTION APPLICATION NO. AC 23546

- ✓ 1. Supply plot plan and location map. Show tie in with existing facility. Give UTM coordinates of all emission points accurate to within 0.1 km.
- ✓ 2. Describe process including quantities per unit time, raw materials feed, recirculation, shipping and loading.
- ✓ 3. Supply general arrangement drawings showing equipment sizes, design throughput and materials flow between equipments or groups with enough information to allow computation of an approximate materials balance. Show hoods, plenums and duct take off points including capture systems and arrangements for recycling to process.
4. Specify location, height, temperature, diameter and flow rate of each stack or individual point of emission. Express parameters in consistent units.
5. Phosphate and acid plant must include rock handling reactor filter and evaporator section information.
6. Specify fuel consumption rates.
7. Specify manufacturer, model, description and specification of all proposed control devices.
8. Give pertinent characteristics of all emissions as they would affect the selection of the proposed control devices.
9. Drawings submitted may be of any size providing that they are legible. Drawings should be folded to 8½ x 11".

PS Form 3811, Apr. 1977

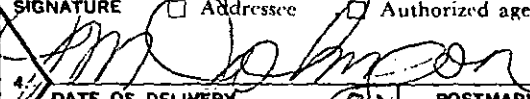
● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

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 Show to whom, date, and address of delivery.
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 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Tom Craig
 PO Box 1035
 Mulberry, FL


3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 644002

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent


DATE OF DELIVERY 10/8/79 POSTMARK

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6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS


PS Form 3800, Apr. 1976

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☆ GPO : 1977-O-234-357

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SENT TO Craig P Flann
 STREET AND NO. PO Box 1035
 P.O., STATE AND ZIP CODE Mulberry FL

POSTAGE		\$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢
	SPECIAL DELIVERY	¢
	RESTRICTED DELIVERY	¢
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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	¢
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TOTAL POSTAGE AND FEES		\$
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