CM: P387 961 076

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IMC FERTILIZER GROUP • MINERALS DIVISION P.O. Box 867 • Bartow, Florida 33830

Telephone: (813) 533-1121

BEST AVAILABLE COPY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

(MC)

LMC FERTILIZER, INC.

INTERNATIONAL MINERALS & CHEMICAL CORPORATION

AC 29-141149 AC 29-141150 PSD-FL-125 DER

JAN 15.1988

January 12, 1988

BAQM

Mr. John Reynolds Bureau of Air Quality Management Department of Environmental Regulation 2600 Blair Stone Road Twin Towers Office Building Tallahassee, Florida 32301

Dear Mr. Reynolds:

Re: IMC Lonesome Dryer Application

Based on recent discussion, I am enclosing the waiver request until March 15, 1988 as you requested.

Thank you for you attention in this matter. If you have further requirements, please contact me.

Very truly yours,

C. D. Turley

v1h

Enclosure

cc: R. S. Hearon

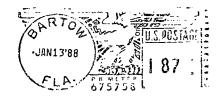
IMC FERTILIZER, INC.

C. D. TURLEY

INTERNATIONAL MINERALS & CHEMICAL CORPORATION IMC Fertilizer Group • Minerals Division P.O. Box 867 • Bartow, Florida 33830







DER JAN 15 BAQM

MR. JOHN REYNOLDS
BUREAU OF AIR QUALITY MANAGEMENT
DEPT. OF ENVIRON. REG.
2600 BLAIR STONE ROAD
TWIN TOWERS OFFICE BLDG.
TALLAHASSEE, FL 32301

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610 :



BOB GRAHAM

VICTORIA J. TECHINKEL SECRETARY

WILLIAM K. HENNESSEY DISTRICT MANAGER

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) AND 403.0876, FLORIDA STATUTES

License (Permit, Certification	A029-111119 on) Application No. A029-111120				
Applicant's Name: IMC Ferti	lizer, Inc.				
The undersigned has read Sections 120.6 understands the applicant's rights under	60(2) and 403.0876, Florida Statutés, and fully rethat section.				
applicant hereby with full knowledge a under Sections 120.60(2) and 403.0876, tions 120.60(2) and 403.0876, Florida Senied by the State of Florida Departmentime period prescribed in Sections 120 waiver is made freely and voluntarily by	cense (permit, certification) application, the and understanding of (his) (her) (its) rights Florida Statutes, waives the right under Sec-Statutes, to have the application approved or it of Environmental Regulation within the 90 day 0.60(2) and 403.0876, Florida Statutes. Said y the applicant, is in (his) (her) (its) self-coercion by anyone employed by the State of clation.				
This waiver shall expire on the 15th d	lay of March 1988.				
The undersigned is authorized to make th	is waiver on behalf of the applicant.				
	1,160				
	Signature Vice Prog. 6 Con. Mar.				
Sword to and subscribed	Vice Pres. & Gen. Mgr. W. C. Cross - Florida Minerals Operations Please Type Name of Signes.				
peforé me this 12th day	1/12/88				

Date

mMy Commission Expires Feb. 13, 1991 DER FORM 17-1.201(8)

Notary Public, State of Florida at Large

Effective November 30, 1982

Page 1 of 2

When an application for a license is made as required by law, the agency shall conduct the proceedings required with reasonable dispatch and with due regard to the rights and privileges of all affected parties or aggrieved persons. Within 30 days after receipt of an application for a license, the agency shall examine the application, notify the applicant of any apparent errors or omissions, and request any additional information the agency is permitted by law to require. Failure to correct an error or omission or to supply additional information shall not be grounds for denial of the license unless the agency timely notified the applicant within this 30 day period. The agency shall notify the applicant if the activity for which he seeks a license is exempt from the licensing requirement and return any tendered application fee within 30 days after receipt of the original application or within 10 days after receipt of the timely requested additional information or correction of errors or omissions. Every application for license shall be approved or denied within 90 days after receipt of the original application or receipt of the timely requested additional information or correction of errors or omissions unless a shorter period of time for agency action is provided by law. The 90-day or shorter time period shall be tolled by the initiation of a proceeding under Section 120.57 and shall resume 10-days after the recommended order is submitted to the agency and the parties. Any application for a license not approved or denied within the 90-day period or shorter time period, within 15 days after conclusion of a public hearing held on the application, for within 45 days after the recommended order is submitted to the agency and the parties, whichever is latest, shall be deemed approved and, subject to the satisfactory completion of an examination, if required as prerequisite to licensure, the license shall be issued. The Public Service Commission, when dissuing a license, and any other agency if specifically exempted by law, shall be exempt from the time limitations within this subsection. The Each agency, supon dissuing or denying a dicense, shall state with particularity the grounds or basis for the issuance or denial of same, sexcept where issuance is a ministerial act and Onedenial ofta license application on which there has been no hearing, the denying (agency shall informathe applicant of any right to a hearing pursuant to Section 120.57.

Section 403.0876, Florida Statutes

Permits; processing. ---Within 30 days after receipt of an application for a permit under this chapter, the department shall review the application and shall request submittal of all additional information the department is permitted by law to require. If the applicant believes any departmental request for additional information is not authorized by law or departmental rule, the applicant may request a hearing pursuant to s. 120.57. Within 30 days after receipt of such additional information, the department shall review it and may request only that information needed to clarify such additional information or to answer new questions raised by or directly related to such additional information. If the applicant believes the request of the department for such additional information is not authorized by law or departmental rule, the department, at the aplicant's request, shall proceed to process the permit application; the last item of timely requested additional material, or the applicant's written request to begin processing the permit application.



DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: File

FROM: Maggie James

SUBJECT: THE Warmer Dated 1.12.88

DATE: JOHNSY 20, 1988/12: 80 pm

John Regraldo, Bill Thomas and I discussed the application numbers on the "request for a wainer" for INC's honesome Dryur applications - AC 29-141149 and 141150, PSD-FL-125. The wainer indicates that the request is for operating permits and not construction purinto, and no where in the come letter was their a represent to the correct application numbers. Juliefon, Biel Thomas Gaire John Reynaldis the option to call anotherquest or colrected want or to write The and Correct their ever. of it was also stated that the company could viguest a waiver for longer than 90 days.

CM; P 387 961 073

PM

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IMÇ FERTIL ZER GROUP • MINERALS DIVISION P.O. Bdx 867, • Bartow, Florida 33830 Telephone: (813) 533-1121 DER Bouton, FL

CERTIFIED COPY
RETURN RECEIPT REQUESTED

JAN 22

BAQM



IMC FERTILIZER, INC.

INTERNATIONAL MINERALS & CHEMICAL CORPORATION

January 20, 1988

Mr. John Reynolds Bureau of Air Quality Management Department of Environmental Regulation 2600 Blair Stone Road Twin Towers Office Building Tallahassee, Florida 32301

Dear Mr. Reynolds:

RE: IMC Lonesome Dryer Application

Based on recent discussion, I am enclosing the waiver request until May 2, 1988 as you requested.

Thank you for your attention in this matter. If you have further requirements, please contact me.

Very truly yours,

C. D. Turley

vlh

Enclosure

cc: R. S. Hearon

COPIED. John Rynauss } 1.25.88 km

LMC FERTILIZER, ING.

C. D. TURLEY

INTERNATIONAL MINERALS & CHEMICAL CORPORATION IMC Fertilizer Group • Minerals Division P.O. Box 867 • Bartow, Florida 33830



1.25.88



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CERMPIED

P 387 961 073

MAIL



MR. JOHN REYNOLDS
BUR. OF AIR QUALITY MGMT.
DEPT. OF ENVIR. REG.
2600 BLAIR STONE ROAD
TWIN TOWERS OFFICE BLDG.
TALLAHASSEE, FL 32301

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT 7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610



BOB GRAHAM GOVERNOR

VICTORIA J. TECHINKEL BECRETARY

WILLIAM K. HENNESSEY DISTRICT MANAGER

DER

JAN 22

BAQM

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) AND 403.0876, FLORIDA STATUTES

License (Permit, Certification)	AC29-141149 (No. 1) Application No. AC29-141150 (No. 2)
Applicant's Name: IMC Fertilize	er, Inc.
The undersigned has read Sections 120.60(2) understands the applicant's rights under the	
With regard to the above reference license applicant hereby with full knowledge and under Sections 120.60(2) and 403.0876, Florida State of Vlorida Department of time period prescribed in Sections 120.60(waiver is made freely and voluntarily by the interest, and without any pressure or coefflorida Department of Environmental Regulati	inderstanding of (his) (her) (its) rights ida Statutes, waives the right under Sectors, to have the application approved or Environmental Regulation within the 90 day 2) and 403.0876, Florida Statutes. Said applicant, is in (his) (her) (its) self-ccion by anyone employed by the State of
This waiver shall expire on the 2nd day o	f May 19 88.
The undersigned is authorized to make this w	
	WCC-55 Signatura
	Vice Pres. & Gen. Mgr. W. C. Cross - Florida Minerals Operations
Sworn to and subscribed	Please Type Name of Signe's
before me this 20th day of January 1988	1/20/88
Die Care State Sta	Date
Barbaia a. Brown	en e
Notary Public, State of Florida Linge	

DER Form 17-1.201(8)
Effective November 30, 1982

Page 1 of 2

When an application for a license is made as required by law, the agency shall conduct the proceedings required with reasonable dispatch and with due regard to the rights and privileges of all affected parties or aggrioved persons. Within 30 days after receipt of an application for a license, the agency shall examine the application, notify the applicant of any apparent errors or omissions, and request any additional information the agency is permitted by law to require. Failure to correct an error or omission or to supply additional information shall not be grounds for denial of the license unless the agency timely notified the applicant within this 30 day period. The agency shall notify the applicant if the activity for which he seeks a license is exempt from the licensing requirement and return any tendered application fee within 30 days after receipt of the original application or within 10 days after receipt of the timely requested additional information or correction of errors or omissions. Every application for license shall be approved or denied within 90 days after receipt of the original application or receipt of the timely requested additional information or correction of errors or omissions unless a shorter period of time for agency action is provided by law. The 90-day or shorter time period shall be tolled by the initiation of a proceeding under Section 120.57 and shall resume 10-days after the recommended order is submitted to the agency and the parties. Any application for a license not approved or denied within the 90-day period or shorter time period, within 15 days after conclusion of a public hearing held on the application, or within 45 days after the recommended order is submitted to the agency and the parties, whichever is latest, shall be desmed approved and, subject to the satisfactory completion of an examination, if required as a comequisite to licensure, the license shall be issued. The Public Service Commission, when aissuing a license, and any other agency, if specificelly exempted by law, shall be exempt from the time limitations within this subsection. of Each agency, supon dissuing or denying a dicense, shall state with particularity the grounds or basis for the issuance or odenial of same, except where issuance is a ministerial act : (2) On (denial of (a license application on (which there has been no hearing, the denying (agency shall informathe applicant of any right to a hearing pursuant to Section 120.57.

Section 403.0876, Florida Statutes

Permits; processing. ---Within 30 days after receipt of an application for a permit under this chapter, the department shall review the application and shall request submittal of all additional information the department is permitted by law to require. If the applicant believes any departmental request for additional information is not authorized by law or departmental rule, the applicant may request a hearing pursuant to s. 120.57. Within 30 days after receipt of such additional information, the department shall review it and may request only that information needed to clarify such additional information or to answer new questions raised by or directly related to such additional information. If the applicant believes the request of the department for such additional information is not authorized by law or departmental rule, the department, at the aplicant's request, shall proceed to process the permit application? Permits shall be approved or denied within 90 days after receipt of the original application? The last item of timely requested additional material, or the applicant's written request to begin processing the permit application.

Daily Cash Listing # 14

Date Received 10-27-87	Dep # 2078					
Bureau of Accounting & Budgetin	Date Bureau of Air Quality Received				ved	
Lister's Signature Lil Swee	eney	Signature of Receiver M. V. Jours				
						
REMITTED BY	CHECK NUMBER	THUOMA	RECEIPT NUMB	ER REVENU	E CODE	FILE NUMBER
International Minerals & Chemical Corporation	# 204285	\$ 500.00	76189	001031		AC29-141149 AC 29-141150
DEP	STATE OF FLOR		N IO F	76189		
•	PPLICATION FEES AND					
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Received from IMC Address P. O. Box 867, P.	partow, FL 33	3830	Dollars \$ 500.0	0		
Applicant Name & Address W.C.C.	055, V.P., Gan. M	gr. Aldres	5 5ame 25 2	bove.		·
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Total this Page		\$500.00				

IMC FERTILIZER GROUP • MINERALS DIVISION P.O. Box 867 • Bartow, Florida 33830 Telephone: (813) 533-1121





LMC FERTILIZER, INC.

INTERNATIONAL MINERALS & CHEMICAL CORPORATION

September 30, 1987

Mr. Winston A. Smith
US Environmental Protection Agency
345 Courtland Street
Atlanta, Georgia 30365

Dear Mr. Smith:

Re: IMC Fertilizer, Inc., Lonesome Dryers, Nos. 1 and 2 USEPA Permit PSD-FL-088 FDER Permits AC29-49694 and AC29-49692

This is a request to modify the PSD application for the fuel conversion of the two Lonesome Dryers done by Brewster Phosphates in November 1981 in order to change the resulting construction permit conditions. The changes are based primarily on corrections to the original submittals and redefinition of operating condition specifications to be consistent with normal operating procedures. Based on the changes to the original construction permits, a subsequent request will be made to modify the current operating permits, AO29-111119 and AO29-111120. The same request is being made to the Environmental Protection Agency, Region IV, at this time.

The attached document presents the review of the application and the corrections and changes to it. It was done in a manner consistent with an approach that would have been appropriate at the time of the application and then presents more recent information. It also presents a different manner in which some of the permit conditions are specified in order to be more consistent with the normal operating procedures used for this type of equipment.

This is also a request to waive or at least delay the VOC testing requirement for these dryers which you had requested on your letters of February 2, 1987 and June 16, 1987. We have attempted to conduct this test 3 times, April 3, June 10, and August 28, for No 1 Dryer and 1 time, June 10, for No 2 Dryer when it was operated for testing purposes. The first three attempts were procedurally incorrect. The final attempt was procedurally correct but failed because of equipment problems due to the procedure. The final No 1 Dryer test was done with a heated line as required by Method 25A. The analyzer performance was affected by the high stack moisture, >30%, within 10 minutes of exposure to the stack gases.

The VOC compliance concentration occurs at 2-3 ppm as propane in the dry stack gas. This is below the amount that can be detected by manual Method 25. In the attached submittal to review the permit application, a revision to Method 25A is proposed in order to measure the VOC emission addressed in the original application. The permit is non-specific as to the type of VOC to be measured and whether or not the ambient component is to be included. The results from the attempted tests that have been submitted are this measurement without the ambient correction.

Our current schedule requires operation of the No 1 Dryer once every two to three weeks. The No 2 unit is not operated at the current time. It was operated only for testing. We would request that the measurement requirement for the VOC measurement be waived based on the previously submitted results. If this is not possible, we then request that the VOC test of the No 2 Dryer be delayed until such time that it is again necessary to operate it. For No 1 Dryer, we would at least delay it until the issues discussed in the request to change the application are resolved.

If you require any additional information to complete the review of this request, please contact me so that it can be submitted to you. Thank you for your attention in this matter.

Very truly yours,

W. C. Cross

Vice President & General Manager Florida Minerals Operations

cc: VW. A. Thomas - FDER, Tallahassee

M. Brandon - EPA, Air Programs Branch (w/attachments)

Jeff Pallas - EPA, Enforcement

(w/o attachments)
(w/attachments)

(w/o attachments)

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STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ GOVERNOR DALE TWACHTMANN SECRETARY

October 6, 1987

Mr. W. C. Cross Vice President and General Manager Florida Minerals Operations IMC Fertilizer, Inc. Post Office Box 867 Bartow, Florida 33830

Dear Mr. Cross:

We are in receipt of your packet dated September 30, 1987, in which you request to modify PSD-FL-088. Before we can begin the reviewing process, we must have in quadruplicate a completed permit application with the appropriate fee. For your convenience we are enclosing two permit applications and a copy of Rule 17-4.05, Florida Administrative Code, which contains the fee schedule.

If you have any questions, please call me at (904)488-1344 or write to me at the above address.

Sincerely

William A. Thomas, P.E. Environmental Administrator Bureau of Air Quality

Management

WAT/MJ/s

cc: enclosures

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ GOVERNOR DALE TWACHTMANN SECRETARY

October 29, 1987

Mr. Wayne Aronson Chief Program Support Section U.S. EPA, Region IV 345 Courtland Street, N.E. Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: International Minerals & Chemical Corporation/
IMC Fertilizer, Inc.
Modification to a Major Source
State Construction Permit Numbers: AC 29-141149 and
AC 29-141150
New PSD Number: PSD-FL-125
Past PSD Number: PSD-FL-088 - (Brewster Phosphates)

Enclosed for your review and comment is the modification packet for the above referenced company. EPA issued the original federal PSD construction permit for this source. If you have any comments or questions, please contact John Reynolds or Tom Rogers by November 24, 1987, at the above address or at (904)488-1344.

Sincerely,

M.V. Janes

Margaret V. Janes
Bureau of Air Quality
Management

/mj

cc: John Reynolds
 Tom Rogers
 Miguel Flores, NPS
 Bill Thomas, Southwest Dist.
 Jerry Campbell, EPCHC

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

DEC - 3 1987

345 COURTLAND STREET ATLANTA, GEORGIA 30365

4APT/APB-aes

Mr. Clair H. Fancy, P.E. Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER

DEC 7 1987

BAQM

Re: IMC Fertilizer, Inc., Proposed Permit Modification To PSD Permit, PSD-FL-088

Dear Mr. Fancy:

This is to acknowledge receipt of your October 29, 1987, transmittal of the above referenced request from International Minerals and Chemical Corporation. By letter dated September 30, 1987, this application was also submitted to this Regional office for review by IMC. We have reviewed the proposal and have the following comments.

The original PSD analysis for sulfur dioxide assumed a BACT level of 1.1 lb/mm BTU for the proposed dryer and was accepted by Brewster Phosphates (now IMC). This emission rate allows for emissions of 195 lb/hr of sulfur dioxide emissions and correlates with the emissions of sulfur dioxide at an absorption efficiency of approximately 45% for a 1.5% wt. sulfur coal/oil fuel being fired in the dryer processing pebble rock (i.e., worst case). The applicant (IMC) now proposes to use a 2.2% wt. fuel sulfur content which will increase emissions by approximately 819 tons per year. This results in a request for a BACT redetermination resulting in an emissions rate of 429 lb/hr or 2.42 lb/mm BTU (worst case). EPA would not concur with this emissions rate as BACT without an adequate BACT analysis. As you may be aware, EPA will be requiring that each PSD determination consider a "top-down" approach in evaluating BACT for each source. To explain briefly, this approach begins with establishing the most stringent available control as the first control alternative. If this control can be proven to be either technically or economically infeasible, the next most stringent level of control is determined and similarly evaluated until a BACT control level is found to be acceptable. We suggest that IMC consider a "top-down" BACT approach for establishing an appropriate emission limit.

In reference to the proposed nitrogen oxides emissions increase, IMC provided an emissions increase request for the Florida permit, but not for the EPA permit. Despite the apparent inconsistency, the proposed increase will be significant and require a BACT analysis. However, EPA Region IV is amenable to the deletion of the parts per million (ppm) requirements due to the nature of the operation requiring variable amounts of air for drying purposes and the dilutions which may result.



Please submit copies of the PSD preliminary determination for PSD-FL-125 (new PSD) when it is issued.

Sincerely,

Buck P. miller

Bruce P. Miller, Chief Air Programs Branch Air, Pesticides, and Toxics Management Division

cc: W. C. Cross
Vice President and General Manager
Florida Minerals Operation
IMC Fertilizer Group
P.O. Box 867
Barton, Florida 33830

Copied. CHFIBT 212/17/87/000

PM 16 DIC 1987 Deruw, Co



United States Department of the Interior FISH AND WILDLIFE SERVICE

IN REPLY REFER TO: RW AIR QUALITY MAIL STOP 60130 MAILING ADDRESS: Post Office Box 25486 Denver Federal Center Denver, Colorado 80225 STREET LOCATION: 134 Union Blvd. Lakewood, Colorado 80228

DEC 16 1987

Ms. Margaret V. Janes Bureau of Air Quality Management Florida Department of Environmental Regulation Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Dear Ms. Janes:

We appreciate the opportunity to review and comment on the proposed revisions to the Prevention of Significant Deterioration Permits for the IMC Fertilizer, Inc., (formerly Brewster Phosphates) Lonesome Dryers, Nos. 1 and 2. The IMC Fertilizer facility is located near Fort Lonesome, Florida, in Hillsborough County approximately 100 kilometers southeast of Chassahowitzka National Wildlife Refuge, a class I air quality area administered by the U.S. Fish and Wildlife Service.

In 1982, Brewster Phosphates was granted a permit to convert the dryer fuel from No. 6 oil to No. 6 oil, a coal-oil mixture, or coal. The present submittal corrects or changes several items of the original application and proposes changes to the permit on several bases: (1) improper calculations, (2) improper method of estimating existing emissions, (3) corrected operating parameters, (4) change in operating condition specifications, and (5) simplification of emission limitations. Based on these revisions, the maximum increase in permitted nitrogen oxides emissions would be 162.2 tons per year. Considering this relatively small emissions increase, and the facility's distance from the class I area (approximately 100 km), we do not expect the emissions that may result from the proposed permit revisions to cause any adverse impacts to the air quality or air quality related values (flora and fauna) of Chassahowitzka National Wildlife Refuge.

If you have any questions regarding this matter, please contact Wayne King at (303) 969-2072.

Copied: CHF/BT J. Ryraldo 312.22.87

Sincerely

Assistant Regional Director Refuges and/Wildlife

DEC 21 1987

UNITED STATES DEPARTMENT OF THE INTERIOR

FISH AND WILDLIFE SERVICE

POST OFFICE BOX 25486 DENVER FEDERAL CENTER DENVER, COLORADO 80225

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