



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

PROJECT 124-97-03

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BUREAU OF
AIR REGULATION

FAX TRANSMITTAL FORM

TO: John Reynolds and
Al Linder
FED - Tallahassee

FAX NO. _____
FROM: Radeep Raval
DATE: 8/13/98 SENT BY: R

The text being transmitted consists of 3 page(s) PLUS this one. If you do not receive all of the pages or if there are difficulties with this transmission, please call (352) 377-5822.

REMARKS: Updated Attachment 2 for
letter sent on August 11th.
Thank you for looking at this at
your earliest convenience. We are
anxious to resolve the issues. Regards,
R

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KA 124-97-03

August 13, 1998

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

Subject: IMC-Agrico Company (New Wales)
Multifos Plant Production Increase
DEF File No. 1050059-024-AC, PSD-FL-244

Dear Mr. Reynolds:

We hope you have received our letter dated August 11, 1998,
regarding the above project.

Please replace Attachment 2 in that letter with the updated
version enclosed herein.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOUGLER & ASSOCIATES

John B. Kogler, Ph.D., P.E.

par
encl.

c: A. Linero, FDEP
C. Dave Turley, IMC-Agrico

ATTACHMENT 2

MODIFICATION DETERMINATION

As explained to FDEP, the two existing kilns will not be modified or debottlenecked. The existing mixed feed operation is capable of supplying much more material than the existing kilns can process. This surge capacity, accommodated by the storage area, is necessary to allow equipment maintenance and repair in the mixed feed operation, unlike the kilns which operate continuously. There is a definite process disconnect at storage as the material sits for a couple of days to dry. There are separate conveyors and hoppers for each kiln and these supply the kilns continuously with material from storage, for independent kiln operation. Currently, the kilns themselves are the production bottleneck. It should be noted that because the two existing kilns are not being modified, the current bottleneck will remain.

The proposed pugmill will also be operated intermittently, capable of material supply to storage well beyond the kiln capacities. This aspect of the operation will allow for the same maintenance and repair requirements. The existing kilns are not being modified and will be operated no differently as a result of the proposed project. IMC-Agrico is not opposed to recordkeeping of the material processing rates in order to document this fact. Therefore, the existing kilns are not part of the proposed modification.

This assessment is supported by guidance in mid-1980s from Wayne Aronson of EPA to Clair Fancy, Bill Thomas and Pradeep Raval, of FDEP, to exclude independent process units from modification considerations when the associated units have existing federally enforceable operation caps. While the guidance was not in the form of a letter or memorandum, this approach is logical, practical and allows for a common sense approach to PSD applicability determinations of site modifications. We are not aware of any change in EPA position on this issue.

For example, adding molten sulfur storage tanks for increased surge capacity to an existing sulfuric acid plant would not trigger PSD for the sulfuric acid plant as it would be capable of independent operation and have existing federally enforceable operation caps.

Also, in the case of a power plant with four existing coal fired units producing 1000 MW which adds an additional unit to increase site capacity to 1250 MW, the modification would address the additional unit and the

changes to the existing coal handling operation, not all five units at the site. This is because the existing four units would be capable of independent operation and have existing federally enforceable operation caps.

One of the issues to be clarified is that kiln C is being permitted to operate at higher rates than the existing kilns. It should be noted that while the physical dimensions of kiln C will be similar, if not identical, to the existing kilns, there will be differences in the burner and also in the fan capacity. It is anticipated that the new kiln C burner will be more efficient, providing more uniform heat transfer, than the existing kiln burners. Also, a bigger fan on kiln C is expected to allow the processing of more material than the existing kilns.

A maximum hourly feed rate of 25 tph was stated in the application based on FDEP's requirement for a rate that could not conceivably be exceeded. The actual maximum rate of the new kiln configuration is expected to be lower. The annual average feed rate, influenced by normal kiln operating rate (as opposed to an absolute maximum) and kiln down-time (for maintenance and repairs), is expected to be around 17 tph, as discussed with FDEP.

It should be noted that the existing kilns are not being modified and, therefore, their operation capacity remains unchanged.