

April 18, 1997

CERTIFIED MAIL REQUESTING - RETURN RECEIPT REQUESTED

Mr. P.A. Steadham
Chief - Environmental Services
IMC Agrico Company
Post Office Box 2000
Mulberry, Florida 33860-1100

Re: Modification of Permit No. AC53-228026 (PSD-FL-201)
AIRS I.D. No. 1050059-017-AC
No. 3 Phosphoric Acid Plant

Dear Mr. Sreadham:

The Department received IMC Agrico's April 4 letter requesting a modification of the above referenced permit. The permit is hereby modified as shown below:

FROM: Specific Condition 4.

Visible emissions from the No. 3 Phosphoric Acid Plant stack shall not exceed 10 percent opacity.

TO: Specific Condition 4.

(Deleted)

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/aal/hh

Mr. P.A. Steadham
April 18, 1997
Page 2

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this MODIFICATION was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the person(s) listed:

Mr. P.A. Steadham, IMC Agrico Company *
Mr. Brian Beals, EPA
Mr. Roy Harwood, Polk County
Mr. Bill Thomas, SWD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52(7), Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

(Clerk)

(Date)



Certified Mail
Return Receipt Requested

April 4, 1997

Maxing
↓
John Reynolds
Issued this amendment
~ 4/25/97

Mr. Alvaro A. Linero
Florida Department of
Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

105 0059-017-AC

**RE: Phosphoric Acid Train No. 3 w/Scrubber
Permit Nos. AO53-192132A and AC53-228026
AIRS ID No. 1050059
Unit ID No. 039
New Wales Plant**

Dear Mr. Linero:

The operating and construction permits for this plant contain a Visible Emission limitation, which was included in the PSD permit review of the construction permit. There are no corresponding applicable limitations in the Federal NSPS regulations or in the other permits for Phosphoric Acid East and West Plants, Unit ID Nos. 008 and 017. This is a request to remove this limitation, Specific Condition No. 4, from the Construction Permit AC53-228026. A check in the amount of \$250 is included for the required processing fee.

Thank you for your attention in this matter. If you need additional information, please contact C. D. Turley at 941-428-7153.

Sincerely,

F. A. Steadham
Chief Environmental
Services - Concentrates

Enclosure
cwk
pas97

RECEIVED

APR 08 1997

BUREAU OF
AIR REGULATION



Date: 1/29/97 8:02:43 AM
From: Alvaro Linero TAL
Subject: VE emissions from Phos-acid Plant at IMC, New Wales
To: Roger Cawkwell TPA
CC: Gerald Kissel TPA

The engineer (John Reynolds) who most recently reviewed applications to permit these units stated that he does not object to removal of VE emissions limits from phosphoric acid plants. This is because he does not consider particulate matter to be a problem from such units.

He said that it could be argued that the general standard applies.

Such requests should be handled as construction permit amendments or modifications. The documents you attached are not enough. Therefore they should submit an application including \$250. If they are not in a big rush, maybe you can figure out a way process their Title V application and the VE request concurrently and then public notice both the Title V permit and the deletion of the permit condition simultaneously. They seemed to be requesting that you do it within the context of the Title V review anyway.

Alternatively you can direct them to us and we will handle the VE part after receiving the request in proper form. But that would seem inefficient.

TO: Al Linero
THRU: Jerry Kissel 
FROM: Roger Cawkwell 
DATE: January 22, 1997

SUBJECT: Request for deletion of VE limitations from a PSD construction permit.

IMC-Agrico Company requested to delete the 10 percent opacity standard for the Phosphoric Acid Plant #3 (Point 39) at the New Wales facility through their Title V permit application (see Attachment #1). The current permit (AO53-192132A) limits the facility to 10% opacity as stated in Construction Permit No. AC53-228026/PSD-FL-201 (see Attachment #2). The other Phosphoric Acid Plants at IMC-Agrico's New Wales facility, Plants #1 and #2, do not have any opacity limitations. The PSD/BACT determination will have to be modified before the opacity limitation can be deleted from the Title V permit. Are the enclosed documents enough to request a modification to the BACT/PSD determination from your section, or does IMC-Agrico need to make this request separately?

c:\tvswd\1050059\reqstpsd.ddc

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: NA			
2. Basis for Allowable Opacity:		<input type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Requested Allowable Opacity:			
Normal Conditions:	%	Exceptional Conditions:	%
Maximum Period of Excess Opacity Allowed:			min/hour
4. Method of Compliance:			
5. Visible Emissions Comment (limit to 200 characters):			
The current permit (AO53-192132A) limit should be deleted as no standard applies.			

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:			
2. Basis for Allowable Opacity:		<input type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Requested Allowable Opacity:			
Normal Conditions:	%	Exceptional Conditions:	%
Maximum Period of Excess Opacity Allowed:			min/hour
4. Method of Compliance:			
5. Visible Emissions Comment (limit to 200 characters):			

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC53-228026
PSD-FL-201
Polk County

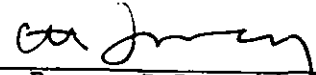
Mr. John A. Brafford
IMC Fertilizer, Inc.
P. O. Box 1035
Mulberry, Florida 33860

Enclosed is Permit Number AC53-228026 (PSD-FL-201) to increase production of the No. 3 Phosphoric Acid Plant at the New Wales Operations facility, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



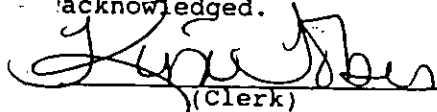
C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 8-4-93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


(Clerk)

8-4-93
(Date)

Copies furnished to:
W. Thomas, SWD
J. Koogler, P.E.
J. Harper, EPA
J. Bunyak, NPS



Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:

IMC Fertilizer, Inc.
P. O. Box 1035
Mulberry, Florida 33860

Permit Number: AC53-228026
PSD-FL-201
Expiration Date: Jan. 1, 1995
County: Polk
Project: Production Increase
Phosphoric Acid
Plant No. 3

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the increase in production from 2,200 to 2,500 tons/day P₂O₅ for the No. 3 Phosphoric Acid Plant with no additional equipment installed. This facility is located in Mulberry, Polk County, Florida. The UTM coordinates are Zone 17, 396.6 km E. and 3079.4 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Operate/Construct Air Pollution Sources, DEP Form 17-202(1), received on March 16, 1993.
2. Letter from EPA dated April 28, 1993.
3. Letter from Koogler & Associates dated June 4, 1993.
4. Letter from USDOJ dated June 28, 1993.

Attachment #3
Page

(CT)

PERMITTEE: IMC Fertilizer, Inc. Permit Number: AC53-228026
Expiration Date: January 1, 1995

GENERAL CONDITIONS:

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The operating capacity of the No. 3 Phosphoric Acid Plant and Clarifier and the associated air pollution control equipment shall be in accordance with the capacities and specifications stated in the application.

2. The production rate of the No. 3 Phosphoric Acid Plant shall not exceed 2,500 tons P₂O₅ per day.

3. The No. 3 Phosphoric Acid Plant may operate up to 8760 hours per year.

4. Visible emissions from the No. 3 Phosphoric Acid Plant stack shall not exceed 10 percent opacity.

5. Fluoride emissions from the No. 3 Phosphoric Acid Plant shall not exceed 43 pounds per day (includes 2 pounds per day allocated to the clarifier).

6. Within 60 days after the production increase is effected, the No. 3 Phosphoric Acid Plant shall be tested for fluoride emissions and visible emissions. Compliance tests shall be in accordance with DEP Method 9 and the test methods and procedures specified in 30 CFR 60.204. The Department's Southwest District office shall be notified in writing at least 15 days prior to the compliance tests. The tests shall be conducted at permitted production capacity or no less than 90 percent thereof. Results of the compliance tests shall be reported to the Department's Southwest District office within 45 days of test completion.

The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

lon
s.

PERMITTEE:
IMC Fertilizer, Inc.
New Wales Operations
P.O. Box 1035
Mulberry, Florida 33860

PERMIT/CERTIFICATION
Permit No: A053-192132
County: Polk
Expiration Date: 04/25/96
Project: Phos Acid Train
No. 3 w/Scrubber

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. For the phosphoric acid train No. 3, IMC Fertilizer, Inc. shall comply with all the requirements of 40 CFR 60, Subpart T - Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants. [AC53-99108].
3. Visible emissions shall not be equal to or greater than 20% opacity. [Rule 17-2.610(2)(a), F.A.C.].
4. Total fluorides emissions shall not exceed 0.019 pound per ton of "equivalent P_2O_5 feed", and shall not exceed 41 pounds per day. [AC53-99108, Rule 17-2.660, F.A.C., and 40 CFR 60 Subpart T].
5. The "equivalent P_2O_5 feed" shall not exceed 2,366 tons per day. [AC53-99108].
6. The product rate shall not exceed 92 tons per hour of acid as P_2O_5 , and shall not exceed 2,200 tons per day of acid as P_2O_5 . [Permit AC53-99108].
7. IMC Fertilizer, Inc. shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rules 17-2.620(2) and 17-2.100, F.A.C.].
8. This source is permitted to operate 8,760 hours per year.
9. Test the emissions for the following pollutants on an annual basis, within 30 days of the date March 19. Submit a copy of the test data to the Air Section of the Southwest District Office of the Department within 45 days of testing. [Rules 17-2.700(2) and 17-2.700(7), F.A.C.].

(X) Fluorides
(X) Opacity

10. Compliance with specific condition #3 shall be demonstrated using EPA Method 9. Compliance with specific condition #4 shall be demonstrated by the test methods and procedures specified in 40 CFR 60.204.