



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

JUL 07 1993

RECEIVED

JUL 14 1993

4APT-AEB

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

Division of Air  
Resources Management

RE: IMC Fertilizer, Incorporated, Mulberry, Polk County, Florida (PSD-FL-201)

Dear Mr. Fancy:

This is to acknowledge receipt of your technical evaluation, preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility by copy of your letter to Mr. John A. Brafford of IMC Fertilizer, Inc. dated May 27, 1993. The major modification proposed consists of an increase in the phosphoric acid (PAD) production rate at one of three existing PAD plants at the above referenced location. The third train PAD production rate will increase to about 105 TPH P<sub>2</sub>O<sub>5</sub> from the current 92 TPH P<sub>2</sub>O<sub>5</sub> rate. As discussed between Mr. Cleve Holladay of your staff and Mr. Stan Kukier of my staff on June 29, 1993, we have reviewed the package as submitted and have no adverse comments.

We agree with your determination of BACT for control of the Mulberry IMC Fertilizer facility's PAD plant fluoride emissions. An existing wet scrubber system consisting of a combination of a 25,000 SCFM crossflow packed bed scrubber using pond water, and a cyclonic demister, will be used to minimize both phosphate rock/sulfuric acid reactor and PAD filter fluoride emissions. The proposed project will not require construction or modification of any PAD plant process equipment. Recent compliance testing has indicated that no increase in allowable fluoride emissions will be required for the 14% increase in production rate.

Thank you for the opportunity to comment on this package. If you have any questions, please contact Mr. Stan Kukier of my staff at (404) 347-5014.

Sincerely yours,

Brian L. Beals, Chief  
Source Evaluation Unit  
Air Enforcement Branch  
Air, Pesticides, and Toxics  
Management Division

cc: J. Reynolds  
C. Holladay  
B. Thomas, SW Dist.  
J. Burmyak, NPS  
J. Novak, Polk Co.  
J. Koogler, P.E.



RECEIVED

JUN 29 1993

Division of Air  
Resources Management

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

June 24, 1993

Mr. C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: No. 3 Phosphoric Acid Plant  
DER File No. AC53-228026, PSD-FL-201

Dear Mr. Fancy:

Enclosed please find a copy of the Affidavit of Publication to increase the production of the above referenced plant.

If you have any questions regarding this information, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Baretincic", with a long horizontal line extending to the right.

J. M. Baretincic  
Director  
Environmental Services

JMB:lmr  
Attachment

C: C. D. Turley  
G. Reynolds  
(#6) C. Holladay  
B. Thomas, saw Dist

G. Harple, EPA  
G. Beanyak, NPS  
J. Novak, Polk Co.

# AFFIDAVIT OF PUBLICATION

## THE LEDGER

Lakeland, Polk County, Florida

Case No. ....

STATE OF FLORIDA)  
COUNTY OF POLK )

Before the undersigned authority personally appeared Tharon Honeycutt, who on oath says that he is Controller of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Notice of intent to issue permit .....

in the matter of .....

No. 3 Phosphoric Acid Plant .....

in the .....

Court, was published in said newspaper in the issues of .....

June 10; .....

1993 .....

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to IMC Fertilizer, Inc., State Road 640 and County Line Road, PO Box 1035, Mulberry, Florida 33860, to increase the production of the No. 3 Phosphoric Acid Plant at their facility in Polk County. A determination of Best Available Control Technology (BACT) was required. The proposed project is subject to Prevention of Significant Deterioration regulations (PSD). Modeling is not required since there will be no increase in allowable emissions. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel of the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
Magnolia Park Courtyard  
111 South Magnolia Drive  
Tallahassee, Florida

Department of Environmental Regulation  
Southwest District office  
4520 Oak Fair Blvd.  
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Furthermore, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.  
D-373 - 6-10: 1993

IDENTIFICATION:

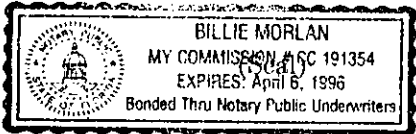
Signed Tharon Honeycutt Controller

Personal Knowledge  Passport  
 Driver's License  Military

ID# .....

Sworn to and subscribed before me this 10th

day of June A.D. 19 1993



Billie Morlan  
Notary Public

BILLIE MORLAN



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
75 Spring Street, S.W.  
Atlanta, Georgia  
30303

June 28, 1993

Mr. C. H. Fancy  
Chief, Bureau of Air Regulation  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
JUL 01 1993  
Division of Air  
Resources Management

Dear Mr. Fancy:

We have completed our review of the IMC Fertilizer, Inc., permit application for the proposed project to increase the production of the No. 3 Phosphoric Acid Plant at their facility near Mulberry, Polk County, Florida. The facility is located approximately 104 km southeast of the Chassahowitzka Wilderness Area (WA), a Class I air quality area, administered by the Fish and Wildlife Service.

The project, as originally proposed by IMC, would have resulted in a significant increase in allowable fluoride emissions over present actual emissions. However, you concluded in your Technical Evaluation and Preliminary Determination document that since present fluoride emissions were significantly below the present permit limits, no increase in allowable fluoride emissions will be required for the proposed 14 percent increase in production. We agree with this determination. Because the actual increase in fluoride emissions will be minimal, we do not anticipate that resources in the Chassahowitzka WA would be adversely impacted by the proposed project.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our refuges.

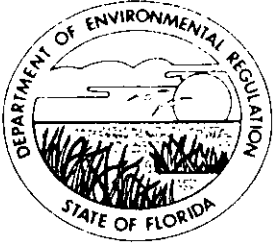
If you have any questions regarding this matter, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at 303/969-2071.

Sincerely yours,



James W. Pulliam, Jr.  
Regional Director

cc: J. Reynolds  
C. Halladay  
B. Thomas SW Dist.  
G. Harper, EPA  
J. Novak, Park Co.  
G. Koozler, R&A



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

June 1, 1993

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John A. Brafford  
Vice President and General Manager  
IMC Fertilizer, Inc.  
P. O. Box 1035  
Mulberry, Florida 33860

Dear Mr. Brafford:

Enclosed is Page 6 of 6 of the draft permit for the production rate increase at your No. 3 Phosphoric Acid Plant. This page was inadvertently omitted from the Intent to Issue package mailed to you on May 28, 1993.

We apologize for any inconvenience this may have caused. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/pa

Enclosure

cc: W. Thomas, SW Dist.  
J. Koogler, P.E.  
J. Harper, EPA  
J. Bunyak, NPS  
L. Novak, Polk County

P 230 524 361



### Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, June 1991

Sent	John A. Bradford	
Sender's Name	I-M-C Fert.	
City, State, and ZIP Code	Mulberry, FL	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, and Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date	6-1-93	
	Pg. 6 of 6 - P50-FT-201	
	AC53-228026	

Is your RETURN ADDRESS completed on the reverse

- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 John A Bradford, VP  
 I-M-C Fertilizer, Inc  
 PO BOX 1035  
 Mulberry, FL 33860

4a. Article Number  
 P 230 524 361

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 6-4-93

5. Signature (Addressee)

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

6. Signature (Agent)  
 M J Hano

Thank you for using Return Receipt Service.

PERMITTEE:  
IMC Fertilizer, Inc.

Permit Number: AC 53-228026  
PSD-FL-201  
Expiration Date: January 1, 1994

**SPECIFIC CONDITIONS:**

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 DER Method 9 and the test methods and procedures specified in 40 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.

7. 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).

8. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1993

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Virginia B. Wetherell, Secretary  
Department of Environmental  
Regulation



MESSAGE CONFIRMATION

JUN-01-'93 TUE 10:58

TERM ID: DIV OF AIR RES MGMT F-9999

TEL NO: 904-932-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
124	06-01	10:56	00:01:54	904 377 7158		03	00



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

## FAX TRANSMITTAL SHEET

TO: John Koogler

DATE: 6-1-93 PHONE: FAX 377-7154

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Patty Adams

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: I don't know IMC's FAX number.  
They will probably receive this package today.  
Can you FAX them this - or let me know the  
number & I'll do it - Thanks - and sorry  
for the mistake -

PHONE: 904/484-1344

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.



KOOGLER & ASSOCIATES  
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

KA 124-92-02

June 4, 1993

RECEIVED  
JUN 07 1993  
Division of Air  
Resources Management

Mr. C. H. Fancy  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Comments on Draft FDER Permit  
Phosphoric Acid Third Train  
IMC Fertilizer, Inc.  
Permit No. AC53-228026 and PSD-FL-201

Dear Mr. Fancy:

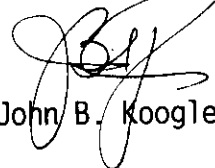
This is in response to FDER's Intent to Issue dated May 27, 1993, for the above project.

It is requested that the proposed permit expiration date be extended from January 1, 1994 to January 1, 1995. It is anticipated that the revised expiration date will allow adequate time for normalizing and debugging of the plant at the higher production rate prior to testing. The draft permit conditions Nos. 6 and 8 reflect a seven-month period associated with testing and procedural matters.

If you have questions, please do not hesitate to give me call.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:PAR:wa

c: D. Turley, IMC  
*G. Reynolds*