



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

May 27, 1993

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Brafford:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for IMC Fertilizer, Inc. to increase production of the No. 3 Phosphoric Acid Plant at the New Wales Operations facility near Mulberry.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

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

CHF/JR/plm

Attachments

c: W. Thomas, SW Dist.
J. Koogler, P.E.

G. Warner, EPA
G. Bernal, NPS
G. Royal, Tall B.

P 230 524 360



Receipt for Certified Mail

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Sent to	John A. Brafford
Sent by	LMC Fert.
Post Office 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	5-28-93
AC 53-22802 6 PSD-FL-201	

PS Form 3800, June 1991

Is your RETURN ADDRESS completed on the reverse side?

SENDER

- Complete items 1, 2, and 3 on the reverse side.
- Complete items 3, and 4a & b.
- 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.

3. Article Addressed to:
 John A. Brafford, VP
 LMC Fertilizer, Inc.
 PO BOX 1035
 Mulberry, FL
 33860

5. Signature (Addressee)
 6. Signature (Agent)
M. J. [Signature]

4a. Article Number
 P 230 524 360

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

7. Date of Delivery
 6-2-93

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

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- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

Thank you for using Return Receipt Service.

RECEIPT

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

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

DER File No. AC 53-228026
PSD-FL-201
Polk County

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, IMC Fertilizer, Inc., applied on March 16, 1993, to the Department of Environmental Regulation for a permit to increase the production of the No. 3 Phosphoric Acid Plant from 2200 to 2500 tons/day P₂O₅ at their facility near Mulberry, Polk County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. 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 in General Counsel at 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

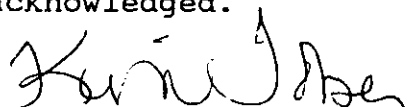


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 5-28-93.

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk
5-28-93
Date

Copies furnished to:

W. Thomas, SW Dist.
J. Koogler, P.E.

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 at 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.

Technical Evaluation
and
Preliminary Determination

IMC Fertilizer, Inc.
Polk County
Mulberry, Florida

No. 3 Phosphoric Acid Plant
Proposed Production Increase

Permit No. AC 53-228026
PSD-FL-201

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

May 27, 1993

I. Application Information

A. Applicant

IMC Fertilizer, Inc.
New Wales Operations
Post Office Box 1035
Mulberry, Florida 33860

B. Project/Location

The applicant proposes to increase the production of their existing No. 3 Phosphoric Acid Plant (SIC 2874) from 2,200 to 2,500 TPD P₂O₅. The application was complete on March 16, 1993. No modifications of equipment are required for the higher production rate. The plant is located in Polk County near Highway 640 and County Line Road. The UTM coordinates of the plant are: Zone 17: 396.7 Km E and 3,079.4 Km N.

II. Emissions

Fluoride emissions from the applicant's No. 3 Phosphoric Acid Plant are controlled by a 25,000 SCFM crossflow scrubber using pond water. Compliance tests consistently show that this plant's fluoride emissions are significantly below the new source performance standard of 0.02 lb F/ton P₂O₅ input. The actual 1991-1992 fluoride emissions have averaged only 0.005 lb F/ton P₂O₅ input. Therefore, in accordance with the top-down BACT Determination for this project, no increase in allowable fluoride emissions will be required for the 14 percent increase in production.

III. Rule Applicability

The applicant's proposed increase in fluoride emissions from the No. 3 Phosphoric Acid Plant would result in a significant increase, therefore the application is subject to preconstruction review in accordance with Chapter 403 of the Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-210 through 297 and 17-4. The federal new source performance standards under 40 CFR Subpart T, Standards of Performance for the Phosphate Fertilizer Industry: Wet Process Phosphoric Acid Plants, would apply except that a top down BACT analysis is required which supersedes the new source standards.

IV. Air Quality Impact Analysis

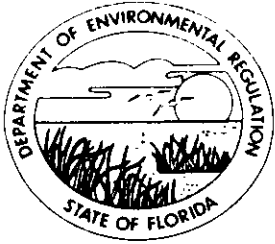
Since there will be no increase in allowable emissions, no air quality impact analysis is required.

V. Conclusion

Based on the information provided by IMC Fertilizer, Inc.,

the Department has reasonable assurance that the proposed production increase, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provisions of Chapter 17-210 through 297 of the Florida Administrative Code.

P. Lester Lewis
41755



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

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, 1994

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 17-2 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, DER Form 17-202(1), received on March 16, 1993.

PERMITTEE:
IMC Fertilizer, Inc.

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

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or

PERMITTEE:
IMC Fertilizer, Inc.

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

GENERAL CONDITIONS:

auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source

PERMITTEE:
IMC Fertilizer, Inc.

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

GENERAL CONDITIONS:

arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for

PERMITTEE:
IMC Fertilizer, Inc.

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

GENERAL CONDITIONS:

this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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).

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

AC53-228026 (PSD-FL-201)

Best Available Control Technology (BACT) Determination
IMC Fertilizer, Inc.
Polk County

The applicant proposes to increase production of wet-process phosphoric acid from 2,200 to 2,500 TPD P_2O_5 at their No. 3 Phosphoric Acid Facility located near Mulberry in Polk County, Florida. The production increase will be accomplished without any equipment modification or installation.

A BACT determination is required for all regulated air pollutants emitted in amounts equal to or greater than the significant emission rates listed in Table 500-2 of Florida Administrative Code (F.A.C.) Rule 17-212.400. Fluoride is the only regulated air pollutant associated with this production increase.

Date of Receipt of a Complete Application: March 16, 1993

BACT Determination Requested by the Applicant

Control Technology: Crossflow scrubber using pond water

Fluoride Emission Limit: 0.02 lb/ton P_2O_5 input = 53.8 lbs/day
(includes clarifier emissions allocated at 2 lbs/day)

BACT Determined by the Department

Control Technology: Crossflow scrubber using pond water

Fluoride Emission Limit: Same as current allowable; $41+2= 43$
lbs /day

Visible Emission Limit: 10% opacity

NOTE: This determination is not to be used for establishing BACT limits for other facilities since this determination is only for the purpose of allowing a production increase.

BACT DETERMINATION PROCEDURE

In accordance with Florida Administrative Code, Chapter 17-212 (Best Available Control Technology Determination Stationary Source-Preconstruction Review) this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available control methods, systems and techniques. In addition, the regulations require that in making the BACT determination the Department shall give consideration to:

BACT-IMC Fertilizer, Inc.
AC53-228026 (PSD-FL-201)
Page Two

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other State.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Determination Rationale

This is the first time that EPA's "top-down" BACT approach has been applied to wet process phosphoric acid plants in Florida. Application of the "top-down" approach requires the most stringent justifiable limit after considering technical and economic factors. Compliance test data indicate that the existing crossflow scrubber using pond water will achieve an emission level well below the current allowable fluoride limit, even at the requested production rate. Therefore, the Department will allow the production increase as proposed but with no increase in allowable fluoride emissions. As stated above, this determination is specific to the subject facility and is not to be used for establishing a BACT limit for any other similar source or facility.

Details of the Analysis May be Obtained by Contacting:

Doug Outlaw, P.E., BACT Coordinator
Department of Environmental Regulation
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BACT-IMC Fertilizer, Inc.
AC53-228026 (PSD-FL-201)
Page Three

Recommended by:

Approved by:

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

Virginia B. Wetherell, Secretary
Dept. of Environmental Regulation

Date 1993

Date 1993