



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 5, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. E. M. Newberg
Vice President and General Manager
IMC-Agrico Company
3095 Highway 640
P.O. Box 2000
Mulberry, Florida 33860

Re: DEP No. 1050059-021-AC (PSD-FL-199)
New Wales AFI Plant

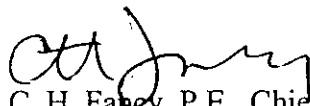
Dear Mr. Newberg:

Enclosed is one copy of the Draft Re-issued Air Construction Permit for the particulate control project at the New Wales Animal Feed Ingredients Plant located at 3095 Highway 640, Mulberry, Polk County. The Department's Intent to Issue Air Construction Permit and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" are also included.

The enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (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.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact John Reynolds or Mr. Linero at 850/488-1344.

Sincerely,


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

CHF/aal

Enclosures

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

In the Matter of an
Application for Permit by:

IMC-Agrico Company
3095 Highway 640
P.O. Box 2000
Mulberry, Florida 33860

DEP File No. 1050059-021-AC
Permit No. AC53-222859 (PSD-FL-199)
New Wales AFI Plant
Polk County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to re-issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the original Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, IMC-Agrico Company, submitted an application on October 6, 1997 to the Department for a re-issued construction permit to construct an air classifier and air pollution control system at its animal feed ingredients plant at the New Wales Fertilizer Facility located at 3095 Highway 640, near Mulberry, Polk County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that a confirmation of the previous review for the Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT) and a re-issued air construction permit are required to perform the described project.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT". The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "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. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax 850/922-6979) within 7 (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 pursuant to Rule 62-103.150 (6), F.A.C.

The Department will issue the FINAL Permit, in accordance with the conditions of the enclosed DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT." Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the Department shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. The procedures for petitioning for a hearing are set forth below. Mediation is not available for this action.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9730, fax: 850/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.


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

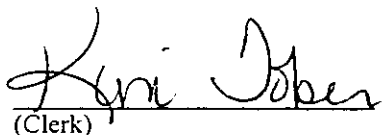
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12-8-97 to the person(s) listed:

Mr. E.M. Newberg, IMCA *
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Bill Thomas, DEP
Mr. Joe King, Polk County

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) 12-8-97
(Date)

10/10/93 10:00 AM
10/10/93 10:00 AM

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 1050059-021-AC (PSD-FL-199)

Animal Feed Ingredients Plant
IMC-Agrico Company- New Wales Facility

Polk County

The Department of Environmental Protection (Department) gives notice of its intent to re-issue an air construction permit to IMC-Agrico Company to construct an air classifier and air pollution control system at an animal feed ingredients plant. The plant is located at the IMC-Agrico New Wales Fertilizer Facility, 3095 Highway 640, near Mulberry, Polk County. A Best Available Control Technology (BACT) determination was conducted for particulate matter pursuant to Rule 62-212.400 and 410, F.A.C., Prevention of Significant Deterioration (PSD). The applicant's name and address are: IMC-Agrico Company, 3095 Highway 640, Mulberry, Florida 33860.

The original Notice for the project was published on April 2, 1993 in The Ledger and a permit was issued on June 9, 1993. The applicant did not execute the project due to unfavorable economic conditions and the original permit expired. Therefore this public notice and a re-issued permit are required to conduct the described work. The Department has determined that the original BACT determination of a fabric filter achieving 0.015 grains per dry standard cubic foot (7.5 pounds per hour of particulate matter) is still applicable to this project. Minimal fluoride emissions are projected because defluorinated phosphoric acid is used as a process input.

An air quality impact analysis was conducted during the original review. The project is predicted to have no significant impact in the vicinity of the facility or on the Chassahowitzka National Wilderness Area PSD Class I area located approximately 100 kilometers northwest of the plant.

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the Department shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The Department will issue FINAL Permit with the conditions of the DRAFT Permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. The procedures for petitioning for a hearing are set forth below. Mediation is not available for this action.

NOTICE OF INTENT
FOR THE PROPOSED ACTION

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9370, fax: 850/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Polk County Public Works
Department - Air Division
4189 Ben Durrance Road
Bartow, Florida 33830
Telephone: 941/534-7377
Fax: 941/534-7374

Dept. of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979

Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the application, Draft Permit, previous technical evaluation and permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-1344, for additional information.

DRAFT

PERMITTEE:

IMC-Agrico Company
Post Office Box 2000
Mulberry, Florida 33860-1100

Authorized Representative:
Mr. P. A. Steadham
Chief - Environmental Services

FID No.	1050059
PSD No.	PSD-FL-199
SIC No.	2874
Project:	New Wales AFI Plant
Permit No.	1050059-021-AC
Expires:	December 31, 1998

PROJECT AND LOCATION:

Reissued air construction and PSD permit for an air classifier with bag collector at the New Wales Animal Feed Ingredients Plant at the IMC-Agrico (New Wales) facility, 3095 Highway 640, Mulberry, Polk County. UTM coordinates are Zone 17; 396.7 km E; 3079.4 km N.

STATEMENT OF BASIS:

This construction permit is reissued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to construct the project in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendices are made a part of this permit:

Appendix GC Construction Permit General Conditions
Appendix SC Emission Unit(s) Specific Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

APPENDIX SC
Specific Conditions

DRAFT

-
1. This permit supersedes permit AC53-222859 (PSD-FL-199), dated June 10, 1993.
 2. The provisions of air construction permit AC53-222859 (PSD-FL-199), dated June 10, 1993 are incorporated into this air construction permit except that the General Permit Conditions are replaced by the attached conditions with updated references to applicable statutes.

APPENDIX GC GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 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.
- G.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.
- G.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.
- G.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 auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.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 and 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.

- G.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.

APPENDIX GC GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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.

- G.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 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.
- G.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.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (X)
 - (b) Determination of Prevention of Significant Deterioration (X);
- G.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 or 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:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.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.
-

Memorandum

Florida Department of
Environmental Protection

TO: Clair Fancy

THRU: Al Linero *a a Linero*

FROM: John Reynolds *cc: for J.R.*

DATE: December 5, 1997

SUBJECT: IMC-Agrico Company - New Wales AFI Plant
1050059-021-AC (PSD-FL-199)

Attached is the Public Notice package for re-issuance of the construction permit for an air pollution control project that IMC-Agrico failed to carry out at its New Wales animal feed ingredients plant. They said that economic conditions were unfavorable for production of animal feed.

The only pollutant that underwent PSD and BACT review was particulate matter, for which a fabric filter achieving 0.015 gr/dscf was required. Annual emissions are 35 - 40 TPY. Since defluorinated acid is used, fluoride emissions are insignificant.

I recommend your approval and signature.

AAL/aal

Attachments

Is your RETURN ADDRESS completed on the reverse side?

SEND TO:

- Complete items 1 and 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address

2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. E. M. Newberg, VP & GM
 EMC-Asico
 P O Box 2000
 Mulberry, FL 33860

4a. Article Number
 P 265 659 263

4b. Service Type

Registered Certified

Express Mail Insured

Return Receipt for Merchandise COD

7. Date of Delivery
 12-10-97

5. Received By: (Print Name)
 [Signature]

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

6. Signature: (Addressee or Agent)
 X

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

Domestic Return Receipt

P 265 659 263

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	EM Newberg
Street & Number	EMC-Asico
Post Office, State, & 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, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	12-8-97
	1050059-021-AC
	PSD-FI-199

PS Form 3800 April 1995

AC53-222589 (PSD-FL-199)

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

The applicant proposes to construct an air classifier with bag collector at their Animal Feed Ingredients Plant located near Mulberry in Polk County, Florida. The project will consist of an air classifier for the sizing of product, a cyclone, a bag collector and associated equipment.

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. Particulate matter (PM/PM₁₀) is the only regulated air pollutant to be emitted from this project.

Date of Receipt of a Complete Application: December 7, 1992

BACT Determination Requested by Applicant

Control Technology: Fabric Filter

Emission Limit: PM/PM₁₀ 0.02 gr/SCF, 9.9 lb/hr

BACT Determined by the Department

Control Technology: Fabric Filter

Emission Limit: PM/PM₁₀ 0.015 gr/SCF, 7.5 lb/hr, 5% opacity

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 methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to 40 CFR 52.21, 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.

BACT-IMC Fertilizer, Inc.
AC53-222589 (PSD-FL-199)

- (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

From the standpoint of equipment selection (bag collector vs. scrubber), the Department agrees that the applicant selected the best control technology available based on permit requirements for similar facilities. However, the applicant's proposed emission limit basis of 0.02 grain per cubic foot is no longer representative of BACT emission limits. Application of the "top-down" approach requires the most stringent justifiable limit after considering technical and economic factors. Sufficient data are available to show that a fabric filter collector can consistently achieve a grain loading of 0.015 or lower in similar applications. Also, the applicant has submitted test data for similar installations at the New Wales facility showing emission levels in the range of 0.01-0.015 grain per cubic foot. One example in particular is the bag collector for the DAP No. 2 plant at New Wales. Therefore, the Department will require 0.015 as the BACT limit along with an opacity limit of 5 percent.

Details of the Analysis May be Obtained by Contacting:

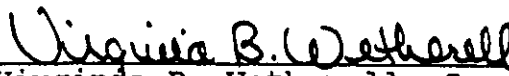
Doug Outlaw P.E., BACT Coordinator
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blairstone Road, Rm 338
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:



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



Virginia B. Wetherell, Secretary
Dept. of Environmental Regulation

MAY 26, 1993

Date

June 9, 1993

Date

Technical Evaluation
and
Preliminary Determination

IMC Fertilizer, Inc.
Mulberry, Polk County, Florida

Air Classifier/Bag Collector
Animal Feed Ingredients Plant
Permit No. AC 53-222859
PSD-FL-199

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

March 1, 1993

I. Application

A. Applicant

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

B. Request

The Department received a complete application on December 7, 1992, for a permit to construct an air classifier system and bag collector for the Animal Feed Ingredients Plant at the applicant's phosphate fertilizer facility in Mulberry, Polk County, Florida.

C. Classification/Location

The applicant's phosphate fertilizer manufacturing facility (SIC Code 2874) is located in Polk County at Highway 640 and County Line Road. UTM coordinates of the site are 396.7 km E and 3079.4 km N.

II. Project Description/Emissions

It is proposed to construct an air classifier system for the Animal Feed Ingredients (AFI) Plant to solve product particle size problems associated with the existing equipment. Pollution control equipment will consist of a new cyclone followed by a bag collector. Other equipment to be installed will include a surge bin with rotary air lock, air classifier with inlet blower, cyclone exhaust fan (58000 CFM), and stack (4.5 ft. dia. x 145 ft.)

Estimated particulate matter emissions (PM and PM₁₀) resulting from this installation are listed below:

<u>Emission Limit Basis</u>	<u>lbs/hr</u>	<u>tons/yr</u>
0.015 gr/SCF	7.5	32.7

Particulate emissions are based on the BACT determination of 99.9% overall efficiency. No fluorides will be emitted since the process uses defluorinated phosphoric acid.

III. Rule Applicability

The proposed installation is subject to review under provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C) Chapter 17-212, 17-296, and 17-4. Since the facility is major for particulate matter and is located in a county designated as an attainment area for particulate matter, the project is subject to the new source review requirements of F.A.C. Rule 17-212 since the emissions increase is over 25 tons per year. Therefore PSD review is required and the emission limit has been established by the BACT determination.

IV. Air Quality Analysis

A. Introduction

The proposed project will result in emissions increases which are projected to be greater than the PSD significant emission rates for two pollutants: PM and PM10. Therefore, the project is subject to the PSD NSR requirements contained in F.A.C. Rule 17-212.400 for these pollutants. Part of these requirements is an air quality impact analysis for these pollutants which includes:

- * An analysis of existing air quality;
- * A PSD increment analysis;
- * An Ambient Air Quality Standards (AAQS) analysis;
- * An analysis of impacts on soils, vegetation, and visibility and of growth-related air quality modeling impacts; and
- * A "Good Engineering Practice" (GEP) stack height determination.

The analysis of existing air quality generally relies on preconstruction monitoring data collected with EPA-approved methods. The PSD increment and AAQS analysis depends on the air quality dispersion modeling carried out in accordance with EPA guidelines.

Based on the required analysis, the Department has reasonable assurance that the proposed IMC project as described in this report and subject to the approval proposed herein, will not cause or contribute to a violation of any ambient air quality standard or PSD increment. A discussion of the modeling methodology and required analysis follows.

B. Analysis of Existing Air Quality

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD review.

An exemption to the monitoring requirement can be obtained if the maximum air quality impact resulting from the predicted emissions increase, as determined by air quality modeling, is less than a pollutant-specific "de minimus" concentration.

The predicted maximum concentration increases for both PM and PM10 is 4.45 ug/m³. These increases are less than the PSD de minimus concentration level for these two pollutants, which is 10 ug/m³, 24-hour average. Therefore, no preconstruction monitoring analysis is required for these pollutants.

C. Modeling Methodology

The EPA-approved Industrial Source Complex Short-Term (ISCST2) dispersion model was used to evaluate the pollutant

emissions from the proposed facility. The model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, area and volume sources. The model incorporates elements for plume rise, transport by the mean wind, Gaussian dispersion, and pollutant removal mechanisms such as deposition. The ISCST2 model allows for the separation of sources, building wake downwash, and various other input and output features. A series of specific model features, recommended by the EPA, are referred to as the regulatory options. The applicant used the EPA recommended regulatory options in each modeling scenario. Downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height. Five years of sequential hourly surface and mixing depth data from the Tampa, Florida National Weather Service (NWS) station collected during 1982 through 1986 were used in the model.

D. Modeling Results

The applicant first evaluated the potential maximum increase in ambient ground-level concentrations associated with the project to determine if these predicted ambient concentration increases would be greater than specified PSD significant impact levels for PM and PM₁₀. Concentrations were predicted at 360 receptors located in a radial grid centered on the proposed stack. Receptors were located in "rings", with 36 receptors per ring spaced at 10-degree intervals at distances of 250, 406, 562, 717, 873, 1029, 1165, 1300, 1365, and 1564m. An additional 17 receptors were located along the property boundaries. The results of this modeling show that the maximum increases in ambient ground-level concentrations for PM and PM₁₀ are 4.45 ug/m³, 24-hour average and 0.32 ug/m³, annual average. These predicted maximum increases are less than the 24-hour average PM and PM₁₀ significant impact level of 5.0 ug/m³ and are less than the annual average PM and PM₁₀ significant impact level of 1.0 ug/m³. Therefore further dispersion modeling for comparison with AAQS and PSD Class II increment consumption was not required.

The Chassahowitzka National Wilderness Area is a PSD Class I area that is located 103 km to the north west of IMC. The maximum impact of this project was evaluated at the Class I point closest to the modeled source. The maximum 24-hour PM and PM₁₀ impact is 0.03 ug/m³ which is less than the National Park (NPS) significant impact level of 0.33 ug/m³. The maximum annual PM and PM₁₀ impact is 0.001 ug/m³ which is less than the NPS significant impact level of 0.08 ug/m³. Therefore, no further dispersion modeling for comparison with Class I increment consumption was required.

E. Additional Impacts Analysis

A Level-1 screening analysis using EPA model VISCREEN was used to determine any potential adverse visibility impacts on the

Class I area located 103 km away. Based on this analysis the maximum predicted visual impacts due to the proposed project are less than the screening criteria both inside and outside the Class I area. No significant impacts on the Class I area from this project are expected.

In addition, the maximum predicted concentrations from PM and PM10 are predicted to be less than the AAQS, including the national secondary standards designed to protect public-welfare related values. As such, no harmful effects on soil and vegetation are expected in the area of the project. Also, the proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

V. Conclusion

Based on the information provided by IMC, the Department has reasonable assurance that the proposed air classifier project, 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 the air pollution rules of the Florida Administrative Code.

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