

## RECEIVED

OCT 3 1 1998

BUREAU OF AIR REGULATION

Certified Mail
Return Receipt Requested

October 28, 1996

Mr. Clair Fancy
Florida Department of
Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: DAP II Plant

Permit No. AC53-118671 AIRS ID No. 1050059 Unit ID No. 45 and 46 New Wales Plant

Dear Mr. Fancy:

This letter is to follow-up on the personal conversation with C. D. Turley on: September 24, 1996 regarding the operating hours for the above-referenced permit.

As you suggested, we have reviewed our files. In addition, our consultant, Koogler & Associates, has reviewed the FDEP permit files in Tallahassee. Nothing was discovered in the review of the construction permits for this plant that indicates that the hours were considered separately. Each Train in the plant is limited to 7920 hrs/yr. These Trains are identical. They were apparently considered individually because of the manner in which permit applications are structured.

Under current conditions, the West Train achieves a higher operating efficiency than the East Train. In this current year, the West Train is likely to be able to exceed the 7920 hour limit. The East Train will not approach the limit even if it could operate 100% of the remaining year. The attached table illustrates this fact.

IMC-Agrico Company requests a change in the hourly operating limit in Specific Condition No. 1 of construction permit No. AC53-118671 from "each plant will not operate over 7920 hours per year" to "the plant, both production trains, will not operate over 15,840 hours per total." This change will not alter the modeled impact of this plant from the construction permit review. A check in the amount of \$50 is included for the modification fee.

Mr. Fancy October 28, 1996 Page 2

As a second issue, the application calculations were based on an operating factor of 95%. We were unable to determine the basis of the final 7920 hour limit which corresponds 90%. Please advise, based on your review of this, as how we should proceed to request this permit correction also.

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

Sincerely,

P. A. Steadham

Chief Environmental Services - Concentrates

Enclosure

cwk pas96



## на российент свуйсая остов выходиль и разыку и вырод од бай и в на выбрасти MC-AGRICO COMPANY

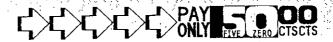
P.O. BOX 2005 MULBERRY, FLORIDA 33860

**OPERATING ACCOUNT** 

The Northern Trust Company
Chicago, II 0710
Payable through
Northern Trust Benk/DuPage
Oak Brook II

CHECK NO. 131467

*****				í
物品等选择I	DATE	199	1	ł
MONTH	DAY	×YF	AR :	1
10	11	96	)	1



FIFTY DOLLARS AND OO CENTS \*\*\*\*\*\*\*\*\*

PAY TO THE ORDER OF

FLORIDA DEPARTMENT OF ENVIRON-MENTAL PROTECTION 2600 BLAIR STONE RD ∵FL 32399 TALLAHASSEE

VOID OVER \$50.00



00013146?# 1:0719238281:000056405#

图 Tatheloriginal document has a reflective watermark on the Back Tothe load at an anguel to view when the cking the endors ement to the control of the second of the seco

NO. 131467 F53568

IMC-AGRICO CO. P.O. BOX 2005 MULBERRY, FL. 33860

NO.	31467	F3330			CO. 1.0.	DOX 2003	WULDERNI, FL.	20000	ALL STREET
	OICE DA	TE VEAR	INVOICE NUM	ивеr RE	FERENCE UMBER	PURCHASE ORDER NO.	INVOICE/AMOUNT	DISCOUNT	NET PAYABLE
10	09	96	CK REG1009		7-040M		50.00		50.00
1 10			on imaious		, 0.1011	•	50.00	.00	50.00
				1					
				ŀ					
								,	
							-		
								,	
								٠.	
	.								
						:			
	·				;				
•									
	}			ĺ					
		ļ							
ļ		ļ							
1						ļ		ļ	
}				1					
		Ì							
								]	
				1					
	-							i	
1	-								
						}			
1					•				!
1									
				1					
					•				
	Ì		1					!	
1									
	1	L	<u> </u>			1	<u> </u>		

									l		<u> </u>	<del>-</del>
		IN	/IC-Agric	o New Wa	ales DAP	II Plant I	Projected	Operation	on for 19	96		
Available	hours					<u> </u> 		<u>.</u>	<u> </u>	<u> </u>	1	
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	_ Nov	Dec	
744	672	744	720	744	720	744	744	720	744	720	744	
							 	6552	Re	maining ho	urs to 8760:	2208
DAP #2 Ea	st Train		<u> </u>		<u> </u>	<u>;</u>			<u> </u>			
Operating	Hours					ļ			Hrs at proj	ected opera	ating factor	total
676	586	592	579	553	483	646	691	659 5465	684	662	684	2031
Operating Factor			Unused hours		1087	Remaining hours to 7920:			2455			
90.86%	87.20%	79.57%	80.42%	74.33%	67.08%	86.83%	92.88%	91.47%	92%	92%	92%	
				<del></del>	Average operating factor:			83.40%	:	 1	··	
									East unused hours to shift:		424	
DAP #2 W	l est Train				<u>                                     </u>				<u> </u> 	<u>i</u> 	<u> </u>	
Operating Hours					İ	• • •			Hrs at proj	ected opera	ating factor	total
687	650	693	639	624	624	695	706	681	684	662	684	2031
	,				<u> </u>			5999				
Operating	Factor				Unused hours		553	Remaining hours to 7920:		1921		
92.34%	96.73%	93.15%	88.75%	83.87%	86.67%	93.41%	94.89%	94.55%	92%	92%	92%	
	;		 		. Av	erage oper	ating factor:	91.59%	<u>i</u>		·	
	;		<del></del> -			i			Projected hours over 7			110
	[				i	1 1	Remainir	ng hours to	7920 with s	shifted hour	s from East:	2345
			 		 	1	Remainir	ng hours to	7920 with s	shifted hour	s from East:	2

1,

.