

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 7, 1995

John B. Koogler, Ph.D., P.E.
Koogler & Associates Environmental Services
4014 Northwest Thirteen Street
Gainesville, Florida 32609

Dear Dr. Koogler:

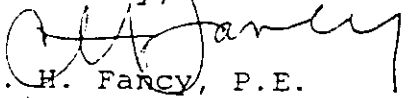
Subject: Requests to Remove NO_x Limits and Testing Requirements
from Sulfuric Acid Plants, IMC-Agrico (PSD-FL-170) and
Farmland Hydro (PSD-FL-143)

Additional information is requested to aid the Department in making a final determination on the above requests. You indicated that based on stack test data, the subject emissions units should not have required PSD review for NO_x. Please provide the EPA Suggested Emissions Netting Procedure (page A.44 of NSR Workshop Manual), to demonstrate that net emissions of NO_x were below significant levels at the time of the proposed modifications from the above referenced PSD permits.

Please evaluate the sulfuric acid plants prior to the above referenced modifications (each PSD permit listed above), for PSD applicability. For the five sulfuric acid plants at the IMC-Agrico New Wales facility, please provide the dates of initial construction and apply the emissions netting procedure for each of these units that were installed after August 7, 1980 to determine PSD applicability at the time these units were installed. For the Farmland Hydro No. 5 SAP, please consider the initial construction and later modification to increase production to 2,400 TPD as phased projects which should be counted together for PSD applicability purposes.

If you have questions, please contact Martin Costello at (904)488-1344 or write to me at the above address.

Sincerely,


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

CHF/mc/c

cc: Martin Costello ✓

"Protect, Conserve and Enjoy Florida's Natural Resources"