

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

November 14, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dr. John B. Koogler, P.E.
Sholtes and Koogler, Environmental Consultants
1213 Northwest 6th Street
Gainesville, Florida 32601

Dear Dr. Koogler:

RE: IMCC's No. 2 DAP, AC53-23546 and PSD-FL-034

Your August, 1985 tests confirm that the nitrogen oxides emissions from IMCC's No. 2 DAP plant may be as high as 36 lb/hr which is equivalent to 144 TPY. The federal construction permit for this source limits the nitrogen oxides emissions to 4.3 lb/hr/train (8.6 lb/hr total) which is equivalent to 34 TPY. Thus, you are requesting a significant net emissions increase of over 40 TPY in the permitted nitrogen oxides emissions from a major source.

Because of the magnitude of the requested increase in emissions and because nitric oxides emissions were not given an indepth review and regulated by the state construction permit (low NO_x emissions were predicted by the company) both EPA and the department will require a complete, new application for a construction permit to process this request.

The increase in emissions being requested will be subject to review under the PSD regulations. For the BACT section of the application, please evaluate the use of low NO_x burners and the burner design used on IMCC's No. 1 DAP plant.

P 408 533 326

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED--
NOT FOR INTERNATIONAL MAIL

(See Reverse)

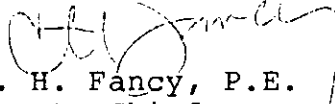
Sent to Dr. John B. Koogler	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
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Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 11/15/85	

PS Form 3800, Feb. 1982

November 14, 1985
Page Two

If you have any question in this matter, please call
Willard Hanks at (904) 488-1344 or write me at the above address.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CF/WH/p

Attachment: EPA 10/22/85 letter

cc: Mr. Jerry Giradin
Mr. Bill Thomas
Mr. Bruce Miller



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

REP: 4APT-AP

OCT 22 1985

Mr. Clair H. Fancy. P. E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

RE: PSD-FL-034, International Minerals & Chemical Corporation

Dear Mr. Fancy:

This is in regard to your letter dated August 7, 1985, to Dr. John B. Koogler concerning the above referenced facility. In that letter, the Florida Department of Environmental Regulation (DER) responded to a request from IMC to revise the NO_x emission limit for the diammonium phosphate dryer. In your letter to Dr. Koogler, you stated that the state and federal construction permits would be modified if approved by the Department, and if EPA evaluated the request to modify Federal PSD permit PSD-FL-034 and found it justified.

It is EPA's policy that PSD construction permits may be modified for sources which are in operation, if the changes are of an administrative nature, or if the proposed emission increases are less than the significant levels as specified in 40 CFR 52.21(b)(23). However, a significant increase for a source which is operating qualifies the change as a major modification and requires that a new permit be issued. In the letter from Dr. John B. Koogler (Sholtes & Koogler, Environmental Consultants for IM & C) dated July 3, 1985, the requested NO_x emission limit revision from 0.21 lbs/mm BTU heat input, 8.6 lbs per hour (whichever is less) to 35 lbs. per hour would increase emissions of NO_x by approximately 110 tons per year. The significance level for NO_x is 40 tons per year and will qualify this change in emissions as a major modification. The source is therefore obligated to submit a new application for a PSD permit to accommodate this change. Since Florida now has a SIP in place to issue federally enforceable PSD permits for this facility, the DER has responsibility for requesting that an application be submitted for a new PSD permit and for the permit issuance.

If you have any questions or comments regarding this letter, please contact me or Mr. Wayne J. Aronson at 404/881-4901.

Sincerely yours,

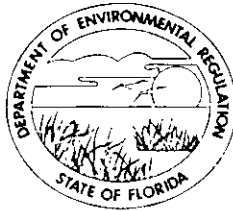
Bruce P. Miller

Bruce P. Miller, Acting Chief
Air Programs Branch

cc: Sholtes & Koogler (Environmental Consultants)
1213 N. W. 6th Street
Gainesville, FL 32601

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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2600 BLAIR STONE ROAD
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BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

September 9, 1985

Dr. John B. Koogler
Sholtes & Koogler
1213 North West 6th Street
Gainesville, Florida 32601

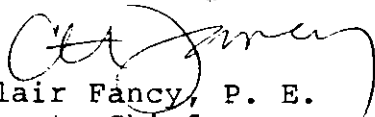
Reference: IMCC - No. 2 DAP Plant

Dear Dr. Koogler:

Based on your August 19 letter, the only nitric oxides emission data you were able to locate was the emission factors in AP-42 and the test results from two phosphate rock dryers. This data implies that the nitric oxides emissions rate from IMCC's No. 2 DAP plant should be lower than the rate reported.

We do not believe it is prudent to establish a new emission standard for the No. 2 plant based on the limited data submitted. More emission data is needed before we can evaluate IMCC's request. We request you investigate the use of alternate test methods, including continuous emission monitors, to measure the nitric oxide emissions from a DAP plant, have the most appropriate procedure for this plant approved by the Bureau, and retest the emissions from IMCC's No. 2 DAP plants for nitric oxides. Once we review the test reports, we should be able to make a recommendation in this matter.

Sincerely,


Clair Fancy, P. E.
Deputy Chief
Bureau of Air Quality
Management

WH/ps

cc: Bill Thomas
Jerry Girardin