State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee
To: _____ Location: _____
To: _____ Location: _____
To: _____ Location: _____
From: _____ Date: _____

Interoffice Memorandum

TO: Bruce Mitchell, AIR BAR, Tallahassee

FROM: Gary Maier, S.W. District Air, Tampa
(Suncom 542-6100, ext 408)

DATE: April 3, 1992

SUBJECT: Request Your Opinion Regarding PSD Applicability

I am processing an after-the-fact construction/modification permit application from IMC Fertilizer, Inc., New Wales Operations. This application presents an unusual situation. At this time, I do not believe the NSR requirements of Rule 17-2.500, F.A.C. are applicable; however, I would appreciate your opinion on that issue.

The permit application (copy attached) requests after-the-fact authorization to increase the sulfur content of the fuel oil used in IMC's GTSP plant. The S.W. District Office received this application on March 30, 1992. PATS day 30 is April 28, 1992. I would appreciate receiving your opinion by April 22, 1992 because I will not be in the office during the week of April 27, 1992.

The following chronology summarizes relevant facts.

February 2, 1973 - IMC applied for a construction permit for its GTSP plant. The application stated that low sulfur oil (ie. 1%) would be burned.

April 24, 1973 - The State of Florida Department of Air and Water Pollution Control issued permit AC-53-2026.

March 20, 1974 - Due to a temporary unavailability of low sulfur fuel oil, IMC requested temporary permission to burn higher sulfur fuel oil (ie. 2.5 to 3%). IMC promised to burn 1% sulfur fuel oil when available.

May 28, 1974 - The Department of Pollution Control granted temporary approval to burn higher sulfur fuel oil. The relevant conditions of the temporary approval were:

(A) "The lowest sulfur content fuel oil available will be burned".

(B) The temporary approval "is in effect only until low sulfur fuel oil is commonly available".

IMC never ceased burning 2.5% fuel oil. IMC is still burning 2.5% fuel oil today.

December 16, 1991 - IMC submitted an application to renew its operation permit for the GTSP plant. My normal completeness review of the permit file revealed the above facts.

January 14, 1992 - The S.W. District Office notified IMC that "low sulfur fuel oil is now commonly available", and that the permitted sulfur limitation would be reduced accordingly.

March 30, 1992 - IMC submitted the instant application for an after-the-fact construction/modification permit requesting authorization to increase the sulfur content of the fuel oil used in IMC's GTSP plant from 1% to 2.5%.

PSD Applicability Analysis

Although the estimated increase in sulfur dioxide emissions resulting from the proposed increase in fuel sulfur content is a rather large 450 tons per year, this permit application might be exempt from the NSR requirements of Rule 17-2.500, F.A.C. for either of the two reasons presented below.

(1) Rule 17-2.500(2)(c)4., F.A.C. exempts "Use of an alternative fuel or raw material which the facility was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975;".

Documentary evidence in the S.W. District permit file appears to be sufficient to support a finding that IMC's GTSP plant was capable of accommodating 2.5% sulfur fuel oil prior to January 6, 1975. Also, my review of the S.W. District file did not reveal any federally enforceable prohibition which would prevent the use of 2.5% sulfur oil.

Conclusion - The instant permit application may qualify for the exemption authorized by Rule 17-2.500(2)(c)4., F.A.C.

(2) Rule 17-2.500(2)(c)5., F.A.C. exempts "Use of an alternative fuel or raw material which the facility is approved to use under any permit issued under 40 CFR 52.21 or Section 17-2.500".

IMC asserts that New Wales has been through PSD review, and that included in the modeling was the subject source burning 2.5% sulfur oil. I am unable to verify this assertion through my review of the S.W. District files. Perhaps the Tallahassee files contain more information.

Conclusion - If IMC's assertion is true, then the instant permit application may qualify for the exemption authorized by Rule 17-2.500(2)(c)5., F.A.C.

Bruce, your input on this permit application would be greatly appreciated. The S.W. District Office is prepared to process the application unless we hear otherwise from Tallahassee. If Tallahassee decides to process the application, please let us know ASAP. Attached to this memo are copies of some relevant documents. Thank you in advance for your assistance.

Calculated Sulfur Dioxide Emissions

Source	lb/hr at 1%	TPY at 1%	lb/hr at 2.5%	TPY at 2.5%
GTSP Dryer	68.86	301.6	172.14	754.0

copy to: J. Harry Kerns, w/o attachments

Florida Department of Environmental Regulation
Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347
Lawton Chiles, Governor 813-620-6100 Carol M. Browner, Secretary

CERTIFIED March 10, 1992

Mr. J. M. Baretincic
Director, Environmental Services
IMC Fertilizer, Inc.
New Wales Operations
P.O. Box 1035
Mulberry, FL 33860

Re: DER File No. AO53-206082.
Renewal of Permit No. AO53-127483.
GTSP Production Scrubbers.

Dear Mr. Baretincic:

Our letter dated January 14, 1992, notified you that the above referenced permit application is incomplete and that additional information is required. When a permit application is incomplete, all processing of the application is suspended. Pursuant to Section 120.60, Florida Statutes, the Department may deny a permit application if the applicant, after receiving timely notice, fails to correct errors, omission, or supply additional information within a reasonable period of time.

It has been 56 days since you were notified of the need for additional information. The Department has not received a response. Therefore, within 15 days of receipt of this letter please advise us whether,

(A) you wish to withdraw your application,
(B) you need additional time to submit the required additional information (please provide the date that the Department will receive it), or
(C) you have questions about our request and wish to discuss it with us.

If we do not receive one of the responses listed above or the required additional information within 15 days of your receipt of this letter, then the Department will initiate procedures to deny your permit.

Additionally, in your letter dated January 21, 1992, you indicated that IMC might want to continue utilizing 2.5% sulfur fuel oil in the dryer rather than the originally permitted 1% sulfur fuel oil. If that is still IMC's intention, then IMC must submit a permit application for after-the-fact "construction/ modification" to burn fuel oil with increased sulfur content.

Your cooperation regarding these matters will be appreciated.

Sincerely,

J. Harry Kerns

J. Harry Kerns, P.E.
District Air Engineer

P 149 932 026

MR J M BARETINCIC
DIRECTOR ENV SERVICES
IMC FERTILIZER INC
PO BOX 1035
MULBERRY FL 33860

PS Form 3800, June 1988

Postmark or Date
A053 198387
MAR 1 0 1992
A053-206082

Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-734

Lawton Chiles, Governor 813-620-6100 Carol M. Browner, Secretary

January 14, 1992

Mr. J. M. Baretincic
Director, Environmental Services
IMC Fertilizer, Inc.
New Wales Operations
P.O. Box 1035
Mulberry, Florida 33860

Re: DER File No. AO53-206082. (Renewal of AO53-127483).
GTSP Production Scrubbers.

Dear Mr. Baretincic:

Thank you for submitting the above referenced operating permit application. As you are aware, the Department recently authorized IMC to upgrade the existing ID fan (reference letter from Gary A. Maier to J. M. Baretincic dated December 19, 1991). The authorization requires IMC to conduct emission testing and submit certain documentation after completing the upgrade. The Department will require the same information in order to process this permit application. Pursuant to Rule 17-4.055(1), F.A.C., please submit the information requested in the December 19, 1991 letter from Gary A. Maier to J. M. Baretincic.

For your information, our review of the permit file revealed that the dryer was originally permitted to burn 1% sulfur fuel oil rather than the 2.5% sulfur fuel oil requested in your permit application. On May 28, 1974, due to a temporary unavailability of low sulfur fuel oil, the Department granted a temporary allowance to burn higher sulfur oil "only until low sulfur fuel oil is commonly available" (see attached letter). The Department believes that low sulfur fuel oil is now commonly available, and intends to adjust the permitted sulfur limitation accordingly when issuing permit AO53-206082.

Pursuant to Section 120.60, F.S., the Department suspends the processing of your permit application until receipt of the requested additional information. If you have any questions, please call Mr. Gary A. Maier at (813) 620-6100, ext 408.

Sincerely,

J. Harry Kerns, P.E.
District Air Engineer

IMC FERTILIZER, INC.

D.E.R.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 21, 1992

Mr. J. Harry Kerns, P.E.
District Air Engineer
Florida Department of Environmental
Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

RE: **DER File No. AO53-206082**
(Renewal of AO53-127483)
GTSP Production Scrubbers

Dear Mr. Kerns:

IMC Fertilizer, Inc., New Wales Operations is dismayed that in your letter of January 14, 1992 the Department intends to adjust our above referenced permit to burn low sulfur fuel rather than 2.5% sulfur fuel oil.

Granted, the original Construction application listed low sulfur fuel oil but since 1981, the Department has issued IMC Fertilizer four Operation permits where each of our applications listed our intent to burn 2.5% sulfur fuel oil.

In 1979, New Wales went through PSD review for our Plant expansion. The review included the construction of two new sulfuric acid plants. Included in the modeling, was the subject source along with all of our other fuel burning sources modeled as burning 2.5% sulfur fuel oil. IMC Fertilizer, New Wales Operations feels that this is sufficient justification to retain a 2.5% sulfur fuel oil allowance.

A conversion to low sulfur fuel oil for this one unit would require the construction of a separate tankage and pumping system since all of our units are fed from a single system.

Sincerely,

J. M. Baretincic
Director
Environmental Services

JMB:lmr
061/jmb#9

xc: J. A. Brafford
E. M. Newberg
W. C. Thomas, P.E. - DER

IMC Fertilizer, Inc. • New Wales Operations
P. O. Box 1035 • Hwy. 640 West • Mulberry, Florida 33860 • (813) 428-2531

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

DER Form #
Form Title
Effective Date
DER Application No.
(Filled in by DER)

AC 53-211264
Received 03/30/92

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: FLUORIDE & PARTICULATE [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [ ] Construction [ ] Operation [X] Modification

COMPANY NAME: IMC FERTILIZER, INC. COUNTY: POLK

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) GTSP PRODUCTION SCRUBBERS (3)

SOURCE LOCATION: Street HIGHWAY 640 & COUNTY LINE ROAD City MULBERRY

UTM: East (17) 396.7 KM North 3079.4 KM

Latitude ____ ° ____ ' ____ "N Longitude ____ ° ____ ' ____ "W

APPLICANT NAME AND TITLE: JOHN A. BRAFFORD, VICE PRESIDENT & GENERAL MANAGER

APPLICANT ADDRESS: POST OFFICE BOX 1035 - MULBERRY, FLORIDA 33860

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of IMC FERTILIZER, INC.

I certify that the statements made in this application for a OPERATING permit are true, correct and complete to the best of my knowledge and belief. Furth I agree to maintain and operate the pollution control source and pollution cont facilities in such a manner as to comply with the provision of Chapter 403, Flor Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transfera and I will promptly notify the department upon sale or legal transfer of the permit establishment.

*Attach letter of authorization

Signed: John A. Brafford
JOHN A. BRAFFORD
VICE PRESIDENT & GENERAL MANAGER
Name and Title (Please Type)

Date: 3/27/92 Telephone No. 813/428-2531

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project h been designed/examined by me and found to be in conformity with modern engineer principles applicable to the treatment and disposal of pollutants characterized in permit application. There is reasonable assurance, in my professional judgment, t

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

Northwest District 160 Governmental Center Pensacola, Florida 32501-5794 904-436-8300
Northeast District 3426 Bills Rd. Jacksonville, Florida 32207 904-798-4200
Central District 3319 Maguire Blvd. Suite 232 Orlando, Florida 32803-3767 407-894-7555
Southwest District 4520 Oak Fair Blvd. Tampa, Florida 33610-7347 813-623-5561
South District 2269 Bay St. Fort Myers, Florida 33901-2896 813-332-2667
Southeast District 3900 S. Congress Ave. Suite A West Palm Beach, Florida 33406 407-964-9668

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed Charles David Turley

CHARLES DAVID TURLEY
Name (Please Type)

IMC FERTILIZER, INC.
Company Name (Please Type)

POST OFFICE BOX 1035 - MULBERRY, FLORIDA 33860
Mailing Address (Please Type)

Florida Registration No. 23344 Date: 3/27/92 Telephone No. (813) 428-2531

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

THIS APPLICATION WILL MODIFY THE ORIGINAL CONSTRUCTION PERMIT BY CHANGING THE SULFUR CONTENT SPECIFICATION FOR FUEL OIL WHEN USED IN THE PLANT. THE CHANGE WILL BE FROM 1% SULFUR OIL TO 2.5% SULFUR OIL.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

PERMIT NO.: A053-127483 ISSUED: 2/13/87 EXPIRES: 2/11/92

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - ~~lbs/hr~~ TPH AVG.	Relate to Flow Diagram
	Type	% Wt		
PHOSPHATE ROCK	F	3.5	26	ROCK
PHOSPHORIC ACID	F	2.0	19	ACID

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (~~lbs/hr~~): 37 TPH AVERAGE

2. Product Weight (~~lbs/hr~~): 65 TPH MAX. (57 TPH AVERAGE)

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			~~lbs/hr~~	T/yr	
FLUORIDE	1.96	6.4	17-2.600(3)(a)4.b	0.15 LB/TON P205		21	STACK
PARTICULATE	12.0	39	17-2.650(2)	33.8 LB/HR.		148	STACK

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr_____; if seasonal, describe:_____

AVERAGE HOURS OF OPERATION: 17.8 HOURS/DAY. (SEE ATTACHMENT A.)

F. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NO

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NO

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NO

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NO*

   a. If yes, for what pollutants?_____

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

* PLANT HAS BEEN MODELED AT PWR AND HAS NO SIGNIFICANT IMPACT ON AIR QUALITY MAINTENANCE AREA.

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
TAILGAS SCRUBBER	PART./FLUORIDE	99+	N/A	EST.
VENTURI W/CYCLONIC	PART./FLUORIDE	99+	N/A	EST.
WET CYCLONIC	PART./FLUORIDE	95+	N/A	EST.

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
NATURAL GAS	0.039	0.062	63.7
NO. 6 FUEL OIL	284	449	63.7

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 2.5 MAX. Percent Ash: 0.10

Density: 8.2 lbs/gal Typical Percent Nitrogen: N/A

Heat Capacity: _____ BTU/lb 140-150000 BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

SCRUBBER UNDERFLOW RECYCLED IN PROCESS WATER.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 142 ft. Stack Diameter: 6 ft.

Gas Flow Rate: 124000 ACFM 103000 DSCFM Gas Exit Temperature: 124 °F.

Water Vapor Content: 7.5 % Velocity: 72.8 FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

ATTACHMENT A

PROCESS WEIGHT CALCULATION

	INPUT TONS			PRODUCT		mmCF	mGAL
YEAR	ROCK	ACID	TOTAL	GTSP	HRS	GAS	6 OIL
1986	186700	134900	321600	407201	6768	82.8	1363
1987	176100	127300	303400	384000	6676		1924
1988	189400	136900	326300	413000	6879		2005
1989	145800	105400	251200	318000	5943		1635
1990	155000	112000	267000	338000	6428	85.6	1139
1991	169200	122300	291500	369000	6274	25.8	1616
TOTALS	1022200	738800	1761000	2229201	38968	194	9682
TPH	26.2	19.0	45.2	57.2		0.039	0.284 /HR

6 YEAR AVERAGE RATES

AVG TPH	57
HRS/YR	6495
HRS/DAY	17.8

PRODUCTION CALCULATION BASIS

TONS: PRODUCT TONS
(ROCK P205 + ACID P205)/0.485 * 0.96

HOURS: HOURS

MASS AND VISIBLE EMISSION DATA AND CALCULATION

GTSP Production Scrubbers					PROD
DATE	TEMP	% HOH	FPS	ACFM	TPH
04/09/86	121	6.4%	68.3	115910	60
09/17/86	131	6.4%	71.7	121661	62
01/22/87	115	6.7%	62.5	105978	62
10/05/87	125	8.0%	68.1	125509	62
01/27/89	121	8.7%	69.3	117531	57
07/25/89	128	9.9%	66.2	112321	57
02/05/90	110	6.0%	77.1	130811	57
08/10/90	129	8.1%	80.5	136530	62
02/14/91	125	6.7%	84.7	143714	57
10/04/91	132	8.1%	79.3	134463	63
AVERAGE	124	7.5%	72.8	124443	60

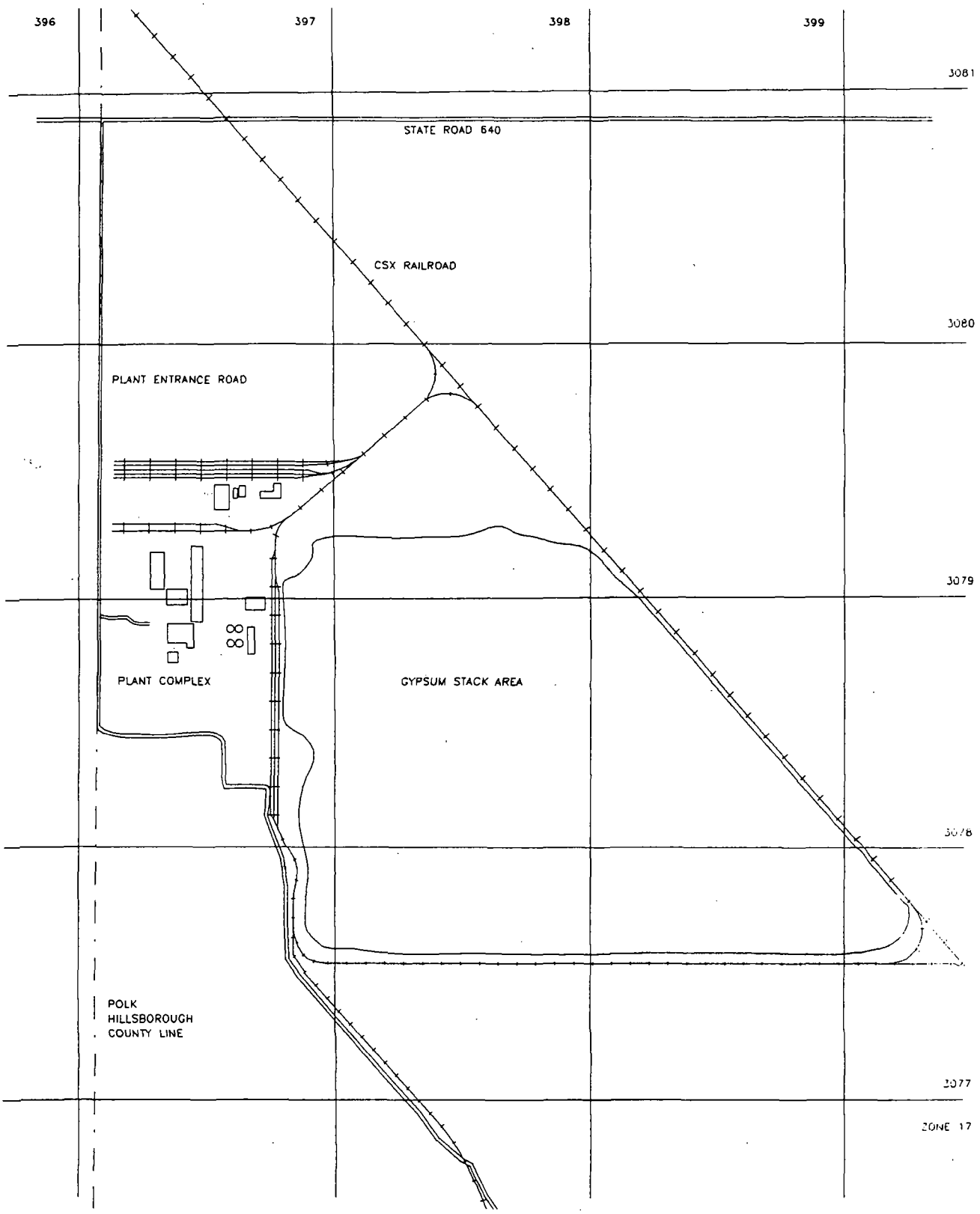
	FLUORIDE EMISSIONS			PARTICULATE EMISSIONS			
	LB/HR	ALLOW	LB/TON	OPAC	LB/HR	ALLOW	LB/TON
04/09/86	0.90	4.59	0.01500	12	4.66	33.33	0.07767
09/17/86	0.51	4.71	0.00828	10	4.95	33.45	0.08036
01/22/87	0.96	4.47	0.01548	10	6.59	33.51	0.10629
10/05/87	0.98	4.47	0.01578	10	3.96	33.51	0.06377
01/27/89	2.53	4.35	0.04454	10	19.17	33.04	0.33750
07/25/89	1.90	4.13	0.03345	10	11.68	33.04	0.20563
02/05/90	2.82	4.13	0.04965	10	12.12	33.04	0.21338
08/10/90	1.73	4.53	0.02781	15	24.05	35.00	0.38666
02/14/91	3.79	4.08	0.06673	5	22.02	33.04	0.38768
10/04/91	4.21	4.80	0.06644	10	15.59	33.62	0.24602
AVERAGE	2.03	4.43	0.03432	10	12.48	33.46	0.21049

AVERAGE ANNUAL EMISSION AND ALLOWABLE CALCULATION

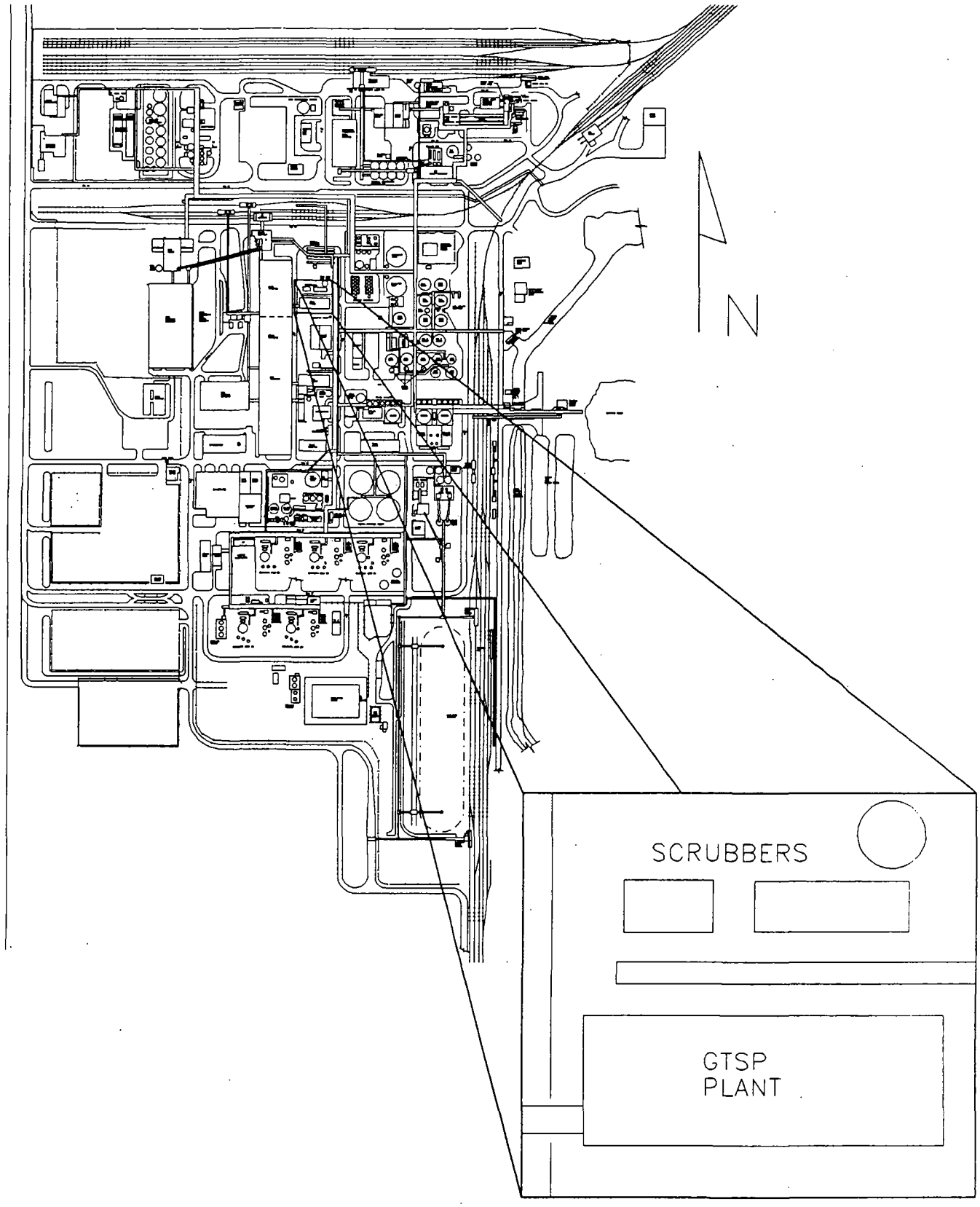
	ACTUAL EMISSIONS				ALLOWABLE EMISSION			TPY
	LB/TON	TPD	LB/HR	TPY	LB/HR	LB/TON	TPY	@8760 HRS
FLUORIDE	0.0343	1373	1.96	6.37	4.8	0.15	18.7	21.0
PART.	0.2105	1373	12.0	39.1	33.8	0.59	132	148

PROPOSED PERMIT CONDITIONS GTSP Production Scrubbers

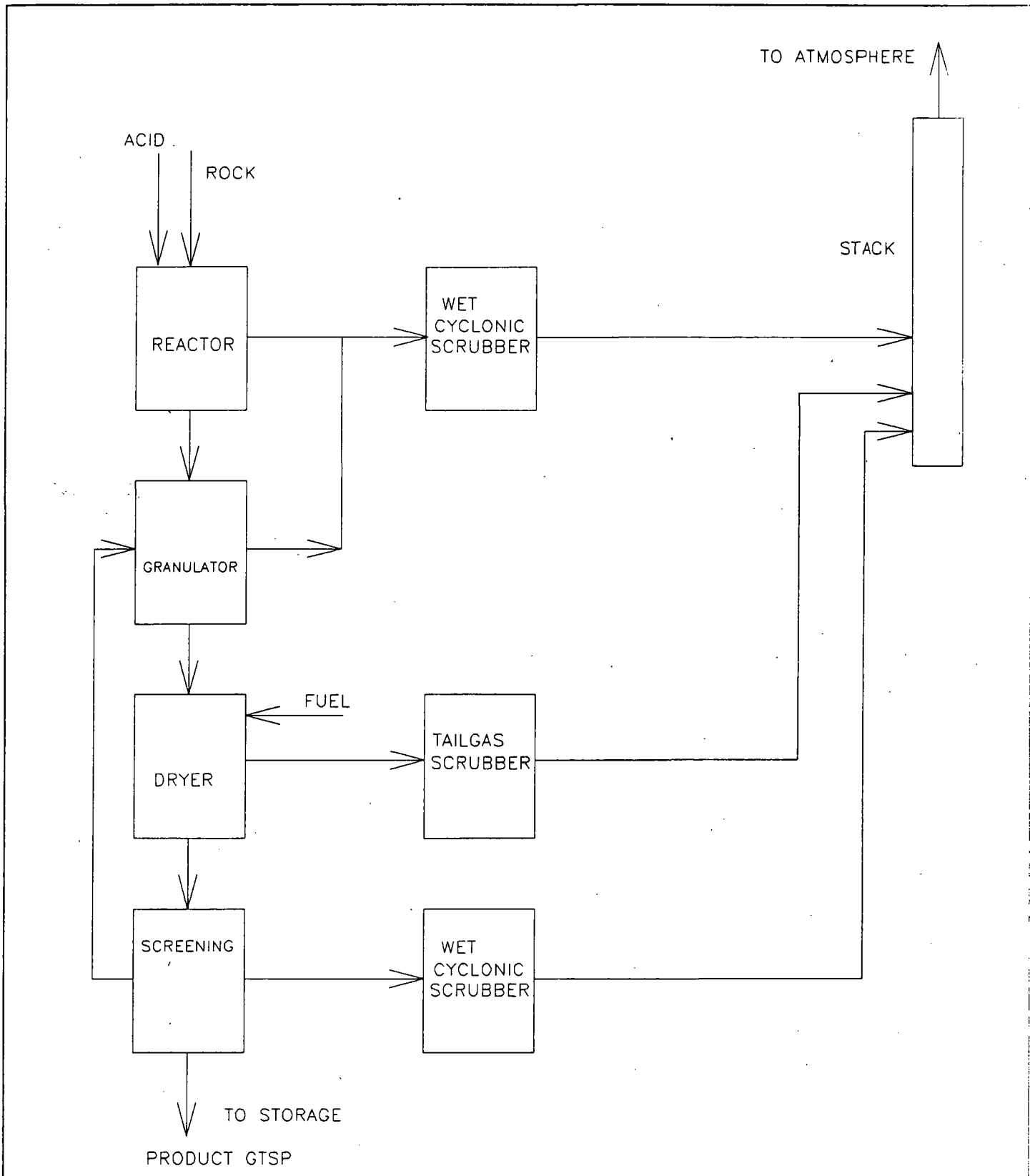
FLUORIDE EMISSION LIMIT:	0.15 LB/TON P2O5	17-2.600(3)(a)4.b.
PARTICULATE EMISSION LIMIT:	33.8 LB/HR	17-2.650(2)
VISIBLE EMISSION LIMIT:	20%	17-2.610(2)(a)
PERMITTED HOURS OF OPERATION:	8760 HRS/YEAR	NO REFERENCE
MAXIMUM PERMITTED OPERATION:	65 TPH	NO REFERENCE
OPERATING TEST CONDITION:	65 + 10%	NO REFERENCE
APPLICABLE TEST METHODS:	1,2,4,5,9 AND 13A/B	17-2.700
COMPLIANCE TEST SPECIFICATION:	FLUORIDE, PART & VE	17-2.700(2)
COMPLIANCE TEST FREQUENCY:	SEMI-ANNUAL	17-2.700(2)
PERMIT RENEWAL TEST:	FLUORIDE, PART & VE	17-2.700(3)(d)



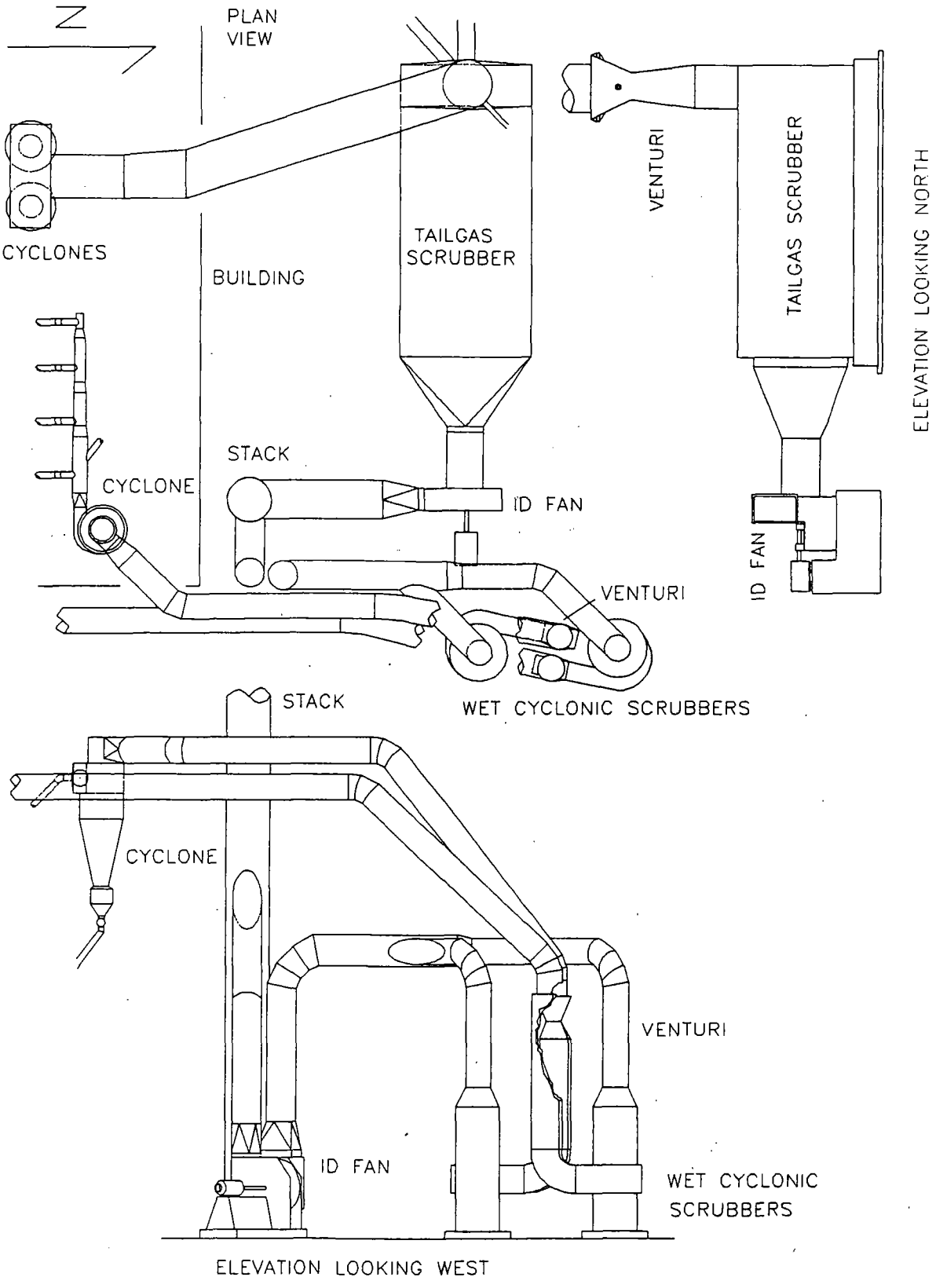
PREPARED: CDT	TITLE: PLANT LOCATION DRAWING	IMC FERTILIZER, INC.	
DATE: 1/23/91	UTM COORDINATE GRID	LOCATION: NEW WALES	FILE: NWALES02
REVISED: 2/12/91		SCALE: 1"=2000'	DRAWING NO: L3



PREPARED: CDT	TITLE: GTSP PRODUCTION SCRUBBERS	IMC FERTILIZER, INC.	
DATE: 12/11/91	LOCATION DIAGRAM	LOCATION: NEW WALES	FILE: PLANT01
REVISED:		SCALE: NONE	DRAWING NO.: L30



PREPARED: CDT	TITLE: GTSP PRODUCTION SCRUBBERS	IMC FERTILIZER, INC.	
DATE: 12/11/91	FLOW DIAGRAM	LOCATION: NEW WALES	FILE: NWALES03
REVISED:		SCALE: NONE	DRAWING NO.: L6



PREPARED: CDT	TITLE: GTSP PRODUCTION SCRUBBERS	IMC FERTILIZER, INC.	
DATE: 12/11/91	PLAN AND ELEVATION VIEWS	LOCATION: NEW WALES	FILE: NWALES03
REVISED:		SCALE: NONE	DRAWING NO.: L6