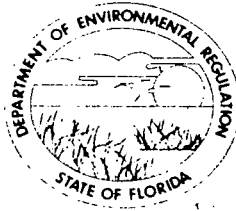


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

January 7, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. T. H. Traylor
Vice President and General Manager
IMC, New Wales Operations
Post Office Box 1035
Mulberry, Florida 33860

Dear Mr. Traylor:

Attached is one copy of the application, Technical Evaluation and Preliminary Determination, and proposed permit for reactivation of an existing dry rock silo at IMC's facility in Mulberry, Polk County, Florida.

Pursuant to Section 403.815, Florida Statutes, and Florida Administrative Code Rule 17-1.62, you are required to publish (at your own expense) the attached notice. This notice should be published, one time only, in the legal ad section of a newspaper of general circulation in the Mulberry area. The department, in accordance with Rule 17-1.62, is required to have proof that notice was given. Therefore, please have the newspaper prepare an affidavit of publication to submit to the department.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

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

CHF/pa

cc: Mr. C. A. Pflaum, P.E., IMC, New Wales Operations
Mr. J. M. Baretincic, IMC, New Wales Operations
Mr. Dan Williams, DER Southwest District

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

INTERNATIONAL MINERALS & CHEMICAL CORPORATION

New Wales Operations
Polk County, Florida

East Ground Rock Silo
Proposed Permit No. AC 53-63143

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
BUREAU OF AIR QUALITY MANAGEMENT
CENTRAL AIR PERMITTING

January 7, 1983

Evaluation and Preliminary Determination

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NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to International Minerals and Chemical Corporation (IMC) to reactivate an existing 1,500 ton capacity dry phosphate rock silo. Emissions from the silo will be controlled by a 5,000 CFM dust collector. The silo will store ground phosphate rock that will be used to make granular triple superphosphate. This equipment is located at IMC's New Wales Operation on Route 640 and County Line Road in western Polk County. The UTM coordinates of this site are 396.7 km E and 3078.9 km N.

The dust collector will emit 0.03 grains/SCF of particulate matter which is equivalent to 1.30 lbs/hr and 5.62 TPY. The project is not required to have a BACT determination. No other criteria pollutant will be emitted from the bag collector.

Emissions from the modified facility will not impact the Hillsborough County Particulate Matter Nonattainment Area by a significant amount nor exceed the allowable increment consumption or cause an ambient air quality violation in other areas.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The Technical Evaluation and Preliminary Determination for the proposed project is available for public inspection during normal business hours at the following locations:

Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Department of Environmental Regulation
Southwest District
7601 Highway 301 N
Tampa, Florida 33610

Any person may send written comments on the proposed action to Mr. Clair Fancy at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

I. PROJECT DESCRIPTION

A. Applicant

International Minerals & Chemical Corporation
New Wales Operations
Post Office Box 1035
Mulberry, Florida 33860

B. Project and Location

International Minerals & Chemical Corporation (IMC) plans to reactivate an existing dry rock silo that was shut down in conjunction with the construction of a new diammonium phosphate plant. The silo will be used to store up to 1,500 tons of 75 BPL phosphate rock that will be used to manufacture granular triple superphosphate (GTSP) fertilizer in an existing plant. The dust collector originally used on the silo will not be reactivated. An existing 5,000 CFM bag collector previously used in the phosphoric acid plant will be installed to control the emissions created by the transfer of the dried phosphate rock. This smaller control device is more compatible with the 50 ton per hour phosphate rock transfer equipment than the original silo control device.

The project will be located at IMC's New Wales Operations' complex. The phosphate fertilizer manufacturing complex is located near the intersection of Route 640 and County Line Road in western Polk County. The UTM coordinates of the complex are 396.7 km E and 3078.9 km N.

C. Process and Controls

Dry, ground, 75 BPL phosphate rock will be brought into the plant in railroad hopper cars and transferred to the existing east ground rock silo at a rate of 50 TPH by pneumatic conveying equipment. A 5,000 CFM bag collector will vent the air from the silo after removing the dust. The phosphate rock filtered out by the bag collector will fall back into the silo. Other pneumatic conveying equipment will transfer the rock from the reactivated silo to the GTSP plant. The bag collector on the reactivated silo will limit the particulate matter (PM) emissions to 0.03 grains/CF. The equipment in the existing GTSP plant has its own air pollution control equipment and the emissions from the GTSP plant will not be affected by the proposed project.

II. RULE APPLICABILITY

The proposed project, reactivation of an existing phosphate rock silo and bag collector, is subject to preconstruction review under provisions of Chapter 403, Florida Statutes (FS), and Chapter 17-2, Florida Administrative Code (FAC).

The plant is in an area designated unclassifiable for particulate matter (17-2.430, FAC), attainment for all other criteria pollutants (17-2.420, FAC), and in the area of influence of the Hillsborough County Particulate Matter Nonattainment Area (17-2.410, FAC).

The potential emissions from the control equipment, after the silo is reactivated, is 1.3 pounds per hour (lbs/hr) or 5.62 tons per year (TPY) of particulate matter.

The plant is a major source for particulate matter as defined in 17-2.100(96), FAC, because the potential emissions exceed 100 TPY.

The project is not subject to prevention of significant deterioration (PSD) review, 17-2.500, FAC, because the potential emissions of particulate matter are less than the significant emission rate listed in Table 500-2 and the plant is not within 10 km of a Class I area.

The project is not subject to 17-2.510, FAC, New Source Review for Nonattainment Areas, because the emissions proposed by the applicant do not have a significant impact on the Hillsborough County Particulate Matter Nonattainment Area.

The project is subject to the permitting requirements of 17-2.520, FAC. By limiting the reactivated source to the particulate matter emission limits proposed by the applicant, the source will not interfere with reasonable further progress toward attaining the ambient air quality standards.

III. SUMMARY OF EMISSIONS AND AIR QUALITY IMPACT

A. Emission Limitations

The Company proposed a particulate matter (PM) emission limit for the silo's bag collector of 0.03 grains/CF. At this concentration, a 5,000 ACFM bag collector will emit slightly less than 1.3 pounds per hour or, for full time operation, 5.62 TPY.

This emission limit is in compliance with the state's air pollution control regulations. A higher emission limit, if allowed, could subject the source to PSD and RACT (Reasonably Available Control Technology) regulations. Therefore, the Department finds the Company's proposed emission limit acceptable.

The Department will limit visible emissions from the complete system to a maximum of 10 percent opacity. The visible emissions from the conveyor, silo and bag collector, should be less than 10 percent opacity if the equipment is properly designed, maintained, and operated.

B. Air Quality Impact

The proposed emissions of 1.3 lbs PM/hr from a stack at 110 feet elevation, having a temperature and velocity of 108°F and 47.2 feet per second, respectively, will increase the impact on the particulate matter ambient air quality at the boundary of the Hillsborough County Particulate Matter Nonattainment Area by 0.02 ug/m³, daily. The maximum daily impact at this boundary, caused by all the sources in the plant, is estimated to be 3.76 ug/m³. The impact considered significant is 5.0 ug/m³, daily.

Thus, the proposed emissions will not cause a significant impact on the Hillsborough County Particulate Matter Nonattainment Area. There is reasonable assurance that the modification will not lead to any violation of the ambient air quality standards.

IV. CONCLUSION

Based on the proposed PM emission limits of 1.3 lbs/hr and visible emissions of 10 percent opacity, the applicant can reactivate the existing east dry rock silo and 5,000 CFM bag collector and operate in compliance with the state air pollution control regulations.

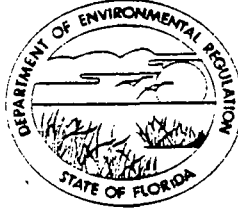
The Department proposes to issue a construction permit that will allow the Company to reactivate the existing east dry rock silo and 5,000 CFM bag collector. As a condition of this approval, the Department will require certain general and specific conditions be met by the Company to assure compliance with the applicable regulations. A copy of the draft permit, which includes the general and specific conditions, is in the Appendix.

V. APPENDIX

Application
Draft State Permit

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

APPLICANT: International Minerals & Chemical Corporation

PERMIT/CERTIFICATION
NO. AC 53-63143

COUNTY: Polk

PROJECT: East Ground
Rock Silo

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

Modification to the existing 1,500 ton capacity East Dry Rock Silo and an existing 5,000 CFM Dust Collector to allow up to 50 TPH of 75 BPL ground phosphate rock to be unloaded and stored for later use in the Granular Triple Superphosphate Plant. The UTM coordinates of the source are 396.7 E and 3078.9 N.

Construction shall be in accordance with the permit application signed by Mr. T. H. Traylor, Vice-President and General Manager, on November 22, 1982.

PERMIT NO.: AC 53-63143

APPLICANT: International Minerals & Chemical Corporation

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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. 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
 - Determination of Best Available Control Technology (BACT)
 - Determination of Prevention of Significant Deterioration (PSD)
 - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 53-63143
APPLICANT: International Minerals & Chemicals Corporation

SPECIFIC CONDITIONS:

1. Ground phosphate rock will not be transferred to the east ground rock silo at a rate greater than 50 TPH.
2. Particulate matter emissions from the 5,000 CFM dust collector controlling air pollution from the east ground rock silo shall not exceed 1.30 lbs/hr.
3. Visible emission from any part of the east dry rock silo system, including the pneumatic loading and unloading conveyors, shall not exceed 10 percent opacity during any 6 minute period.
4. Compliance with the emission limits shall be determined by EPA reference methods 5 and 9 as described in 40 CFR 60, Appendix A.
5. Test the emissions from the east ground rock silo system for visible emissions annually and for particulate matter on request of the Department.
6. The pressure drop across the baghouse will be measured at least once per week and records of this measurement kept for 2 years for Department inspection.
7. The source may be operated continuously as long as it remains in compliance with all air pollution control regulations and permit conditions.
8. The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to the Southwest District a minimum of 90 days prior to the expiration date of this permit or 60 days after the silo is placed in operation, whichever date is the earliest. The company may continue to operate in compliance with all terms of this permit until the expiration date or issuance of an operating permit.

PERMIT NO.: AC 53-63143
APPLICANT: International Minerals & Chemical Corporation

Expiration Date: February 1, 1984

Issued this _____ day of _____, 19_____.

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Signature

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