

# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347

Lawton Chiles, Governor 813-623-5561 FAX 813-272-2279 Carol M. Browner, Secretary

March 26, 1991

Mr. J. A. Brafford  
Vice President & General Manager  
IMC Fertilizer, Inc.  
Post Office Box 1035  
Mulberry, FL 33860

Dear Mr. Brafford:

Re: Polk County - AP  
A053-193163

On February 25, 1991, the Department received your air pollution application to operate the new product cooler at DAP Plant 2E. In order to continue processing the application, the Department will need the following additional information pursuant to Rule 17-4.070(1), F.A.C.:

1. The results of a visible emission test.
2. As stipulated in Specific Condition No. 8 of permit AC53-177264, submit the correct tons/hour of P<sub>2</sub>O<sub>5</sub> input, pH of scrubber water, and the scrubber pressure drop during the January 25 and 28, 1991 stack test or from the test proposed on March 28, 1991.
3. Explain how this source complies with 40 CFR 60.223(c), concerning the operation of a monitoring device which continuously measures and permanently records the total pressure drop across the scrubbing system.

As discussed with Mr. Jerry Girardin of your staff, a response to this letter should be received by June 30, 1991, since you will be requesting from our Tallahassee office to amend permit AC53-177264 for the following issues:

1. State in an additional specific condition, this source is subject to NSPS 40 CFR 60, Subpart V.

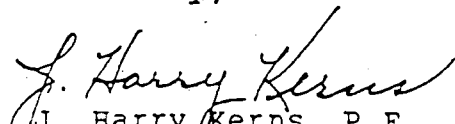
Mr. J. A. Brafford  
Vice President & Gen. Manager  
Mulberry, FL 33860

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2. The requirement to report the pH of scrubber water in Specific Condition No. 8 be changed to reporting the gallons per minute (gpm) of recirculating water to the scrubber.
3. Add a specific condition stating this source shall comply with 40 CFR 60.223(c) regarding the total pressure drop across the scrubbing system.
4. Add a specific condition stating this source shall not exceed a design recirculating water flow rate to the scrubber of 800 gpm.
5. Add a specific condition stating this source shall continuously measure and permanently record the scrubber's recirculating water flow rate (gpm).
6. If a compliance test is conducted when only fresh water is used for scrubber water, a new compliance test shall be required when the scrubber has operated more than 10 days during a calendar year with pond water.
7. Add a specific condition(s) stating the applicable visible emission standard [Rule 17-2.610(2), F.A.C.] and test method.

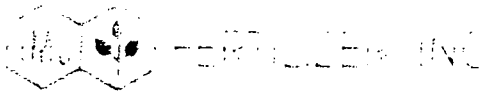
If you have any questions, please call Mr. Jim McDonald of my staff at (813) 623-5561 extension 421.

Sincerely,

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

JHK/jmq

cc: Jerry Girardin - IMC Fertilizer, Inc. ✓  
John Reynolds - DER, Tallahassee



CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

RECEIVED

APR 8 1991

April 3, 1991

DER-BAQM

Mr. John Reynolds  
 Florida Department of  
 Environmental Regulation  
 2600 Blair Stone Road  
 Tallahassee, FL 32399-2400

Dear John,

In a recent discussion with Jim McDonald, DER-TPA, it was determined that in the interest of clarity, some changes should be made to the current permit requirements contained in AC53-177264. Our following comments address the permit changes suggested in the attached letter from DER-Tampa regarding this source.

1. We concur.
2. We concur.
3. We concur.(System to be installed)
4. It is our experience that restricting use to a maximum flow across a scrubber could potentially cause problems with meeting emission limiting standards. This source is presently using what is essentially fresh water for scrubbing at a recirculation rate much less than design rates. We have operated in this mode since start-up and are meeting compliance standards. In the future, should we be required to use pond water for scrubbing, it may be necessary to use flows above the design recirculation rate. We appreciate the Departments concern with water flow rates but it could be counter-productive to restrict our ability to use whatever amount of water is necessary to meet the emission limiting standards. We feel very strongly regarding this issue because our experience at New Wales shows that more water not less has in most cases led to a cleaner gas stream exiting the plant. In the event you feel some statement or condition needs to exist to address water flow we suggest that you specify retesting of the source if the recirculation rate varies plus or minus twenty-five percent of recorded flow during the most recent compliance test.
5. We concur.(This system is already in existence)
6. We concur.

Mr. John Reynolds  
April 3, 1991  
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7. We concur.

We would appreciate your earliest possible response to this request for permit amendment so that we may respond to DER-Tampa by June 30, 1991 as requested in the attached copy of their letter.

Thanks for your assistance in this matter and if you have any questions regarding this request please do not hesitate to contact me.

Sincerely

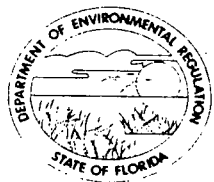


J. M. Baretincic  
Director, Environmental Services

JMB/alg

Attachment

cc: J. A. Brafford  
A. L. Girardin  
Jim McDonald - DER, Tampa



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: Steve Smallwood  
FROM: Clair Fancy *CHF*  
DATE: May 22, 1991  
SUBJ: Amendment to Construction Permit AC 53-177264  
IMC Fertilizer, Inc.

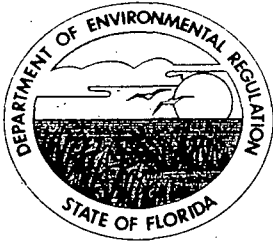
Attached for your approval and signature is a letter modifying certain conditions of the above referenced construction permit.

The Bureau recommends approval of these amendments.

CF/JR/plm

Attachment

*CHF/OK  
Thank you  
for  
5-23-91*



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 22, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John A. Brafford  
Vice President & General Manager  
IMC Fertilizer, Inc.  
P. O. Box 1035  
Mulberry, Florida 33860

Dear Mr. Brafford:

Re: Modification of Permit No. AC 53-177264

The above permit is amended as stated below in response to IMC's letter dated April 3, 1991.

Specific Condition No. 8

Present:

Within 60 days after initial startup, the DAP 2E cooler scrubber shall be tested for particulate matter and fluoride emissions. Test procedures shall be in accordance with EPA reference methods 1, 2, 3, 5 and 13A or 13B as published in 40 CFR Part 60, Appendix A. The Department's Southwest District office shall be notified in writing at least 5 days prior to initial startup and at least 15 days prior to the compliance test. The test shall be conducted at permitted production capacity or no less than 90 percent thereof. P<sub>2</sub>O<sub>5</sub> input, pH of scrubber water, and scrubber pressure drop shall be reported along with the test data. Results of the compliance test shall be reported to the Department's Southwest District office within 45 days of test completion.

New:

Within 60 days after initial startup, the DAP 2E cooler scrubber shall be tested for particulate matter, visible emissions, and fluoride emissions. Test procedures shall be in accordance with EPA reference methods 1, 2, 3, 5, 9, and 13A or 13B as published in 40 CFR Part 60, Appendix A. The Department's Southwest District office shall be notified in writing at least 5 days prior to initial startup and at least 15 days prior to the compliance test. The test shall be conducted at permitted production capacity or no less than 90 percent thereof. P<sub>2</sub>O<sub>5</sub> input, gpm scrubber water, and scrubber pressure drop shall be reported along with the test data. Results of the compliance test shall be reported to the Department's Southwest District office within 45 days of test completion. If a compliance test is conducted when only fresh

Mr. John A. Brafford  
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water is used for scrubber water, a new compliance test shall be required when the scrubber has operated more than 10 days during a calendar year with pond water.

New Specific Condition No. 11

This source shall comply with all applicable provisions of the new source performance standards listed in 40 CFR 60, Subpart V.

New Specific Condition No. 12

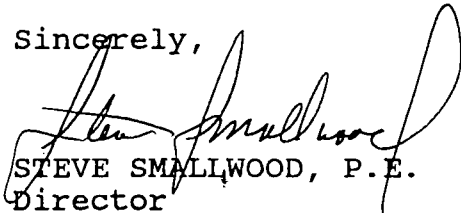
This source shall continuously measure and permanently record the scrubber's recirculating water flow rate (gpm).

New Specific Condition No. 13

Visible emissions from the DAP 2E cooler scrubber shall not exceed 20 percent opacity in accordance with F.A.C. Rule 17-2.610(2).

This amendment letter shall become a part of construction permit AC 53-177264.

Sincerely,



STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

SS/JR/plm

c: B. Thomas, SWD  
C. Pflaum, P.E.