



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 16, 1997

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. E. M. Newberg  
Vice President and General Manager  
IMC-Agrico Company  
P.O. Box 2000  
Mulberry, Florida 33860

Re: DEP File No. 1050059-024-AC (PSD-FL-244)  
New Wales Multiphos Plant

Dear Mr. Newberg:

The Department has reviewed IMC-Agrico's application received on December 1, 1997 for new equipment to be installed in the Multiphos Plant. The additional information listed below is required to process the application.

1. A detailed description of the proposed emission control system is needed including control system flow rates (gas and liquid streams), pond water fluoride concentrations and temperatures, and the proposed SO<sub>2</sub> removal efficiency and cost effectiveness calculations. The additional information should be sufficiently detailed to allow a determination of achievable emission levels through mass transfer calculations. A thorough assessment of the cost effectiveness of the various SO<sub>2</sub> control options including a separate countercurrent scrubber vs. the proposed crossflow add-on should be done.
2. Please explain why the SO<sub>2</sub> scrubbing system performance was not specified. SO<sub>2</sub> scrubbing is sufficiently advanced that the reagent and its performance can be specified prior to construction. Also explain the sulfurous acid/stripper system indicated on Drawing L5.
3. Along with the Appendix D information to be submitted, please provide all SO<sub>2</sub> emission test results that have been obtained for this plant to date.
4. NO<sub>x</sub> emissions based on AP-42 factors exceed the PSD significance level when No. 6 oil is used for 400 hours (Kiln: 4.1 TPY for No. 6; 33.4 TPY for No. 2; Dryer: 0.3 TPY for No. 6; 2.5 TPY for No. 2 = 40.3 TPY total). To resolve PSD-applicability concerns, EPA Method 7E emission tests should be performed while burning each of the fuels used and the results submitted along with Appendix D.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

*Printed on recycled paper.*

Mr. E. M. Newberg  
Page 2 of 2  
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The Department will resume processing this application after receipt of the requested information. If you have any questions on this matter, please call John Reynolds at 850/488-1344.

Sincerely,



A. A. Linero, P.E. Administrator  
New Source Review Section

AAL/jr

cc: Bill Thomas, SWD  
Joe King, Polk Co.  
John Koogler, K&A  
Brian Beals, EPA  
John Bunyak, NPS

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 E.M. Newberg  
 IMC-Asico  
 P.O. Box 2000  
 Mulberry, FL  
 33860

4a. Article Number  
 P 2105 659 268

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PS Form 3811, December 1994

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PS Form 3800 April 1995