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BUREAU OF AIR REGULATION

September 30, 1999

Mr. Eric Peterson, P. E.
Florida Department of
Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

**RE: AFI Plant - Scrubbing System Alternative Methods
of Operation Application
Permit Nos. 1050059-026-AC and 1050059-027-AV
AIRS No 1050059
Emission Unit No. 027
New Wales Plant**

Dear Mr. Peterson:

Based on your request for additional information dated September 20, 1999, the following responses are submitted in order that the Department can continue processing the application.

1. **Why were the packed scrubbers previously included in the scrubbing system?**

When the AFI plant was designed back in the 1970s the best technology for scrubbing at that time included packed bed scrubbers based on GTSP plant technologies. The packed bed scrubbers were required for fluoride scrubbing. The AFI process uses defluorinated acid so there are no fluoride emissions present.

2. **What effect will the removal of the packed sections have on potential fluoride and SO₂ emissions, if any?**

As stated above the AFI process uses defluorinated acid so fluoride scrubbing is not an issue. The plant also uses natural gas the majority of the time so SO₂ emissions should not be an issue either.

3. **Do you still wish to be permitted to fire fuel oil at the AFI Plant? If the packing controls S02 emissions, the removal of the packing would cause an increase in actual S02 emissions. The project would be considered a modification and require review for PSD applicability.**

The ability to use fuel oil is needed. The requirement to run fuel oil with the packing can be included in the permit to retain the SO2 emissions at current permitted levels. This is operation as Alternative 1.

4. **How were the pressure drop readings lost and what steps have been taken to correct this loss of data?**

The lost readings were made on an additional log sheet for the test. The log sheet was misplaced after the final test day. The Title V readings for that day were made and were used in place of the missing readings. They however did not coincide exactly to test periods.

5. **Do you plan to produce DAP at the AFI Plant? Limited DAP production occurred at the AFI Plant in the early 1980's, according to our files.**

There are no plans to make DAP again in AFI. This was done in the past when AFI production requirements were low and DAP was very high. The demand for AFI products now utilizes that plant's present capacity.

6. **Please provide the visible emissions test reports for the compliance tests conducted on August 4 and 5, 1999.**

Based on a conversation with W. A. Proses and C. D. Turley, a separate visible emission test will be submitted in place of those tests. The first opportunity to conduct this test will be after October 14 for the same product as tested in the application. The test will be submitted separately once completed.

7. **Please provide the scrubber pressure drop and flowrate readings during the compliance tests conducted in 1997 and 1998.**

The pressure drop and flowrate for the compliance tests in 1997 and 1998 were not recorded and can not be submitted. These data were not specifically required by the permit at that time and are currently being recorded as part of the present Title V permit recordkeeping requirements.

The supplemental requirement No. 14, Compliance Report and Plan, and No. 15, Compliance Certification, are also included for the processing of the New Wales Title V permit revision as indicated on page 2 of the application.

Mr. Eric Peterson, P. E.

Page 3

September 30, 1999

Thank you for your attention to this matter. If you have any questions, please contact C. D. Turley or myself at 941-428-7153 or 941-428-7106.

Sincerely,



P. A. Steadham
Environmental Team Leader
Concentrates - Florida

Attachments

xc: Mr. A. Linero - w/o att.
FDEP - Tallahassee Z 149 946 398

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