



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 24, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. M. A. Daigle
Vice President, Florida Concentrates
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860-1100

Re: Synthetic Minor Source Application DEP File No. 1050059-044-AC
Original Permit PSD-FL-244 (1050059-024-AC)

Dear Mr. Daigle:

On September 26, 2003 the Department received your application (dated September ²⁵) for a synthetic minor source (non-PSD) permit for the existing tricalcium phosphate animal feed (Multifos) Kiln C. On October 16, we received your responses to our partial list of questions related to the application. Following are the additional questions for which a response is needed in order to process the application.

1. Please provide updated information on NO_x emissions. Although the original permit did acknowledge NO_x emissions marginally greater than 40 tons per year, a final BACT value has not been determined because the kiln has not been tested at relatively high production rates. The new application still anticipates operating at a higher rate than the recent historical operation of Kiln C. The possibility of substantial NO_x formation (thermal NO_x) exists based on the temperatures required to defluorinate the raw materials. The alternative given in the October 16 letter to limit fuel usage would make sense for controlling fuel-related NO_x but not thermal NO_x.
2. Please describe the features incorporated into the kiln design that control NO_x.
3. Please provide a rough overall material balance regarding the fluorides that enter the process and their fate. This would include the fluorides in the raw materials entering the Multifos process, incoming and outgoing scrubber water, etc. Estimate percent removal by the control equipment.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

If you have any questions regarding this matter, please call me at 850/921-9523.

Sincerely,

A. A. Linero, Administrator
New Source Review Program

AAL/aal

cc: Jerry Kissel, DEP-SWD
John Koogler, P.E., Koogler & Associates

"More Protection, Less Process"

Printed on recycled paper.