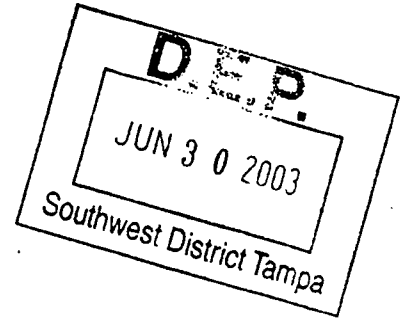




Certified Mail 7002 0460 0002 8878 5908
Return Receipt Requested

June 25, 2003



Mr. Eric Peterson, P.E.
District Air Permitting Supervisor
Southwest District
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

**Re: Response to Request for Additional Information
Monitoring Method Proposal, NESHAP, 40 CFR 63, Subpart AA and BB
Facility ID No. 1050059
Title V Permit Revision Project No. 1050059-038-AV
Initial Title V Permit No. 1050059-014-AV
New Wales Plant**

Dear Mr. Peterson:

The Request for Additional Information referenced above was received on May 30, 2003. The questions are repeated below in bold with each response following.

1. **All Emission Units. No pressure drop units were provided in the tables. Reviewing the Title V permit (1050059-014-AV) would indicate that the pressure drop is recorded in inches of water. Please confirm and include the units with the information provided.**

Response:

Pressure drop is recorded in inches of water.

2. **DAP Plant No. 2 East Train (EU No. 045). The pressure drop range proposed for the Dryer Venturi Scrubber was 15.0 – 23.8 inches of water (see item 1 of this correspondence). However, a pressure drop of 23.9 was indicated for the 9/24/01 test. Please confirm that the high end of the range requested is 23.8 or 23.9. If the applicant chooses 23.8, please provide a rationale for that choice.**

Eric Peterson, P.E., District Air Permitting Supervisor
Florida Department of Environmental Protection
June 25, 2003
Page 2



Response:

The high end of the proposed pressure drop range should have been 23.9 inches of water. Thanks for catching our oversight.


- All Emissions Units. 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. Therefore, please have your response and proposed pressure drop range request certified by a professional engineer.**

Response:

This response has been certified by a professional engineer registered in the State of Florida. Attachments 1 and 2 from the proposed pressure drop range request being re-submitted under this certification are also enclosed.

Should any additional information be required to process the proposed monitoring method, please contact Phil Steadham (863-428-7106) or Dave Turley (863-428-7153). Thank you.

Sincerely,


M. A. Daigle
Vice President
Concentrates - Florida

MAD:jp
attachments

cc: C. D. Turley
P. A. Steadham

NESHAP Request for add inf 053003



ATTACHMENT 1

**IMC Phosphates Company – New Wales Plant – Facility ID No. 1050059
Phosphoric Acid Plant (East) EU ID No. 008**

D.E.P.
JUN 30 2003
Southwest District Tampa
SPECIAL SAMPLING

Test Results:

Test Date:	<u>5/11/2000</u>	<u>8/09/2001</u>	<u>4/09/2002</u>	<u>3/18/2003</u>	
TPD P ₂ O ₅ input:	1872	<u>1847</u>	<u>1968</u>	1950	
Actual F lb/hr:	1.06	0.81	1.14	0.49	
Allowable, lb/hr:	1.53	1.53	1.53	1.53	±20%
Total GPM:	641	657	<u>676</u>	<u>589</u>	471 - 707
IN H ₂ O Scrubber Pressure Drop:	<u>0.3</u>	1.7	0.5	<u>10.5</u>	8.4 - 12.6

Proposed Pressure Drop Range: 0.2 - 10.5 GPM 589 - 676
0.3

**IMC Phosphates Company – New Wales Plant – Facility ID No. 1050059
Phosphoric Acid Plant (West) EU ID No. 017**

Test Results:

Test Date:	<u>5/18/2000</u>	<u>5/24/2001</u>	<u>3/26/2002</u>	<u>3/31/2003</u>	
TPD P ₂ O ₅ input:	2056	<u>1942</u>	2062	<u>2068</u>	
Actual F lb/hr:	0.89	0.73	0.69	0.39	
Allowable, lb/hr:	1.53	1.53	1.71	1.53	±20%
Total GPM:	636	<u>701</u>	669	<u>583</u>	467 - 700
Scrubber Pressure Drop:	<u>0.4</u>	2.3	3.9	<u>5.0</u>	4 - 6

Proposed Pressure Drop Range: 0.2 - 5.0 GPM 583 - 701
0.4

**IMC Phosphates Company – New Wales Plant – Facility ID No. 1050059
Phosphoric Acid Plant No. 3 EU ID No. 039**

Test Results:

Test Date:	<u>5/25/2000</u>	<u>5/18/2001</u>	<u>4/17/2002</u>	<u>3/17/2003</u>	
TPD P ₂ O ₅ input:	<u>2673</u>	<u>2375</u>	2436	2407	
Actual F lb/hr:	0.58	1.42	0.25	0.23	±20%
Allowable, lb/hr:	1.79	1.79	1.79	1.79	
Total GPM:	683	695	<u>708</u>	<u>597</u>	478 - 716
Scrubber Pressure Drop:	<u>0.3</u>	0.3	0.5	<u>10.5</u>	8.4 - 12.6

Proposed Pressure Drop Range: 0.2 - 10.5 GPM 597 - 708
0.3

ATTACHMENT 2

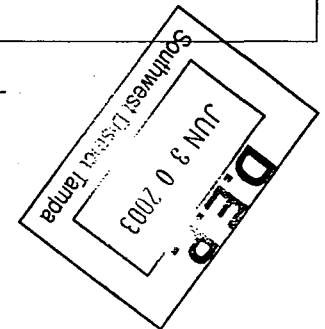
**IMC Phosphates Company – New Wales Plant – Facility ID No. 1050059
DAP Plant No. 2 – West Train EU ID No. 046**

SPECIAL SAMPLING

Test Date:	1/17/95	2/13/96	1/26/98	4/14/98	2/10/99	9/25/00	9/10/01	5/22/02	4/01/03
TPH	153.02	140	140	150	154	157	148	149	141
TPH P ₂ O ₅ input:	74.1	68.2	66.0	71.0	73.0	74.8	70.6	71.6	67.0
Fuel Type:	No. 6 Oil		No. 6 Oil		No. 6 Oil		No. 6 Oil		Natural Gas
Allowable, mmBtu/hr:	11.52		7.5	13.1	8.15	19.8	9	1.4	1.8
Actual PM lb/hr:	4.1	2.1	8.7	3.1	2.7	5.1	3.7	3.8	2.7
Allowable, lb/hr:	14.1	14.1	14.1	5.7	5.8	6.0	5.7	5.7	5.4
Actual F lb/hr:	1.2	1.2	2.5	2.5	2.6	2.6	1.7	1.8	1.8
Allowable, lb/hr:	3.5	3.5	3.5	3.0	3.0	3.1	2.9	3.0	2.8
Actual SO ₂ lb/hr:	18.9		4.99		5.5	14.2	14.0		
Allowable, lb/hr:	22		22		22	22	22		
Actual NO _x lb/hr:	3.6		3.9	2.7	3.7	5.8	0.8	0.2	2.6
Allowable, lb/hr:	12.6		12.6	12.6	12.6	12.6	12.6	12.6	12.6 ± 20%
R/G Venturi GPM:						1100	1520	1686	1549 1238-1859
R/G Venturi Pressure Drop:	17.4	18.0	16.7	16.1	17.0	18.6	20.5	21.3	21.3 17.0-25.6
Dryer Venturi GPM:						1100	1500	1712	1551 1241-1861
Dryer Venturi Pressure Drop:	15.7	19.0	15.5	20.7	15.5	17.1	19.5	21.9	22.1 17.7-26.5
R/G Tailgas GPM:						2200	1967	2231	2190 1758-2626
R/G Tailgas Pressure Drop:	7.6	3.0	3.1			6.0	5.2	5.2	7.0 5.6-9.4
Dryer Tailgas GPM:						1200	1700	1791	1992 1594-2390
Dryer Tailgas Pressure Drop:	2.9	3.0	1.9			4	4.1	3.7	4.2 3.4-5.0

ALL TESTS	Proposed Pressure Drop Range	2000-2003
(16.1) - 21.3	R/G Venturi: (15.0) - 21.3	18.6 - 21.3
(15.5) - 22.1	Dryer Venturi: (15.0) - 22.1	17.1 - 22.1
3.0 - 7.6	R/G Tailgas: 3.0 - 7.6	5.2 - 7.0
1.9 - 4.2	Dryer Tailgas: 1.9 - 4.2	3.7 - 4.2

GPM 2000-2003
1100 - 1686
1100 - 1712
1967 - 2231
1200 - 1992



IMC Phosphates Company – New Wales Plant – Facility ID No. 1050059
DAP Plant No. 2 – East Train EU ID No. 045

Test Results:

Test Date:	1/25/95	1/30/96	3/12/97	2/03/98	5/12/98	2/23/99	8/29/00	9/24/01	10/10/01	10/30/2002	3/26/2003	SPECIAL SAMPLING
TPH	139	140	140	137	150	154	168	152	154	139	142	17%
TPH P ₂ O ₅ input:	67.1	68.0	67.8	64.6	71.0	72.0	75.5	72.1	72.7	64.9	67.5	
Fuel Type:	No. 6 Oil		Natural Gas	No. 6 Oil	No. 6 Oil	No. 6 Oil	No. 6 Oil	No. 6 Oil	Natural Gas	Natural Gas	Natural Gas	
Allowable, mmBtu/hr:	5.4		4	9	6.2	10	20.1	9.9	1.3	1.2	3.3	
Actual PM lb/hr:	3.3	1.9	1.3	3.5	2.1	2.1	4.0	2.8	3.3	4.0	3.1	
Allowable, lb/hr:	14.1	14.1	14.1	14.1	5.7	5.8	6.0	5.8	5.8	5.2	5.4	
Actual F lb/hr:	0.4	0.9	2.6	2.1	1.5	1.5	2.4	0.9	1.2	1.0	1.8	
Allowable, lb/hr:	3.5	3.5	3.5	3.5	3.5	3.5	3.2	3.0	3.0	2.7	2.8	
Actual SO ₂ lb/hr:	0.2			3.3		3.4	8.5	4.5				
Allowable, lb/hr:	22			22		22	22	22				
Actual NO _x lb/hr:	5.1		0.8	3.6	1.3	6.2	5.2	2.7	1.7	1.0	0.9	
Allowable, lb/hr:	12.6		12.6	12.6	12.6	12.6	12.6	12.6	12.6	12.6	12.6	± 20%
R/G Venturi GPM:							1000	1608	1534	1546	1501	1204-1801
R/G Venturi Pressure Drop:	14.0	18.5	16.5	24.0	17.0	18.0	13.7	19.2	17.2	18.8	20.1	16.1-24.0
Dryer Venturi GPM:							1000	1652	1561	1550	1497	1148-1796
Dryer Venturi Pressure Drop:	14.5	20	19	19.2	21.0	19.5	21.3	23.9	16.3	23.8	21.5	17.2-25.8
R/G Tailgas GPM:							1300	2000	1894	1936	2236	1789-2683
R/G Tailgas Pressure Drop:	6.2	3.0	3.4	5.4			5.8	5.7	5.1	5.4	6.4	5.1-7.7
Dryer Tailgas GPM:							1000	1650	1594	1894	1989	159-2387
Dryer Tailgas Pressure Drop:	6.2	2.0	3.4	2.9			3.8	4.0	4.1	3.5	3.9	3.1-4.7

ALL TESTS Proposed Pressure Drop Range 2000-2003

14.0-24.0	R/G Venturi:	15.0-24.0	15.7-24.0
14.5-23.9	Dryer Venturi:	15.0-23.8	16.3-23.9
3.0-6.4	R/G Tailgas:	3.0-6.4	5.0-6.4
2.0-6.2	Dryer Tailgas:	2.0-6.2	3.5-4.1

GPM 2000-2003

1000-1608
1000-1652
1500-2236
1000-1989

**IMC Phosphates Company – New Wales Plant – Facility ID No. 1050059
GMAP 3 Plant EU ID No. 078**

Test Results:

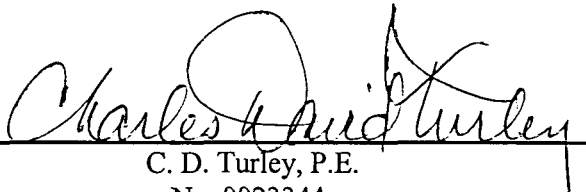
<u>Test Date:</u>	<u>7/13/2001</u>	<u>5/09/2002</u>	<u>5/24/2002</u>	<u>5 Period SAMPUNG 3/05/2003</u>
TPH	95	139	117.5	124
TPH P ₂ O ₅ input:	45.3	74.7	62.3	67.1
Fuel Type:	Natural Gas	No. 6 Oil	Natural Gas	Natural Gas
Allowable, mmBtu/hr:	15.4	9.6	10.2	6.1
Actual PM lb/hr:	5.54	5.24		
Allowable, lb/hr:	6.1	9		
Actual F lb/hr:	0.28	0.64	0.61	0.21 $\pm 20\%$
Allowable, lb/hr:	1.7	2	2	2.1
Venturi GPM:	1689-1854 1689	1854	1880	1758 1406-2110
Venturi Pressure Drop:	20.8-22.8 22.5	21.8	22.8	20.8 16.6-25.0
Impact Spray GPM:	904-1585 1421	1568	1585	904 723-1085
Kimre Face GPM:	1063-1231 1063	1231	1216	1150 920-1380
Kimre Pressure Drop:	2.6-9.8 2.6	3.9	3.6	9.8 7.8-11.8
Equipment Venturi GPM:	378-436 378	393	418	436 349-523
Equipment Venturi Pressure Drop:	15.4-17.9 15.4	17.8	17.9	16 12.8-19.2
Equipment Impact Spray GPM:	236-247 238	247	241	236 189-283

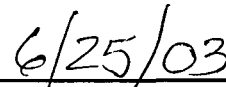
Proposed Pressure Drop Range
Kimre Face: 2.6 – 9.8

ATTACHMENT 3

Certification by Professional Engineer

Based on my review of the above information submitted, I certify, to the best of my knowledge, that there is reasonable assurance the air pollutant emission unit and the air pollution control equipment described herein, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in Florida statutes and rules of the Department. Furthermore, I certify that, to the best of my knowledge, the emission estimates and cost estimates reported or relied upon in these documents are true, accurate and complete and are based on reasonable techniques available for calculating emissions.


C. D. Turley, P.E.
No. 0023344


Date