



ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 ▪ FAX/377-7158

KA 124-01-03

August 8, 2002

RECEIVED

AUG 09 2002

BUREAU OF AIR REGULATION

Mr. Syed Arif, P.E.  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: IMC Phosphates Company  
Additional Information  
Sulfuric Acid Plant 4 – Boiler Replacement

Dear Mr. Arif:

The following information is submitted in response your letter dated July 30, 2002.

- 1. Please explain the type of boiler being replaced, whether it's a waste heat boiler or some other boiler, and provide a drawing of the plant indicating the boiler being replaced.**

RESPONSE: The boiler being replaced is a fire-tube type unit normally referred to as the No. 1 Waste Heat Boiler in a Monsanto Flow Diagram. The plant flow diagram is attached.

- 2. Please explain the reasons for complete failure of the boiler, whether due to age or for some other reasons.**

RESPONSE: The No. 4 Sulfuric Plant has been operating since 1981 with the original boiler tube bundle. The No. 1 Waste Heat Boiler had 3 major tube failures in the past 12 months (September 2001, June 2002 and July 2002). Replacement was planned for the next plant turnaround.

- 3. Please give details of the new boiler that will replace the failed boiler. Is the new boiler considered like-kind replacement of the same type? Is the capacity and size of the new boiler same as the old one.**

RESPONSE: The replacement boiler is a spare that has been rebuilt that originally came from No. 3 Plant. This No. 1 Boiler is identical in all the 5 Sulfuric Plants at New Wales. The replacement is "like-kind" and will not change capacity. The boiler removed will be repaired and become the next spare.

**4. Please explain what is included in the related equipment that will be repaired along with the boiler.**

RESPONSE: The top 12 inches of the first pass catalyst bed was screened. The ductwork that was damaged due to the boiler failure was replaced.

**5. Please give details of recent (last two years) modifications done at the plant.**

RESPONSE: The No. 4 Plant under went a turnaround in July 2001. Several pieces of ductwork were replaced and routine turnaround maintenance was performed. No modifications were made to the plant.

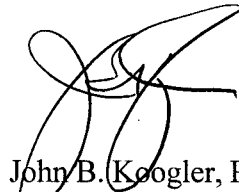
**6. Please provide a sealed statement from a Professional Engineer registered in Florida certifying that this change will not increase short or long-term emissions as well as production increase.**

RESPONSE: This change will not increase short or long-term emissions or production.

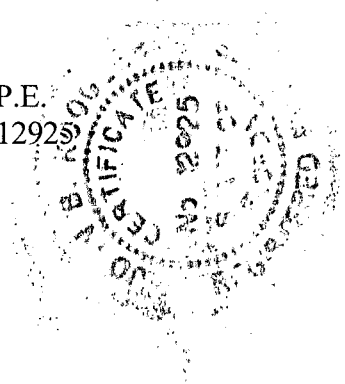
If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.  
Florida Registration No. 12925  
(SEAL)

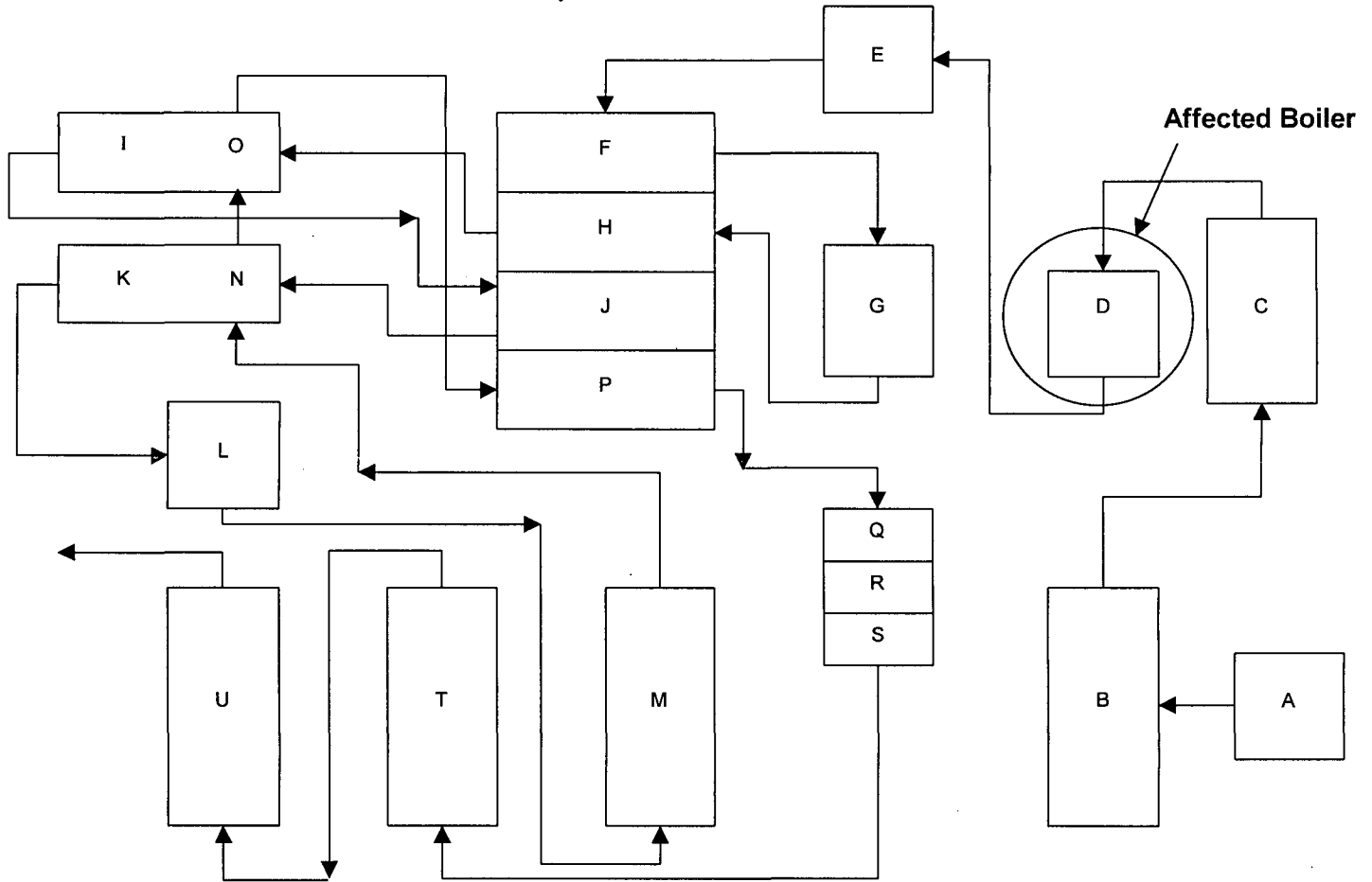


JBK:par.  
Encl.

c: C. D. Turley, IMC  
*Dr. Kiesel, SWP*

# Process Flow Diagram - 04 Sulfuric Acid Plant

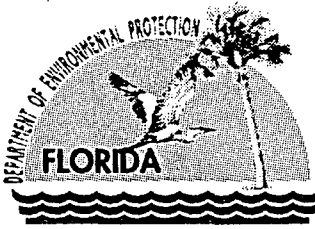
Gas System



- A – Blower (Turbine)
- B – Drying Tower
- C – Furnace
- D – #1 Waste Heat Boiler
- E – OA Superheater
- F – Converter; 1st Pass
- G – #2 Waste Heat Boiler
- H – Converter; 2nd Pass

- I – Hot Pass Heat Exchanger
- J – Converter; 3rd Pass
- K – Cold Pass Heat Exchanger
- L – 3B Economizer
- M – Interpass (IPA) Tower\*
- O – Hot Pass Heat Exchanger
- P – Converter; 4th Pass
- N – Cold Pass Heat Exchanger

- Q – 4A Superheater
- R – 4C Economizer
- S – 4A Economizer
- T – Final Absorption Tower
- U – Stack



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

July 30, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. P.A. Steadham, Manager  
Environmental Services Concentrates - Florida  
IMC Phosphates Company  
P.O. Box 2000  
Mulberry, FL 33860-1100

Re: Notification of Equipment Maintenance, Repair & Replacement  
Sulfuric Acid Plant No. 4, New Wales Plant

Dear Mr. Steadham:

The Department received your notification on July 25, 2002 of the replacement of the No. 1 boiler and repair of related equipment in the No. 4 Sulfuric Acid Plant. The Department needs further clarification in the type of equipment being replaced and additional information concerning this request. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. Please explain the type of boiler being replaced, whether it's a waste heat boiler or some other boiler, and provide a drawing of the plant indicating the boiler being replaced.
2. Please explain the reasons for complete failure of the boiler, whether due to age or for some other reasons.
3. Please give details of the new boiler that will replace the failed boiler. Is the new boiler considered like-kind replacement of the same type? Is the capacity and size of the new boiler same as the old one.
4. Please explain what is included in the related equipment that will be repaired along with the boiler.
5. Please give details of recent (last two years) modifications done at the plant.
6. Please provide a sealed statement from a Professional Engineer registered in Florida certifying that this change will not increase short or long-term emissions as well as production increase.

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 Syed Arif at 850/921-9528.

Sincerely,

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

cc: Jerry Kissell, DEP SWD  
P. Raval, Koogler & Associates

"More Protection, Less Process"

Printed on recycled paper.



Via Certified Mail 7002 0460 0002 8879 3064  
Return Receipt Requested

IMC Phosphates Company  
P.O. Box 2000  
Mulberry, Florida 33860-1100  
863.428.2500

July 23, 2002

**RECEIVED**

**JUL 25 2002**

**BUREAU OF AIR REGULATION**

Mr. A. L. Linero, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Notification of Equipment Maintenance,  
Repair and Replacement  
Sulfuric Acid Plant No.4  
New Wales Plant

Dear Mr. Linero:

This is to notify the Department of the replacement of the No. 1 boiler and repair of related equipment in No. 4 Sulfuric Acid Plant at New Wales.

The existing unit will need to be replaced in the next two weeks. The plant is not operating due to complete failure of the boiler. Based on our past discussions with the Department, we understand that this remedial action is routine in nature and will not affect plant capacity or air emissions. This letter is provided as a courtesy to update your files.

If you have any questions, please call me at 863-428-7106.

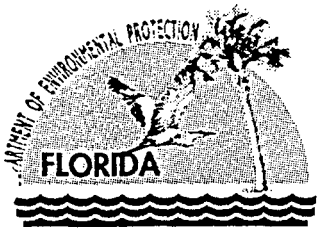
Sincerely,

A handwritten signature in cursive script, appearing to read "P. A. Steadham", with a long horizontal flourish extending to the right.

P. A. Steadham, Manager  
Environmental Services  
Concentrates - Florida

PAS:jp

cc: P. Raval, Koogler & Associates  
M. A. Daigle, IMC



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

March 25, 2003

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. P.A. Steadham, Manager  
Environmental Services Concentrates - Florida  
IMC Phosphates Company  
P.O. Box 2000  
Mulberry, FL 33860-1100

Re: Notification of Equipment Maintenance, Repair & Replacement  
Sulfuric Acid Plant No. 5, New Wales Plant

Dear Mr. Steadham:

The Department received your notification on March 24, 2003 of the replacement of the No. 1 boiler, cold pass heat exchanger and repair of related equipment in the No. 5 Sulfuric Acid Plant. Please provide a sealed statement from a Professional Engineer registered in Florida that the equipment changes are like-kind replacements and will not increase short or long-term emissions as well as production increase.

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 Syed Arif at 850/921-9528.

Sincerely,

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

cc: Jerry Kissell, DEP SWD  
P. Raval, Koogler & Associates  
M. A. Daigle, IMC

*"More Protection, Less Process"*

*Printed on recycled paper.*

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

**OFFICIAL USE**

7001 0320 0001 3692 6792

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	\$	

Sent To  
**Mr. P. A. Steadham**  
 Street, Apt. No.  
 or PO Box No. **Box 2000**  
 City, State, ZIP+4  
**Mulberry, FL 33860-1100**

PS Form 3800, January 2001 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:  
 Mr. P. A. Steadham  
 Manager, Environmental Services  
 IMC Phosphates Company  
 PO Box 2000  
 Mulberry, FL 33860-1100

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 *[Signature]*  Agent  
 Addressee

B. Received by (Printed Name)  
*PA Steadham*

C. Date of Delivery  
*3-28-03*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below  No

Concentrates - Florida

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

7001 0320 0001 3692 6792

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box.

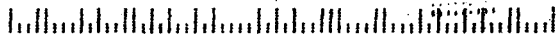
Dept. of Environmental Protection  
Division of Air Resources Mgt.  
Bureau of Air Regulation, NSR  
2600 Blair Stone Rd., MS 5505  
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

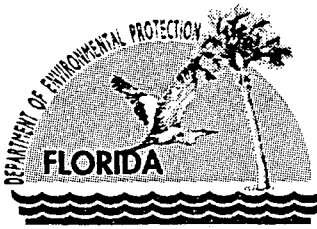
MAR 31 2003

RECEIVED

32399+2400







Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

March 25, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. P.A. Steadham, Manager  
Environmental Services Concentrates - Florida  
IMC Phosphates Company  
P.O. Box 2000  
Mulberry, FL 33860-1100

Re: Notification of Equipment Maintenance, Repair & Replacement  
Sulfuric Acid Plant No. 5, New Wales Plant

Dear Mr. Steadham:

The Department received your notification on March 24, 2003 of the replacement of the No. 1 boiler, cold pass heat exchanger and repair of related equipment in the No. 5 Sulfuric Acid Plant. Please provide a sealed statement from a Professional Engineer registered in Florida that the equipment changes are like-kind replacements and will not increase short or long-term emissions as well as production increase.

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 Syed Arif at 850/921-9528.

Sincerely,

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

cc: Jerry Kissell, DEP SWD  
P. Raval, Koogler & Associates  
M. A. Daigle, IMC

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KOOGLER & ASSOCIATES  
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 ■ FAX/377-7158

KA 124-01-03

April 1, 2003

RECEIVED

APR 07 2003

BUREAU OF AIR REGULATION

Mr. A. A Linero, P.E.  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Notification of Equipment Maintenance, Repair and Replacement  
Sulfuric Acid Plant No. 5, IMC Phosphates Company (New Wales)

Dear Mr. Linero:

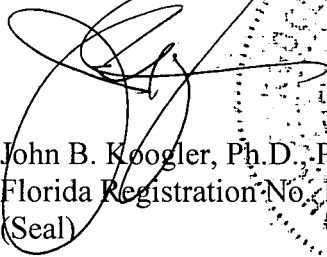
This is in response to your letter dated March 25, 2003, requesting a sealed statement from a Professional Engineer regarding the above proposed equipment changes.

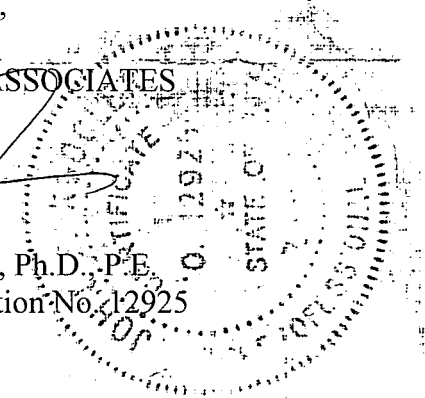
The proposed heat exchange equipment replacement does not involve the installation of identical components. However, the equipment replacement will be like-kind relative to the heat exchange capacity and is not expected to increase short or long-term emissions. Further, the proposed heat exchange equipment replacement is not expected to result in an increase in the production rate of sulfuric acid.

If you have any further questions, please do not hesitate to call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

  
John B. Koogler, Ph.D., P.E.  
Florida Registration No. 12925  
(Seal)



JBK:par

C: Phil Steadham, IMC  
Mike Daigle, IMC  
Jerry Kissel, FDEP-Tampa



RECEIVED

MAR 24 2003

Via Certified Mail 7002 2030 0002 3542 8831  
Return Receipt Requested

BUREAU OF AIR REGULATION

IMC Phosphates Company  
P.O. Box 2000  
Mulberry, Florida 33860-1100  
863.428.2500

March 19, 2003

Mr. A. L. Linero, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Re: Notification of Equipment Maintenance,  
Repair and Replacement  
Sulfuric Acid Plant No.5  
New Wales Plant**

Dear Mr. Linero:

This is to notify the Department of the replacement of the No. 1 boiler, cold pass heat exchanger, and repair of related equipment in No. 5 Sulfuric Acid Plant at New Wales.

The existing units will need to be replaced in the turnaround next month, beginning on April 23. Based on our past discussions with the Department, we understand that this remedial action is routine in nature and will not affect plant capacity or air emissions. This letter is provided as a courtesy to update your files.

If you have any questions, please call me at (863) 428-7106.

Sincerely,

P. A. Steadham, Manager  
Environmental Services  
Concentrates - Florida

PAS:jp\SAP5

cc: P. Raval, Koogler & Associates  
M. A. Daigle, IMC  
*Q. Kessel, SWP*

Permitting Application - Permit Detail and Log Permit					
<b>ARMS Facility</b>					
POINT	AIRS ID: 1050059	STATUS: A	OFFICE: SWD	SW: TAMPA	
SITE NAME: NEW WALES PLANT			COUNTY: POLK		
OWNER/COMPANY: MOSAIC FERTILIZER LLC					
<b>Project</b>					
AIR Permit #	1050059	041	AC	Project #	041
Permit Office	TAL (HEADQUARTERS)			Agency Action	Issued
Project Name	MC PHOSPHATES		Desc	modification conditions 5, 7, and 8 of SAP no. 2 and no. 3 (1050036-036)	
Type/Sub/Des	AC	M1	Minor Modification		Logged
Received	02/24/2003	Issued	04/17/2003	Expires	04/17/2003
Fee	0.00	Fee Recd		Dele	
				Override	TITLE V
<b>Related Party</b>					
Role	APPLICANT		Begin	03/04/2003	End
Name	KOOGLER, JOHN B.		Company	KOOGLER & ASSOCIATES	
Address	4014 NW 13TH ST				
City	GAINESVILLE		State	FL	Zip
Phone	352-377-5822	Fax	352-377-7158		
<b>Processors</b>					
Processor	ARIF_S	Y	Active	03/04/2003	Inactive
					Events



4014 NW 13th STREET  
GAINESVILLE, FL 32609-1923  
352/377-5822 ■ FAX/377-7158

KA 124-06-01

March 22, 2007

RECEIVED

MAR 26 2007

BUREAU OF AIR REGULATION

Ms. Trina Vielhauer  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

SUBJECT: Request for Past NSR/PSD Applicability Determinations  
Regarding Sulfuric Acid Plants

Dear Ms. Vielhauer:

In order to better understand the PSD/NSR rule applicability provisions, as applied to sulfuric acid plants, we are requesting from FDEP copies of past applications, determinations and guidance documents on that subject pursuant to the Sunshine Law, Chapter 286, Florida Statutes.

It is understood that these determinations are on a case-by-case basis, however, FDEP's past determinations will provide us more insight on the subject.

As it is not our intention to burden FDEP staff with making copies of the documents, we will contact you in the next few days to make the necessary copying arrangements.

Your assistance in this matter would be greatly appreciated.

If you have any questions, please do not hesitate to call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:par