



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

August 22, 2000

RECEIVED

AUG 31 2000

BUREAU OF AIR REGULATION

Mr. Richard Krakowski
Vice President and General Manager
IMC Phosphate Company
P.O. Box 2000
Mulberry, FL 33860-1100

Dear Mr. Krakowski:

RE: Responsible Official (RO) for IMC Phosphates Company Facilities

As we discussed on the phone on August 18, 2000, your recent request to process Title V permit Administrative Corrections for five IMC facilities to reflect the recent company name change raised the question of the designation of the Responsible Official (RO) for each of the facilities. This is an important Title V concept as this person is required to sign all Title V permit applications and compliance statements and thereby accepts responsibility for the accuracy of the information contained in them.

The recent Administrative Correction requests, in which the Application for Transfer of Permit documents were signed by you and included a letter delegating to you the designation of a Responsible Corporate Official, raised the question as to whether this was indicating that you were now the designated RO for these five facilities under the new company name of IMC Phosphate Company, superceding other individual facility RO designations that we had previously received under the name IMC - Agrico Co. Based on our conversation, this was not your intent, and we agreed that it would be appropriate and useful for all parties if there were an official designation and acceptance of RO status for each of the facilities under the new company name. To that end please respond by indicating who is the responsible official (name and title) for each of the following Title V facilities, along with a signature from each of those so designated stating that they are aware of and accept this RO designation.:

- Central Florida Mineral Operations (facility ID 1050034)
- South Pierce Facility (facility ID 1050055)
- Prairie Facility (facility ID 1050056)
- Nichols Facility (facility ID 1050057)
- New Wales Facility (facility ID 1050059)

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

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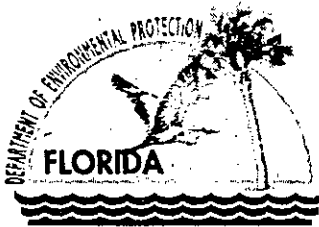
If you have any questions concerning this letter please contact me (ext. 107) or David Zell (ext. 118) of my staff at (813) 744-6100.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Kissel". The signature is written in a cursive style with a large initial "J".

Jerry Kissel, P.E.
District Air Engineer
Southwest District

dz/
IMC_RO.doc



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

NOTICE OF PERMIT AMENDMENT

CERTIFIED MAIL

Mr. Richard Krakowski
Vice President and General Manager
IMC Phosphate Company
P.O. Box 2000
Mulberry, FL 33860-1100

Dear Mr. Krakowski:

Re: Air Construction Permit Amendment Request, dated July 21, 2000
Project: Company Name Change from IMC-Agrico Company to IMC
Phosphates Company (*ARMS Project 1050059-0032*)
Location: New Wales Facility (*Facility ID 1050059*)
Affected Permit Nos.: 1050059-024-AC (PSD FL-244), 1050059-029-AC

On July 25, 2000 the Department received the referenced request to change the company name for the two (2) current construction permits for the IMC Phosphates Company New Wales facility. The Department hereby amends air construction permits 1050059-024-AC (PSD FL-244), 1050059-029-AC as follows:

Page 1 - PERMITTEE; and in header on Pages 2-6 for 1050059-029-AC:

Change From:

IMC-Agrico Company

To:

IMC Phosphates Company

* * * * *

Procedures for administrative hearing and variance/waiver are described below.

Administrative Hearing

This permit is final agency action unless a timely petition for administrative hearing is filed pursuant to sections 120.569 and 120.57 F. S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

IMC Phosphates Company

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Variance/Waiver

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542 F.S.. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to this permit.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c);
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by the person under the Clean Air Act unless and until Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.


IMC Phosphates Company

This permit amendment is final agency action unless a timely petition for administrative hearing is filed pursuant to sections 120.569 and 120.57 F. S., before the deadline for filing a petition. Upon timely filing of a petition or a request for an extension of time to file the petition, this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, Douglas Building, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


W.C. Thomas, P.E.
District Air Program Administrator

drz IMCNWacam.doc

copy to:

Al Linero, FDEP DARM/BAR, New Source Review Section, Tallahassee
(regarding BAR issued construction permit 1050059-024-AC (PSD FL-244))

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT AMENDMENT was sent by certified mail and copies were mailed by U.S. Mail before the close of business on AUG 29 2000 to the listed persons, unless otherwise noted.

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

AUG 29 2000
Date



xc: Stack Team – UR Bldg.
A. A. Linero

Certified Mail 7099 3400 0005 0929 3712
Return Receipt Requested

August 28, 2000

RECEIVED

AUG 30 2000

BUREAU OF AIR REGULATION

Mr. W. C. Thomas, P. E.
Florida Department of
Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

RE: Multifos C-Kiln
Permit ID No. 1050059-014-AV
Unit ID No. 074
New Wales Plant

Dear Mr. Thomas:

Enclosed are the results of the compliance test for the above-referenced permit.

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

Sincerely,

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

PAS:oan

Enclosures

a:\t_1108

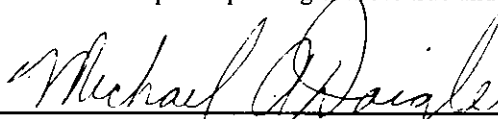
Turley Ext. 7153

Report of Compliance Sampling

IMC-Phosphates Company

Project: Multifos C-Kiln
Facility: New Wales Operations
Point ID: 74
AIRS: 1050059
Permit Number: 1050059-014-AV
Test Date: July 11,12,13 , 2000

To the best of my knowledge, all applicable field and analytical procedures comply with Florida Department of Environmental Protection requirements and all test data and plant operating data are true and correct.



Signature, Owner or Authorized Representative
Michael A. Daigle, General Manger, New Wales

IMC-Phosphates Company

P.O. Box 2000
Mulberry, FL 33860

(863) 428-2500

Company ID #: 1108

08/21/2000

Introduction:

This report details the compliance sampling results for the following source:

Project: Multifos C-Kiln
Facility: New Wales Operations
Point ID: 74
AIRS: 1050059
Permit Number: 1050059-014-AV (1050059-024-AC)
Test Date: July 11,12,13 , 2000

Summary of Results

The source was found to be in compliance with the permits and regulations of the Florida Department of Environmental Protection. The process data and emissions testing results are summarized below:

Process Data:

Kiln P2O5 Feed Rate 2.05 TPH

Fuel Firing Information

Fuel: Natural Gas

C Kiln Fuel Rate 32.1 MMBtu/hr

Emissions:

Allowables by Permit Condition Number P.5, P.6 , P.8, P.9 & P.10

	Actual	Allowable
Fluorides: lb/hr	0.45	0.08
lb/ton P2O5	0.220	0.038
Particulates: lb/hr	4.50	14.30
Sulfur Dioxide: lb/hr	2.27	8.70
Nitrogen Oxides: lb/hr	6.25	N/A
Visible Emissions: %	12.9	15

Emissions Testing Methods:

Methods in accordance with Specific Condition Number P.15

Fluorides: Method 5 & 13B Combined with modifications as allowed by Department for analysis.

Particulate: Method 5 & 13B Combined.

Nitrogen Oxides: Method 7E

Sulfur Dioxide: Method 8

Visible Emissions: Method 9

IMC-Phosphates Company

Process Information

Project: Multifos C-Kiln
 Facility: New Wales Operations
 Point ID: 74
 AIRS: 1050059
 Permit Number: 1050059-014-AV
 Test Date: July 11,12,13 , 2000
 Test Time: 0844-0948, 0853-1009, 1020-1125

Process Rate Data & Calculations

Kiln Feed Rate			Kiln Feed		/ .43646		
Date	Time	Kiln	Kiln Feed Rate	Moisture	% P	%P2O5/%P	= P2O5 TPH
7/11/00	0844-0948	C Kiln	6	6.5	16.1	0.43646	2.07
7/12/00	0853-1009	C Kiln	5.5	3.6	16.1	0.43646	1.96
7/13/00	1020-1125	C Kiln	6	5.5	16.3	0.43646	2.12
Average P2O5 TPH							2.05

		Caustic Scrubber			Cross flow Scrubber		
Date	Time	Sulfite Sump ph	50 % Caustic Flow gpm	Recirc Flow	Total Liquid gpm	Delta p "inches H2O	Fan Amps
7/11/00	8:00	7.2	25	196	1882	1.07	127
	9:00	7.4	26	197	1883	1.12	128
	10:00	7.6	24	197	1882	1.13	126
7/12/00	8:00	7.2	17	198	2053	0.80	93
	9:00	7.4	6	198	2050	0.80	93
	10:00	7.6	9	197	2048	0.78	91
7/13/00	10:00	6.5	17	196	2017	0.96	104
	11:00	6.6	21	196	2015	0.91	104
	12:00	6.5	15	196	2011	0.95	104
AVG		7.1	17.8	197	1982	0.95	108

Fuel Usage Information		C Kiln Fuel Rate	
Date	Time	Fuel Type	mmBTU/hr (1000Btu/cu ft)
7/11/00	0844-0948	Natural Gas	32.4
7/12/00	0853-1009	Natural Gas	34.0
7/13/00	1020-1125	Natural Gas	30.0
Average Fuel Firing Rates			32.1

Process Statement:

I certify that the above statements are true and correct to the best of my knowledge.

Signature: John R. Cloutier
 Title: Production Superintendent
 Date: 8-18-00

IMC-Phosphates Company

Process Information

Project: Multifos C-Kiln
 Facility: New Wales Operations
 Point ID: 74
 AIRS: 1050059
 Permit Number: 1050059-014-AV
 Test Date: July 11,12,13 , 2000
 Test Time: 1145-1250 , 1402-1509 , 0847-0951

Process Rate Data & Calculations

Kiln Feed Rate			Kiln Feed Rate	Kiln Feed Moisture	% P	/ .43646 %P2O5/%P	= P2O5 TPH
Date	Time	Kiln					
7/11/00	1145-1250	C Kiln	6	6.5	16.1	0.43646	2.07
7/12/00	1402-1509	C Kiln	5.5	3.6	16.1	0.43646	1.96
7/13/00	0847-0951	C Kiln	6	5.5	16.3	0.43646	2.12
Average P2O5 TPH							2.05

Date	Time	Caustic Scrubber			Cross flow Scrubber		
		Sulfite Sump ph	50 % Caustic Flow gpm	Recirc Flow	Total Liquid gpm	Delta p "inches H2O	Fan Amps
7/11/00	11:00	6.5	26	196	1881	1.07	125
	12:00	6.5	26	196	1884	1.10	125
	13:00	6.6	24	195	1883	1.01	124
7/12/00	13:00	9.7	18	199	2046	0.79	92
	14:00	8.2	7	197	2047	0.80	91
	15:00	6.6	16	196	2049	0.80	90
7/13/00	8:00	6.5	9	196	2016	0.89	98
	9:00	6.6	11	196	2019	0.98	104
	10:00	6.5	17	196	2017	0.96	104
AVG		7.1	17.1	196	1982	0.93	106

Fuel Usage Information			C Kiln Fuel Rate mmBTU/hr (1000Btu/cu ft)
Date	Time	Fuel Type	
7/11/00	1145-1250	Natural Gas	32.4
7/12/00	1402-1509	Natural Gas	34.0
7/13/00	0847-0951	Natural Gas	30.0
Average Fuel Firing Rates			32.1

Process Statement:

I certify that the above statements are true and correct to the best of my knowledge.

Signature: Jack R. Cluff
 Title: Production Superintendent
 Date: 8-18-00

Source Sampling Summary Sheet							
		Facility:	NEW WALES				
		Plant:	MULTIFOS C - KILN				
		Company ID:	1108				
		FDEP AIRS & Pt. ID:	1050059-074				
		Test Team:	RS/DA				
		Parameter	Unit	Run 1	Run 2	Run 3	Average
		Date:		7/11/00	7/12/00	7/13/00	
		Time Start:		844	853	1020	
		Time End:		948	1009	1125	
		Barometric Pressure:	Inch Hg	30.10	30.10	30.10	
		Static Pressure:	Inch H2O	0.32	0.32	0.32	
		Stack Pressure:	Inch Hg	30.124	30.124	30.124	
		Average Sqrt Delta P:	Inch HOH 1/2	0.747	0.650	0.635	
		Average Delta H:	Inch HOH	1.821	1.413	1.358	1.530
		Maximum Run Vacuum:	Inch Hg	10.0	11.0	10.0	
		Meter Box Number:	Unity	3187	3187	3187	
		Average Meter Temp:	Degrees F	84.8	81.2	91.7	
		Average Stack Temp:	Degrees F	113.8	111.5	110.7	112.0
		Metered Sample Volume:	Cubic Feet	46.51	41.03	40.99	
		Standard Meter Volume:	Cubic Feet	45.39	40.27	39.46	
		Moisture Measured:	%	0.0894	0.0897	0.0787	
		Moisture Saturation:	%	0.0962	0.0900	0.0880	
		Moisture Used for Calculations:	%	0.0894	0.0897	0.0787	0.0860
		Pitot Coefficient:	Unity	0.84	0.84	0.84	
		Nozzle Diameter:	Inch	0.25	0.25	0.25	
		Stack Area:	Square Feet	7.07	7.07	7.07	
		Traverse Points:	Unity	24	24	24	
		Sampling Time:	Minutes	60	60	60	
		Stack Gas Molecular Weight:	lb/lb-mol	27.988	27.985	28.106	
		Actual Stack Velocity:	Feet/sec	44.285	38.404	37.416	40.035
		Actual Stack Gas Flow:	ACFM	18772	16279	15861	16971
		Dry Standard Stack Gas Flow:	DSCFM	15835	13784	13610	14409
		Isokinetic Rate:	%	99.10	101.00	100.23	
		Fluoride Emission:	lb/day	7.74	14.05	10.56	10.78
		Fluoride Emission:	lb/hr	0.32	0.59	0.44	0.45
		Particulate Emission:	lb/day	13.28	41.58	105.46	53.44
		Particulate Emission:	lb/hr	0.55	1.73	4.39	2.23

Source Sampling Summary Sheet							
		Facility:	New Wales				
		Plant:	MULTIFOS C-KILN				
		Company ID:	1108				
		FDEP AIRS & Pt. ID:	1050059 & 074				
		Test Team:	FB,DC,RS				
		Parameter	Unit	Run 1	Run 2	Run 3	Average
		Date:		7/11/00	7/12/00	7/13/00	
		Time Start:		1145	1402	847	
		Time End:		1250	1509	951	
		Barometric Pressure:	Inch Hg	30.10	30.10	30.12	
		Static Pressure:	Inch H2O	0.32	0.32	0.32	
		Stack Pressure:	Inch Hg	30.124	30.124	30.144	
		Average Sqrt Delta P:	Inch HOH 1/2	0.692	0.664	0.688	
		Average Delta H:	Inch HOH	1.817	1.504	1.592	1.638
		Maximum Run Vacuum:	Inch Hg	10.0	13.0	9.0	
		Meter Box Number:	Unity	3187	3187	3187	
		Average Meter Temp:	Degrees F	84.5	92.9	88.1	
		Average Stack Temp:	Degrees F	114.0	112.7	110.8	112.5
		Metered Sample Volume:	Cubic Feet	47.06	42.95	43.63	
		Standard Meter Volume:	Cubic Feet	45.95	41.27	42.33	
		Moisture Measured:	%	0.0911	0.0728	0.0757	
		Moisture Saturation:	%	0.0966	0.0932	0.0880	
		Moisture Used for Calculations:	%	0.0911	0.0728	0.0757	0.0798
		Pitot Coefficient:	Unity	0.84	0.84	0.84	
		Nozzle Diameter:	Inch	0.250	0.250	0.250	
		Stack Area:	Square Feet	7.07	7.07	7.07	
		Traverse Points:	Unity	24	24	24	
		Sampling Time:	Minutes	60	60	60	
		Stack Gas Molecular Weight:	lb/lb-mol	27.970	28.171	28.139	
		Actual Stack Velocity:	Feet/sec	41.011	39.179	40.554	40.248
		Actual Stack Gas Flow:	ACFM	17385	16608	17191	17061
		Dry Standard Stack Gas Flow:	DSCFM	14634	14293	14809	14579
		Isokinetic Rate:	%	108.55	99.83	98.83	
		SO2 Emission:	lb/day	28.51	58.68	76.05	54.41
			SO2 lb/hr	1.19	2.44	3.17	2.27
		Nitrogen Oxides:	lb/day	121.20	197.52	155.04	157.92
			lb/hr	5.05	8.23	6.46	6.25

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME
IMC PHOSPHATES

ADDRESS
NEW WALES FACILITY

P.O. BOX 2000 3095 C.R. 640

CITY **MULBERRY** STATE **FL** ZIP **33860**

PHONE **408-7383** SOURCE ID NUMBER **074**

PROCESS EQUIPMENT **MULTI-PHOS C-KILN** OPERATING MODE **6 T.P.H**

CONTROL EQUIPMENT **WET SCRUBBER** OPERATING MODE **NORMAL**

DESCRIBE EMISSION POINT
START **CIRCULAR STACK** STOP **SAME**

HEIGHT ABOVE GROUND LEVEL
START **~125** STOP **SAME**

HEIGHT RELATIVE TO OBSERVER
START **~125** STOP **SAME**

DISTANCE FROM OBSERVER
START **~360'** STOP **SAME**

DIRECTION FROM OBSERVER
START **WSW** STOP **WSW**

DESCRIBE EMISSIONS
START **LOFTING PLUME** STOP **SAME**

EMISSION COLOR
START **WHITE** STOP **WHITE**

PLUME TYPE CONTINUOUS FUGITIVE INTERMITTENT

WATER DROPLETS PRESENT
NO YES

IS WATER DROPLET PLUME ATTACHED **N/A** DETACHED

POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED
START **~20' ABOVE STACK EXIT** STOP **SAME**

DESCRIBE BACKGROUND
START **SKY** STOP **SKY**

BACKGROUND COLOR
START **BLUE-WHITE** STOP **SAME**

SKY CONDITIONS
START **SCATT.** STOP **SCATT.**

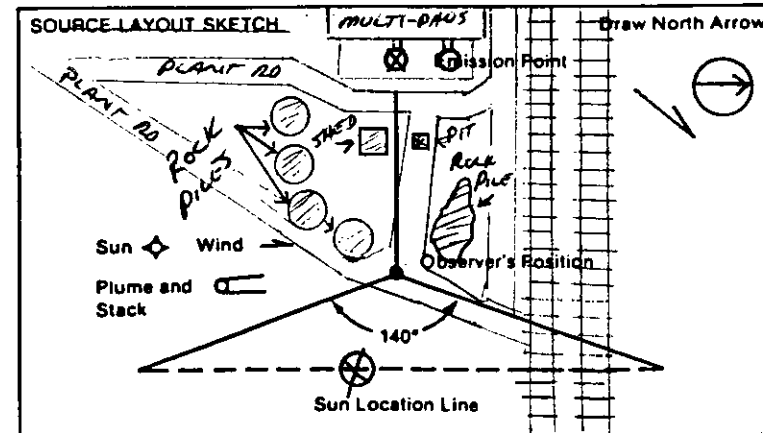
WIND SPEED MPH
START **2-4** STOP **2-4**

WIND DIRECTION
START **2-4** STOP **2-4**

AMBIENT TEMP
START **88°** STOP **88°**

WET BULB TEMP
82°

RH, percent
78%



COMMENTS

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS

SIGNATURE _____ DATE _____

TITLE _____

OBSERVATION DATE		START TIME				STOP TIME			
07-13-00		10:20				11:20			
SEC	0	15	30	45	SEC	0	15	30	45
MIN					MIN				
1	10	10	10	10	31	15	15	10	10
2	10	10	10	10	32	10	10	10	10
3	10	15	15	10	33	10	10	10	15
4	10	10	10	10	34	10	10	10	10
5	10	15	15	15	35	15	15	15	10
6	15	10	10	10	36	10	10	15	15
7	10	10	10	10	37	15	10	15	15
8	10	10	10	10	38	10	10	10	10
9	10	15	10	10	39	10	10	10	10
10	10	10	10	10	40	10	15	15	10
11	15	15	10	10	41	10	10	10	10
12	10	10	10	10	42	5	5	10	10
13	10	10	10	10	43	10	10	10	10
14	15	10	10	15	44	10	10	10	15
15	15	10	10	10	45	15	10	10	15
16	10	10	10	10	46	10	10	10	10
17	10	10	10	10	47	10	10	10	10
18	10	10	15	10	48	10	10	15	15
19	10	10	10	10	49	15	15	15	10
20	10	10	10	10	50	10	10	10	10
21	10	10	10	15	51	10	10	10	10
22	15	15	10	10	52	10	10	10	10
23	10	10	10	10	53	15	15	10	10
24	5	10	10	10	54	15	15	15	10
25	10	10	15	10	55	10	10	10	10
26	10	10	15	15	56	10	15	10	10
27	15	15	15	10	57	10	10	10	10
28	10	10	15	15	58	15	15	15	15
29	15	10	10	15	59	15	10	10	10
30	15	15	10	10	60	10	10	10	10

AVERAGE OPACITY FOR HIGHEST PERIOD **12.9%** NUMBER OF READINGS ABOVE **15** % WERE **0**

RANGE OF OPACITY READINGS
MINIMUM **5%** MAXIMUM **15%**

OBSERVER'S NAME (PRINT)
JEFFREY J. KEAT

OBSERVER'S SIGNATURE
Jeffrey J. Keat DATE **7/13/00**

ORGANIZATION
IMC PHOSPHATES

CERTIFIED BY
ETA TAMPA FDEP DATE **2/22/2000**

VERIFIED BY _____ DATE _____

Test Participants

Conducted the Field Testing

- 1 F. Barnes
- 2 R. Sellers
- 3 M. Gierke

Performed the Laboratory Analysis

- 1 F. Barnes
- 2 R. Sellers
- 3 M. Gierke

Provided the Process Data

- 1 J. Clements

Prepared the Test Report

- 1 R. Sellers
- 2 F. Barnes

Field Data

&

Run Calculations

Run 1 Calculations and Results

Facility: NEW WALES
 Plant: MULTIFOS C - KILN
 Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059-074
 Test Team: RS/DA

Date: 7/11/00 mm/dd/yy
 Start Time: 844 End Time: 948

Standard Meter Volume Vms: 45.39 dscf

Average Stack Velocity: 44.28 fps

Stack Gas Volume: 18772 ACFM

Stack Gas Dry Volume: 15835 DSCFM

Isokinetic Variation: 99.10 %

Isokinetics Adjusted For Bws>Saturation: NA %

Vlc calculated for Saturated Conditions: NA ml H2O

Emission Calculations

Particulate	Total mg:	12.0 mg
		0.55 lb/hr
		13.28 lb/day

Fluoride	Total mg:	7.00 mg
		0.32 lb/hr
		7.74 lb/day

Run 1

Run 1 Data

Facility: NEW WALES
 Plant: MULTIFOS C - KILN
 Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059-074
 Test Team: RS/DA

Date: 7/11/00 mm/dd/yy
 Start Time: 844 End Time: 948

Number of Traverse Points: 24
 Dwell Time/Point: 2.5 min.
 Total Test Time: 60 min.

Stack Diameter: 36 inches
 Stack Area: 7.07 sq. ft.

Molecular Weight Dry Md: 28.969
 Volume of Water Vapor Condensed: 84 ml
 Weight of Water Collected in Silica Gel: 10.7 gram
 Moisture Volume Fraction Bwo: 0.0894
 Moisture Volume Saturated Bwo: 0.0962
 Moisture Percent Saturation: 93
 Moisture Used for Calculations: 0.0894
 Stack Molecular Weight Ms: 27.988

Barometric Pressure Pb: 30.10 in Hg
 Stack Static Pressure Pv: 0.32 in H2O
 Stack Pressure Ps: 30.124 in Hg
 Average Meter Delta H: 1.821 in H2O
 Meter Pressure Pm: 30.234 in Hg
 Console Number: 3187
 Meter Delta Ha: 1.742
 Meter Correction Factor: 0.9969

Average Meter Temperature: 84.8 deg. F
 Average Stack Temperature: 113.8 deg. F 45.5 deg C

Average Square Root Delta P: 0.747
 Meter Volume Vm: 46.51 cu. ft.
 Probe Length/Liner: 3' SS
 Cp: 0.84
 Nozzle Ident.: 0.25
 Nozzle Diameter Dn: 0.25 in.
 Impinger Set Number: P-1
 Average Computer K: 3.3157

Run 1 Data Sheet

Facility: NEW WALES
 Plant: MULTIFOS C - KILN
 Team (CB/PR): RS/DA

Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059-074

Date	7/11/00
Dwell Time	2.5 min.
Traverse Points	24
Stack Diameter	36 inches
Est % Saturation	90%
Stack Static Pressure	0.32 in H2O
Barometric Pressure	30.10 in Hg
Dry Molecular Weight	28.969

Meter Box Number	3187
Meter Delta Ha (in. H2O)	1.742
Meter Correction Factor	0.9969
Nozzle Ident.:	0.25
Nozzle Diameter Dn:	0.250
Impinger Set Number:	P-1
Probe length/Liner:	3' SS
Filter Set Number	1

Pitot Check	
pos	4.2 in H2O
neg	4.6 in H2O
Leak Check	
cfm	0.005 cfm
vac	15 in Hg

Time Start 844

Point	Time	Meter Volume	Delta P	Calc'd Delta H	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0.0	886.814	0.69	2.273	2.2	112	244	246	75	75	66	9
2	2.5	888.93	0.68	2.240	2.2	113	239	244	75	75	61	9
3	5.0	891.05	0.68	2.227	2.2	113	241	249	76	75	58	9
4	7.5	893.16	0.72	2.360	2.3	113	242	247	78	75	57	10
5	10.0	895.29	0.72	2.365	2.3	113	241	244	80	75	57	10
6	12.5	897.41	0.73	2.402	2.4	113	242	244	82	75	59	10
7	15.0	899.56	0.62	2.044	2	113	242	243	84	76	62	9
8	17.5	901.64	0.5	1.653	1.6	114	243	243	86	77	62	7
9	20.0	903.48	0.44	1.450	1.4	114	245	242	89	77	61	6
10	22.5	905.2	0.4	1.321	1.3	114	245	243	91	77	61	5
11	25.0	906.87	0.39	1.291	1.2	114	245	244	93	78	61	5
12	27.5	908.48	0.38	1.261	1.2	114	247	245	94	78	61	5
13	30.0	910.085	0.47	1.561	1.5	113	237	240	89	79	66	6
14	32.5	911.83	0.47	1.565	1.5	113	235	242	93	79	62	6
15	35.0	913.59	0.47	1.571	1.5	114	236	245	95	80	62	6
16	37.5	915.35	0.48	1.599	1.5	114	236	250	96	80	63	6
17	40.0	917.1	0.57	1.900	1.9	115	239	247	98	81	64	9
18	42.5	919.1	0.64	2.126	2.1	114	237	243	99	82	64	9
19	45.0	921.17	0.65	2.177	2.1	114	243	245	100	82	65	9
20	47.5	923.25	0.62	2.078	2	115	244	246	100	83	66	9
21	50.0	925.31	0.58	1.934	1.9	115	245	244	100	83	66	9
22	52.5	927.35	0.58	1.934	1.9	115	245	245	101	84	67	9
23	55.0	929.4	0.54	1.804	1.8	115	245	245	101	84	67	9
24	57.5	931.4	0.52	1.737	1.7	115	246	245	101	85	67	8
End	60.0	933.325										

Average		113.8		84.8		62.7	
0.73 Max			247	250		67	10
Min			235	240		57	
Range			223-273	223-273		32-68	

Time End 948

Pitot Check		Min Value
pos	5.0	0.73 in H2O
neg	4.7	0.73 in H2O
Leak Check		
cfm	0.005	<0.020 cfm
vac	11	10 in Hg

Field Data Sheet:

Run Number: 1

Facility: New Wales

Plant: Multifos C-Kiln

Company ID: 1108

Test Team: RS/DA

FDEP AIRS & Pt. ID: 1050059-074

Date: 7-11-00
 Traverse Points: 24
 Stack Diameter: 36 inches
 Dwell Time: 1.5 min.
 Est % Saturation: 90 %
 Stack Static Pressure: .32 in H2O
 Barometric Pressure: 30.10 in Hg
 Dry Molecular Weight: 28.969

Meter Box Number: 3187
 Meter Delta Ha (in. H2O): 1.742
 Meter Correction Factor: .9969
 Nozzle Identification:
 Nozzle Diameter Dn: .250
 Impinger Set Number: P-1
 Probe length/Liner: 3' 55
 Filter Set Number: 1

Pitot Check
 pos: 4.2 in H2O
 neg: 4.6 in H2O
 Leak Check
 cfm: .005
 vac: 15 in Hg

Time Start: 08 44

Point	Time	Meter Volume	Delta P	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp.	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0	886.814	.69	2.2	112	244	246	75	75	66	9
2	2.5	888.93	.69	2.2	113	239	244	75	75	61	9
3	5	891.05	.68	2.2	113	241	249	76	75	58	9
4	7.5	893.16	.72	2.3	113	242	247	78	75	57	10
5	10	895.29	.72	2.3	113	241	244	80	75	57	10
6	12.5	897.41	.73	2.4	113	242	244	82	75	59	10
7	15	899.56	.62	2.0	113	242	243	84	76	62	9
8	17.5	901.64	.50	1.6	114	243	243	86	77	62	7
9	20	903.48	.44	1.4	114	245	242	89	77	61	6
10	22.5	905.20	.40	1.3	114	245	243	91	77	61	5
11	25	906.97	.39	1.2	114	245	244	93	78	61	5
12	27.5	908.48	.38	1.2	114	247	245	94	78	61	5
13	30	910.085	.47	1.5	113	237	240	89	79	66	6
14	32.5	911.83	.47	1.5	113	235	242	93	79	62	6
15	35	913.59	.47	1.5	114	236	245	95	80	62	6
16	37.5	915.35	.48	1.5	114	236	250	96	80	63	6
17	40	917.10	.57	1.9	115	239	247	98	81	64	9
18	42.5	919.10	.64	2.1	114	237	243	99	82	64	9
19	45	921.17	.65	2.1	114	243	245	100	82	65	9
20	47.5	923.25	.62	2.0	115	244	246	100	83	66	9
21	50	925.31	.58	1.9	115	245	244	100	83	66	9
22	52.5	927.35	.58	1.9	115	245	245	101	84	67	9
23	55	929.40	.54	1.8	115	245	245	101	84	67	9
24	57.5	931.40	.52	1.7	115	246	245	101	85	67	9
25	60	933.325									
End											

Time End: 09 48

Pitot Check
 pos: 5.0 in H2O
 neg: 4.7 in H2O

Leak Check
 cfm: .005
 vac: 11 in Hg

Run 2 Data

Facility: NEW WALES
 Plant: MULTIFOS C - KILN
 Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059-074
 Test Team: Da,Fb

Date: 7/12/00 mm/dd/yy
 Start Time: 853 End Time: 1009

Number of Traverse Points: 24
 Dwell Time/Point: 2.5 min.
 Total Test Time: 60 min.

Stack Diameter: 36 inches
 Stack Area: 7.07 sq. ft.

Molecular Weight Dry Md: 28.969
 Volume of Water Vapor Condensed: 75 ml
 Weight of Water Collected in Silica Gel: 9.3 gram
 Moisture Volume Fraction Bwo: 0.0897
 Moisture Volume Saturated Bwo: 0.0900
 Moisture Percent Saturation: 100
 Moisture Used for Calculations: 0.0897
 Stack Molecular Weight Ms: 27.985

Barometric Pressure Pb: 30.10 in Hg
 Stack Static Pressure Pv: 0.32 in H2O
 Stack Pressure Ps: 30.124 in Hg
 Average Meter Delta H: 1.413 in H2O
 Meter Pressure Pm: 30.204 in Hg
 Console Number: 3187
 Meter Delta Ha: 1.742
 Meter Correction Factor: 0.9969

Average Meter Temperature: 81.2 deg. F
 Average Stack Temperature: 111.5 deg. F 44.2 deg C

Average Square Root Delta P: 0.650
 Meter Volume Vm: 41.03 cu. ft.
 Probe Length/Liner: 3' SS
 Cp: 0.84
 Nozzle Ident.: 0.25
 Nozzle Diameter Dn: 0.250 in.
 Impinger Set Number: P-2
 Average Computer K: 3.3432

Run 2 Data Sheet

Facility: NEW WALES
 Plant: MULTIFOS C - KILN
 Team (CB/PR): Da,Fb

Company ID: 1108
 DEP AIRS & Pt. ID: 1050059-074

Date 7/12/00
 Dwell Time 2.5 min.
 Traverse Points 24
 Stack Diameter 36 inches
 Est % Saturation 90 %
 Stack Static Pressure 0.32 in H2O
 Barometric Pressure 30.10 in Hg
 Dry Molecular Weight 28.969

Meter Box Number 3187
 Meter Delta Ha (in. H2O) 1.742
 Meter Correction Factor 0.9969
 Nozzle Ident.: 0.25
 Nozzle Diameter Dn: 0.250
 Impinger Set Number: P-2
 Probe length/Liner: 3' SS
 Filter Set Number 2

Pitot Check
 pos 4.2 in H2O
 neg 4.5 in H2O
 Leak Check
 cfm 0.000 cfm
 vac 15 in Hg

Time Start 853

Point	Time	Meter Volume	Delta P	Calc'd Delta H	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0.0	981.317	0.45	1.511	1.5	110	234	240	79	79	64	9
2	2.5	983.07	0.47	1.578	1.6	110	253	241	78	78	63	9
3	5.0	984.85	0.48	1.609	1.6	111	243	244	79	79	61	10
4	7.5	986.65	0.5	1.669	1.7	111	243	240	80	78	61	10
5	10.0	988.47	0.5	1.669	1.7	111	243	243	81	79	60	10
6	12.5	990.3	0.48	1.606	1.6	111	244	248	83	79	63	10
7	15.0	992.11	0.48	1.609	1.6	111	245	247	84	79	64	10
8	17.5	993.93	0.45	1.510	1.5	111	245	245	85	79	61	10
9	20.0	995.72	0.4	1.343	1.3	112	245	244	86	79	57	9
10	22.5	997.44	0.4	1.336	1.3	112	246	245	87	79	55	9
11	25.0	999.13	0.38	1.271	1.3	111	246	244	88	79	57	9
12	27.5	1000.83	0.36	1.212	1.2	111	246	244	90	79	58	8
13	30.0	1002.43	0.32	1.079	1.1	112	244	243	81	79	66	7
14	32.5	1003.93	0.35	1.164	1.2	112	242	245	81	79	63	8
15	35.0	1005.48	0.38	1.264	1.3	112	243	245	81	79	62	9
16	37.5	1007.1	0.4	1.330	1.3	112	244	246	83	79	63	9
17	40.0	1008.73	0.4	1.333	1.3	112	245	245	83	79	61	10
18	42.5	1010.36	0.44	1.466	1.5	112	245	244	83	79	56	11
19	45.0	1012.1	0.46	1.533	1.5	112	245	244	83	79	56	11
20	47.5	1013.85	0.46	1.533	1.5	112	247	245	84	79	58	11
21	50.0	1015.6	0.44	1.467	1.5	112	245	246	84	79	59	11
22	52.5	1017.4	0.4	1.334	1.3	112	245	244	85	80	61	9
23	55.0	1019.07	0.39	1.303	1.3	112	246	243	86	80	61	9
24	57.5	1020.72	0.37	1.237	1.2	112	244	243	88	80	61	9
End	60.0	1022.35										

Average 111.5 81.2 60.5
 0.5 Max 253 248 66 11
 Min 234 240 55
 Range 223-273 223-273 32-68

Time End 1009

Pitot Check Min Value
 pos 4.3 0.5 in H2O
 neg 4.6 0.5 in H2O
 Leak Check
 cfm 0.000 <0.020 cfm
 vac 13 11 in Hg

Field Data Sheet

Run Number: 2

Facility: New Lakes
 Plant: Multifor C-Kita
 Test Team: DC, FB

Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059-074

Date: 7/12/2000
 Traverse Points: 24
 Stack Diameter: 36 inches
 Dwell Time: 25 min.
 Est % Saturation: 90 %
 Stack Static Pressure: .32 in H2O
 Barometric Pressure: 30.10 in Hg
 Dry Molecular Weight: 28.969

Meter Box Number: 3187
 Meter Delta Ha (in. H2O): 1.742
 Meter Correction Factor: .9969
 Nozzle Identification: .250
 Nozzle Diameter Dn: .250
 Impinger Set Number: 1-2
 Probe length/Liner: 3'55
 Filter Set Number: 2

Pitot Check
 pos: 4.2 in H2O
 neg: 4.5 in H2O
 Leak Check
 cfm: .000
 vac: 15 in Hg

Time Start: 8:53

Point	Time	Meter Volume	Delta P	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp.	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0	981.317	.45	1.5	110	234	240	79	79	64	9
2	2.5	983.07	.47	1.6	110	253	241	78	78	63	9
3	5.0	984.85	.48	1.6	111	243	244	79	79	61	10
4	7.5	986.65	.50	1.7	111	243	240	80	78	61	10
5	10	988.47	.50	1.7	111	243	243	81	79	60	10
6	12.5	990.30	.48	1.6	111	244	248	83	79	63	10
7	15	992.11	.48	1.6	111	245	247	84	79	64	10
8	17.5	993.93	.45	1.5	111	245	245	85	79	61	10
9	20	995.72	.40	1.3	112	245	244	86	79	57	9
10	22.5	997.47	.40	1.3	112	246	245	87	79	55	9
11	25	999.13	.38	1.3	111	246	244	88	79	57	9
12	27.5	1000.83	.36	1.2	111	246	244	90	79	58	8
13	30	1002.426	.32	1.1	112	244	243	81	79	66	7
14	32.5	1003.93	.35	1.2	112	242	245	81	79	63	8
15	35	1005.48	.38	1.3	112	243	245	81	79	62	9
16	37.5	1007.10	.40	1.3	112	244	246	83	79	63	9
17	40	1008.73	.40	1.3	112	245	245	83	79	61	10
18	42.5	1010.36	.44	1.5	112	245	244	83	79	56	11
19	45	1012.10	.46	1.5	112	245	244	83	79	56	11
20	47.5	1013.85	.46	1.5	112	247	245	84	79	58	11
21	50	1015.60	.44	1.5	112	245	246	84	79	59	11
22	52.5	1017.40	.40	1.3	112	245	244	85	80	61	9
23	55	1019.07	.39	1.3	112	246	243	86	80	61	9
24	57.5	1020.72	.37	1.2	112	244	243	88	80	61	9
25	60	1022.348									
End											

Time End: 10:09

Pitot Check
 pos: 4.3 in H2O
 neg: 4.6 in H2O

Leak Check
 cfm: .000
 vac: 13 in Hg

Run 3 Data

Facility: NEW WALES
 Plant: MULTIFOS C - KILN
 Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059-074
 Test Team: Da,Fb

Date: 7/13/00 mm/dd/yy
 Start Time: 1020 End Time: 1125

Number of Traverse Points: 24
 Dwell Time/Point: 2.5 min.
 Total Test Time: 60 min.

Stack Diameter: 36 inches
 Stack Area: 7.07 sq. ft.

Molecular Weight Dry Md: 28.969
 Volume of Water Vapor Condensed: 62 ml
 Weight of Water Collected in Silica Gel: 9.6 gram
 Moisture Volume Fraction Bwo: 0.0787
 Moisture Volume Saturated Bwo: 0.0880
 Moisture Percent Saturation: 89
 Moisture Used for Calculations: 0.0787
 Stack Molecular Weight Ms: 28.106

Barometric Pressure Pb: 30.10 in Hg
 Stack Static Pressure Pv: 0.32 in H2O
 Stack Pressure Ps: 30.124 in Hg
 Average Meter Delta H: 1.358 in H2O
 Meter Pressure Pm: 30.200 in Hg
 Console Number: 3187
 Meter Delta Ha: 1.742
 Meter Correction Factor: 0.9969

Average Meter Temperature: 91.7 deg. F
 Average Stack Temperature: 110.7 deg. F 43.7 deg C

Average Square Root Delta P: 0.635
 Meter Volume Vm: 40.99 cu. ft.
 Probe Length/Liner: 3' SS
 Cp: 0.84
 Nozzle Ident.: 0.25
 Nozzle Diameter Dn: 0.250 in.
 Impinger Set Number: P-3
 Average Computer K: 3.4230

Run 3 Data Sheet

Facility: NEW WALES
 Plant: MULTIFOS C - KILN
 Team (CB/PR): Da,Fb
 Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059-074

Date 7/13/00
 Dwell Time 2.5 min.
 Traverse Points 24
 Stack Diameter 36 inches
 Est % Saturation 90 %
 Stack Static Pressure 0.32 in H2O
 Barometric Pressure 30.10 in Hg
 Dry Molecular Weight 28.969
 Meter Box Number 3187
 Meter Delta Ha (in. H2O) 1.742
 Meter Correction Factor 0.9969
 Nozzle Ident.: 0.25
 Nozzle Diameter Dn: 0.250
 Impinger Set Number: P-3
 Probe length/Liner: 3' SS
 Filter Set Number 3
 Pitot Check
 pos 4.5 in H2O
 neg 4.1 in H2O
 Leak Check
 cfm 0.000 cfm
 vac 15 in Hg

Point	Time	Meter	Delta P	Calc'd	Actual	Stack	Probe	Hot Box	Meter In	Meter Out	Impinger	Pump
		Volume		Delta H								
1	0.0	110.12	0.5	1.712	1.4	109	237	237	87	86	63	5
2	2.5	111.88	0.57	1.952	1.9	111	236	231	89	86	60	7
3	5.0	113.93	0.57	1.933	1.9	111	236	231	91	86	60	7
4	7.5	115.98	0.55	1.869	1.8	111	236	230	92	86	55	7
5	10.0	117.92	0.55	1.871	1.8	111	239	231	94	87	55	7
6	12.5	119.82	0.55	1.876	1.8	111	236	236	95	87	55	7
7	15.0	121.78	0.4	1.365	1.3	111	237	236	96	88	56	7
8	17.5	123.51	0.35	1.197	1.1	111	237	236	96	88	56	7
9	20.0	125.09	0.33	1.128	1.1	111	237	239	97	88	57	7
10	22.5	126.7	0.3	1.027	1	111	236	239	98	88	58	6
11	25.0	128.3	0.27	0.925	0.92	110	239	240	97	88	58	5
12	27.5	129.65	0.3	1.033	1	110	240	240	97	88	59	5
13	30.0	131.22	0.41	1.411	1.4	110	240	242	93	87	62	7
14	32.5	132.9	0.45	1.542	1.5	110	239	242	94	88	60	8
15	35.0	134.69	0.45	1.545	1.5	111	238	242	96	88	60	8
16	37.5	136.44	0.5	1.710	1.7	111	239	244	97	88	58	10
17	40.0	138.25	0.52	1.780	1.7	111	238	244	98	88	58	10
18	42.5	140.09	0.5	1.713	1.7	111	237	245	98	88	59	10
19	45.0	141.9	0.4	1.370	1.3	110	238	242	98	88	59	10
20	47.5	143.75	0.35	1.206	1.2	111	238	237	99	88	59	10
21	50.0	145.3	0.35	1.200	1.2	111	237	235	99	89	59	8
22	52.5	147	0.3	1.030	1	111	238	236	99	88	59	7
23	55.0	148.6	0.2	0.686	0.68	111	238	236	99	88	59	7
24	57.5	149.79	0.2	0.686	0.68	111	238	236	99	88	60	5
End	60.0	151.11										
		Average			110.7				91.7		58.5	
		0.57 Max					240 245				63 10	
		Min					236 230				55	
		Range			223-273		223-273				32-68	

Time End 1125

Pitot Check
 pos 4.1 0.57 in H2O
 neg 4.5 0.57 in H2O
 Leak Check
 cfm 0.000 <0.020 cfm
 vac 13 10 in Hg

Facility: New Wales
 Plant: C-Kiln
 Test Team: RS/DA/FB

Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059-074

Date: 7-13-00
 Traverse Points: 24
 Stack Diameter: 36 inches
 Dwell Time: 2.5 min.
 Est % Saturation: 90 %
 Stack Static Pressure: 1.32 in H2O
 Barometric Pressure: 30.12 in Hg
 Dry Molecular Weight: 28.969

Meter Box Number: 3187
 Meter Delta Ha (in. H2O): 1.742
 Meter Correction Factor: .9969
 Nozzle Identification: .250
 Nozzle Diameter Dn: .250
 Impinger Set Number: P-3
 Probe length/Liner: 3'55
 Filter Set Number: 3

Pitot Check
 pos: 4.5 in H2O
 neg: 4.1 in H2O
 Leak Check
 cfm: 1000
 vac: 15 in Hg

Time Start: 1020

Point	Time	Meter Volume	Delta P	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp.	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0	110.12	.50	1.4	109	237	237	87	86	63	5
2	2.5	111.88	.57	1.7	111	236	231	89	86	60	7
3	5	113.93	.57	1.7	111	236	231	91	86	60	7
4	7.5	115.98	.55	1.8	111	236	230	92	86	55	7
5	10	117.92	.55	1.8	111	239	231	94	87	55	7
6	12.5	119.82	.55	1.8	111	236	236	95	87	55	7
7	15	121.78	.40	1.3	111	237	236	96	88	56	7
8	17.5	123.51	.35	1.1	111	237	236	96	88	56	7
9	20	125.09	.33	1.1	111	237	239	97	88	57	7
10	22.5	126.70	.30	1.0	111	236	239	98	88	58	6
11	25	128.30	.27	.92	110	239	240	97	88	58	5
12	27.5	129.65	.30	1.0	110	240	240	97	88	59	5
13	30	131.22	.41	1.4	110	240	242	99	87	62	7
14	32.5	132.90	.45	1.5	110	239	242	94	88	60	8
15	35	134.69	.45	1.5	111	238	242	96	88	60	8
16	37.5	136.44	.50	1.7	111	239	244	97	88	58	10
17	40	138.25	.52	1.7	111	238	244	98	88	58	10
18	42.5	140.09	.50	1.7	111	237	245	98	88	59	10
19	45	141.90	.40	1.3	110	238	242	98	88	59	10
20	47.5	143.75	.35	1.2	111	238	237	99	88	59	10
21	50	145.30	.35	1.2	111	237	235	99	89	59	8
22	52.5	147	.30	1.0	111	238	236	99	88	59	7
23	55	148.6	.20	.6	111	238	236	99	88	59	7
24	57.5	149.79	.20	.6	111	238	236	99	88	60	5
25	60	151.11									
End											

Time End: 1125

Pitot Check
 pos: 4.1 in H2O
 neg: 4.5 in H2O

Leak Check
 cfm: 1000
 vac: 13 in Hg

Run 1 Data

Facility: New Wales
 Plant: MULTIFOS C-KILN
 Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059 & 074
 Test Team: FB,DC,RS

Date: 07/11/00
 Start Time: 1145 End Time: 1250

Number of Traverse Points: 24
 Dwell Time/Point: 2.5 min.
 Total Test Time: 60 min.

Stack Diameter: 36 inches
 Stack Area: 7.07 sq. ft.

Molecular Weight Dry Md: 28.969
 Volume of Water Vapor Condensed: 83 ml
 Weight of Water Collected in Silica Gel: 14.8 gram
 Moisture Volume Fraction Bwo: 0.0911
 Moisture Volume Saturated Bwo: 0.0966
 Moisture Percent Saturation: 94
 Moisture Used for Calculations: 0.0911
 Stack Molecular Weight Ms: 27.970

Barometric Pressure Pb: 30.10 in Hg
 Stack Static Pressure Pv: 0.32 in H2O
 Stack Pressure Ps: 30.124 in Hg
 Average Meter Delta H: 1.817 in H2O
 Meter Pressure Pm: 30.234 in Hg
 Console Number: 3187
 Meter Delta Ha: 1.742
 Meter Correction Factor: 0.9969

Average Meter Temperature: 84.5 deg. F
 Average Stack Temperature: 114.0 deg. F 45.5 deg C

Average Square Root Delta P: 0.692
 Meter Volume Vm: 47.06 cu. ft.
 Probe Length/Liner: 3' Glass
 Cp: 0.84
 Nozzle Ident.: 0.250
 Nozzle Diameter Dn: 0.250 in.
 Impinger Set Number: S3
 Average Computer K: 3.8424

Run 1 Data Sheet

Facility: New Wales
 Plant: MULTIFOS C-KILN
 Team (CB/PR): FB,DC,RS

Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059 & 074

Date: 07/11/00
 Dwell Time: 2.5 min.
 Traverse Points: 24
 Stack Diameter: 36 inches
 Est % Saturation: 0 %
 Stack Static Pressure: 0.32 in H2O
 Barometric Pressure: 30.10 in Hg
 Dry Molecular Weight: 28.969

Meter Box Number: 3187
 Meter Delta Ha (in. H2O): 1.742
 Meter Correction Factor: 0.9969
 Nozzle Ident.: 0.250
 Nozzle Diameter Dn: 0.250
 Impinger Set Number: S3
 Probe length/Liner: 3' Glass
 Filter Set Number: 1

Pitot Check
 pos: 4.2 in H2O
 neg: 4.5 in H2O
 Leak Check
 cfm: 0.000 cfm
 vac: 15 in Hg

Time Start: 1145

Point	Time	Meter Volume	Delta P	Calc'd Delta H	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0.0	933.99	0.37	1.410	1.4	114			80	80	62	6
2	2.5	935.67	0.4	1.525	1.5	113			81	80	60	5
3	5.0	937.46	0.4	1.529	1.5	114			83	80	55	6
4	7.5	939.24	0.39	1.491	1.4	114			85	80	55	6
5	10.0	940.95	0.45	1.723	1.7	114			87	80	55	7
6	12.5	942.85	0.5	1.918	1.9	114			88	80	55	8
7	15.0	944.82	0.52	1.997	1.9	114			90	80	55	9
8	17.5	946.85	0.58	2.231	2.2	114			92	80	55	9
9	20.0	948.98	0.52	2.004	2	114			93	80	55	9
10	22.5	951.05	0.52	2.006	2	114			93	81	55	9
11	25.0	953.04	0.46	1.776	1.7	114			93	81	55	10
12	27.5	954.95	0.52	2.008	2	114			93	82	55	10
13	30.0	956.91	0.6	2.319	2.3	114			90	82	63	10
14	32.5	959.04	0.61	2.351	2.3	114			89	82	60	10
15	35.0	961.15	0.6	2.310	2.3	114			88	82	58	10
16	37.5	963.22	0.59	2.270	2.2	114			88	82	56	10
17	40.0	965.49	0.55	2.116	2.1	114			88	82	56	10
18	42.5	967.69	0.55	2.116	2.1	114			88	82	56	10
19	45.0	969.84	0.45	1.731	1.7	114			88	82	56	10
20	47.5	971.89	0.4	1.539	1.5	114			88	82	59	9
21	50.0	973.75	0.4	1.539	1.5	114			86	82	59	9
22	52.5	975.59	0.4	1.536	1.5	114			86	82	59	9
23	55.0	977.4	0.39	1.497	1.4	114			86	82	60	9
24	57.5	979.2	0.4	1.536	1.5	114			86	82	60	9
End	60.0	981.05										
		Average				114.0			84.5	57.3		
		0.61		Max						63		10
				Min						55		

Time End: 1250

32-68
 Pitot Check Min Value
 pos: 4.5 0.61 in H2O
 neg: 4.1 0.61 in H2O
 Leak Check
 cfm: 0.000 <0.020 cfm
 vac: 12 10 in Hg

Field Data Sheet

Run Number: 12

Facility: New Wales

Plant: Mullins C-KiN

Company ID: 1108

Test Team: DA/RS/FG 502

FDEP AIRS & Pt. ID: 1050059 074

5L 711

Date 7-11-00
 Traverse Points 24
 Stack Diameter 36 inches
 Dwell Time 2.5 min.
 Est % Saturation 90 %
 Stack Static Pressure .32 in H2O
 Barometric Pressure 30.10 in Hg
 Dry Molecular Weight 28.969

Meter Box Number 3187
 Meter Delta Ha (in. H2O) 1.742
 Meter Correction Factor .9969
 Nozzle Identification: .250
 Nozzle Diameter Dn: .250
 Impinger Set Number: P-2
 Probe length/Liner: 3'55
 Filter Set Number: 2

Pitot Check
 pos 4.2 in H2O
 neg 4.5 in H2O
 Leak Check
 cfm .000
 vac 15 in Hg

Time Start 1145

Point	Time	Meter Volume	Delta P	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp.	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0	933.99	.37	1.4	114	N/A	N/A	80	80	62	6
2	2.5	935.67	.40	1.5	113	N/A	N/A	81	80	60	5
3	5	937.46	.40	1.5	114			83	80	55	6
4	7.5	939.24	.39	1.4	114			85	80	55	6
5	10	940.95	.45	1.7	114			87	80	55	7
6	12.5	942.85	.50	1.9	114			88	80	55	8
7	15	944.82	.52	1.9	114			90	80	55	9
8	17.5	946.85	.58	2.2	114			92	80	55	9
9	20	948.98	.52	2.0	114			93	80	55	9
10	22.5	951.05	.52	2.0	114			93	81	55	9
11	25	953.04	.46	1.7	114			93	81	55	10
12	27.5	954.35	.52	2.0	114			93	82	55	10
13	30	956.91	.60	2.3	114			90	82	63	10
14	32.5	959.04	.61	2.3	114			89	82	60	10
15	35	961.15	.60	2.3	114			88	82	58	10
16	37.5	963.22	.59	2.2	114			88	82	56	10
17	40	965.49	.55	2.1	114			88	82	56	10
18	42.5	967.69	.55	2.1	114			88	82	56	10
19	45	969.84	.45	1.7	114			88	82	59	10
20	47.5	971.09	.40	1.5	114			88	82	59	9
21	50	973.75	.40	1.5	114			86	82	59	9
22	52.5	975.59	.40	1.5	114			86	82	59	9
23	55	977.40	.39	1.4	114			86	82	60	9
24	57.5	979.20	.40	1.5	114	√	√	86	82	60	9
25	60	981.05									
End											

Time End 1250

Pitot Check
 pos 4.5 in H2O
 neg 4.1 in H2O

Leak Check
 cfm .000
 vac 12 in Hg

Run 2 Data

Facility: New Wales
 Plant: MULTIFOS C-KILN
 Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059 & 074
 Test Team: FB,DC,RS

Date: 07/12/00
 Start Time: 1402 End Time: 1509

Number of Traverse Points: 24
 Dwell Time/Point: 2.5 min.
 Total Test Time: 60 min.

Stack Diameter: 36 inches
 Stack Area: 7.07 sq. ft.

Molecular Weight Dry Md: 28.969
 Volume of Water Vapor Condensed: 58 ml
 Weight of Water Collected in Silica Gel: 10.8 gram
 Moisture Volume Fraction Bwo: 0.0728
 Moisture Volume Saturated Bwo: 0.0932
 Moisture Percent Saturation: 78
 Moisture Used for Calculations: 0.0728
 Stack Molecular Weight Ms: 28.171

Barometric Pressure Pb: 30.10 in Hg
 Stack Static Pressure Pv: 0.32 in H2O
 Stack Pressure Ps: 30.124 in Hg
 Average Meter Delta H: 1.504 in H2O
 Meter Pressure Pm: 30.211 in Hg
 Console Number: 3187
 Meter Delta Ha: 1.742
 Meter Correction Factor: 0.9969

Average Meter Temperature: 92.9 deg. F
 Average Stack Temperature: 112.7 deg. F 44.8 deg C

Average Square Root Delta P: 0.664
 Meter Volume Vm: 42.95 cu. ft.
 Probe Length/Liner: 3' Glass
 Cp: 0.84
 Nozzle Ident.: 0.250
 Nozzle Diameter Dn: 0.250 in.
 Impinger Set Number: S-2
 Average Computer K: 3.3912

Run 2 Data Sheet

Facility: New Wales
 Plant: MULTIFOS C-KILN
 Team (CB/PR): FB,DC,RS

Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059 & 074

Date 07/12/00
 Dwell Time 2.5 min.
 Traverse Points 24
 Stack Diameter 36 inches
 Est % Saturation 90 %
 Stack Static Pressure 0.32 in H2O
 Barometric Pressure 30.10 in Hg
 Dry Molecular Weight 28.969

Meter Box Number 3187
 Meter Delta Ha (in. H2O) 1.742
 Meter Correction Factor 0.9969
 Nozzle Ident.: 0.250
 Nozzle Diameter Dn: 0.250
 Impinger Set Number: S-2
 Probe length/Liner: 3' Glass
 Filter Set Number 1

Pitot Check
 pos 3.8 in H2O
 neg 4.5 in H2O
 Leak Check
 cfm 0.000 cfm
 vac 15 in Hg

Time Start 1402

Point	Time	Meter Volume	Delta P	Calc'd Delta H	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp.	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0.0	22.8	0.45	1.537	1.5	113			98	98	66	5
2	2.5	24.58	0.49	1.674	1.7	113			94	96	64	6
3	5.0	26.45	0.5	1.699	1.7	113			94	97	64	8
4	7.5	28.32	0.5	1.700	1.7	113			93	96	60	9
5	10.0	30.11	0.49	1.663	1.7	113			93	95	59	12
6	12.5	32	0.47	1.594	1.6	113			93	95	58	12
7	15.0	33.82	0.4	1.356	1.4	113			93	94	59	12
8	17.5	35.48	0.4	1.355	1.4	113			93	94	60	12
9	20.0	37.31	0.36	1.220	1.2	113			93	93	60	13
10	22.5	38.95	0.35	1.185	1.2	111			94	93	60	12
11	25.0	40.54	0.36	1.234	1.2	111			95	93	60	12
12	27.5	42.12	0.35	1.201	1.2	111			95	93	61	12
13	30.0	43.725	0.44	1.510	1.5	113			93	92	65	13
14	32.5	45.498	0.44	1.488	1.5	113			93	92	61	13
15	35.0	47.286	0.46	1.556	1.6	113			93	92	62	8
16	37.5	49.11	0.5	1.691	1.7	113			92	92	61	9
17	40.0	50.99	0.51	1.723	1.7	113			92	91	60	9
18	42.5	52.91	0.49	1.654	1.7	113			91	90	61	9
19	45.0	54.82	0.47	1.584	1.6	113			91	90	62	8
20	47.5	56.68	0.45	1.516	1.5	113			92	90	61	8
21	50.0	58.52	0.44	1.484	1.5	113			92	90	61	8
22	52.5	60.33	0.45	1.518	1.5	113			92	90	62	8
23	55.0	62.14	0.45	1.518	1.5	113			92	89	63	8
24	57.5	64	0.4	1.348	1.3	112			92	89	63	7
End	60.0	65.75										

Average 112.7
 0.51 Max 66 13
 Min 58
 Range 32-68

Time End 1509

Pitot Check Min Value
 pos 4.5 0.51 in H2O
 neg 4.2 0.51 in H2O
 Leak Check
 cfm 0.000 <0.020 cfm
 vac 15 13 in Hg

Field Data Sheet:

Run Number: 3

Facility: New Wales

Plant: Mult. Fos C-kiln Sor

Company ID: 1108

Test Team: DC, RS, FB SO2

FDEP AIRS & Pt. ID: 1050059 & 074

Date: 7/12/2000
 Traverse Points: 24
 Stack Diameter: 36 inches
 Dwell Time: 2.5 min.
 Est % Saturation: 90 %
 Stack Static Pressure: .32 in H2O
 Barometric Pressure: 30.10 in Hg
 Dry Molecular Weight: 28.969

Meter Box Number: 3187
 Meter Delta Ha (in. H2O): 1.742
 Meter Correction Factor: .9769
 Nozzle Identification: .250
 Nozzle Diameter Dn: .250
 Impinger Set Number: P-3
 Probe length/Liner: 2.55
 Filter Set Number: 3

Pitot Check
 pos: 3.8 in H2O
 neg: 4.5 in H2O
 Leak Check
 cfm: 000
 vac: 15 in Hg

Time Start: 2:02

Point	Time	Meter Volume	Delta P	Actual Delta H	Stack Temp	Probe Temp	Hot Box Temp.	Meter In Temp	Meter Out Temp	Impinger Temp	Pump Vac
1	0	22.80	.45	1.5	113	N/A	N/A	98	98	66	5
2	2.5	24.58	.49	1.7	113	↓	↓	94	96	64	6
3	5	26.45	.50	1.7	113			94	97	64	8
4	7.5	28.32	.50	1.7	113			93	96	60	9
5	10	30.11	.49	1.7	113			93	95	59	11
6	12.5	32.0	.47	1.6	113			93	95	58	12
7	15	33.82	.40	1.4	113			93	94	59	12
8	17.5	35.48	.40	1.4	113			93	94	60	12
9	20	37.31	.36	1.2	113			93	93	60	13
10	22.5	38.95	.35	1.2	111			94	93	60	12
11	25	40.54	.36	1.2	111			95	93	60	12
12	27.5	42.12	.35	1.2	111			95	93	61	12
13	30	43.725	.44	1.5	113			93	92	65	13
14	32.5	45.49	.44	1.5	113			93	92	61	13
15	35	47.28	.46	1.6	113			93	92	62	8
16	37.5	49.11	.50	1.7	113			92	92	61	9
17	40	50.99	.51	1.7	113			92	91	60	9
18	42.5	52.91	.49	1.7	113			91	90	61	9
19	45	54.82	.47	1.6	113			91	90	62	8
20	47.5	56.68	.45	1.5	113			92	90	61	8
21	50	58.52	.44	1.5	113			92	90	61	8
22	52.5	60.33	.45	1.5	113			92	90	62	8
23	55	62.14	.45	1.5	113			92	89	63	8
24	57.5	64	.40	1.3	112			92	89	63	7
25	60	65.750									
End											

Time End: 1:59

Pitot Check
 pos: 4.5 in H2O
 neg: 4.2 in H2O

Leak Check
 cfm: .000
 vac: 15 in Hg

Run 3 Data

Facility: New Wales
 Plant: MULTIFOS C-KILN
 Company ID: 1108
 FDEP AIRS & Pt. ID: 1050059 & 074
 Test Team: FB,DC,RS

Date: 07/13/00
 Start Time: 847 End Time: 951

Number of Traverse Points: 24
 Dwell Time/Point: 2.5 min.
 Total Test Time: 60 min.

Stack Diameter: 36 inches
 Stack Area: 7.07 sq. ft.

Molecular Weight Dry Md: 28.969
 Volume of Water Vapor Condensed: 62 ml
 Weight of Water Collected in Silica Gel: 11.6 gram
 Moisture Volume Fraction Bwo: 0.0757
 Moisture Volume Saturated Bwo: 0.0880
 Moisture Percent Saturation: 86
 Moisture Used for Calculations: 0.0757
 Stack Molecular Weight Ms: 28.139

Barometric Pressure Pb: 30.12 in Hg
 Stack Static Pressure Pv: 0.32 in H₂O
 Stack Pressure Ps: 30.144 in Hg
 Average Meter Delta H: 1.592 in H₂O
 Meter Pressure Pm: 30.237 in Hg
 Console Number: 3187
 Meter Delta Ha: 1.742
 Meter Correction Factor: 0.9969

Average Meter Temperature: 88.1 deg. F
 Average Stack Temperature: 110.8 deg. F 43.8 deg C

Average Square Root Delta P: 0.688
 Meter Volume Vm: 43.63 cu. ft.
 Probe Length/Liner: 3' Glass
 Cp: 0.84
 Nozzle Ident.: 0.250
 Nozzle Diameter Dn: 0.250 in.
 Impinger Set Number: S-1
 Average Computer K: 3.3974

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

1204 North Wheeler St. Plant City, Florida 33566 (813) 752-5014

NOX EMISSIONS TEST CALCULATIONS

COMPANY: IMC-AGRICO CO. NEW WALES FACILITY
SOURCE: MULTIFOS KILN "C"
TEST DATE: 07/13/00
DATA ANALYST: M. Gierke

RUN NO	AVERAGE CONC. (PPM)	STACK FLOWRATE (dscfm)	EMISSIONS		
			(mg/m3)	(lbs/ft3)	(lbs/hr)
1	47.6	14,809	91.0	5.68E-06	5.05
2	77.6	14,809	148.4	9.27E-06	8.23
3	51.5	14,809	98.5	6.15E-06	5.46
AVERAGE	58.90	14,809	112.6	7.03E-06	6.25

FORMULAS: $\text{mg/m}^3 = \text{ppm} \times .041573 \times \text{molecular wt.}$

$$\text{lb/ft}^3 = \frac{\text{mg/m}^3}{35.31 \text{ ft}^3/\text{m}^3 \times 1000 \text{ mg/g} \times 453.59 \text{ g/lb}}$$

$$\text{lb/hr} = \text{lb/ft}^3 \times \text{flowrate} \times 60 \text{ min/hr}$$

where: $P_{\text{std}} = 29.92 \text{ "Hg}$
 $T_{\text{std}} = 528 \text{ deg R}$
Molecular Wt. of $\text{NO}_2 = 46$

Analytical Data

IMC-Agrico Company**Particulate and Moisture Data Sheet
Method 5 & 13B Combined**Facility NEW WALES

Date: 7/11/00

Plant MULTIFOS C - KILN

Run 1

Impinger Set Number: P-1

Impinger Number:	1	2	3	4
Final (grams/mls):	174	110	0	370.6
Initial (grams/mls):	100	100	0	359.9
Difference (grams/mls):	74	10	0	10.7
Total Moisture Collected:			84 mls	10.7 gram

Filter Set Number: 1

Filter Analysis		Probe Wash Analysis	
Filter Number:	63	Beaker Number:	C
Final Weight	0.6757	Final Weight:	159.5257
Initial Weight:	0.6756	Initial Weight:	159.5138
Difference:	0.0001	Difference:	0.0119

Fluoride and Particulate Calculations**Fluoride**

Probe Wash Fluoride mg	1.48
Impinger Fluoride mg:	5.52
Total Fluoride mg:	7.00

Particulate

Probe Wash Particulate mg	11.9
Filter Particulate mg:	0.1
Total Particulate mg:	12.0

IMC-Agrico Company**Particulate and Moisture Data Sheet
Method 5 & 13B Combined**Facility NEW WALES

Date : 7/12/00

Plant MULTIFOS C - KILN

Run 2

Impinger Set Number: P-2

Impinger Number:	1	2	3	4
Final (grams/mls):	163	112	0	326.7
Initial (grams/mls):	100	100	0	317.4
Difference (grams/mls):	63	12	0	9.3
Total Moisture Collected:			75 mls	9.3 gram

Filter Set Number: 2

Filter Analysis		Probe Wash Analysis	
Filter Number:	64	Beaker Number:	42
Final Weight	0.7272	Final Weight:	150.4336
Initial Weight:	0.7031	Initial Weight:	150.4194
Difference:	0.0241	Difference:	0.0142

Fluoride and Particulate Calculations**Fluoride**

Probe Wash Fluoride mg	1.33
Impinger Fluoride mg:	11.16
Filter Fluoride mg:	0.45
Total Fluoride mg:	12.94

Particulate

Probe Wash Particulate mg	14.2
Filter Particulate mg:	24.1
Total Particulate mg:	38.3

IMC-Agrico Company

Particulate and Moisture Data Sheet Method 5 & 13B Combined

Facility NEW WALES

Date : 7/13/00

Plant MULTIFOS C - KILN

Run 3

Impinger Set Number: P-3

Impinger Number:	1	2	3	4
Final (grams/mls):	152	110	0	391.1
Initial (grams/mls):	100	100	0	381.5
Difference (grams/mls):	52	10	0	9.6
Total Moisture Collected:			62 mls	9.6 gram

Filter Set Number: 3

Filter Analysis		Probe Wash Analysis	
Filter Number:	65	Beaker Number:	B
Final Weight	0.7427	Final Weight:	106.7722
Initial Weight:	0.6637	Initial Weight:	106.7548
Difference:	0.0790	Difference:	0.0174

Fluoride and Particulate Calculations

Fluoride

Probe Wash Fluoride mg	4.20
Impinger Fluoride mg:	0.95
Filter Fluoride mg:	4.50
Total Fluoride mg:	9.65

Particulate

Probe Wash Particulate mg	17.4
Filter Particulate mg:	79.0
Total Particulate mg:	96.4

Run 1

IMC Phosphates Company

Moisture Data Sheet Method 8

Facility New Wales

Date : 07/11/00

Plant MULTIFOS C-KILN

Run 1

Impinger Set Number: S3

Impinger Number:	1	2	3	4
Final (grams/mls):	155	122	106	335.0
Initial (grams/mls):	100	100	100	320.2
Difference (grams/mls):	55	22	6	14.8
Total Moisture Collected:			83 mls	14.8 gram

Sulfur Dioxide

Laboratory mg 82.22

IMC Phosphates Company

Moisture Data Sheet Method 8

Facility New Wales

Date : 07/12/00

Plant MULTIFOS C-KILN

Run 2

Impinger Set Number:	S-2			
Impinger Number:	1	2	3	4
Final (grams/mls):	154	102	102	301.4
Initial (grams/mls):	100	100	100	290.6
Difference (grams/mls):	54	2	2	10.8
Total Moisture Collected:	58 mls			10.8 gram

Sulfur Dioxide

Laboratory mg 53.42

Run 3

IMC Phosphates Company

Moisture Data Sheet Method 8

Facility New Wales

Date : 07/13/00

Plant MULTIFOS C-KILN

Run 3

Impinger Set Number:	S-1			
Impinger Number:	1	2	3	4
Final (grams/mls):	157	104	101	336.4
Initial (grams/mls):	100	100	100	324.8
Difference (grams/mls):	57	4	1	11.6
Total Moisture Collected:			62 mls	11.6 gram

Sulfur Dioxide

Laboratory mg 68.54

IMC-AGRICO COMPANY
New Wales Facility
Multifos Kiln "C"
7/13/00
Nitrogen Oxides
0-1000 PPM Range
6 cm/hr

446 PPM NO

1345 END RUN #3

ZERO

1245 START RUN #3

446 PPM NO

1225 END RUN #2

ZERO

1125 START RUN #2

446 PPM NO

1105 END RUN #1

ZERO

1005 START RUN #1

446 PPM NO

ZERO

446 PPM NO

446 PPM NO 852

ZERO

YOKOGAWA
B53121 (BAS-15)

YOKOGAWA
B53121 (BAS-15)

100cm

10

Calibrations

IMC Phosphates Company

Post Test Dry Gas Meter Calibration Form

Facility: NEW WALES

Plant: MULTIFOS C- KILN

Meter Box Number: 3187

Date: 8/2/00

Barometric Pressure, Pb: 30.10

Standard Test Meter Number: 693497

Delta H	Gas Volume				Temperature, F				Time min.	Yi	Delta H@
	Standard Meter		Dry Gas Meter		Standard Meter		Dry Gas Meter				
	Initial	Final	Initial	Final	Inlet	Outlet	Inlet	Outlet			
1.6	639.125	649.762	426.358	437.538	68	76	89	90	15	0.9789	1.7259
1.6	649.762	660.343	437.538	448.636	68	72	88	86	15	0.9802	1.7390
1.6	660.343	670.877	448.636	459.676	66	70	88	83	15	0.9820	1.7462
Delta H to be at intermediate setting from test.									Tolerance	+/- 0.02	+/- 0.15
Test Performed at Vacuum: <u>13</u> in Hg									Deviation	0.0016	0.0111
									Average	0.9803	1.737

Percentage Difference in Yi Pretest vs Post Test. 1.66 %

Pretest Yi Value 0.9969

Percentage Difference cannot exceed 5%

Person Performing Calibration:



Ross Sellers

IMC Phosphates Company

Post Test Dry Gas Meter Calibration Form

Facility: New Wales

Plant: Multifos C-Kiln

Meter Box Number: 3187

Date: 8/3/00

Barometric Pressure, Pb: 30.1

Standard Test Meter Number: 693497

Delta H	Gas Volume				Temperature, F				Time min.	Yi	Delta H@
	Standard Meter		Dry Gas Meter		Standard Meter		Dry Gas Meter				
	Initial	Final	Initial	Final	Inlet	Outlet	Inlet	Outlet			
1.5	708.06	718.46	498.2	508.85	68	68	75	70	15	0.9813	1.7205
1.5	718.46	728.87	508.85	519.54	68	68	75	70	15	0.9785	1.7172
1.5	728.87	739.3	519.54	530.25	68	68	81	72	15	0.9859	1.6978
Delta H to be at intermediate setting from test.									Tolerance	+/- 0.02	+/- 0.15
Test Performed at Vacuum: <u>11</u> in Hg									Deviation	0.0040	0.0140
									Average	0.982	1.712

Percentage Difference in Yi Pretest vs Post Test. 1.50 %

Pretest Yi Value 0.9969

Percentage Difference cannot exceed 5%

Person Performing Calibration:


 Flint Barnes

IMC-Agrico Company

Dry Gas Meter Calibration Form

Meter Box Number: 3187

Date: 02/08/00

Barometric Pressure, Pb: 30.25

Standard Test Meter Number: 693497

Delta H	Gas Volume				Temperature, F				Time min.	Yi	Delta H@	
	Standard Meter Initial	Standard Meter Final	Dry Gas Meter Initial	Dry Gas Meter Final	Standard Meter Inlet	Standard Meter Outlet	Dry Gas Meter Inlet	Dry Gas Meter Outlet				
0.5	60.271	65.638	43.039	48.515	70	71	75	74	14	0.9863	1.8772	
1	65.969	71.027	48.852	53.982	70	71	75	74	9	0.9910	1.7470	
1.5	71.662	77.16	54.624	60.198	70	71	80	74	8	0.9948	1.7442	
2	77.793	83.385	60.736	66.395	70	71	81	74	7	0.9964	1.7196	
3	84.125	90.099	67.238	73.163	70	71	81	74	6	1.0142	1.6604	
4	91.448	97.122	74.617	80.318	70	71	80	75	5	0.9987	1.7043	
										Tolerance	+/- 0.02	+/- 0.15
										Deviation	0.0173	0.1351
										Average	0.9969	1.742

Person Performing Calibration:

Flint Barnes

Flint Barnes

IMC-Agrico Company

Dry Gas Meter Calibration Form

Meter Box Number: 3187

Date: 02/08/00

Barometric Pressure, Pb: 30.25

Standard Test Meter Number: 693497

Delta H	Gas Volume				Temperature, F				Time min.	Yi	Delta H@	
	Standard Meter		Dry Gas Meter		Standard Meter		Dry Gas Meter					
	Initial	Final	Initial	Final	Inlet	Outlet	Inlet	Outlet				
0.5	60.271	65.638	43.039	48.515	70	71	75	74	14	0.9863	1.8772	
1	65.969	71.027	48.852	53.982	70	71	75	74	9	0.9910	1.7470	
1.5	71.662	77.16	54.624	60.198	70	71	80	74	8	0.9948	1.7442	
2	77.793	83.385	60.736	66.395	70	71	81	74	7	0.9964	1.7196	
3	84.125	90.099	67.238	73.163	70	71	81	74	6	1.0142	1.6604	
4	91.448	97.122	74.617	80.318	70	71	80	75	5	0.9987	1.7043	
										Tolerance	+/- 0.02	+/- 0.15
										Deviation	0.0173	0.1351
										Average	0.9969	1.742

Person Performing Calibration:

Flint Barnes

Flint Barnes

THERMOMETER CALIBRATIONS

Calibrated BY

Flint Barnes
FLINT BARNES

DATE	ID NO	TYPE	RANGE	ICE BATH			TEPID WATER			BOILING WATER		
				STD THERM	TEMP	% or o DIFF	STD THERM	TEMP	% or o DIFF	STD THERM	TEMP	
6/26/00	OM1	Them	Dig	38	38	0	62	62	0	210	210	0
6/26/00	OM2	Them	Dig	38	38	0	62	62	0	210	210	0
6/26/00	OM3	Them	Dig	38	38	0	62	62	0	210	210	0
6/26/00	OM4	Them	Dig	34	34	0	62	62	0	210	210	0
6/26/00	PS3	T/T	Dig	34	34	0	72	72	0	212	212	0
6/26/00	PSA (5)	T/T	Dig	34	34	0	68	68	0	210	210	0
6/26/00	PSB (5)	T/T	Dig	34	34	0	70	69	1	210	210	0
6/26/00	PSC (5)	T/T	Dig	34	34	0	70	70	0	210	210	0
6/26/00	PSB-OLD	T/T	Dig	34	34	0	72	72	0	210	210	0
6/26/00	PS6 5	T/T	Dig	34	34	0	68	68	0	212	212	0
6/26/00	PG3	T/T	Dig	34	34	0	72	72	0	210	210	0
6/26/00	PG5	T/T	Dig	34	34	0	70	70	0	212	212	0
6/26/00	E1	T/T	Dig	34	34	0	68	68	0	0		0
6/26/00	E2	T/T	Dig	34	34	0	68	68	0	0		0
6/26/00	E3	T/T	Dig	34	34	0	70	70	0	0		0
6/26/00	E4	T/T	Dig	34	34	0	68	68	0	0		0
6/26/00	HB1	T/T	Dig	0	0	0	70	70	0	212	212	0
6/26/00	HB2	T/T	Dig	0	0	0	70	70	0	210	210	0
6/26/00	HB3	T/T	Dig	0	0	0	72	72	0	212	212	0
6/26/00	HB4	T/T	Dig	0	0	0	70	70	0	210	210	0
6/26/00	PS 8 NE	T/T	Dig	34	34	0	68	68	0	210	210	0
								PS	STEEL	PROBE		
								PG	GLASS	PROBE		
								E	EXIT	ADAPTOR		
								HB	HOT	BOX		
								Them	Digital	Thermometer		
								T/T	Thermometer-Them-Couple			

IMC-Agrico Company

Environmental Department

Nozzle Size Calibration

Facility: IMC-AGRICO New Lakes

Plant: MULTIFOS C-KILN

Date: 7/11/2000

Nozzle ID	Run Number	D-1	D-2	D-3	Delta	Average
.250	1, 2, 3	.250	.251	.250	.001	.250

D-1, D-2, D-3

Measurement of Diameter at Three locations
Three Decimal Places required.

Delta

Maximum Difference in a D-1, D-2, D-3.
Value not to exceed 0.004.

Average

Average of D-1, D-2, D-3.
Three Decimal Places required.

Person Performing Calibration:

David Colwell

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

1204 North Wheeler St. Plant City, Florida 33566 (813) 752-5014

NITROGEN OXIDES ANALYZER CALIBRATION DATA

EPA METHOD 7E

COMPANY	IMC-AGRICO CO. NEW WALES FACILITY
SOURCE	MULTIFOS KILN "C"
OPERATOR	M. Gierke
DATE	07/13/00
RUN #S	ALL
INSTRU. SPAN RANGE	1000

	Cylinder value (PPM)	Analyzer calibration responses (PPM)	Absolute difference (PPM)	Difference (% of Span)
Zero	0	0	0	0.0
Mid-range	446	445	1	0.1
High-range	852	850	2	0.2

SYSTEM CALIBRATION BIAS AND DRIFT DATA

		Initial Values			Final Values		Drift (% of span)
		Analyzer calibration response (PPM)	System calibration response (PPM)	System calibration bias (% of span)	System calibration response (PPM)	System calibration bias (% of span)	
Run 1	Zero	0	0	0.0	0	0.0	0.0
	Upscale	445.0	448	0.3	449	0.4	0.1
Run 2	Zero	0	0	0.0	0	0.0	0.0
	Upscale	445.0	449	0.4	448	0.3	-0.1
Run 3	Zero	0	0	0.0	0	0.0	0.0
	Upscale	445.0	448	0.3	448	0.3	0.0

$$\text{System Calibration Bias} = \frac{\text{System Cal. Response} - \text{Analyzer Cal.}}{\text{Span}} \times 100$$



SPECTRA GASES INC.

3434 Route 28 West • Branchburg, NJ 08876 USA Tel: (908) 252-9300 • (908) 932-0624 • Fax: (908) 252-0311
 Shipped From: 50 Industrial Drive • Alpha, NJ 08865



CERTIFICATE OF ANALYSIS

**EPA PROTOCOL MIXTURE
 PROCEDURE #: G1**

CUSTOMER: Cherokee Instruments Inc.
 SGI ORDER #: 151725
 ITEM#: 5
 P.O.#: 3685

CYLINDER #: CC85120
 CYLINDER PRES: 2000 PSIG
 CGA OUTLET: 680

A-3

CERTIFICATION DATE: 3/15/2000
 EXPIRATION DATE: 3/15/2002

CERTIFICATION HISTORY

COMPONENT	DATE OF ASSAY	MEAN CONCENTRATION	CERTIFIED CONCENTRATION	ANALYTICAL ACCURACY
Nitric Oxide	3/7/2000	353.3 ppm	352 ppm	-0.1%
NOx	3/15/2000	349.8 ppm	352 ppm	Reference Value Only

BALANCE Nitrogen

PREVIOUS CERTIFICATION DATES: None

REFERENCE STANDARDS

COMPONENT	SRM/NTRM#	CYLINDER#	CONCENTRATION
Nitric Oxide	GMIS-1	CC119978	1014 ppm

INSTRUMENTATION

COMPONENT	MAKE/MODEL	SERIAL #	DETECTOR	CALIBRATION DATE(S)
Nitric Oxide	Teco 10	10AR-34979-249	Chem	3/15/2000

THIS STANDARD WAS CERTIFIED ACCORDING TO THE EPA PROTOCOL PROCEDURES.
 DO NOT USE THIS STANDARD IF THE CYLINDER PRESSURE IS LESS THAN 150 PSIG.

ANALYST: [Signature]

DATE: 3/15/2000

For Technical Information Call
-800-752-1597



Air Products and Chemicals, Inc. * 12722 S. Wentworth Avenue, Chicago, IL 60628

ISO CERTIFICATION: 9002

CERTIFICATE OF ANALYSIS: EPA PROTOCOL GAS STANDARD

PERFORMED ACCORDING TO EPA TRACEABILITY PROTOCOL FOR ASSAY AND CERTIFICATION OF GASEOUS CALIBRATION STANDARDS (PROCEDURE #G1)

Customer:
AIR PRODUCTS AND CHEMICALS, INC.
4822 INDUSTRY LANE
UDI BUSINESS PARK
DURHAM NC 27709

Order No: CSS-072856-01
Batch No: 861-51026
PO:
Release:

Cylinder No: SC9166856BAL
Bar Code No: DTX194
Cylinder Pressure*: 2000 psig
Certification Date: 11/12/1998
Expiration Date: 11/12/2000

CERTIFIED CONCENTRATION		REFERENCE STANDARDS			ANALYTICAL INSTRUMENTATION			
Component	Certified Concentration	Cylinder Number	Standard Type	Standard Concentration	Instrument Make/Model	Serial Number	Last Calibration	Measurement Principal
NITRIC OXIDE	446 ±5.2 PPM	SG91518788AL	NTRM 81687X	844.0 PPM	ROSEMOUNT 951A	010877	10/28/98	CHEMILUMINESCENCE

NO2 (Reference Value Only): 2.20 PPM
NITROGEN Balance Gas

* STANDARD SHOULD NOT BE USED BELOW 150 PSIG

Analyst:

Richard Vardyle

Approved By:

James Laas

(16821)

Pub. No. 320 9702

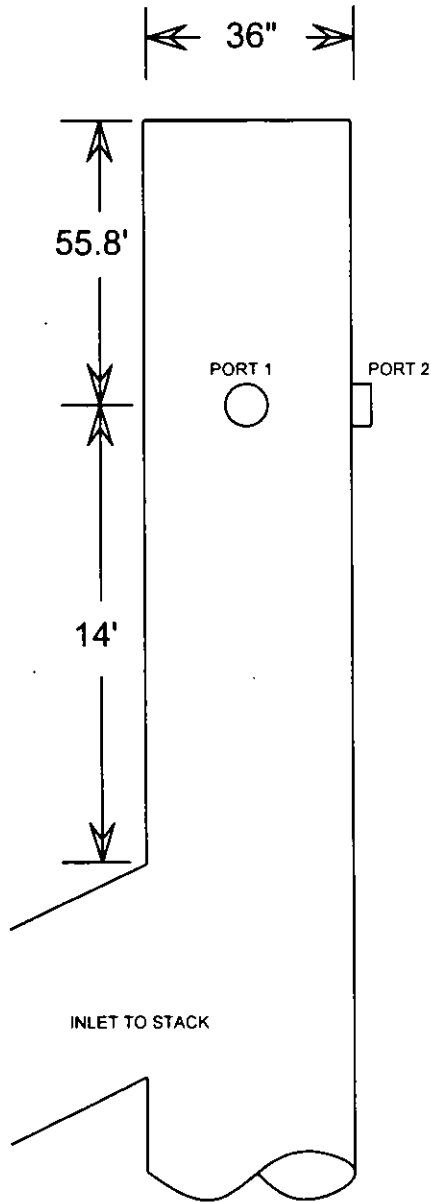
17-18-2000 3:41PM

FROM

P. 1

Stack Diagram and Sampling Locations

SAMPLE PORT LOCATION
NEW WALES OPERATIONS
MULTIFOS C KILN



POINT NO.	INCHES INSIDE STACK WALL
1	1.00
2	2.41
3	4.25
4	6.38
5	9.00
6	12.80
7	23.20
8	27.00
9	29.62
10	31.75
11	33.59
12	35.00

PREPARED: CDT	TITLE: TRAVERSE POINT LOCATION	IMC-AGRIC CO.	
DATE:		LOCATION: NEW WALES	FILE:
REVISED:		SCALE:	DRAWING NO.:

**Method 1
Sample and Velocity Traverse Selection**

Facility: New Wales
Plant: Multifos C Kiln
Company ID: 1108
FDEP AIRS & Pt. ID: 1050059-014-AV

Points for Circular Stacks

Stack Diameter inches
 Distance Upstream of Disturbance feet
 Upstream Diameters 25.69
 Distance Downstream of Disturbance feet
 Downstream Diameters 18.60
 Downstream/Upstream Ratio 18.60 25.69

Number of Traverse Points pts
 Number of Ports
 Number of Points per Port 12
 Number of Points on Diameter 12
 Traverse Distance Offset inches

Particulate Traverses

> 7/1.75	> 6/1.5	> 5/1.25	< 5/1.25
12	16	20	24

Non Particulate Traverses

> 6/1.5	< 6/1.5
12	16

Point Number	Distance (inches)	Distance w/offset	Distance %
1	1.00	1.00	2.13
2	2.41	2.41	6.70
3	4.25	4.25	11.81
4	6.38	6.38	17.73
5	9.00	9.00	25.00
6	12.80	12.80	35.57
7	23.20	23.20	64.43
8	27.00	27.00	75.00
9	29.62	29.62	82.27
10	31.75	31.75	88.19
11	33.59	33.59	93.30
12	35.00	35.00	97.87



IMC

RECEIVED

AUG 31 2000

BUREAU OF AIR REGULATION

CERTIFIED MAIL 7099 3400 0005 0929 3835
RETURN RECEIPT REQUESTED

August 28, 2000

A. A. Linero, P.E.
Administrator, New Source Review Section
Bureau of Air Regulation
Florida Department of
Environmental Protection
Southwest District
2600 Blair Stone Road MS 5505
Tallahassee, Florida 32399-2400

RE: Construction Permit Extension Request
Permit No. 1050059-024-AC (PSD-FL-244)
AIRS No. 1050059
Emissions Units Nos. 074, 075 and 076
New Wales Plant

Dear Mr. Linero:

This letter is in response to your letter of August 7, 2000, which requested additional information related to IMC Phosphates' request to extend the Mulifos Kiln C construction permit. Because of market conditions, the Company has suspended operation of C Kiln for approximately three months. The responses follow:

1. **List the tasks to be performed to achieve "normal operating conditions" and the approximate dates for completing those tasks.**
 - A. A summary of actions taken to-date is attached.
 - B. A new burner was installed on June 27, 2000 and required adjustments to optimize the flame shape. This task has been completed and must be evaluated once the kiln resumes operation. This configuration is now similar to that of the A and B Kilns.
 - C. Instrumentation to monitor volumetric flow through the kiln will be installed and is needed to improve combustion control for the burner. This task will be completed by December 1, 2000.

D. Operating procedures for kiln combustion control must be developed based on the recently installed carbon monoxide monitoring instrumentation. This task will begin once the kiln resumes operation. To this point, the sustained fuel usage rate for the new kiln has not been comparable to that of the existing kilns.

2. Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.

A. Testing to improve the quality of the mixed feed to the kilns will be conducted. This will involve operation of the C Kiln on a non-continuous basis for up to four weeks to reduce the free moisture content of the mixed feed.

B. Not all possible improvements have been identified and as testing progresses, additional action items may be developed. Testing will begin December 1, 2000 depending on kiln operation.

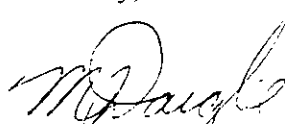
C. Additional fluoride testing will need to be conducted to address the problem identified in the response to the Department's question below.

3. Provide a statement (and basis for believing) that the facility will comply with applicable regulation.

Based on the compliance testing conducted on the new kiln, the emission limits of the construction permit will be met with the exception of the fluoride limit of 0.038 lb/ton P_2O_5 . From the two compliance tests that have been conducted on this kiln, the fluoride emissions have been found to be located primarily in the probe/filter portion of the sampling train. This indicates that the fluoride is a liquid, solid, or both. As the Department is aware, the design of the scrubbing system was based on the fluoride being in a gaseous form. These compliance test reports are being finalized and will be submitted under separate cover.

Thank you for your attention to this matter. If you have any questions, please contact P.A. Steadham at 863-428-7106 or C.D. Turley at 863-428-7153.

Sincerely,



M. A. Daigle
General Manager
New Wales Plant

MAD:oan

Attachment (1 copy)

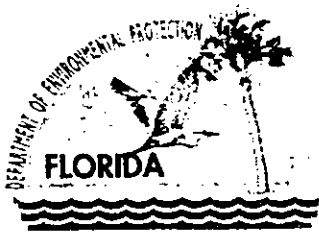
John J. Reynolds

8/28/00

Summary of Tasks Completed on C-Kiln

This is a summary of actions taken to achieve "normal operation" of C-Kiln over the period from start up in October 1999 through shutdown in August 2000.

1. November 1999 - installed air dump on primary air to keep from blowing flame out on start-up.
2. December 1999 - installed Pillard type gas nozzle in burner to lengthen flame.
3. March 2000 - corrected primary air flow and burner steam flow instrument calibrations.
4. March 2000 - purchased portable combustion analyzer to fine tune burner operation.
5. April 2000 - reinstalled Svedala burner. Svedala field service engineer visited plant for 3 days to optimize burner. Burner had been set for low firing rate. In addition, balance of primary to secondary air was incorrect and was properly adjusted.
6. April 2000 - reinstalled Pillard type gas nozzle. The bushy flame pattern with Svedala burner washed out refractory in burner zone, requiring replacement.
7. April 2000 - switched to high pressure steam over concerns with fluctuating steam quality using low pressure steam.
8. April 2000 - verified kiln slope was correct.
9. May 2000 - repositioned both the oxygen sample tube and temperature probe in the feed end of the kiln.
10. June 2000 - installed Pillard burner to improve flame length. Better than Svedala burner but still not as long as A/B. Ring formation near burning zone continued to affect rates.
11. July 2000 - replaced missing distribution cone on Pillard burner to increase flame length similar to A/B.
12. August 2000 - installed on-line CO analyzer for improved combustion control.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

August 7, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. M. A. Daigle, General Manager
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860-1100

Re: Extension Request/DEP File No. 1050059-024-AC (PSD-FL-244)

Dear Mr. Daigle:

The Department reviewed your request dated July 21, 2000 to extend the expiration date of the construction permit from September 30, 2000 to September 30, 2001. The reasons given for the extension request are that "the initial startup has been problematic and normal operating conditions have not been achieved. Efforts to reach these levels continue."

Per Rule 62-4.080(3), F.A.C., an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

We already have fairly extensive information about the facility and the control equipment. To complete the reasonable assurance requirement allowing extension of the permit, please submit the following information:

1. List the tasks to be performed to achieve "normal operating conditions" and the approximate dates for completing those tasks.
2. Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.
3. Provide a statement (and basis for believing) that the facility will comply with applicable regulation.

According to Rule 62-4-080(3), the permit will remain in effect until final action is taken by the Department. 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 John Reynolds at 850/921-9536.

Sincerely,

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

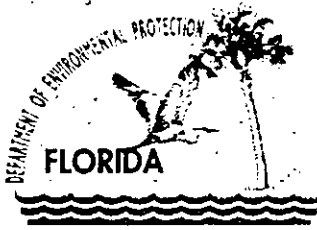
Cc: Bill Thomas, DEP SWD
Jeff Spence, Polk County ESD

"More Protection. Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> 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. 	<p>A. Received by (Please Print Clearly) <i>Bel Fry</i> B. Date of Delivery <i>8-9-00</i></p> <p>C. Signature <i>Bel Fry</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr. M. A. Daigle, Gen. Mgr. IMC Phosphates Co. PO Box 2000 Mulberry, FL 33860-1100</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Copy from service label) 7099 3400 0000 1453 2870</p>	
<p>PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789</p>	

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)												
7099 3400 0000 1453 2870	<p>Article Sent To: <i>Mr. M. A. Daigle, Gen. Mgr. IMC Phosphate</i></p> <table border="1"> <tr> <td>Postage</td> <td>\$</td> <td rowspan="5" style="text-align: center; vertical-align: middle;"> <i>8/9/00</i> Postmark Here </td> </tr> <tr> <td>Certified Fee</td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Total Postage & Fees</td> <td>\$</td> </tr> </table> <p>Name (Please Print Clearly) (to be completed by mailer) <i>M. A. Daigle, Gen. Mgr.</i></p> <p>Street, Apt. No., or P.O. Box No. <i>P.O. Box 2000</i></p> <p>City, State, ZIP+4 <i>Mulberry FL 33860-1100</i></p> <p>PS Form 3800, July 1999 See Reverse for Instructions</p>	Postage	\$	<i>8/9/00</i> Postmark Here	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		Total Postage & Fees	\$
Postage	\$	<i>8/9/00</i> Postmark Here										
Certified Fee												
Return Receipt Fee (Endorsement Required)												
Restricted Delivery Fee (Endorsement Required)												
Total Postage & Fees	\$											



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

July 27, 2000

Mr. M. A. Daigle
General Manager
New Wales Plant
IMC Phosphates Company
P. O. Box 2000
Mulberry, Florida 33860-1100

RE: Permit No. 1050059-024-AC
Request for Extension of Expiration Date

Dear Mr. Daigle:

The Bureau of Air Regulation received the above referenced request on July 26, 2000 and processing has begun. Since this facility holds a current Title V operating permit, no fee is required to extend the permit pursuant to Chapter 62-4.050(4)(a)2. Your check No. 120070 for \$50 is enclosed. If you have any questions, please feel free to call me at (850)921-9505.

Sincerely,

Patty Adams
Bureau of Air Regulation

/pa

Enclosure

Cc: John Reynolds

Permitting Application

ARMS Facility

POINT AIRS ID 1050059 STATUS A OFFICE SWD SW: TAMPA
 SITE NAME IMC-AGRICO CO. (NEW WALES) COUNTY POLK
 OWNER/COMP IMC-AGRICO CO. (NEW WALES)

Project

AIR Permit #: 1050059-014-AV Project #: 014 CRA Reference #:
 Permit Office: SWD (DISTRICT) Agency Action: Issued
 Project Name: INITIAL TITLE V Desc:
 Type/Sub/Req: AV /00 Initial Title V Permit Requests Logged: 07-AUG-1996
 Received: 14-JUN-1996 Issued: 26-MAR-1999 Expires: 26-MAR-2004 OGC:
 Fee: 0.00 Fee Recd: Dele: Override: NONE

Related Party

Role: APPLICANT Begin: 07-AUG-1996 End:
 Name: RAVAL, PRADEEP Company: KOOGLER & ASSOCIATES
 Addr: 4014 NW THIRTEENTH STREET
 City: GAINESVILLE State: FL Zip: 32609- Country: U.S.A.
 Phone: 904-377-5822 Fax: 904-377-7158

Processors

Processor: CAWKWELL_R Y Active: 27-JAN-1997 Inactive:

Enter Project Name.
 Count: 16 ^ v

<Replace>



IMC

Certified Mail 7099 3400 0005 0929 4702
Return Receipt Requested

July 21, 2000 **RECEIVED**

JUL 26 2000

Mr. Clair Fancy
Florida Department of
Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

RE: Request for Extension of Expiration Date
Permit No. 1050059-024-AC
AIRS No. 1050059
Emissions Units Nos. 079, 075, and 076
New Wales Plant

Dear Mr. Fancy:

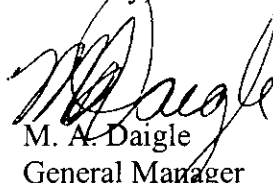
IMC Phosphates Company requests an extension of the expiration date of Construction Permit No. 1050059-024-AC from September 30, 2000 to September 30, 2001. Check No. 120070 in the amount of \$50.00 is enclosed to cover the applicable processing fee. The initial startup of the project has been problematic and normal operating conditions have not been achieved. Efforts to reach these levels continue.

In my capacity as General Manager of the New Wales Plant, a delegation of authority as the responsible official for this facility is attached.

The company has recently undergone a name change from IMC-Agrico Company to IMC Phosphates Company. The name change is being made under separate cover in accordance with Department requirements.

Thank you for your attention to this matter. If you have any questions, please contact me at 863-428-7102.

Sincerely,



M. A. Daigle
General Manager
New Wales Plant

MAD: oan
Attachment

C:\COLA\NW_1050059-24_EXTENSION.DOC

Steven J. Demetriou
President



IMC Phosphates MP Inc.
100 S. Saunders Road, Suite 300
Lake Forest, Illinois 60045-2561
847.739.1200

July 10, 2000

Mike A. Daigle
General Manager - New Wales Plant
IMC Phosphates MP Inc.
P.O. Box 2000
Mulberry, FL 33860-1100

Re: Delegation of Authority under Environmental Programs

Dear Mike:

In your capacity as General Manager - New Wales Plant for IMC Phosphates MP Inc. (the "Corporation"),¹ you are in charge of principal business functions for IMC Phosphates Company in the areas of mine permitting, reclamation and remediation, surveying, and terminal operations in Florida. Consequently, for purposes of applicable environmental, mine permitting, reclamation, and remediation statutes and regulations, and in accordance with the By-laws of the Corporation, the resolutions of the Board of Directors, and the Amended and Restated Partnership Agreement of the Partnership, as amended, I hereby designate you as a Responsible Corporate Official and delegate to you the authority to execute all necessary environmental documentation and reports, mine permitting documentation, reclamation and remediation documentation, and surveys required in connection with your responsibilities for the Corporation and the Partnership; provided, however, that such authority shall be subject to all necessary corporate approvals having been first obtained, as required by the By-laws, resolutions of the Board of Directors or actions of the Policy Committee of the Partnership, and is further limited now or in the future by such resolutions, management guides, and actions as may be inconsistent with this delegation.

As you know, this delegation has been in effect since the 1st day of December 1999, and supersedes any previous delegations of similar authority that may have been given either to you or to any predecessor with responsibilities similar to yours.

Steven J. Demetriou

A handwritten signature in black ink, appearing to read "Steve Demetriou", written over a horizontal line.

President
IMC Phosphates MP Inc.

¹ IMC Phosphates MP Inc. is the managing general partner of IMC Phosphates Company, a general partnership organized under the laws of Delaware (the "Partnership").



RECEIVED

APR 14 2000

CERTIFIED MAIL Z 149 946 516
RETURN RECEIPT REQUESTED

BUREAU OF AIR REGULATION

April 11, 2000

Mr. Gerald J. Kissel
Florida Department of
Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

RE: Testing Extension Request
Permit No. 1050059-024-AC
AIRS No. 1050059
Emissions Units Nos. 074, 075 and 076
New Wales Plant

PSD-FL-244

Dear Mr. Kissel:

This is a request to extend the date to conduct performance tests required for Construction Permit No. 1050059-024-AC. The extension would be from 4/23/00 to 7/22/00 or an additional 90 days. Consistent operation of Kiln C has not been accomplished to date due to a host of start up problems. An attempt to conduct the tests was made in the first week of April. The emission tests were not valid because of erratic kiln operation due to problems during the runs. Efforts are underway to solve these problems. The testing will be scheduled as soon as possible.

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

Sincerely,

P. A. Steadham
Environmental Manager
Concentrates - Florida

cc: twf, jrg
John Reynolds, FDEP Tallahassee

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