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BUREAU OF AIR REGULATION

September 30, 1999

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

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

Dear Mr. Peterson:

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

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

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

**2. What effect will the removal of the packed sections have on potential fluoride and SO<sub>2</sub> emissions, if any?**

As stated above the AFI process uses defluorinated acid so fluoride scrubbing is not an issue. The plant also uses natural gas the majority of the time so SO<sub>2</sub> emissions should not be an issue either.

September 30, 1999

3. **Do you still wish to be permitted to fire fuel oil at the AFI Plant? If the packing controls SO<sub>2</sub> emissions, the removal of the packing would cause an increase in actual SO<sub>2</sub> emissions. The project would be considered a modification and require review for PSD applicability.**

The ability to use fuel oil is needed. The requirement to run fuel oil with the packing can be included in the permit to retain the SO<sub>2</sub> emissions at current permitted levels. This is operation as Alternative 1.

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

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

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

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

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

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

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

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

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

Mr. Eric Peterson, P. E.

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

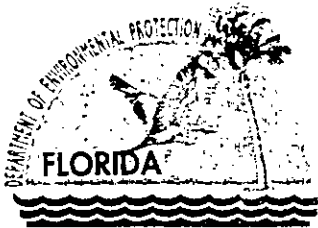
Sincerely,



P. A. Steadham  
Environmental Team Leader  
Concentrates - Florida

Attachments

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



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

June 29, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. E. M. Newberg  
Vice President and General Manager  
IMC-Agrico Company  
P.O. Box 2000  
Mulberry, Florida 33860

Re: DEP File No: 1050059-024-AC (PSD-FL-244)  
New Wales Multifos Plant

Dear Mr. Newberg:

The Department received IMC-Agrico's June 16 letter and diagrams of the modifications to the Kiln A & B scrubber systems in the Multifos Plant. This satisfies the approval requirements of Specific Conditions Nos. 6 and 7 regarding the disposition of caustic scrubber effluent.

If you have any questions on this matter, please call John Reynolds of our staff at 850/921-9536.

Sincerely,

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

AAL/jr

cc: Bill Thomas, SWD  
Joe King, Polk Co.  
John Koogler, K&A  
Greg Worley, EPA  
John Bunyak, NPS

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3. Article Addressed to:  
 Mr. E. M. Newberg, VP + GM  
 Inc - AgriCo  
 PO Box 2000  
 Mulberry, FL 33860

4a. Article Number  
 Z 333 618 187

- 4b. Service Type
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  - Return Receipt for Merchandise  COD

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PS Form 3800 April 1995

Sent to	EM Newberg
Street & Number	Inc - AgriCo
Post Office, State, & ZIP Code	Mulberry FL
Postage	\$
Certified Fee	
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Return Receipt Showing to Whom & Date Delivered	
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TOTAL Postage & Fees	\$
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	1050059-024-AC PSO-FI-244



Certified Mail Z 149 946 304  
Return Receipt Requested

June 16, 1999

RECEIVED

JUN 18 1999

BUREAU OF  
AIR REGULATION

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

**RE: Multifos Kiln C, AIRS No. 1050059 Unit 074  
Permit No. 1050059-024-AC.  
Scrubber Effluent  
New Wales Plant**

Dear Mr. Fancy:

Pursuant to Section III. Specific Condition 7 which prohibits the discharge of the scrubber solutions from being discharged to the plant process water system, the effluent will be discharged into the separate A-11 fresh water pond. This will be accomplished in the following manner:

Pumps in the Multifos plant will transfer the solution into the existing 24 inch header that discharges into the A-11 pond. Normal operation will transfer the sodium sulfite generated by the C-Kiln scrubber to the A/B-Kiln recirculating system as additional make-up solution to that system. The combined effluent will then be transferred from the A/B-Kiln scrubber system to the A-11 pond header. The design is also capable of transferring the C-Kiln scrubber effluent directly to the A-11 header if necessary. A holding tank is included to temporarily store the effluent solution during times when the discharge header to the A-11 pond requires maintenance.

The A/B-Kiln scrubber retrofit design consists of a new sump and pumps to re-circulate scrubber solution over the existing scrubbers' packed demisting section. Caustic, make-up water, and the C-Kiln scrubber effluent solution will be transferred into this sump. Instrumentation will track and record the caustic flow (15 gph) to the A/B-Kiln scrubber system and the re-circulation flow (100 gpm) to each of the A/B-Kiln scrubbers. The system is indicated on the two attached sketches.

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

Sincerely,

P. A. Steadham  
Environmental Team Leader  
Concentrates - Florida

cc: J. Reynolds

Enclosure

cwk  
pas99



PREPARED:	CDT	TITLE:	PROPOSED MULTIFOS KILN C	IMC-AGRICO CO.	
DATE:	11/13/97	LOCATION:	NEW WALES	FILE:	KILN02
REVISED:	6/7/99	SCALE:	NONE	DRAWING NO.:	L2

