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November 8, 1999

BUREAU OF AIR REGULATION

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 October 18, 1999, the following response is submitted in order that the Department may continue processing the application.

1. Please provide an estimate of fluoride emissions, based on a material balance.

The attached table represents typical production at the AFI Plant. The fluoride analyses are not performed routinely and are based on historical data.

As indicated in the September 30, 1999 submittal, the Visible Emission Evaluation was conducted and is included with this submittal.

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

cwk (q:\cdt\petrsn01)

xc: FDEP - Tallahassee

~~Mr. A. Linero - Z-149-946-433~~

Mr. J. Reynolds - Z 149 946 434

New Wales AFI Plant
Fluoride Mass Balance

Product*	Dynafos	Biofos
Tons produced (2 day period)	3567	4161
%F in product (daily avg analysis)	0.146	0.165
Tons P ₂ O ₅	1534	2030
% P ₂ O ₅ in acid (daily avg analysis)	56.2	56.2
Equivalent solution tons of acid	2730	3611
%F in acid (4 day average)	0.185	0.185
Tons limestone used	1787	1656
%F in limestone (previous analysis)	0.01	0.01
Material Balance		
Tons F in acid	5.050	6.681
Tons F in limestone	0.179	0.166
Total	5.228	6.847
Tons F in product	5.215	6.847
Tons Fluoride Emitted	0.013	1.9E-04
Tons F/Ton product	3.8E-06	4.7E-08
Tons product / Year **	204000	360000
Tons Fluoride / Year	0.77	0.02
Total Fluoride (TPY)	0.79	

*Calcium based products at the AFI Plant

** Typical product distribution, production plan for year 2000 is 34/66% Dynafos/Biofos ratio. This ratio may be subject to change pending market conditions and product demand.



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

KA 124-97-01

June 13, 1997

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

Subject: IMC-Agrico Company (New Wales)
DAP 2 Plant Production Increase

1050059-018-AC
POD-FI-114

Dear Mr. Linero:

This is a follow up to the recent discussions with FDEP staff concerning the DAP 2 Plant permit amendment request.

At this time, IMC-Agrico is withdrawing the subject request. An increase in the permitted production rate will be requested, in a different format, in the near future. We appreciate the prompt feedback from BAR staff on this issue.

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par

c: C.D. Turley, IMC-Agrico
W.C. Thomas, FDEP Tampa

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JUN 17 1997

BUREAU OF
AIR REGULATION

Date: 5/27/97 11:42:22 AM
From: Gerald Kissel TPA
Subject: IMC-Agrico app'n 5/21/97 for DAP 2 production increase
To: Alvaro Linero TAL
CC: Patty Adams TAL
CC: Lydia Montes TPA

Since this is a modif'n of a PSD permit issued by Tall'e, I'm sending three copies of the app'n to you for processing (we're keeping the fourth copy). We'll work out the details of the ARMS entry and the check we received here with Lydia and Patty.

Lydia and Patty ignore this part:

In cases like this, where someone does a stack test and shows no increase in emissions on an hourly basis at a higher production rate, PSD review can still apply on an annual basis (prior actuals to new allowables). I believe the reasoning is first that a modification has occurred, because the prior production rate was in a federally enforceable permit, and second, given that there is a modification, that annual increases would result (in this case) only from increased hours of operation (actual to allowable), resulting in PSD analysis. This reasoning only leads to PSD ANALYSIS, not necessarily a PSD modification, since the PSD significance levels may not be triggered. We have not always looked at this correctly in the past, and in this case, we MAY have led the applicant to believe that no increase in hourly emissions would result in escaping PSD analysis. We have since explained this to Dave Turley of IMC.

c: J. Koogler/Pradeep Raval, Koogler & Associates
D. Turley, IMC