



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX/377-7158

KA 124-01-01

February 21, 2003

RECEIVED

FEB 24 2003

BUREAU OF AIR REGULATION

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

Subject: IMC Phosphates Company (New Wales)
Withdrawal of PSD Construction Permit Application
DAP 1 Plant Project PSD-FL-331
1050059-039-AE

Dear Mr. Arif:

This is a follow up to your recent telephone conversation with Pradeep Raval regarding the status of the above referenced project.

According to your discussion, IMC hereby withdraws this application.

We are very appreciative of your effort in resolving the administrative aspects of the project review based on your discussions with Al Linero and Jerry Kissel.

If you have any questions, please call me.

Very truly yours,

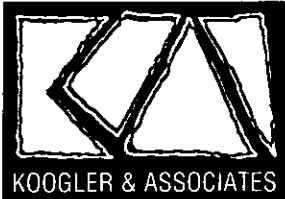
KOOGLER & ASSOCIATES



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

JBK:par

C: Al Linero, FDEP
Jerry Kissel, FDEP
C. Dave Turley, IMC



KOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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GAINESVILLE, FLORIDA 32609
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KA 124-01-01

February 14, 2003

RECEIVED

FEB 19 2003

BUREAU OF AIR REGULATION

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

Subject: IMC Phosphates Company (New Wales)
PSD Construction Permit Application
DAP 1 Plant Production Increase

Dear Mr. Arif:

This is in response to your letter dated December 10, 2002, requesting additional information on the above referenced project.

Information on the modeling inputs is attached (documentation of information previously submitted with R.O. and P.E. certification).

Additional responses will be submitted, if deemed necessary, after your review of the status of the proposed project.

If you have any questions, please call me.

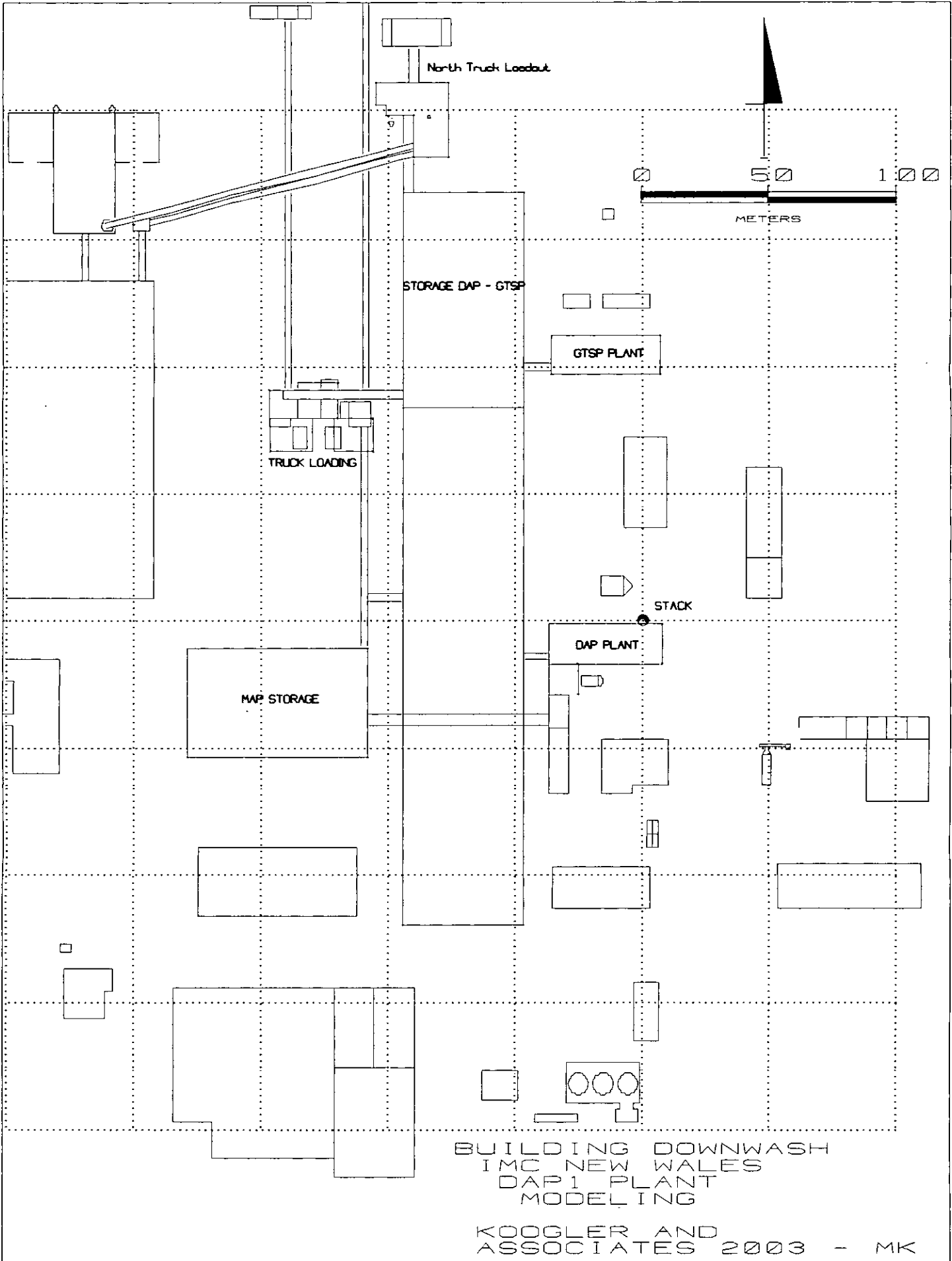
Very truly yours,

KOGLER & ASSOCIATES

Pradeep Raval

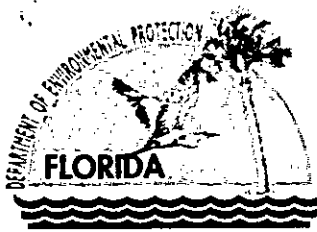
Par.
Encl.

C: C. Dave Turley, IMC



BPIP Building Downwash of IMC NEW WALES DAP PLANT #1
POLK COUNTY, FLORIDA 8/02'

Structure	Height	Length	Width
DAP PLANT	38.1	16.8	48.1
STORAGE DAP - GTSP	24.4	284.9	47.5
MAP STORAGE	27.4	42.9	71.1
GTSP PLANT	38.1	16.1	43.6
TRUCK LOADING	43.6	13.6	11.0
NORTH TRUCK LOADOUT	43.6	10.2	7.4



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

November 15, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Mike Daigle, Vice President
Florida Concentrates
IMC Phosphate Company
Post Office Box 2000
Mulberry, Florida 33860

Re: DEP File No. 1050059-039-AC; PSD-FL-331
Granular Monoammonium Phosphate (MAP)/Diammonium Phosphate (DAP) Production Increase
New Wales Facility

Dear Mr. Daigle:

The Department has received the above referenced application on October 18, 2002, for the increase in the hourly production rate of the DAP 1 Plant at the New Wales Facility in Polk County. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. Please explain the basis for using the same fluoride emissions limit of 3.3 lb/hr and 14 tpy while producing either MAP or DAP. The conversion factor of the process rate should be different under the two modes, thereby giving a lower fluoride emission limit when producing DAP.
2. Please provide the annual production rates established for this plant. The attached permit (1050059-014-AV) with the application does not indicate an annual production limitation.
3. Please indicate if the actual emission rates submitted for different pollutants in Appendix A were when the plant was producing MAP or DAP. Also, provide emission rates in terms of lb/ton P_2O_5 input for both fluorides (F) and particulate matter (PM) for the submitted data.
4. Please provide stack test summary pages and emission rates for F and PM for the years 1997, 1998, 2001 and 2002, if available. Also, indicate the production rate, the emission rates in terms of lb/ton P_2O_5 input and the plant mode of operation (MAP or DAP) when the stack test was conducted.
5. Please explain the removal phenomena for gaseous and particulate F from this process. Provide the breakdown between the various forms of F emissions from this process. If most of the F emissions from a DAP process is gaseous F, explain the reasons for such an occurrence.

"More Protection, Less Process"

Printed on recycled paper.

6. Please provide actual emission rates for SO₂ for 1999 and 2000 based on actual sulfur content of the fuel received. If the actual sulfur content of the fuel is not available for those years, provide the sulfur content of the fuel for the years that are available.
7. Please provide calculations for the 34.3 tpy increase of SO₂ emissions from the GMAP/DAP Plant as listed in Appendix A of the application.
8. Please provide calculations for the 38 tpy increase of NO_x emissions from the GMAP/DAP Plant as listed in Appendix A of the application.
9. Please provide detailed information of the changes that took place in terms of pollution control equipment for F and PM in the DAP 1 Plant. This should include, but not be limited to, drawings, written description with chronology and reasons for making the changes.
10. Please provide cost data of using packed scrubbers in series with the existing venturi scrubbers on a non-incremental basis (total costs per total tons removed).
11. The application refers to a previous total capital cost of \$690,500 in the replacement of the existing tail-gas scrubber with a cross-flow packed scrubber. How was the total capital cost number arrived at. Also, provide the basis for using \$700,000 for added ducting and production loss cost.
12. Rule 62-212.400(3)(h)(5) states that an application must include *information relating to the air quality impacts of, and the nature and extent of, all general commercial, residential, industrial and other growth which has occurred since August 7, 1977, in the area the facility or modification would affect*. Please satisfy this rule requirement as it relates to the IMC New Wales facility.
13. In Table 4-1, the existing emissions for F are given as 0.30 g/s. This is the value used as input in the ambient air quality modeling for current emissions. Please provide the calculation for this value.
14. The building information contained in the application is inadequate. Please provide the detailed building structure information used in the modeling to determine downwash impacts. This information should include building dimensions for all buildings used in the modeling analyses and BPIP files. In addition, please provide a detailed plot plan to scale of the facility showing the exact location in meters from the modeling origin of each building and stack. All stacks and buildings should be labeled. In addition, a grid with 50 meter spacing should be overlaid over this plot plan so that the information on the plot plan can be easily correlated with the information in the BPIP files.

Any additional comments from EPA and the U.S. Fish and Wildlife Service will be forwarded to you after we receive them.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."

We will be happy to meet and discuss the details with you and your staff. Mr. Syed Arif, P.E. is responsible for the technical review of the application. He may be contacted at 850/921-9528. You may discuss the modeling requirements with Mr. Cleve Holladay at 850/921-8689.

Sincerely,



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

AAL/sa

cc: Ms. Jeaneanne Gettle, EPA Region IV
Mr. John Bunyak, NPS
Mr. Jerry Kissel, DEP-SWD
Mr. John Koogler, Ph.D., P.E. Koogler & Associates

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Mr. Mike Daigle
 Vice President
 Florida Concentrates
 IMC Phosphate Company
 P. O. Box 2000
 Mulberry, FL 33860

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 1-18-02

C. Signature Agent
 Addressee

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

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

4. Restricted Delivery? (Extra Fee) Yes

2. 7001 0320 0001 3692 7638

PS Form 3811, July 1999

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 Mike Daigle
 Street, Apt. No.,
 or PO Box 2000
 City, State, ZIP+4
 Mulberry, FL 33860

PS Form 3800, January 2001

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