

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
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Date Due: _____	Date Due: _____	

December 17, 1984

TO: C. H. Fancy
FROM: Bill Thomas *WCT*
SUBJECT: IMCC New Wales AC53-23546, DAP Plant No. 2

I have a copy of Jerry Girardin's letter of December 6, 1984, requesting modifications to the above subject permit.

IMCC's request to treat the DAP facility as one plant, rather than two, does not alter the maximum allowable air pollution emissions, either on an hourly or per ton of P₂O₅ basis. Therefore I recommend that their permit be altered as requested.

WCT/js

Willard
~~*Bill T.*~~ *OK*

Please handle.

Clan

P.S. Willard is similar with this.

PSD-FL-024

DER
DEC 19 1984
BAQM

NEW WALES OPERATIONS
P.O. Box 1035 • Mulberry, Florida 33860
Telephone: (813) 428-2531



INTERNATIONAL MINERALS & CHEMICAL CORPORATION

December 12, 1984

D. E. R.

DEC 14 1984

Mr. C. H. Fancy, P.E.
Florida Department of Environmental
Regulation
7601 Highway 301 N.
Tampa, FL 33610-9544

SOUTH WEST DISTRICT
TAMPA

RE: AC53-23546 - DAP PLANT #2

Dear Mr. Fancy:

IMC New Wales Operations is currently operating one half of a diammonium phosphate (DAP) plant, which was constructed after undergoing a PSD review by both the state and the EPA. By permit conditions each plant, even though they each discharge through the same product cooler and are under the same roof, is considered a separate unit with a maximum production rate of 70 TPH each.

We are requesting that the permit be changed to reflect a maximum production rate for the entire system of 140 TPH and remove the individual maximum rates of 70 TPH.

In allowing this change, IMC would then be able to operate one of the two DAP Plants at a rate higher than 70 TPH. Meet our production requirements and not suffer the expense of having to operating both plants. Our NSPS requirements, based on the 0.06 fluoride emission rule, would still remain as originally permitted with the maximum emission not to exceed 4.2 lbs/hr assuming an individual plant could achieve the 140 TPH rate.

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DEC 19 1984
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We appreciate any consideration you can give us in this matter and we understand that EPA will also have to approve this request. If further clarification is necessary, please contact us and we will be happy to respond.

Sincerely,



A. L. Girardin, III

ALG:rc
(ALG:CHF)

cc: J. M. Baretincic - New Wales Operations
D. K. Larsen - Mundelein
W. C. Thomas - DER, S.W. District