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KA 124-01-03

June 25, 2002

RECEIVED

JUN 27 2002

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 MP, Inc. (New Wales)
Comments on Draft Permit
DEP File No. 1050059-036-AC, PSD-FL-325

Dear Mr. Arif:

The following comments are submitted in response to the above referenced draft permit issued June 3, 2002.

Comments on Technical Evaluation

The following comments are submitted to clarify certain issues; however, it is acknowledged that FDEP will not be revising the Technical Evaluation based on the nature of the comments.

1. The wording "necessary modifications to the converter" and "converter modifications" should reflect "necessary changes to the converter". Also, please note that the various possible converter changes may be conducted for a given emissions unit over a period of time, as and when it is practical and/or warranted.
2. It is requested that references to the more stringent sulfur dioxide emission limits (3.25 lb/ton, etc.) be replaced with a requirement for submittal of a BACT review to FDEP if the current BACT limits are not met by deadlines stated in the permit. Furthermore, these numerical limits should not be referred to as BACT limits.

Comments on Draft Permit

3. Specific Condition 6: It is requested that this condition be reworded as follows to allow IMC flexibility and still maintain the net result intended by FDEP:

“SAP No. 1 shall meet the BACT-based emission limitations by 12/31/03. If this deadline is not met, the permittee shall, within 30 days of the deadline, submit an updated BACT analysis to BAR for review and, as a result, FDEP may impose a more restrictive emission limitation thereafter. (Rule 62-4, F.A.C.)”

Alternatively, at a minimum, the following rewording is requested, if FDEP is unable to grant the rewording requested above:

“SAP No. 1 shall meet the BACT-based SO₂ emission limitations by 12/31/03. If the deadline is not met, a more restrictive 24-hour rolling average emission limit of 3.25 lb/ton of 100% H₂SO₄ will be imposed on the permittee. (Rule 62-4, F.A.C.)”

Please note that the above wording retains the 3-hour average SO₂ emission limitation of 4.0 lb/ton of 100% H₂SO₄ to allow for any potential minor emission variations without compromising FDEP’s intention of a more restrictive annualized emission rate dictated by a more restrictive 24-hour limit.

4. Specific Condition 7: The format and intent of Comment 3 also applies here.
5. Specific Condition 8: The format and intent of Comment 3 also applies here.
6. Specific Condition 10: The reference to SAP No. 3 was inadvertently omitted.

Comments on BACT Determination

7. Page BD4, Paragraph 2, Sentence 3: It is requested that this sentence be reworded as follows to allow IMC flexibility and maintain the net result intended by FDEP:

“If the BACT-based emission limits are not met by 12/31/03, FDEP will require the permittee to submit an updated BACT analysis and impose a more restrictive emission limitation, as warranted, based on the updated BACT review.”

Alternatively, at a minimum, the following rewording is requested, if FDEP is unable to grant the rewording requested above:

“If the BACT-based emission limits are not met by 12/31/03, a more restrictive 24-hour rolling average emission limit of 3.25 lb/ton of 100% H₂SO₄ will be imposed on the permittee.”

8. Page BD4, Paragraph 3, Sentences 2, 3, 4 and 5: It is requested that these sentences be reworded as follows to allow IMC flexibility and maintain the net result intended by FDEP:

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“If the BACT-based emission limits are not met by 7/31/04 for SAP No. 2 and 12/1/04 for SAP No. 3, FDEP will require the permittee to submit an updated BACT analysis and impose a more restrictive emission limitation, as warranted, based on the updated BACT review.”

Alternatively, at a minimum, the following rewording is requested, if FDEP is unable to grant the rewording requested above:

“If the BACT-based emission limits are not met by 7/31/04 for SAP No. 2 and 12/1/04 for SAP No. 3, a more restrictive 24-hour rolling average emission limit of 3.25 lb/ton of 100% H₂SO₄ will be imposed on the permittee.”

9. Page BD4, Paragraph 4: It is requested that converters and dryers be added to the list of equipment to make the list more complete.

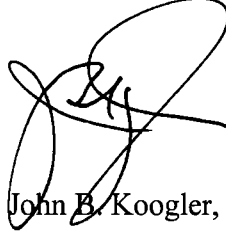
10. Page BD5: It is requested that the changes discussed above be reflected in the tabulated summary on this page for Items 2, 3 and 4, regarding the limits and the time frames.

We appreciate your willingness to consider our comments on the Technical Evaluation, Draft Permit and BACT determination.

If you have any questions, please call me.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:par.
Encl.

c: C. D. Turley, IMC