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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

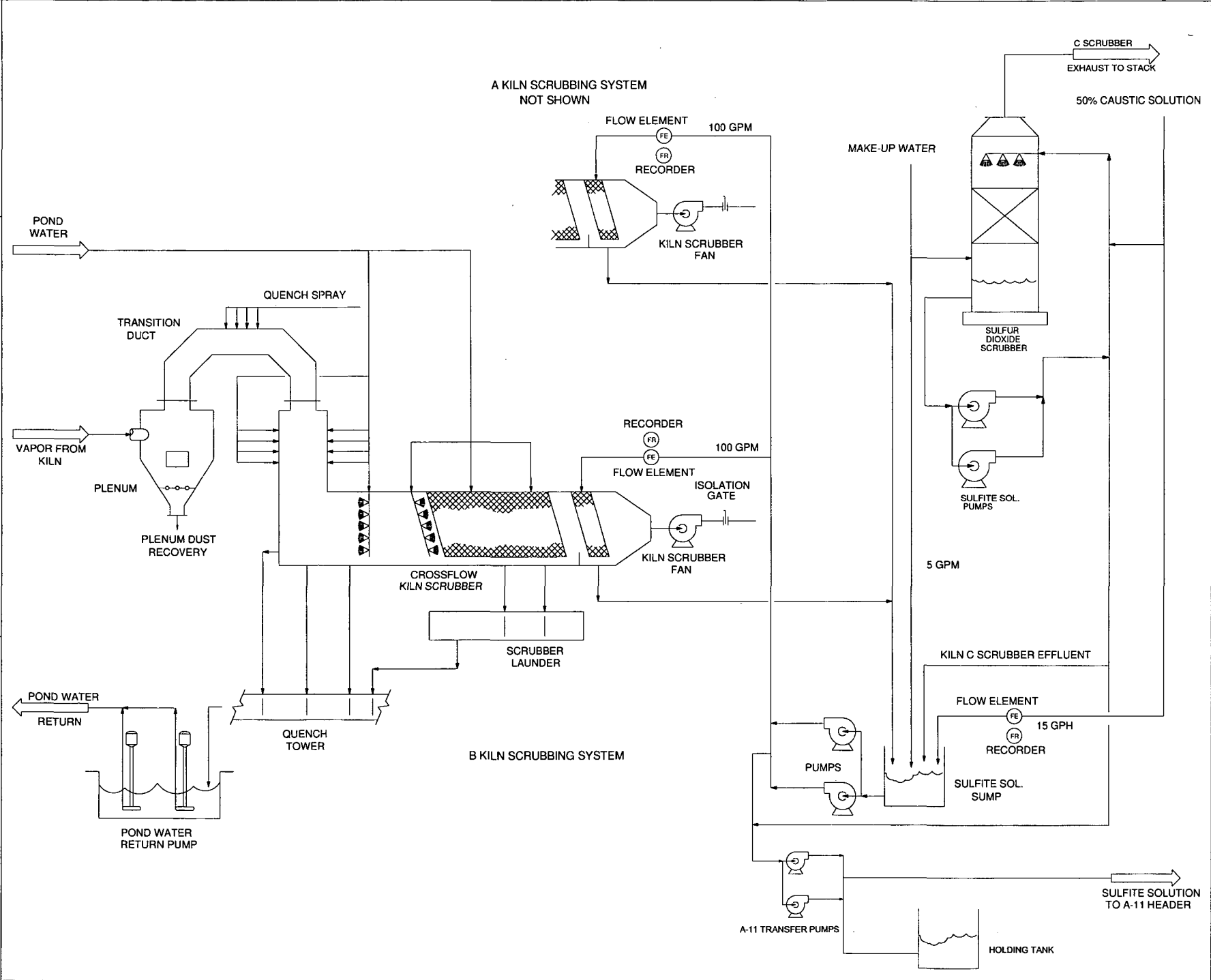
Enclosure

cwk  
pas99

PREPARED: CDT  
 DATE: 11/13/97  
 REVISED: 6/7/99

TITLE: PROPOSED MULTIFLO KILN C  
 MODIFICATIONS TO A&B SCRUBBER SYSTEMS

LOCATION: NEW WALES  
 SCALE: NONE  
 FILE: KILN02  
 DRAWING NO.: L9



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

