

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

April 2, 2003

RECEIVED BY
P.A. STEADHAM

APR 04 2003

Mr. M.A. Daigle
Vice President
Florida - Concentrates
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860-1100

COPIES _____
ROUTE TO _____

Re: Monitoring Method Proposal
IMC Phosphates Company – New Wales Facility
NESHAP, 40 CFR 63, Subparts AA and BB
Facility ID No. 1050059
Title V Permit Revision Project No. 1050059-038-AV
Initial Title V Permit No. 1050059-014-AV

Dear Mr. Daigle:

The Department received your letters dated March 10, 2003 and March 27, 2003 with IMC Phosphate Company's proposal to meet the monitoring requirements of the NESHAP, 40 CFR 63, Subparts AA and BB at the New Wales facility.

The Department acknowledges that IMC – New Wales will comply with the +/- 20% of the baseline average value requirements per §63.605(d)(1) and §63.625(f)(1) for the liquid flow rate for all scrubbers. The Department acknowledges that both the +/- 20% of the baseline average value per §63.605(d)(1) and §63.625(f)(1) and the owner/operator established allowable ranges per §63.605(d)(2) and §63.625(f)(2) will be used to establish the allowable ranges for the pressure drop across the scrubbers.

The following table summarizes the method proposed by IMC to establish the allowable pressure drop ranges to comply with the monitoring requirements of 40 CFR 63, Subparts AA and BB:

EU ID No.	Emissions Unit	Method to Determine Allowable Pressure Drop Range
-008	Phosphoric Acid Plant – East Train	§63.605(d)(2) Minimum = Title V permit limit Maximum = Most recent performance test
-017	Phosphoric Acid Plant – West Train	
-039	Phosphoric Acid Plant – Third Train	
-009	DAP Plant No. 1	Dryer Venturi Scrubber, Equipment Venturi Scrubber, Cyclonic Tailgas Scrubber, Cooler Venturi Scrubber; §63.625(f)(1) +/- 20%

IMC Phosphates Company
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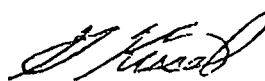
EU ID No.	Emissions Unit	Method to Determine Allowable Pressure Drop Range
-045	DAP Plant No. 2 East	Reactor/Granulator Tailgas Scrubber, Dryer Tailgas Scrubber, Reactor/Granulator Venturi Scrubber, Dryer Venturi Scrubber: §63.625(f)(2) Minimum per recent compliance test data; Maximum per testing to determine upper bound
-056	DAP Plant No. 2 East Cooler	Cooler Venturi Scrubber: §63.625(f)(1) +/- 20%
-046	DAP Plant No. 2 West	Reactor/Granulator Tailgas Scrubber, Dryer Tailgas Scrubber, Reactor/Granulator Venturi Scrubber, Dryer Venturi Scrubber: §63.625(f)(2) Minimum per recent compliance test data; Maximum per testing to determine upper bound
-010	GMAP No. 3	Main Venturi Scrubber; Equipment Venturi Scrubber: §63.625(f)(1) +/- 20% Tailgas Scrubber: §63.625(f)(2) Minimum per recent compliance test data; Maximum per testing to determine upper bound
-011	MAP Plant	§63.625(f)(1) +/- 20%

The Department accepts your proposal to use existing information as well as perform emissions testing to establish the allowable ranges for the pressure drop across the various scrubbers per §63.605(d)(2) and §63.625(f)(2). The Department requires that IMC – New Wales notify the Department of testing and include in the test reports the same information that is required for annual compliance testing, Rules 62-297.310(7)(a)9 and 62-297.310(8), F.A.C.

However, the permittee shall note that the allowable pressure drop ranges established by this method are subject to approval by the Department as required in §63.605(d)(2) and §63.625(f)(2). The Department may also request additional information, when reviewing the established ranges submitted to this office for approval.

If you have any questions regarding this matter, please call Ann Quillian at (813) 744-6100 x117.

Sincerely,



Gerald J. Kissel, P.E.
 District Air Program Administrator
 Southwest District

cc: Phil A. Steadham, IMC
 C.D. Turley, P.E., IMC
 Trina Vielhauer, FDEP- BAR