

Sheplak, Scott

From: Phillips, Cindy
Sent: Thursday, November 20, 2003 11:29 AM
To: Waters, Jason
Cc: Sheplak, Scott
Subject: RE: IMC New Wales Incomplete letter

Jason, Scott has been in meetings all morning and hasn't had a chance to review this. I told him that I had already given you my comments so he said for you to go ahead and send it.

-Cindy

-----Original Message-----

From: Waters, Jason
Sent: Thursday, November 20, 2003 9:22 AM
To: Sheplak, Scott; Phillips, Cindy
Subject: IMC New Wales Incomplete letter

Scott & Cindy,

I attached a DRAFT copy of IMC's incompleteness letter for New Wales. South Pierce will be similar.

If you wouldn't mind taking a quick look at it and letting me know something by noon, so I can mail out today I will.

I am awaiting CAM plan comments from Jonathan on South Pierce.

After I mail these, I will transfer these to you.

Jason

CERTIFIED MAIL

November XX, 2003.

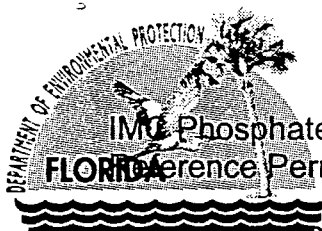
Mr. M. A. Daigle, Vice President
IMC Phosphates Company
PO Box 2000
Mulberry, FL 33860

Re: Title V Renewal Application dated September 29, 2003
Reference Permit No. 1050059-045-AV
New Wales Facility

Dear Mr. Daigle:

On September 29, 2003, the Department received your Title V air permit application to renew your existing permit. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Application Responsible Official Certification. It is the department's understanding that you and/or your consultant will be using EPSAP (Electronic Permit Submittal And Processing system) to submit your application. In this case, the certification will be using a PIN (Personal Identification Number). Please contact the Division of Air Resource Management Help Desk at 850-921-9557 to obtain the necessary PIN. Please obtain the PIN number in advance as the Department cannot waive the processing clock to wait on a PIN.
2. Paper Application and EPSAP Applications. The September 29, 2003 submittal was submitted by using a few pages of the Paper Form DEP 62-210.900(1) and the remainder using the EPSAP Application. Application must be made on either the Paper Form OR the EPSAP Application.
3. PE Seal. It is the department's understanding that you and/or your consultant will be using EPSAP (Electronic Permit Submittal And Processing system) to submit your application. In this case, the certification will be using a PIN (Personal Identification Number). Please contact the Division of Air Resource Management Help Desk at 850-921-9557 to obtain the necessary PIN. Please obtain the PIN number in advance as the Department cannot waive the processing clock to wait on a PIN. The September 29, 2003 submittal contained a paper copy PE Certification that appears to be a photocopy and the raised seal is illegible. If you choose to use the paper application form, please take necessary steps to insure the signature (i.e., blue ink) and seal are legible and original.



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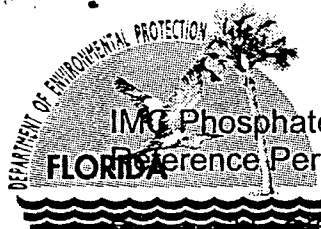
IME Phosphates Company – New Wales
Reference Permit No. 1050093-015-147

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4. Facility Supplemental Information. The application lists “previously submitted” for several items. The application also states a compliance report and plan, a document containing the identification of applicable requirements, and a list of insignificant activities is attached; however, no attachments were included with the application. All information must be submitted at time of renewal application for Title V permit renewal. Please correct the application and all applicable information and/or attachments. (See Note 1)
5. Emission Unit Information. The application did not contain emission unit information (Section III) or Emission Units were missing from the application. All information must be submitted at time of renewal application for Title V permit renewal. Please submit the applicable pages with all the applicable information for this facility. If the reason some emission units were missing because they have been removed from service, please note this in the application. (See Note 1)
6. Compliance Assurance Monitoring (CAM). In order to review the CAM plans, please submit the following information:
- A. The indicator ranges in the CAM plans need to be adequately supported by test data. For each pollutant at each emissions unit that is subject to CAM, provide test the date, allowable operating capacity, operating capacity during test, percentage of allowable operating capacity during test, tested emissions rate, allowable emissions rate, percentage of allowable emissions rate measured during the test, maximum and minimum scrubber flow rates, maximum and minimum pressure drops across the scrubber(s). A sufficient number (5-10) of test results shall be included in order to determine and justify the chosen indicator ranges.
7. Maximum Achievable Control Technology (MACT) applicability. The application did not contain a discussion of MACT applicability for 40 CFR 63 Subparts AA and BB (National Emission Standards for Hazardous Air Pollutants – Phosphoric Acid Manufacturing and Phosphate Fertilizers Production). Please submit a MACT applicability determination.

¹Per Rules 62-213.420(1)(b) and 62-213.430(3), F.A.C., applications for permits that are being renewed shall be submitted on the DEP Form 62-210.900(1) or using EPSAP and contain all the information identified in Rule 62-213.420(3), F.A.C. Please submit the necessary pages or revised EPSAP application to correct your Title V operation permit renewal application with all the required information as well as any supporting calculations, assumptions, and reference material with the completed application form (DEP Form 62-210.900(1) Effective 6/16/03). Include with this application all required attachments and supplemental information, such as, but not limited to, diagrams and compliance assurance monitoring (CAM) plans. Please note that up to date electronic versions of the application form can be down loaded from the Department’s webpage:

<http://www.dep.state.fl.us/air/forms/application.htm#airpermit>



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Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the DEP Form 62-210.900(1), effective June 16, 2003 or use the EPSAP Application.

Professional Engineer (P.E.) Certification Statement: 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 response to Department requests for additional information of an engineering nature. Please complete and submit a new P.E. certification statement page from DEP Form 62-210.900(1), effective June 16, 2003 or use the EPSAP Application.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6, F.A.C. If you have any questions, please call Scott Sheplak at (850) 488-0114.

Sincerely,

Jason W. Waters
Air Permitting Engineer

CC: John B. Koogler, Ph.D., P.E.
Koogler and Associates