

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

MEMORANDUM

TO: T. H. Traylor, IMCC, New Wales Operations
J. M. Baretincic, IMCC, New Wales Operations
Craig A. Pflaum, IMCC, New Wales Operations
Dan Williams, DER Southwest District

FROM: C. H. Fancy, Deputy Chief, Bureau of Air
Quality Management *CH Fancy*

DATE: May 27, 1982

SUBJ: Preliminary Determination - IMCC, New Wales Operations
AC 53-54878

Attached is one copy of the application, Technical Evaluation and Preliminary Determination, and proposed permit for IMCC, New Wales Operations to construct a multifos product dedusting system with a 5000CFM bag collector at their facility in Mulberry, Polk County, Florida.

Please submit any comments which you wish to have considered concerning this action, in writing, to Bill Thomas of the Bureau of Air Quality Management.

CHF/bjm

Attachment

Preliminary Determination
and
Technical Evaluation

International Minerals & Chemical Corporation
5000 CFM Baghouse
Mulberry, Florida

State Permit Number
AC 53-54878

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
May 24, 1982

PUBLIC NOTICE

Modification of an air pollution source located at Highway 640 & County Line Road, in Mulberry, Florida, is being proposed by IMCC-New Wales Operations. The proposed project is the construction of a 5000 CFM Baghouse to replace an existing unit. The construction will produce emissions of particulate matter by 15.7 tons per year.

The proposed project has been reviewed by the Florida Department of Environmental Regulation (FDER) under Chapter 403, Florida Statutes. The Department has made a preliminary determination that the project can be approved provided certain conditions are met. A summary of the basis for the determination and the application for state permit submitted by IMCC-New Wales Operations are available for public review at the following FDER offices:

Bureau of Air Quality Management
Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Southwest District Office
Department of Environmental
Regulation
7601 Highway 301 North
Tampa, Florida 32601

Any person may submit written comments to FDER regarding the proposed project. All comments, postmarked not later than 30 days from the date of this notice, will be considered by FDER in making a final determination regarding approval for construction of this source. Those comments will be made available for public review on request. Furthermore, an administrative hearing on the proposed project can be requested by any person by filing a petition for hearing as set forth in Section 28-5.15 F.A.C. (copy attached). Such petition must be filed within 14 days of the date of this notice. Letters should be addressed to:

Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

I. SYNOPSIS OF APPLICATION

A. Name and Address of Applicant

International Minerals & Chemical Corporation
P. O. Box 1035
Mulberry, Florida 33860

B. Source Location

The proposed source is located at Highway 640 and County Line Road in Mulberry, Polk County, Florida. The UTM coordinates are Zone 17.396.7 km East and 3079.4 km North.

C. Project Description

The applicant proposes the construction of a multifos product dedusting system with a 5000 CFM bag collector to be located on the west end of the Multifos plant. The new operation will use the existing fines bin.

Background Information

The proposed unit is designed to replace an existing 1500 CFM dust collector which was originally permitted under the process weight tables. Under an agreement with DER this unit was re-permitted at an allowable limit of 3.6 lbs/hr as part of a BACT determination for a new DAP plant. The 3.6 lbs/hr level was arrived at through computer modeling as an acceptable limit which, in conjunction with similar reductions on other bag collectors, would allow New Wales to construct the new plant without degradation of the ambient particulate levels.

The existing 1500 CFM collector was tested as part of the requirements of the BACT determination. Actual levels of emissions at the time of testing were .03 lbs particulate/hr. This unit at an emission level of .02 grains/SCF would emit .26 lbs/hr. Test information on this collector and the other collectors can be reviewed at DER, Southwest District Office files. This information was submitted by the applicant in their response to technical discrepancies (letter dated May 7, 1982).

II. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes and Chapter 17-2, Florida Administrative Code. Specifically, the proposed project involves a minor source for particulate matter (PM). Potential emissions of PM are 15.7 tons per year. The source is located in the area of influence of the Hillsborough County particulate nonattainment area.

As the potential emission of 15.7 TPY PM will not cause a significant impact in the PM nonattainment area, the proposed source is exempt from the NSR requirements for nonattainment areas pursuant to 17-2.510 (2)2.b., Areas of Influence of Nonattainment Areas and from provisions of 17-2.650(2)(b), Reasonably Available Control Technology (RACT).

The modification is also exempt from the provisions of Section 17-2.500, Prevention of Significant Deterioration (PSD), because there will be no significant increase in actual particulate matter emissions.

The proposed source will be permitted under section 17-2.520, Permitting Requirements of Sources not subject to Prevention of Significant Deterioration or Nonattainment Requirements.

III. SOURCE IMPACT ANALYSES

A. Emissions Limitations

The installation of the proposed 5000 CFM baghouse will produce emissions of particulate matter (PM) to the atmosphere. The potential emissions from this source are:

<u>Pollutant</u>	<u>Potential Emission Rates</u>	
	<u>lb/hr</u>	<u>ton/yr</u>
PM	3.6	15.7

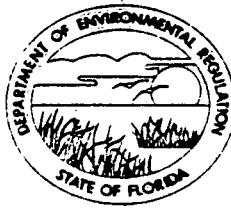
B. Air Quality Analysis

No air quality analysis is required for this project since there will be no significant increase in actual particulate matter emissions.

IV. CONCLUSIONS

Based on review of the data submitted by International Minerals & Chemical Corporation, the FDER concludes that compliance with all applicable state air quality regulations will be achieved provided certain specific conditions are met. The impact of the emissions from this source will not cause or contribute to a violation of any ambient air quality standard.

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: International Minerals & Chemical Corp.
New Wales Operations
P. O. Box 1035
Mulberry, FL 33860

PERMIT/CERTIFICATION
NO. AC 53-54878

COUNTY: Polk

PROJECT:
5000 CFM
Dry dust Collector

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code. The above-named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a 5000 CFM dry dust collector (baghouse) at IMCC chemical complex located at Highway 640 & County Line Road in Mulberry, Florida. The UTM coordinates are 396.7 Km East and 3079.4 Km North respectively.

Construction shall be in accordance with the attached permit application and plans, documents, and drawings except as otherwise noted on page 3 - "Specific Conditions".

Attachments:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16)
2. Responses to technical discrepancies (letter dated on May 7, 1982).

PERMIT NO.: AC 53-54878
APPLICANT: IMCC-New Wales Operations

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 53-54878
APPLICANT: IMCC-New Wales Operations

SPECIFIC CONDITIONS:

1. The maximum emission rate for the 5000 CFM bag collector shall not exceed 3.6 lb/hr.
2. The unit shall be allowed to operate continuously (8736 hours per year).
3. Before this construction permit expires, the unit will be tested for particulate matter and visible emission. Except as provided under 40 CFR 60.8(b), the performance tests shall be in accordance with the provisions of the following reference methods in Appendix A of 40 CFR 60.
 - a. Method 1. Sample and Velocity Traverses.
 - b. Method 2. Volumetric Flow Rate.
 - c. Method 3. Gas Analysis.
 - d. Method 5. Particulate matter.
 - e. Method 9. Visible emission.

Test results will be the average of 3 valid runs. The Department will be notified 30 days in advance of the compliance test. The test will be conducted at 90 to 100% capacity.

4. Visible emissions shall not exceed 5% opacity.
5. Reasonable precautions to prevent fugitive particulate emissions during construction such as coating or spraying roads and construction sites used by contractors will be taken by the applicant.
6. The applicant shall report any delays in construction and completion of this unit to the Department's Southwest District Office.
7. The applicant will demonstrate compliance with the conditions of the construction permit, and submit a complete application for an operating permit to the Department's Southwest District Office prior to 90 days of the expiration date of the construction permit. The applicant may continue to operate in compliance with all terms of the construction permit until its expiration date or issuance of an operating permit.
8. Upon obtaining an operating permit, the applicant will be required to submit periodic test reports on the actual operation and emissions of the facility.
9. This permit replaces operating permit No. AO 53-7026. The applicant shall return this operating permit to the Southwest District office within three (3) months of start-up of the new unit.

PERMIT NO.: AC 53-54878
APPLICANT: IMCC-New Wales Operations

10. The source shall comply with the provisions and requirements of the attached general conditions.

Expiration Date: December 30, 1984

Issued this _____ day of _____, 19_____.

_____ Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Signature