**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

# DRAFT PERMIT

**PERMITTEE**

CF Industries, Inc.
P.O. Drawer L
Plant City, Florida 33564

Authorized Representative:
Mr. Herschel E. Morris, Vice President Phosphate Operations and General Manager

Air Permit No. 0570005-056-AC
Permit Expires: 07/31/2015
Plant City Phosphate Complex
Minor Air Construction Permit
Converter Maintenance at "C" and "D" Sulfuric Acid Plants (SAPs)

This is the final air construction permit which authorizes modifications to the "C" and "D" Sulfuric Acid Plants. Specifically, this permit authorizes CF Industries, Inc. to perform maintenance related modifications and repairs to the "C" and "D" Sulfuric Acid Plant converters. The proposed work will be conducted at the Plant City Phosphate Complex (Standard Industrial Classification No. 2874). The facility is located in Hillsborough County at 660 East County Line Road in Plant City, Florida. The UTM coordinates are Zone 17, 388.0 km East, and 3116.0 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
*DRAFT*

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Kelley M. Boatwright — Effective Date
District Air Program Administrator
Southwest District

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Herschel E. Morris, CF Industries, Inc. (hmorris@cfindustries.com)

Mr. Ronald L. Brunk, CF Industries, Inc. (rbrunk@cfindustries.com)

Mr. John B. Koogler, Koogler and Associates, Inc. (Jkoogler@kooglerassociates.com)

Mr. Pradeep Raval, Koogler and Associates, Inc. (praval@kooglerassociates.com)

Ms. Diana Lee, EPC of Hillsborough County (Lee@epchc.org)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

*DRAFT*

_____ _____

(Clerk) (Date)

## FACILITY AND PROJECT DESCRIPTION

### Existing Facility

This facility is a phosphate fertilizer production facility. The facility includes four sulfuric acid production plants, two phosphoric acid production plants, four ammonium phosphate production plants with associated storage and shipping units, a molten sulfur storage and handling system, a phosphogypsum stack, and four emergency diesel engines. Final products produced at the facility include sulfuric acid, phosphoric acid, ammonium sulfate, diammonium phosphate (DAP), and monoammonium phosphate (MAP). The existing facility consists of the following emissions units.

Facility ID No. 0570005

| ID No. | Emission Unit Description |
|---|---|
| 001 | Johnson Scotch Marine Type Boiler |
| 002 | “A” Sulfuric Acid Plant |
| 003 | “B” Sulfuric Acid Plant |
| 004 | “A” Phosphoric Acid Plant |
| 007 | “C” Sulfuric Acid Plant |
| 008 | “D” Sulfuric Acid Plant |
| 009 | “B” Phosphoric Acid Plant |
| 010 | “A” DAP/MAP Plant |
| 011 | “Z” DAP/MAP Plant |
| 012 | “X” DAP/MAP Plant |
| 013 | “Y” DAP/MAP Plant |
| 014 | “A & B” Storage Buildings |
| 015, 018, 019, 020 | “A & B” Storage, Sizing and Shipping |
| 022, 023, 024, 033 | Molten Sulfur Storage and Handling |
| 032 | Phosphoric Acid Cleanup Unit (PACU) |
| 100 | Phosphogypsum Stack |
| 102 | Emergency Diesel Engines (Existing stationary RICE) |
| 099 | Unregulated Facility Fugitive Emissions |

### Project Description and Affected Emission Units

This permit authorizes CF Industries, Inc. to perform maintenance related modifications and repairs to the “C” and “D” Sulfuric Acid Plant (SAP) converters. Maintenance will include the replacement of damaged and deteriorated internal components of the existing “C” and “D” SAP Converters including the posts, grids, division plates and support rings. The grid supports will be upgraded and the diameter of the new replacement posts will be increased from 3 to 4 inches providing extra support to address buckling problems currently encountered and any future change in the weight of the catalyst. Portions of the converter shells will be repaired or replaced as necessary.

This project will modify the following emissions units (EUs).

| EU ID No. | Emissions Unit Description |
|---|---|
| 007 | "C" Sulfuric Acid Plant |
| 008 | "D" Sulfuric Acid Plant |

***NOTE:*** *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

## FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

## PERMIT HISTORY/AFFECTED PERMITS

Reference Permit No. 0570005-055-AV

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

**1.** Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

**2.** Compliance Authority - The compliance authority for this project is the Environmental Protection Commission of Hillsborough County (EPC). The mailing address and phone number is:

Environmental Protection Commission of Hillsborough County
Air Management Division
3629 Queen Palm Drive
Tampa, Florida 33619
Telephone: 813-627-2600

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

**3.** Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

**4.** Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

**5.** New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

**6.** Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an

increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

**7.** Source Obligation -

a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

**8.** Actual Emissions Reporting - This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

   1) The name, address and telephone number of the owner or operator of the major stationary source;

   2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

   3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and

   4) Any other information that the owner or operator wishes to include in the report.

c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the Department requires the annual reporting of actual Sulfur Dioxide ($SO_2$) emissions for Emissions Unit Nos. 007 and 008.

[Permit Application dated 5/21/2013; Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

**9.** Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

**10.** Application for Title V Air Operation Permit - A Title V permit revision is not required for this construction modification. This construction permit is being processed concurrently with a Title V revision ~~application~~ permit (0570005-057-AV), which incorporates the changes made in this construction permit.
[Rule 62-4.070(3) and Chapter 62-213, F.A.C.]

## A. EU Nos. 007 & 008 (C & D Sulfuric Acid Plants)

This section of the permit addresses the following emissions units (EUs).

| EU ID No. | Emissions Unit Description |
|---|---|
| 007 | "C" Sulfuric Acid Plant |
| 008 | "D" Sulfuric Acid Plant |

This subsection applies to the "C" and "D" sulfuric acid plants (SAPs), as described below:

Each plant is a Monsanto Design, double absorption sulfuric acid plant, with a maximum design production rate of 2,962 tons per day of 100% sulfuric acid and permitted production rate of 2,600 tons per day of 100% sulfuric acid. At the plant, dry air and molten sulfur are ignited in a sulfur burner. The combustion gases, primarily sulfur dioxide ($SO_2$), are passed through a 3-stage catalytic converter where $SO_2$ is converted to sulfur trioxide ($SO_3$). The gases, now primarily $SO_3$, enter the interpass tower where the $SO_3$ is absorbed into a sulfuric acid solution. The remaining gases (a mixture of $SO_2$, $SO_3$ and other products) exit the interpass tower through a high-efficiency mist eliminator. The gas then enters the 4th stage of the catalytic converter where additional $SO_2$ is converted to $SO_3$. This gas enters the final tower where $SO_3$ is again absorbed into a sulfuric acid solution. The remaining gases exit through a high-efficiency mist eliminator to the atmosphere with the limits established by the Best Available Control Technology (BACT). The plant also incorporates a Waste Heat Boiler System for generating steam from the energy produced by the combustion of molten sulfur in air.

### PERFORMANCE RESTRICTIONS

**A.1.** Federal Regulatory Requirements - Sulfuric Acid Plants "C" and "D" (E.U. Nos. 007 & 008) are subject to the applicable requirements contained in 40 CFR 60 Subpart A - General Provisions and 40 CFR 60 Subpart H – Standards of Performance for Sulfuric Acid Plants.
[Rules 62-213.440, F.A.C. and 62-204.800(8), F.A.C. and 40 CFR 60, Subparts A and H]

**A.2.** Permitted Capacity - The maximum allowable production rates are as follows:

| E.U. No. | Plant Name | Maximum Production Rate |
|---|---|---|
| 007 | "C" SAP | 2,600 tpd of 100% $H_2SO_4$ |
| 008 | "D" SAP | 2,600 tpd of 100% $H_2SO_4$ |

*{Permitting Note - See Appendix D, Condition 1, for operation rate during testing requirements.}*

[Construction Permit 0570005-034-AC; Rules 62-296.340(5)(c) (escape BART), 62-4.160(2) and 62-210.200 (Definitions – Potential to Emit (PTE)), F.A.C.]

**A.3.** Hours of Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

## EMISSIONS STANDARDS

**A.4.** Visible Emissions Standards - Visible emissions shall not exceed 10% opacity (except during start-up, shutdown, or malfunction, pursuant to Rule 62-210.700, F.A.C.).
[E.U. No. 007 & 008: Rules 62-296.402(1)(b)1. and 62-204.800(8)(b)11., F.A.C.; 40 CFR 60.83(a)(2)]

**A.5.** $SO_2$ Emissions Standards - The maximum allowable emission rates for $SO_2$ are as follows:

| Sulfur Dioxide ($SO_2$) | | | |
|---|---|---|---|
| **E.U. No.** | **Plant Name** | **Rolling/ block average based on CEMS data*** | **Consecutive 12-month rolling total based on CEMS data*** |
| 007 | "C" SAP | **3-hour rolling average:**<br>3.25 lbs/ton of 100% $H_2SO_4$ Produced;<br>{Equivalent to 352 lb/hr at 2,600 tpd of 100% $H_2SO_4$ }<br>**24-hour (daily) block average:**<br>303.3 lb/hr;<br>{Equivalent to 2.8 lbs/ton of 100% $H_2SO_4$ Produced at 2,600 tpd} | 1,329 tons/yr |
| 008 | "D" SAP | **3-hour rolling average:**<br>3.25 lbs/ton of 100% $H_2SO_4$ Produced;<br>{Equivalent to 352 lb/hr at 2,600 tpd of 100% $H_2SO_4$ }<br>**24-hour (daily) block average:**<br>303.3 lb/hr;<br>{Equivalent to 2.8 lbs/ton of 100% $H_2SO_4$ Produced at 2,600 tpd} | 1,329 tons/yr |

[Construction Permit Nos. 0570005-026-AC/PSD-FL-339B and 0570005-034-AC; Rules 62-296.402, 62-4.340(5)(c) (escape BART), 62-4.070(1)&(2) and 62-213.440(1), F.A.C.; 40 CFR 60, Subpart H]

**A.6.** SAM Emissions Standards - The maximum allowable emission rates for SAM are as follows:

| Sulfuric Acid Mist (SAM) | | | |
|---|---|---|---|
| **E.U. No.** | **Plant Name** | **Allowable Emissions Rate** | **Annual Allowable Emissions Rate** |
| 007 | "C" SAP | 0.093 lb/ton of 100% $H_2SO_4$ Produced; {10.1 lbs/hr} | 44.2 tons/yr |
| 008 | "D" SAP | 0.093 lb/ton of 100% $H_2SO_4$ Produced; {10.1 lbs/hr} | 44.2 tons/yr |

[Construction Permits 0570005-026-AC/PSD-FL-339B and 0570005-034-AC; Rules 62-296.402, 62-4.340(5)(c) (escape BART), 62-4.070(1)&(2) and 62-213.440(1), F.A.C.; 40 CFR 60, Subpart H]

**A.7.** NOx Emissions Standards - The maximum allowable emission rates for NOx are as follows:

| Nitrogen Oxides (NOx) | | | |
|---|---|---|---|
| **E.U. No.** | **Plant Name** | **Allowable Emissions Rate** | **Annual Allowable Emissions Rate** |
| 007 | "C" SAP | 0.11 lb/ton of 100% $H_2SO_4$ Produced; {11.9 lb/hr} | 52.1 tons/year |
| 008 | "D" SAP | 0.11 lb/ton of 100% $H_2SO_4$ Produced; {11.9 lb/hr} | 52.1 tons/year |

[Construction Permit Nos. 0570005-026-AC/PSD-FL-339B and 0570005-034-AC; Rules 62-4.340(5)(c) (escape BART), 62-4.070(1)&(2) and 62-213.440(1), F.A.C.]

**A.8.** This permit acknowledges that leaks of sulfur dioxide and sulfur trioxide or other fugitive process emissions that do not pass through a stack may occur as part of routine operations. Best operation practices to minimize these emissions shall be adhered to and shall include regular inspections and the prompt repair or correction of any leaks or other fugitive emissions.
[Construction Permits AC29-200648, AC29-186931/PSD-FL-155; 0570005-026-AC/PSD-FL-339B, 0570005-020-AC and 0570005-021-AC/PSD-FL-355]

**A.9.** The 4th converter pass of the "C" and "D" sulfuric acid plants contains approximately 165,000 liters cesium promoted vanadium catalyst. A change to non-cesium promoted catalyst or switch to another $SO_2$ control strategy shall not occur without the Department's review and approval and shall require submittal of a permit modification request to revise the Best Available Control Technology Determination.
[Construction Permits 0570005-019-AC/PSD-FL-339, 0570005-026-AC/PSD-FL 339B]

## COMPLIANCE TESTING REQUIREMENTS

**A.8.** Initial Compliance Tests - These emissions units shall be tested to demonstrate initial compliance with the emissions standards for Sulfuric Acid Mist (SAM), Nitrogen Oxide (NOx) and visible emissions (VE). The initial tests shall be conducted no later than 90 days after initial operation of each emissions unit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

**A.9.** Compliance Tests After Initial Testing - During each federal fiscal year (October 1st to September 30th), these emissions units shall be tested to demonstrate compliance with the emissions standards for SAM, NOx and Visible Emissions.
[Rule 62-297.310, F.A.C.]

**A.10.** Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

**A.11.** Compliance Test Methods - Required compliance tests shall be performed in accordance with the following reference methods.

| Methods | Description of Method and Comments |
|---|---|
| 1-4 | Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content |
| 7E | Determination of Nitrogen Oxide Emissions from Stationary Sources |
| 8 | Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources |
| 9 | Visual Determination of the Opacity of Emissions from Stationary Sources<br>(60 minutes minimum duration) |

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rule 62-204.800, F.A.C.; Appendix A of 40 CFR 60]

## MONITORING REQUIREMENTS

**A.12.** $SO_2$ Continuous Emissions Monitoring System (CEMS).

a. In accordance with the New Source Performance Standards (NSPS) (40 CFR 60, Subpart H) requirements for sulfuric acid plants, the permittee shall continue to properly calibrate, maintain and operate a CEMS to measure and record emissions of $SO_2$.

b. 40 CFR 60, Subpart H and Construction Permits 0570005-020-AC, 0570005-021-AC/PSD-FL and 0570005-026-AC/PSD-FL-339B requires the use of CEMS to be used to determine compliance with the 3-hour rolling average emissions limit for $SO_2$.

c. The BART exemption determination (Construction Permit 0570005-034-AC) requires the use of an $SO_2$ CEMS to be used to demonstrate continuous compliance with the 24-hour (daily) block average SO2 emissions standards and limits.

d. The CEMS shall be operated in compliance with 40 CFR 60, Appendix A, General Provisions; 40 CFR 60, Appendix B, Performance Specification 2; 40 CFR 60, Appendix F, Quality Assurance Procedures for Gas CEMS, and other Department-approved QA/QC plans.

e. The CEMS shall calculate and record emission rates in units of pounds $SO_2$ per ton of 100 percent sulfuric acid produced. Each operating day, the rolling averages of the $SO_2$ emission rate for the 3 hour periods shall be calculated and recorded. Emissions shall be calculated in units of pounds of $SO_2$ per ton of 100 percent acid produced using one of the methods specified in 40 CFR 60.84. The 24-hour block averages shall be calculated in units of pounds per hour. The permittee may select either 6am-6am or 12am-12am for the 24-hour block period. The 24-hour block period shall be adjusted to a 23-hour or 25-hour block period to accommodate daylight savings time. Averages are to be calculated as the arithmetic mean of each monitored operating hour in which sulfur is burned

in the unit and at least two emission measurements are recorded at least 15 minutes apart. Data taken during periods of startup, or when sulfur is not burned in the unit, or when the CEMS is out of control as defined in 40 CFR 60, Appendix F, Section 5.2, shall be excluded from the 3-hour rolling and 24-hour block averages. Data recorded during periods of shutdown, malfunction, load change, and continuous operating periods shall be included in the calculation of the 3-hour rolling and 24-hour block averages. When demonstrating compliance with the 12-month rolling total, all valid CEMS emissions data shall be used.

f. To the extent the monitoring system is available to record emissions data, the CEMS shall be operated and shall record data at all operating hours when sulfur is burned in the unit, including periods of startup, shutdown, load change, continuous operation and malfunction. Monitor downtimes and excess emissions based on 3-hour averages, which include startup emissions, shall be reported on a quarterly basis using the SUMMARY REPORT in 40 CFR 60.7. A detailed report of the cause, duration, magnitude, and corrective action taken or preventative measures adopted for each excess emission occurrence, and a listing of monitor downtime occurrences shall accompany the SUMMARY REPORT when the total duration of excess emissions is 1% or greater or if the monitoring system downtime is 5% greater of the total monitored operating hours.

g. The monitoring device shall meet the applicable requirements of Chapter 62-204, F.A.C., 40 CFR 60, Appendix F, and 40 CFR 60.13, including certification of each CEMS in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) Notification Requirements. Data on monitoring equipment specifications, manufacturer, type calibration and maintenance requirements, and the FINAL location of each stack probe shall be provided to the Department for review at least 30 days prior to installation of a new CEMS.

[Rules 62-296.340(5)(c) (escape BART),62-4.070(1)&(3), 62-213.440(1) and 62-204.800, F.A.C.; 40 CFR 60, Subpart H; Construction Permits 0570005-020-AC, 0570005-021-AC/PSD-FL,0570005-026-AC/PSD-FL-339B and 0570005-034-AC]

## NOTIFICATION REQUIREMENTS

**A.13.** Test Notification - The permittee shall notify the Compliance Authority in writing at least 30 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note* - *The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.; 40 CFR 60.8(d)]

**A.14.** Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of EU Nos. 007 and/or 008 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

## RECORDKEEPING AND REPORTING REQUIREMENTS

**A.15.** Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

**A.16.** $SO_2$ CEMS - A continuous emission monitoring system (CEMS) to determine Sulfur Dioxide ($SO_2$) emissions from this source shall be operated, calibrated, and maintained in accordance with Rule 62-296.402(4), F.A.C. The Permittee shall use the equation cited in 40 CFR 60.84(d) to convert CEM data into pounds of $SO_2$ per ton of 100% sulfuric acid produced.
[40 CFR 60.84 and Rule 62-296.402(4), F.A.C., and Construction Permits AC29-200648 and 0570005-020-AC]
*{Permitting note: See 40 CFR 60, Subpart H for equation cited in 40 CFR 60.84(d).}*

**A.17.** The Permittee shall operate and maintain equipment and/or instruments necessary to determine the daily production rate of $H_2SO_4$. The metered production will be confirmed within 10% of its true value by comparison with the sulfur consumption at the end of each month.
[Rule 62-297.310(5)(b), F.A.C.]

**A.18.** Daily $H_2SO_4$ Production Records. To document compliance with the maximum allowable production rates of Specific Condition No. **A.2.**, the Permittee shall maintain daily records of $H_2SO_4$ production. These records shall be based upon data obtained from acid flow meters measuring acid flow rates to storage as well as transfers between plants. Flow meter information and documentation as to how daily production rates were calculated shall be included as part of the records.
[Rule 62-4.070(3), F.A.C. and Permittee letter of November 16, 1993 submitted as a supplement to permit application for Plants "A" and "B"]

**A.19.** Daily and Monthly $SO_2$ Emissions Records. A CEMS is used to determine compliance with the sulfur dioxide emission limits in Specific Condition No. **A.5**. To document ongoing compliance with the sulfur dioxide emissions limits, the permittee shall maintain the following records for each day of the month:

a. daily acid production (in tons as 100% $H_2SO_4$);
b. daily hours operated;
c. 24-hour (daily) block average $SO_2$ emission rate (in lbs/hr);
d. maximum 3-hr. average $SO_2$ emission rate (in lbs/ton of 100% $H_2SO_4$ produced);
e. total $SO_2$ emission (in tons) for the most recent month; and
f. total $SO_2$ emissions (in tons) for the most recent consecutive 12 month period.

The monthly records shall also show the sulfur dioxide emission limits in Specific Condition No. **A.5**.

[Rule 62-4.070(3), F.A.C., Construction Permits AC29-200648 and 0570005-020-AC, and Appendix 1 to Permittee letter of November 16, 1993 submitted as a supplement to permit application]

*{Permitting Note: Except for the changes specified in the conditions above, these emissions units remain subject to the all other valid conditions contained in the current Title V permit.}*