White Springs Agricultural Chemicals, Inc.
Suwannee River/Swift Creek Complex
Facility ID No.: 0470002
Hamilton County

Title V Air Operation Permit Revision

Permit No. 0470002-085-AV
Revision of Title V Air Operation Permit No. 0470002-080-AV

Permitting & Compliance Authority:
State of Florida
Department of Environmental Protection
Northeast District
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Jacksonville, Florida 32256

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Permit No. 0470002-085-AV

This DRAFT/PROPOSED permit will only reflect the affected Subsections I, and Common Testing Conditions FF, for EU022. Also, Subsections BB for EU070 and CC for EU071. The FINAL permit will be issued in its entirety.

Table of Contents

Section **Page Number**

I. Facility Information.
A. Facility Description. 2
B. Summary of Emissions Units. 2
C. Applicable Regulations. 2

II. Facility-wide Conditions. 3

III. Emissions Units and Conditions.

Sub -section	E.U. ID No.	Brief Description	
A.	001	#2 Phosphate Rock Grinder	7
B.	003	"A" Defluorinated Phosphate (DFP) Plant	9
C.	004	"X"-Train (Monocal/Dical process)	13
D.	008	"Y" Train-#1 MAP/DAP Plant	20
E.	010	#1 Storage and Shipping Building	25
F.	015	Granular Product Shipping and Screening Facility	27
G.	020	"B" Phosphoric Acid Plant	29
H.	021	"C" Sulfuric Acid Plant	34
I.	022	"D" Sulfuric Acid Plant	41
J.	032	"Z"-Train #2 MAP/DAP Plant	47
K.	034	South Phosphoric Acid Filters	53
L.	035	North Phosphoric Acid Filters	55
M.	036	"B" Superphosphoric Acid Plant	57
N.	038	"B" Defluorinated Phosphate (DFP) Plant	61
O.	039	"C" Auxiliary Boiler	64
P.	040	"D" Auxiliary Boiler	68
Q.	042	Defluorinated Phosphate (DFP) Feed Prep	72
R.	044	"A" and "B" DFP Coolers	78
S.	054	Molten Sulfur System	81
T.	061	Green Superphosphoric Acid Plant	82
U.	062	Defluorinated Phosphate (DFP) Silos	84
V.	064	Swift Creek Mine (SCM) Rock Dryer	86
W.	065	Swift Creek Mine Silos Mineral Storage and Conveyor System	89
X.	066	"E" Sulfuric Acid Plant	91

Sub -section	E.U. ID No.	Brief Description	Page
Y.	067	"F" Sulfuric Acid Plant	97
Z.	068	"E" Auxiliary Boiler	103
AA.	069	"D" Phosphoric Acid Plant	107
BB.	070	"C" and "D" Superphosphoric Acid Plants	112
CC.	071	Acid Clarification Plant	117
DD.	072	Molten Sulfur System	119
EE.	---	Common Conditions – Used Oil/Lead	120
FF.	---	Common Conditions – F.A.C. Test Requirements	122
GG.	---	Common Conditions – 40 CFR 63 Subpart AA Monitoring and Testing Requirements	133
HH.	---	Common Conditions – 40 CFR 63 Subpart BB Monitoring and Testing Requirements	140
II	---	Common Conditions – F.A.C. Excess Emissions Rules	145
JJ	075	Relocatable Concrete Batch Plant	148
KK	076	15 Emergency Engines	150
LL	039,040,068	40 CFR 63 Subpart DDDDD	155

Please Note that Defluorinated Phosphate (DFP) is the new name for Pollyphos, which is a registered trademark of Occidental Chemical and, therefore, can no longer be used by White Springs Agricultural Chemicals.

IV. Appendices. 16
Appendix A, Glossary.
Appendix A, Glossary.
Appendix CAM, Compliance Assurance Monitoring Plan.
Appendix CP3, Compliance Plan.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix ICE, Requirements for Internal Combustion Engines.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, AA, BB, ZZZZ.
Appendix NSPS, Subpart A – General Provisions.
Appendix NSPS, Subpart T, U, V, JJJJ.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix U, List of Unregulated Emissions Units and/or Activities.

Referenced Attachments. ..... At End
Figure 1, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance (40 CFR 60, July, 1996).
Table H, Permit History.
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.

DRAFT/PROPOSED PERMIT

PERMITTEE:
White Springs Agricultural Chemicals, Inc.
P. O. Box 300
White Springs, Florida 32096

Permit No. 0470002-085-AV DRAFT/PROPOSED
Suwannee River/Swift Creek Complex
Facility Id No. 0470002
Title V Air Operation Permit Revision

The purpose of this permit is to incorporate Air Construction Permit No. 0470002-078-AC & Air Construction Permit No. 0470002-084-AC (Time Extension), "D" Sulfuric Acid Drying Tower Acid Cooler replacement into the Title V air operation permit and to make minor administrative changes for the above referenced facility. The existing White Springs Agricultural Chemicals, Inc.- Suwannee River/Swift Creek Complex is located in Hamilton County at 15843 SE 78th Street, White Springs, Florida. UTM Coordinates are: Zone 17, 328.3 km East and 3368.8 km North; and, Latitude: 30° 26' 27" North and Longitude: 82° 47' 16" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: xx/xx/xxxx
Renewal Application Due Date: December 17, 2016
Expiration Date: July 30, 2017

(Draft/Proposed)

_____

Richard S. Rachal III, P.G.
Program Administrator
Waste and Air Resource Management Program

RSR/ lm

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility processes phosphate rock to produce several products at the Suwannee River/Swift Creek Complex (two plants). The facility consists of one rock grinder, two phosphoric acid plants, two defluorinated phosphate (DFP) plants, one monocal/dical process, two monoammonium/diammonium phosphate (MAP/DAP) plants, one Storage and Shipping building, one screening/shipping building, four sulfuric acid plants, two phosphoric acid filters, three superphosphoric acid plants, one green superphosphoric plant, the Swift Creek Mine (SCM) rock dryer, and one acid clarification plant. The facility also has storage silos associated with the Swift Creek Mine and the DFP plant.

Also included in this permit are miscellaneous unregulated emissions units and/or activities.

Subsection B. Summary of Emissions Units.

Sub-section	E.U. ID No.	Brief Description
A.	001	#2 Phosphate Rock Grinder
B.	003	"A" Defluorinated Phosphate (DFP) Plant
C.	004	"X"-Train (Monocal/Dical process)
D.	008	"Y" Train-#1 MAP/DAP Plant
E.	010	#1 Storage and Shipping Building
F.	015	Granular Product Shipping and Screening Facility
G.	020	"B" Phosphoric Acid Plant
H.	021	"C" Sulfuric Acid Plant
I.	022	"D" Sulfuric Acid Plant
J.	032	"Z"-Train #2 MAP/ DAP
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N.	038	"B" Defluorinated Phosphate (DFP) Plant
O.	039	"C" Auxiliary Boiler
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Q.	042	DFP Feed Prep
R.	044	"A" and "B" DFP Coolers
S.	054	Molten Sulfur System
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V.	064	Swift Creek Mine (SCM) Rock Dryer
W.	065	Swift Creek Mine Silos Mineral Storage and Conveyor System
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EE.	---	Common Conditions - Used Oil/Lead
FF.	---	Common Conditions - F.A.C. Test Requirements`
GG.	---	Common Conditions – 40 CFR 63 Subpart AA Monitoring and Testing Requirements
HH.	---	Common Conditions – 40 CFR 63 Subpart BB Monitoring and Testing Requirements
II.	---	Common Conditions – F.A.C. Excess Emissions Rules
JJ	075	Relocatable Concrete Batch Plant
KK	076	15 Emergency Engines

Permitting Note: The following emissions units are permanently shutdown: EU-006 (SRM silos), EU-009 (SRM East Dryer), EU-013 (SRM Rock Grinder), EU-016 (#1 SRCC Phosphate Rock Grinder, EU-017 (SRM West Rock Dryer), and EU-041 (Dical Acid Prep).

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received December 6, 2011, this facility **is a major source of hazardous air pollutants (HAP)**. Because this facility operates stationary reciprocating internal combustion engines, it is subject to regulation under 40 CFR 63, Subpart ZZZZ, - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The existing facility **is a** PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

A summary of applicable regulations is shown in the following table.

Regulation	**EU No(s).**
40 CFR 60, Subpart A, NSPS General Provisions	020, 021, 022, 066, 067, 069, 070
40 CFR 60, Subpart H	021, 022, 066, 067
40 CFR 60, Subpart V	008, 032
40 CFR 60, Subpart T	020, 069
40 CFR 60, Subpart U	036, 070
40 CFR 63, Subpart A, NESHAPS General Provisions	020, 032, 036, 064, 068, 069, 070
40 CFR 63, Subpart AA	020, 036, 064, 069, 070
40 CFR 63, Subpart BB	008, 032
40 CFR 63, Subpart ZZZZ & JJJJ	076
40 CFR 63, Subpart DDDDD	039, 040, 068
State Rule Citations: BACT, Rule 62-296.320, F.A.C., Rule 62-297.401, F.A.C Rule 62-296.403, F.A.C., Rule 62-297.620(4), F.A.C.; Rule 62-212.400, F.A.C., Rule 62-296.411, F.A.C.	001, 003, 004, 008, 020, 021, 022, 032, 034, 035, 036, 038, 039, 040, 042, 044, 054, 061, 062, 064, 065, 066, 067, 068, 069, 070, 071, 072, 075

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:
[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW10. For the Emissions Units subject to monitoring of indicator ranges under MACT, upon successful compliance testing at a new indicator range, the permittee shall operate under the new indicator ranges. Under no circumstance is the NED/DEP authorizing the facility to operate outside of the MACT Rule or out of compliance.

[Rule 62-4.070, F. A. C.]

FW11. Compliance Plan CP-4. EU008 & EU032- Project 0470002-079-AC: Upon completion of construction the emissions units shall be tested to demonstrate initial compliance with the emissions standards for Fluoride and PM/PM_{10}. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. This facility is subject to the attached Appendix CP-4.

FW12. The facility may choose to submit quarterly monitoring reports to satisfy the requirements for Facility-Wide Reporting Requirements Condition RR4 (semi-annual monitoring reports), provided the facility indicates it on the quarterly report closest to the next due semi-annual monitoring report, and that all requirements of the semi-annual report are included in the quarterly monitoring report.

In order to provide better customer service and enhance the permitting experience in the Draft/Proposed permit, only the emission unit(s) (EU) which are changed in the revision are listed in Section III. EMISSIONS UNITS AND SPECIFIC CONDITIONS. {*Permitting Note: Strikethroughs indicate items deleted and blue, double underlined font indicates items added.}*

Subsection I. This section addresses the following emissions unit(s).

E.U. ID No.	**Brief Description**
022	"D" Sulfuric Acid Plant

"D" Sulfuric Acid Plant is a double absorption process that produces sulfuric acid and controls sulfur dioxide (SO_2) emissions. This emissions unit has a Brinks mist eliminator to control sulfuric acid mist (SAM). CAM does not apply for sulfur dioxide for this emissions unit.

{Permitting note(s): This emissions unit is regulated under NSPS - 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid, adopted and incorporated by reference in Rule 62-204.800(7)(b)10., F.A.C.; Rule 62-212.300, F.A.C., General Preconstruction Review Requirements; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); and Rule 296.402, F.A.C., Sulfuric Acid Plants.}

The following specific conditions apply to the emissions unit(s) listed above:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

I.1. Permitted Capacity. The production rate shall not exceed 2300 TPD expressed as 100 percent H_2SO_4 or 95.83 TPH.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

I.2. Hours of Operation. The hours of operation for this emissions unit is allowed to operate continuously ~~shall not exceed~~ (8760 hours/year (8784 in any Leap Year).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

EMISSION LIMITATIONS AND STANDARDS

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

I.3. Sulfur Dioxide. Sulfur Dioxide Emissions shall not exceed 2 kg per metric ton of acid produced (4 lb per ton), the production being expressed as 100 percent H_2SO_4, 383.33 lbs/hr and 1679.00 TPY.

[Rule 62-204.800(7)(b)10., F.A.C.; 40 CFR 60.82(a)]

I.4. Sulfuric Acid Mist (SAM). SAM emissions, expressed as H_2SO_4, shall not exceed 0.075 kg per metric ton of acid produced (0.15 lb per ton), the production being expressed as 100 percent H_2SO_4, 14.38 lbs/hr and 63.00 TPY.

[Rule 62-204.800(7)(b)10., F.A.C.; 40 CFR 60.83(a)(1)]

I.5. Visible Emissions. Visible Emissions shall not exceed 10% opacity.

[Rule 62-204.800(7)(b)10., F.A.C.; 40 CFR 60.83(a)(2)]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

I.6. Sulfur Dioxide. The following procedures and test methods shall be used to determine sulfur dioxide emissions. A compliance test shall be conducted on an annual basis, once each federal fiscal year:

(a) The test methods in 40 CFR Appendix A or other methods and procedures as specified in this condition, except as provided in 40 CFR 60.8(b).

(b) (1) The emission rate (E) of sulfur dioxide shall be computed for each run using the following equation:

$$E=(CQsd)/(PK)$$

where:

E = emission rate of SO_2 kg/metric ton (lb/ton) of 100 percent H_2SO_4 produced.
C = concentration of SO_2, g/dscm (lb/dscf).
Qsd = volumetric flow rate of the effluent gas, dscm/hr (dscf/hr).
P = production rate of 100 percent H_2SO_4, metric ton/hr (ton/hr).
K = conversion factor, 1000 g/kg (1.0 lb/lb).

(2) Method 8 shall be used to determine the Sulfur Dioxide concentration (C) and the volumetric flow rate (Qsd) of the effluent gas. The moisture content may be considered to be zero. The sampling time and sample volume for each run shall be at least 60 minutes and 1.15 dscm (40.6 dscf).

(3) Suitable methods shall be used to determine the production rate (P) of 100 percent H_2SO_4 for each run. Material balance over the production system shall be used to confirm the production rate.

(4) N/A

(c) The following may be used as alternatives to the reference methods and procedures specified in this condition:

I.6. continued:

(1) If a source processes elemental sulfur or an ore that contains elemental sulfur and uses air to supply oxygen, the following procedure may be used instead of determining the volumetric flow rate and production rate:

(i) The integrated technique of Method 3 is used to determine the O_2 concentration and, if required, CO_2 concentration.

(ii) The SO_2 emission rate is calculated as described in **Condition I.12**. substituting the acid mist concentration for Cs as appropriate.

[40 CFR 60.85(a),(b),(c); Rule 62-204.800(7)(b)10., F.A.C.; Rule 62-297.401, F.A.C.]

I.7. <u>Sulfuric Acid Mist</u>. The following procedures and test methods shall be used to determine sulfuric acid mist. A compliance test shall be conducted on an annual basis, once each federal fiscal year:

(a) The test methods in 40 CFR Appendix A or other methods and procedures as specified in this condition, except as provided in 40 CFR 60.8(b).

(b) (1) The emission rate (E) of sulfuric acid mist shall be computed for each run using the following equation:

E=(CQsd)/(PK)
where:
E = emission rate of acid mist kg/metric ton (lb/ton) of 100 percent H_2SO_4 produced.
C = concentration of acid mist, g/dscm (lb/dscf).
Qsd = volumetric flow rate of the effluent gas, dscm/hr (dscf/hr).
P = production rate of 100 percent H_2SO_4, metric ton/hr (ton/hr).
K = conversion factor, 1000 g/kg (1.0 lb/lb).

(2) Method 8 shall be used to determine the Sulfuric Acid Mist concentration (C) and the volumetric flow rate (Qsd) of the effluent gas. The moisture content may be considered to be zero. The sampling time and sample volume for each run shall be at least 60 minutes and 1.15 dscm (40.6 dscf).
(3) Suitable methods shall be used to determine the production rate (P) of 100 percent H_2SO_4 for each run. Material balance over the production system shall be used to confirm the production rate.
(4) N/A

(c) The following may be used as alternatives to the reference methods and procedures specified in this condition:

(1) If a source processes elemental sulfur or an ore that contains elemental sulfur and uses air to supply oxygen, the following procedure may be used instead of determining the volumetric flow rate and production rate:

(i) The integrated technique of Method 3 is used to determine the O_2 concentration and, if required, CO_2 concentration.
(ii) The acid mist emission rate is calculated as described in **Condition I.12**. Substituting the acid mist concentration for C as appropriate.

[40 CFR 60.85(a),(b),(c); Rule 62-204.800(7)(b)10., F.A.C.; Rule 62-297.401, F.A.C.]

I.8. Visible Emissions. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually once each federal fiscal year.

[Rule 62-204.800(7)(b)10., F.A.C.; Rule 62-297.310(7)(a)4.a., F.A.C.; 40 CFR 60.85(b)(4); Rule 62-297.401, F.A.C.]

CONTINUOUS MONITORING REQUIREMENTS

I.9. Sulfur Dioxide. A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained, and operated. The pollutant gas used to prepare calibration gas mixtures under Performance Specification 2 and for calibration checks under 40 CFR 60.13(d), shall be sulfur dioxide (SO_2). Method 8 shall be used for conducting monitoring system performance evaluations under 40 CFR 60.13(c) except that only the sulfur dioxide portion of the Method 8 results shall be used. The span value shall be set at 1000 ppm of sulfur dioxide.

[40 CFR 60.84(a)]

I.10. Conversion Factor. A conversion factor for the purpose of converting monitoring data into units of the applicable standard (kg/metric ton, lb/ton) shall be established. The conversion factor shall be determined, as a minimum, three times daily by measuring the concentration of sulfur dioxide entering the converter using suitable methods (e.g., the Reich test, National Air Pollution Control Administration Publication No. 999–AP–13) and calculating the appropriate conversion factor for each eight-hour period as follows:

$$CF = k[(1.000 - 0.015r)/(r - s)]$$

where:

CF = conversion factor (kg/metric ton per ppm, lb/ton per ppm).
k = constant derived from material balance. For determining CF in metric units, k=0.0653. For determining CF in English units, k=0.1306.
r = percentage of sulfur dioxide by volume entering the gas converter. Appropriate corrections must be made for air injection plants subject to the Administrator's approval.
s = percentage of sulfur dioxide by volume in the emissions to the atmosphere determined by the continuous monitoring system required under **Condition I.9.**

[40 CFR 60.84(b)]

I.11. All conversion factors and values under **Condition I.10.,** from which they were computed (i.e., CF, r, and s) shall be recorded.

[40 CFR 60.84(c)]

I.12. <u>Sulfur Dioxide Alternative</u>. Alternatively, a source that processes elemental sulfur or an ore that contains elemental sulfur and uses air to supply oxygen may use the following continuous emission monitoring approach and calculation procedures in determining SO_2 emission rates in terms of the standard. This procedure is not required, but is an alternative that would alleviate problems encountered in the measurement of gas velocities or production rate. Continuous emission monitoring systems for measuring SO_2, O_2, and CO_2 (if required) shall be installed, calibrated, maintained, and operated by the owner or operator and subjected to the certification procedures in Performance Specifications 2 and 3. The calibration procedure and span value for the SO_2 monitor shall be as specified in **Condition I.9.** The span value for CO_2 (if required) shall be 10 percent and for O_2 shall be 20.9 percent (air). A conversion factor based on process rate data is not necessary. Calculate the SO_2 emission rate as follows:

$$Es=(CsS)/[0.265 - 0.0126\ \%O_2) - (A\ \%CO_2)]$$

where:

Es = emission rate of SO_2, kg/metric ton (lb/ton) of 100 percent of H_2SO_4 produced.
Cs = concentration of SO_2, kg/dscm (lb/dscf).
S = acid production rate factor, 368 dscm/metric ton (11,800 dscf/ton) of 100 percent H_2SO_4 produced.
$\%O_2$ = oxygen concentration, percent dry basis.
A = auxiliary fuel factor,
= 0.00 for no fuel.
= 0.0226 for methane.
= 0.0217 for natural gas.
= 0.0196 for propane.
= 0.0172 for No 2 oil.
= 0.0161 for No 6 oil.
= 0.0148 for coal.
= 0.0126 for coke.
$\%CO_2$ = carbon dioxide concentration, percent dry basis.

NOTE: It is necessary in some cases to convert measured concentration units to other units for these calculations: Use the following table for such conversions:

From—	To—	Multiply by—
g/scm	kg/scm	10^{-3}
mg/scm	kg/scm	10^{-6}
ppm (SO_2)	kg/scm	2.660×10^{-6}
ppm (SO_2)	lb/scf	1.660×10^{-7}

[40 CFR 60.84(d)]

I.13. <u>Sulfur Dioxide Excess Emissions</u>. For the purpose of reports under 40 CFR 60.7(c), periods of excess emissions shall be all three-hour periods (or the arithmetic average of three consecutive one-hour periods) during which the integrated average sulfur dioxide emissions exceed the applicable standards under **Condition I.3.**

[40 CFR 60.84(e)]

COMMON CONDITIONS - F.A.C. TEST REQUIREMENTS

I.14. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection FF.

Subsection FF. Common Conditions - F.A.C. Test Requirements

Sub-section	E.U. ID No.	Brief Description
A.	001	#2 Phosphate Rock Grinder
B.	003	"A" Defluorinated Phosphate (DFP) Plant
C.	004	"X"-Train (Monocal/Dical process)
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U.	062	Defluorinated Phosphate (DFP) Silos
V.	064	SCM Rock Dryer
W.	065	SCM Silos
X.	066	"E" Sulfuric Acid Plant
Y.	067	"F" Sulfuric Acid Plant
Z.	068	"E" Auxiliary Boiler
AA.	069	"D" Phosphoric Acid Plant
BB.	070	"C" and "D" Superphosphoric Acid Plants
CC.	071	Acid Clarification Plant
DD.	072	Molten Sulfur System

The following specific conditions may apply to the emissions unit(s) listed above:

{Permitting Note: The following conditions are placed here as a convenience and to avoid duplication. See specific conditions in Subsections A through FF for applicability.}

62-297.310 General Compliance Test Requirements.
The focal point of a compliance test is the stack or duct which vents process and/or combustion gases and air pollutants from an emissions unit into the ambient air.

(1) Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate
was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard.

(2) Operating Rate During Testing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined below. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

(a) Combustion Turbines. (Reserved)

(b) All Other Sources. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

(3) Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule.

(4) Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a FINAL surrogate standard and an existing mass emission limiting standard.

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded Max. deviation between readings	Micrometer	+/-0.001" men of at least three readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually	Spirometer or calibrated wet test or dry gas test meter	2%
	3. Check after each test series	Comparison check	5%

(5) Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

(6) Required Stack Sampling Facilities. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.

2. The ports shall be capable of being sealed when not in use.

3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.

4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d). Work Platforms.

1. minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.

2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.

3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.

4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with

the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e). Access to Work Platform.

1 Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f). Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g). Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

(7) Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

c. Each NESHAP pollutant, if there is an applicable emission standard.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

6. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup.

7. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to Rule 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup.

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62- 210.300(4)(a)1. through 7., F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

(8) Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
l2. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals, who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

62-297.320 Standards for Persons Engaged in Visible Emissions Observations.

(1) Training and Certification Required. All persons engaged in determining the opacity of visible emissions in Florida shall attend training and be certified by a training provider in accordance with the procedures and requirements set forth below.
(a) Certification shall consist of satisfactory attendance and completion of a classroom lecture and a field qualification. For certification purposes, the classroom lecture and field qualification are separate and independent requirements.
(b) Attendance at the classroom lecture is required no less frequently than every three years. Successful completion of the field qualification is required no less frequently than every six months.
(c) Proof of certification shall be made by including copies of the signed and dated certificates or cards issued by the training providers with documentation of visible emissions observations submitted to the department, or otherwise upon request of the department.

(2) Requirements for Training Providers. All persons providing training leading to the certification of persons engaged in determining the opacity of visible emissions in Florida shall meet the requirements of subsections 62-297.320(2)-(8), F.A.C.
(a) For certification purposes, the classroom lecture and field certification are separate and independent requirements. For each course scheduled, each training provider shall offer a classroom lecture and one or more days of field qualification.
(b) Copies of quality assurance documentation, attendance records and field data sheets shall be maintained for a period of no less than three years after the conclusion of each course and shall be made available to the department upon request.
(c) Each training provider shall arrange for suitable locations for the classroom lecture and field qualification sessions that facilitate learning and reduce the impact of the smoke on passersby.
(d) To assure that cigar, pipe or cigarette smoke does not interfere with the observations of the trainees, each training provider shall enforce a policy of no smoking within the field qualification area.

(3) Classroom Lecture.
(a) The classroom lecture shall include the following topics and exercises:
1. Sources and causes of visible emissions.
2. Common types of emission control equipment and their effects on visible emissions observations.
3. History of opacity measurement.
4. Principles and theory of opacity.
5. Plume types and characteristics.
6. Legal aspects of visible emissions observations and legal defensibility of Method 9.
7. Basic meteorological conditions that influence plume behavior.
8. Proper procedures for conducting field observations under a variety of conditions.
9. A demonstration of commonly used measurement devices including a compass, a wind speed measurement device, and an inclinometer.
10. A written exercise demonstrating the proper procedure for documentation of observations.
(b) Training providers shall issue a signed and dated certificate or card to all persons attending the classroom lecture.

(4) Field Qualification.
(a) The field qualification shall be conducted in accordance with the requirements set forth in 40 CFR Part 60, Subpart A, EPA Method 9, adopted and incorporated by reference at Rule 62-204.800, F.A.C.; EPA Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III, Section 3.12, hereby adopted and incorporated by reference; and EPA Guidelines for Evaluation of Visible Emissions (EPA 340/1-75-007, April 1975), hereby adopted and incorporated by reference.
(b) Each training provider shall meet requirements for quality assurance at least as stringent as those outlined in EPA Method 9.
(c) Each training provider shall monitor the attendees so that conferring or copying results during field qualification does not occur.
(d) Each training provider shall not provide hints of any kind or demonstrate the smoke standards during the field qualification sessions, except during familiarization runs prior to each test.
(e) Training providers shall issue a signed and dated certificate or card to all persons who successfully complete the field qualification.

(5) Notification to Department of Training Course Offerings. Each training provider shall notify the Department of all visible emissions training courses such provider offers in Florida at least 30 days prior to the start of each course.

(6) Notification to Department of Persons Receiving Certification. Each training provider shall provide a list of the names of attendees receiving certification at its courses to the department no later than 30 days after the conclusion of each course.

(7) Audit by the Department. For auditing purposes, each training provider shall allow one or more persons from the Department or a local air pollution control agency to observe each visible emissions training course offered in Florida without advance notice to the training provider. The training provider shall not issue a certificate or card to the observers, and shall not charge a fee for their attendance.

(8) Invalidation of Certificates. After investigation by the department, should any training provider's course be found by the department to not meet the requirements of this section, the certificates or cards offered by such provider for such course shall not be considered valid for visible emissions observations in Florida.

Subsection BB this section addresses the following emissions unit(s).

E.U. ID No.	**Brief Description**
070	"C" & "D" Superphosphoric Acid (SPA) Plants (Vacuum Evaporation Process)

"C" & "D" Superphosphoric Acid (SPA) Plants and east & west phosphoric acid storage tanks emit fluoride, and are controlled by a scrubber. ~~Since the Synspar Plant has no air emissions, the limerock (LR) bin associated with this emission unit is included here for recordkeeping purposes. The particulate matter emissions from this bin are controlled by a bag collector.~~ CAM does not apply for fluoride for this emissions unit.

{Permitting note(s): These emissions units are regulated under NSPS - 40 CFR 60, Subpart U, Standards of Performance for Phosphate Fertilizer Industry: Superphosphoric Acid Plants, adopted and incorporated by reference in Rule 62-204.800(7)(b)27., F.A.C.; Rule 62-212.300, F.A.C., General Preconstruction Review Requirements; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); 40 CFR 63, Subpart A - General Provisions; 40 CFR 63, Subpart AA - National Emission Standards for Hazardous Air Pollutants (NESHAP) From Phosphoric Acid Manufacturing Plants. **The Part 40 CFR 63 Subparts A and AA take precedence, however these units are subject to all applicable State Implementation Plan (SIP) rules if these units are out of compliance with the NESHAP**}.

The following specific conditions apply to the emissions unit(s) listed above:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

BB.1. Permitted Capacity. The combined operation rate shall not exceed the Maximum Daily 1-Hour Average Rate = 110 tons of 100% P_2O_5 input. The operation rate shall not exceed 876,000 tons during any 12 consecutive months of 100% P_2O_5 input.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0470002-034-AC, and PSD-FL-297]

BB.2. Hours of Operation. The hours of operation for this emissions unit is allowed to operate continuously ~~shall not exceed~~ (8760 hours/year (8784 in any Leap Year).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and PSD-FL-297]

EMISSION LIMITATIONS AND STANDARDS

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

BB.3. Total Fluorides. Total Fluoride emissions at the sample port shall not exceed 0.0087 lb/ton of equivalent P_2O_5 feed; 0.96 lbs/hr and 3.8 TPY.

[Rule 62-204.800(7)(b), F.A.C.; 40 CFR 60.212; 40 CFR 63.602(b)(1), and PSD-FL-297]

~~Emission Point LR:~~

BB.4. ~~Visible Emissions~~~~. Visible Emissions shall not exceed 5% opacity.~~ **RESERVED**

~~[Rule 62-297.620(4), F.A.C.]~~

OPERATING REQUIREMENTS

BB.5. Scrubber Parameter Daily Averages. The permittee shall maintain daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber within the allowable ranges established pursuant the requirements of **Condition II.4.(1) or (2)**.

[Rule 62-204.800, F.A.C.; 40 CFR 63.604]

MONITORING REQUIREMENTS

BB.6. Phosphorus-bearing feed material. The Permittee shall install, calibrate, maintain, and operate a monitoring system, which can be used to determine and permanently record the mass flow of phosphorus-bearing feed material to the process. The monitoring system shall have an accuracy of ±5 percent over its operating range.

[Rule 62-204.800, F.A.C.; 40 CFR 60.213(a)]

BB.7. P_2O_5 Feed. The Permittee shall maintain a daily record of equivalent P_2O_5 feed.

[Rule 62-204.800, F.A.C.; 40 CFR 60.213(b)]

BB.8. <u>Scrubber Pressure Drop</u>. The Permittee shall install, calibrate, maintain, and operate a monitoring system which continuously measures and permanently records the pressure drop across each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.

[Rule 62-204.800, F.A.C.; 40 CFR 60.213(c)]

BB.9. The Permittee shall meet the 40 CFR 63 Subpart AA requirements stated in **Common Conditions GG.1 – GG.4.**

TEST METHODS AND PROCEDURES

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

BB.10. <u>Total Fluorides</u>. The Permittee shall use the following procedures:

(a) In conducting the performance tests required in § 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in § 60.8(b).

(b) The owner or operator shall determine compliance with the total fluorides standard in § 60.212 as follows:
(1) The emission rate (E) of total fluorides shall be computed for each run using the following equation:

$$E = \left(\sum_{i=1}^{N} C_{si} Q_{sdi} \right) / (PK)$$

where:
E=emission rate of total fluorides, g/Mg (lb/ton) of equivalent P_2O_5 feed.
Csi=concentration of total fluorides from emission point "i," mg/dscm (gr/dscf).
Qsdi=volumetric flow rate of effluent gas from emission point "i," dscm/hr (dscf/hr).
N=number of emission points associated with the affected facility.
P=equivalent P_2O_5 feed rate, Mg/hr (ton/hr).
K=conversion factor, 1000 mg/g (7,000 gr/lb).

BB.10. continued:

(2) Method 13A or 13B shall be used to determine the total fluorides concentration (Csi) and volumetric flow rate (Qsdi) of the effluent gas from each of the emission points. The sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30 dscf).

(3) The equivalent P_2O_5 feed rate (P) shall be computed for each run using the following equation:

$$P=Mp\ Rp$$

where:

Mp=total mass flow rate of phosphorus-bearing feed, Mg/hr (ton/hr).
Rp= P_2O_5 content, decimal fraction.

(i) The accountability system of § 60.213(a) shall be used to determine the mass flow rate (Mp) of the phosphorus-bearing feed.

(ii) The Association of Official Analytical Chemists (AOAC) Method 9 (incorporated by reference -- see § 60.17) shall be used to determine the P_2O_5 content (Rp) of the feed.

[Rule 62-204.800, F.A.C.;40 CFR 60.214]

BB.11. <u>Total Fluorides</u>. The Permittee shall meet the 40 CFR 63 Subpart AA performance testing requirements stated in **Common Conditions GG.5 – GG.7** with the exception that testing shall be done every five years. [Permit 0470002-033-AV, Rule 62-204.800(7)(b), F.A.C.; 40 CFR 60.214, Subpart U; Rule 62-297.401; F.A.C.]

~~From vent (LR):~~

BB.12. ~~Visible Emissions~~. ~~Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually once each federal fiscal year. [Rule 62-297.401, F.A.C. and Rule 62-297.310(7)(a)4.a., F.A.C.]~~ **<u>RESERVED</u>**

NOTIFICATION, RECORDKEEPING, REPORTING REQUIREMENTS

BB.13. The Permittee shall meet the 40 CFR 63 Subpart AA notification, recordkeeping, and reporting requirements stated in Common Conditions GG.10. – GG.12.

BB.14. This emissions unit is subject to specific requirements of 40 CFR 63 Subpart AA, Appendix A to Subpart AA – Applicability to General Provisions to Subpart AA, and alternative MACT monitoring plan (Administrative Order No. 04-I-AP, dated October 4, 2004). The owner or operator is responsible for remaining in compliance with any updates made to Subpart A or AA. This EU is subject to Facility Wide Condition No. 10.

[40 CFR 63-Subpart A; 40 CFR 63-Subpart AA; and Administrative Order No. 04-I-AP, Alternate MACT Monitoring Plan]

EXEMPTION FROM NEW SOURCE PERFORMANCE STANDARDS.

BB.15. This emissions unit is exempted from any otherwise applicable new source performance standard contained in 40 CFR Part 60, Subpart U. To be exempt, a source must have a current operating permit pursuant to Title V of the Clean Air Act and the source must be in compliance with all requirements of 40 CFR 63, Subpart AA. For each affected source, this exemption is effective upon the date that the owner or operator demonstrates to the Administrator that the requirements of Conditions BB.4., GG.1 through GG.9 have been met.

{Permitting Note: Department determined that the requirements for exemption have been met by the facility as of 8/16/06. In accordance with this regulation, if the source is not in compliance with all requirements of 40 CFR 63, Subpart AA, the exemption from any otherwise applicable new source performance standard contained in 40 CFR Part 60, Subpart U is no longer valid.}
[40 CFR 63.610]

COMMON CONDITIONS - F.A.C. TEST REQUIREMENTS

BB.16. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection FF.

COMMON CONDITIONS – GENERAL PROVISIONS OF 40 CFR 63

BB.17. This emissions unit is also subject to the applicable requirements of 40 CFR 63 Subpart A.

Subsection CC. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
071	Acid Clarification Plant

Acid Clarification Plant utilizes a series of 5 rotary drum filters and a belt filter to filter 48% P_2O_5 phosphoric acid prior to evaporation to superphosphoric acid. Fluoride emissions are controlled by a packed, counter-current, wet scrubber. Since the Synspar Plant has no air emissions, the limerock (LR) bin associated with this emission unit is included here for recordkeeping purposes. The particulate matter emissions from this bin are controlled by a bag collector. CAM does not apply for fluoride for this emissions unit.

{Permitting note: This emissions unit is regulated under Best Available Control Technology (BACT) Determination, dated February 28, 1978}

The following specific conditions apply to the emissions unit(s) listed above:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

CC.1. Permitted Capacity. The rate shall not exceed Maximum Daily 1-Hour Average Rate = 110 tons 100% P_2O_5 input. The operating rate shall not exceed 876,000 tons during any 12 consecutive months of 100% P_2O_5 input.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC, and PSD-FL-297]

CC.2. Hours of Operation. The hours of operation for this emissions unit is allowed to operate continuously ~~shall not exceed~~ (8760 hours/year (8784 in any Leap Year).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and PSD-FL-297]

EMISSION LIMITATIONS AND STANDARDS

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

CC.3.a. Fluoride emissions shall not exceed (0.03 lb FL/ton P_2O_5 input) [1]; 3.3 lbs/hr and 13.1 TPY.

[Rule 62-210.200(42), F.A.C.; (BACT from AC24-2722 issued 02-28-78), and [1]PSD-FL-297]

From vent (LR):

CC.3.b. Visible Emissions. Visible Emissions shall not exceed 5% opacity.

[Rule 62-297.620(4), F.A.C.]

TEST METHODS AND PROCEDURES

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

CC.4.a. Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 06/17.

[Rule 62-297.401, F.A.C.]

From vent (LR):

CC.4.b. **Visible Emissions**. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually once each federal fiscal year.
[Rule 62-297.401, F.A.C. and Rule 62-297.310(7)(a)4.a., F.A.C.]

COMMON CONDITIONS - F.A.C. TEST REQUIREMENTS

CC.5. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection FF.

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix A, Glossary.
Appendix CAM, Compliance Assurance Monitoring Plan.
Appendix CP3, Compliance Plan.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix ICE, Requirements for Internal Combustion Engines.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, AA, BB, ZZZZ.
Appendix NSPS, Subpart A – General Provisions.
Appendix NSPS, Subpart T, U, V, JJJJ.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix U, List of Unregulated Emissions Units and/or Activities.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Figure 1, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance (40 CFR 60, July, 1996).
Table H, Permit History.
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.