

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



BOB GRAHAM  
GOVERNOR  
JACOB D. VARN  
SECRETARY

STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

July 7, 1980

Mr. J.R. Terry, Vice-President  
W.R. Grace and Company  
P.O. Box 471  
Bartow, Florida

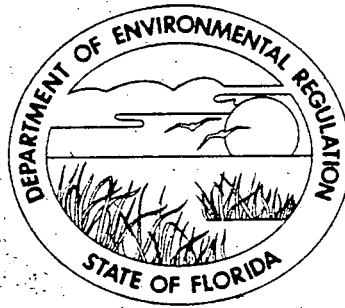
Dear Mr. Terry:

Enclosed is Permit Number AC 53-24460, dated July 3, 1980 to W.R. Grace and Company for a DAP Plant, Bartow, Polk County, issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

Mark G. Hodges,  
Environmental Scientist  
Bureau of Air Quality  
Management



STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL REGULATION

CONSTRUCTION  
PERMIT

NO. AC 53-24460

W. R. GRACE AND COMPANY  
DIAMMONIUM PHOSPHATE PLANT  
BARTOW, POLK COUNTY

DATE OF ISSUANCE

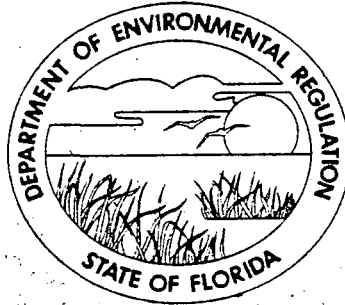
3 JULY 1980

DATE OF EXPIRATION

DECEMBER 31, 1982

*Jacob D. Varn*

JACOB D. VARN  
SECRETARY



STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL REGULATION

CONSTRUCTION  
PERMIT

NO. AC 53-24460

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DIAMMONIUM PHOSPHATE PLANT  
BARTOW, POLK COUNTY

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BOB GRAHAM  
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STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

July 1, 1980

Mr. J. R. Terry, Vice President  
W. R. Grace and Company  
P. O. Box 471  
Bartow, Florida

Dear Mr. Terry:

Enclosed is Permit Number AC 53-24460, dated July 1, 1980 to construct a 130 TPH Diammonium Phosphate Plant issued pursuant to Section Chapter 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

Steve Smallwood, Chief  
Bureau of Air Quality Management

cc: Mr. William Hennessey

Final Determination

W. R. Grace and Company

Polk County, Florida

Construction Permit

AC 53-24460

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

July 1, 1980

W. R. Grace and Company

Final Determination

W. R. Grace and Company's application for a permit to construct a diammonium phosphate plant in Polk County has been reviewed by the Bureau Of Air Quality Management. Public notice of the Department Intent to Issue was published in the Tampa Tribune on April 1, 1980 and, because of modifications to the proposed plant requested by the company that were incorporated into the proposed permit, again in the Lakeland Ledger on May 3, 1980. Copies of the preliminary determination have been available for public inspection at the Southwest District office in Tampa and at the Bureau Of Air Quality Management office in Tallahassee.

No comment from the public were received on either proposed permit. W. R. Grace requested the limit on maximum production rate to be increased and the limit on operation hours be eliminated. In response to their request, the permitted maximum production rate was increased from 115 to 130 TPH DAP and the limit on operation hours was replaced with a limit on annual DAP production.

As originally proposed in the permit to construct, hourly production and annual operation hours were limited. At the Company's request, these limits were modified to provide more operating flexibility. An annual production cap was added to limit overall emissions (permitted emissions are pounds of pollutant per ton of production) to the previously proposed values. Thus, the allowable emissions with these permit modifications are unchanged.

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STATE OF FLORIDA

## DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: W. R. Grace & Company  
P. O. Box 471  
Bartow, Florida 33830

PERMIT/CERTIFICATION  
NO. AC 58-24460

COUNTY: Polk County

PROJECT: DAP/Fertililzer Plan

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a diammonium phosphate plant to be located at the permittee's phosphate fertilizer complex north of State Road 60 west, Bartow, Florida. The latitude, longitude and UTM coordinates of the proposed plant are 27°54'13"N by 81°55'17"W and 409.290E, 3,086.960N respectively.

Construction shall be in accordance with the attached permit application, plans, documents and drawings except as otherwise noted in the following list of "Specific Conditions".

Attachments\* are as follows:

1. Application to Construct Air Pollution Sources, DER form 17-1.122(16) dated April 16, 1980.
2. Figure, Stack Test Faciliites.

\*Distributed March 27, 1980 with Technical Evaluation and Preliminary Determination.

### GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed

PERMIT NO.: AC 53-24460  
APPLICANT: W. R. Grace & Co.  
Bartow, Florida

on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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

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

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

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

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

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

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

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

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

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

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

13. This permit also constitutes:

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

SPECIFIC CONDITIONS:



PERMIT NO.: AC 53-24460  
APPLICANT: W. R. Grace & Company

Specific Conditions

1. The maximum production rate of the plant will be 130 TPH DAP (18-46-0) and the plant shall have a maximum production of 800,000 tons DAP per calendar year.
2. The allowable emissions from the 7 foot diameter, 132.5 foot high stack for the DAP plant will be:

Pollutant	Emission Rate lbs./TP <sub>2</sub> O <sub>5</sub> input	Maximum Emissions	
		lbs/hr	T/yr.
Particulate	0.5	29.9	98.0
Sulfur Dioxide	0.7	41.9	122.5
Fluoride	0.06	3.6	11.8

3. Fugitive particulate and fluoride emissions from the process, conveying and storage equipment will be controlled by sealing and/or venting all fumes from the equipment to pollution abatement devices.
4. No. 5 fuel oil used by the dryer shall not contain more than 2.4% sulfur.
5. Construction shall commence and be completed within a reasonable time based on the schedule given the application. Construction will reasonably conform to the plans submitted.
6. Reasonable precautions to prevent fugitive emissions during construction, such as coating or spraying roads and construction sites used by contractors with a liquid to prevent dust, will be taken by the permittee.
7. Semi-annual progress reports showing approximate percent completion of modifications and construction of new and affected existing facilities will be submitted to the Department until construction permit AC 53-24460 expires or

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APPLICANT: W. R. Grace and Company

is replaced by a permit to operate.

8. The permittee will install, calibrate, maintain, operate and record data from flow monitoring devices that can be used to determine total  $P_2O_5$  input to the plant.
9. The permittee will measure and record the pressure drop of the gas stream across each scrubber system. Pressure drop across the venturi scrubber must be at least 12 inches water during plant operations. The records will be maintained for 2 years and available for inspection by regulatory agency personnel on request.
10. Permittee shall submit a test plan for approval and notify the Bureau of Air Quality Management prior to any compliance testing of the facility. Upon demonstration of compliance with the operational limits of this permit the permittee shall submit a complete application for an operating permit to the Southwest District office. The application must be submitted at least 90 days before expiration of the construction permit. Permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.
11. DER will be notified 30 days in advance of the compliance test. The test procedures will be EPA reference methods 1, 2, 3, 4, 5, 6 and 13A or 13B as described in 40 CFR 60, Appendix A or any approved alternate test method. The test will be conducted with the plant operating at 130 TPH DAP (+10%) with the dryer burning fuel oil containing 2.4% sulfur ( $\pm 10\%$ ).
12. Periodic emissions tests or tests by the request of the Department at the sources expense will be a condition to any permit to operate. If the source can furnish a study on this source showing a high correlation (.95+) between the emission of any pollutant and plant operation parameters, the periodic emission test for that pollutant may be waived by the Department.
13. Stack sampling facilities will include the eyebolt and angle described in the attached sketch.

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APPLICANT: W. R. Grace and Company

14. The fertilizer plant 300-x(AO 53-25191) will be shut down before No. 3 DAP plant starts up. Fertilizer plants 300-y (AO 53-13210) will cease operations within 6 months after the no. 3 DAP plant start-up. Operation permits will be returned to DER within 10 days of the shut down of each plant.

Jacob D. Varn  
Jacob D. Varn  
Secretary

Expiration Date: December 31, 1982 ✓

Issued this 3<sup>rd</sup> day of July, 1980

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION