



Lawton Chiles
Governor

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To Cleve H.	From R. Smith		
Co./Dept.	Co.		
Phone #	Phone 804 448 4300 x237		
Fax # 292-0979	Fax #		

Virginia A. W...

NOTICE OF PERMIT

August 17, 1998

CERTIFIED-RETURN RECEIPT

Mr. P. Rodney Wilson, Executive Vice President
PCS Sales (USA), Inc.
5750 Old Orchard Road, Suite 440
Skokie, IL 60077

Dear Mr. Wilson:

Columbia County - AP
PCS Sales (USA), Inc.
Truck/Rail Transfer Terminal

Enclosed is Permit Number 0230041-001-AC to construct the subject air pollution emissions unit(s), issued pursuant to Section 403.087, Florida Statutes (FS).

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Dorothy Greenfield 8/20/98
Clerk Date

Christopher L. Kirts, P. E.
District Air Program Administrator

RFS
CLK:RFS

cc: John B. Koogler, Ph.D., P.E.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite 8200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

PERMITTEE:

PCS Sales (USA), Inc.
5750 Old Orchard Road, Suite 440
Skokie, IL 60077

I.D. Number: 0230041
Permit/Cert Number: 0230041-001-AC
Date of Issue: August 17, 1998
Expiration Date: February 17, 2001
County: Columbia
Latitude/Longitude: 30° 11' 42"N; 82° 34' 26"W
UTM: E-(17)348.5 N-3341.3
Project: Truck/Rail Transfer Terminal

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction of a truck/rail transfer terminal which consists of the following systems:

Molten Sulfur Storage and Handling System: Sulfur will be unloaded via rail car. A 55' x 35' sulfur pit will provide surge capacity as well as serve as a pumping stations for the loading and unloading operations. Sulfur will be loaded via a gangway and swinging boom type loading arm into trucks.

(2) 20.9 MMBTU/hr Boilers: Steam used to heat the sulfur storage tank, launders, and sulfur pit will be produced from two natural gas/ No. 2 fuel oil fired boilers. No. 6 fuel oil will be used during periods of curtailment of the other aforementioned fuels. One boiler will operate with the other on stand-by.

DAP Storage and Handling System: Diammonium phosphate (DAP) arrives from the plant in bottom unloading hopper trucks. The handling system has the capability of either unloading directly to the rail loading hopper or for storage in the warehouse. Dust is to be captured at all the conveyor and elevator transfer points, and material recovered by a bag dust collector.

Phosphoric Acid Storage & Handling System: Phosphoric acid trucks will unload either merchant grade acid or superphosphoric acid. The phosphoric acid storage tank vents to the atmosphere.

Emission Units are identified as follows:

Emissions Unit 001:	Molten Sulfur Storage and Handling System
Emissions Unit 002:	(2) 20.9 MMBTU/hr Boilers
Emissions Unit 003:	DAP Storage and handling system

The phosphoric acid storage and handling system is an insignificant source of emissions.

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Located Northwest of U.S. 90 and Still Road Intersection, Lake City, Columbia County, Florida.

In accordance with:

Application For Air Permit - Long Form received 02-25-98
Additional information received 04-06-98
BACT Determination dated 05-06-98

PERMITTEE:
 PCS Sales (USA), Inc.
 3750 Old Orchard Road, Suite 440
 Skokie, IL 60077

I.D. Number: 0230041
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 Date of Issue: August 17, 1998
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SPECIFIC CONDITIONS:

1. The I.D. No. and Project name for this source shall be used on all correspondence.
2. The maximum heat input and operating rates are listed below and shall not be exceeded without prior Department approval:

MATERIAL	RATE	TO
Natural Gas or No. 2 fuel Oil or No. 6 fuel Oil NOTES (1)(2)(3)	20.9 MMBTU/hr	Boiler No. 1 (Emissions Unit 002)
Natural Gas or No. 2 fuel Oil or No. 6 fuel Oil NOTES (1)(2)(3)	20.9 MMBTU/hr	Boiler No. 2 (Emissions Unit 002)
DAP	150 TPH	Emissions Unit 003
Sulfur	100 TPH	Emissions Unit 001

NOTE (1) Boiler Nos. 1 and No. 2 shall not operate at the same time. This shall be recorded.

NOTE (2) Sulfur content of No. 2 fuel oil shall not exceed 0.05 weight percent.

NOTE (3) No. 6 fuel oil is to be used only as a back-up fuel during periods of curtailment of natural gas and No. 2 fuel oil. The sulfur content of this oil shall not exceed 1.0 weight percent and the usage shall be limited to 400 hours per calendar year.

3. 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 impracticable 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. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
 [Rule 62-297.310(2)(b), F.A.C.]

4. The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	LOCATION I.D.	EMISSION RATE		FAC RULE
		LBS/HR	TPY	
Sulfur Dioxide	Facility-Wide	1.24	5.3	NOTE (1)
Particulate Matter	Boiler No. 1 NOTE (2)	0.3 NOTE (3)	1.3 NOTE (4)	62-296.406(2)

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SPECIFIC CONDITIONS:
 Specific Condition No. 4 Continued

POLLUTANT	LOCATION I.D.	EMISSION RATE		FAC RULE
		LBS/HR	TPY	
Sulfur Dioxide	Boiler No. 1 NOTE (2)	1.05 NOTE (5)	4.61 NOTE (4)	62-296.406(3)
Visible Emissions	Boiler No. 1 NOTE (2)	20% Opacity except 40% for no more than 2 min/hr		62-296.406(1)
Particulate Matter	Boiler No. 2 NOTE (2)	0.3 NOTE (3)	1.3 NOTE (4)	62-296.406(2)
Sulfur Dioxide	Boiler No. 2 NOTE (2)	1.05 NOTE (5)	4.61 NOTE (4)	62-296.406(3)
Visible Emissions	Boiler No. 2 NOTE (2)	20% Opacity except 40% for no more than 2 min/hr		62-296.406(1)
Visible Emissions	Emissions Unit 003	5% Opacity NOTE (6)		62-297.620(4)
Visible Emissions	Any emissions Point in Emissions Unit 001	≤ 20 % Opacity (six minute average)		62-296.411(1)(g)

- NOTE (1)** Facility-wide emissions cap requested by applicant.
NOTE (2) Boiler Nos. 1 and 2 shall not operate at the same time. This shall be recorded.
NOTE (3) Basis: 150 gallons burned /hr No. 2 fuel oil; 0.002 lb PM/gallon (AP-42 Factor).
NOTE (3) BACT Determination is dated 05-06-98 and limits the No. 2 Fuel Oil sulfur content to 0.05%, by weight.
NOTE (4) The maximum hours of operation of the No. 1 and No. 2 boilers combined shall not exceed 8760 H/Y except during a leap year where the hours shall not exceed 8784 H/Y.
NOTE (5) Basis: 0.05 wt.% sulfur (S) in F.O.; 0.142 x S lb SO₂ / gallon (AP-42 Factor); 150 gallons burned/hr No. 2 fuel oil.
NOTE (6) In lieu of annual compliance stack testing (EPA Method 5).

5. All molten sulfur transfer shall be through enclosed piping systems where feasible and practical. In user facilities, molten sulfur may be transferred by covered trench or a movable spout which is positioned over a receiving pit. Contact surfaces between movable unloading areas and stationary pipes shall seat effectively around the entire circumference to minimize spillage. [Rule 62-296.411(1)(a)]
6. All areas surrounding points where molten sulfur pipes are routinely disconnected and areas where molten sulfur is transferred to trucks or tailraces shall be paved and curbed within 20 feet of the point of disconnection or transfer to contain any spilled molten sulfur, or shall be provided with noncorrosible drip pans or other secondary containment, positioned to collect spill, that are adequate to contain amounts of sulfur that may escape during routine disconnection, reconnection or operation of the piping system. [Rule 62-296.411(1)(b)]

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SPECIFIC CONDITIONS:

7. All spilled molten sulfur shall be collected and properly disposed of whenever the containment area is filled to one-half its containment capacity, or monthly, whichever is more frequent. Spills of molten sulfur outside of a containment area, or where subject to vehicular traffic, shall be collected and disposed of as soon as possible, but no later than 24 hours after the spill occurs. Drip pans or other secondary containment shall be cleaned as needed to prevent exceedance of capacity, but at least weekly. [Rule 62-296.411(1)(d)]
8. All vent surfaces shall be cleaned monthly to remove captured particles. [Rule 62-296.411(1)(e)]
9. All owners and operators of molten sulfur storage and handling facilities shall maintain records of spills outside of containment areas and of collection and disposal of spilled sulfur. Such records shall be retained for a minimum of two years and shall be available for inspection by the Department upon request. [Rule 62-296.411(1)(f), F.A.C.]
10. Approved operational procedures, by the Department, shall be established to minimize spills from any moveable loading arm or pipe upon disconnection, reconnection or operation. [62-296.411(h)]
11. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility are stated as follows:
 - a. Paving and maintenance of roads, parking areas and yards.
 - b. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - c. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - d. Landscaping or planting of vegetation.
 - e. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - f. Enclosure or covering of conveyor systems.
12. Test the emissions for the following pollutant(s) within 45 days after startup, notify the Department 15 days prior to testing [FAC Rules 297.310(7)(a)1 and 297.310(7)(a)9], and submit the test report documentation to the Department with the operation permit application within 45 days after completion of the testing [FAC Rule 297-310(8)(b)].

EMISSIONS UNIT	POLLUTANT	TEST METHOD
002 NOTE (1)	Visible Emissions	EPA 9
002 NOTE (1)	Sulfur Dioxide	NOTE (2)
003	Visible Emissions	EPA 9

NOTE (1) Test required for each boiler (No. 1 and No. 2)while firing fuel oil.

NOTE (2) In lieu of a sulfur dioxide test, a certified ASTM fuel oil analysis shall be conducted to determine the weight percent of sulfur and the fuel oil heat content. The report shall include the certified ASTM analysis and the sulfur dioxide emission calculations (A copy of a certified ASTM fuel oil analysis of the oil delivered is acceptable).

Tests and test reports shall comply with the requirements of FAC Rules 62-297.310(8) and 62-297.401, respectively.

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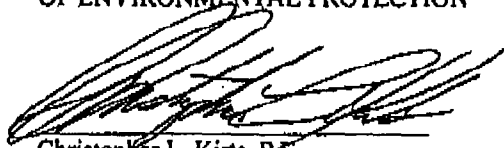
SPECIFIC CONDITIONS:

13. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
14. 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 may 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. [Rule 62-297.310(7)(b), F.A.C., Special Compliance Test]
15. Compliance with the sulfur dioxide emissions cap shall be determined from the sulfur dioxide emissions calculations for Emissions Unit 001 and 002. A copy of this calculation shall be submitted with the compliance report required in Specific Condition 12.
16. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is 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), F.A.C., Objectionable Odor Prohibited; and, Rule 62-210.200(200), F.A.C., Definitions-Objectionable Odor]
17. The facility hours of operation are not restricted - 24 H/D; 7 D/W; 52 W/Y (8760 H/Y except 8784 H/Y during a leap year).
18. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.
19. A completed Application for Air Permit - Short Form with the compliance report is due 60 days prior to the expiration date of this permit.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52 Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.
Dorothy Benefield 8/20/98
Clerk Date


Christopher L. Kirts, P.E.
District Air Program Administrator