

Sheplak, Scott

From: Sheplak, Scott
Sent: Friday, April 10, 2009 10:17 AM
To: 'Iyer, Rama - Pierce'
Cc: dbuff@golder.com; Jagiella, Diana - Plymouth; Arif, Syed; Moore, Ronni
Subject: RE: Riverview Bart

That is good news!

You need to withdraw the extension of time prior to us being able to issue the final permit. Mr. Robert Manning should know how that's done. Please copy me on the withdrawal, then we will route the permit for signature/final issuance.

Have a Good Friday all!

-----Original Message-----

From: Iyer, Rama - Pierce [mailto:Rama.Iyer@mosaicco.com]
Sent: Friday, April 10, 2009 9:50 AM
To: Sheplak, Scott
Cc: dbuff@golder.com; Jagiella, Diana - Plymouth
Subject: Riverview Bart

Scott,

As David Buff has sent you his comments and we have agreed on all items based on our last teleconference and Diana Jagiella does not appear to have any emial comments, please take this email as the go ahead to finalize the permit incorporating all that was discussed and finalized at the last teleconference.

Thanks and have a good Friday and weekend!

Rama

Sheplak, Scott

From: Sheplak, Scott
Sent: Wednesday, April 08, 2009 4:19 PM
To: Moore, Ronni; Arif, Syed
Subject: FW: Mosaic-Riverview, escape BART
Attachments: 0570008-061-AC BART Exemption - draft of final determination 04 08 2009.doc;
0570008-061-AC BART Exemption - draft of final permit 04 08 2009.doc

fyi

From: Sheplak, Scott
Sent: Wednesday, April 08, 2009 4:13 PM
To: 'Iyer, Rama - Pierce'
Cc: 'Stewart, Jeff M - Riverview'; 'Jagiella, Diana - Plymouth'
Subject: Mosaic-Riverview, escape BART

Subsequent to our teleconference discussion of this a.m., please find attached to this e-mail updated responses to comments overviewed in what we refer to as the "Final Determination" along with the associated draft "Final permit" which reflects the proposed changes.

These two documents should contain what we agreed to this a.m. Please review and get back to us.

A very productive teleconference this a.m. in my opinion!

4/8/2009

FINAL DETERMINATION

~ FOR SETTLEMENT DISCUSSION PURPOSES ~

version dated April 8, 2009

PERMITTEE

Mosaic Fertilizer, LLC
8813 U.S. Highway 41 South
Riverview, FL 33569

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, Title V Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0570008-061-AC
Riverview Facility

This project is for a minor source air construction (AC) permit for the Riverview Facility to escape a BART determination pursuant to Rule 62-296.340(5)(c), F.A.C.

Specifically, the permit requires: (1) federally enforceable reductions of SO₂ and SAM emissions to bring this facility's visibility impact to below the 0.5 deciview (dv) threshold allowing the facility to escape a BART determination pursuant to Rule 62-296.340(5)(c), F.A.C. {SO₂ emission limits from SAP Nos. 7, 8 & 9 are reduced to equivalent 3.0 lb SO₂/ton 100% H₂SO₄, 2.8 lb SO₂/ton 100% H₂SO₄, and, 3.0 lb SO₂/ton 100% H₂SO₄, respectively. SAM emission limits from SAP Nos. 7, 8 & 9 are reduced to equivalent 0.05 lb SAM/ton 100% H₂SO₄}; (2) each sulfuric acid plant (SAP) to demonstrate compliance with the SO₂ standards and limitations on a continuous basis using CEMS data on a 24-hour (daily) block average; (3) the use of the existing control technology - the double absorption system with increased catalyst loading, replacement of indicated process equipment, and the use of existing acid mist demister pads for SAP Nos. 7, 8 & 9; and, (4) the permittee to follow best operational practices to minimize excess emissions from each SAP.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Draft Permit and the TE&PD for BART exemption issued (clerked) on March 3, 2009.

Public Notice published on March 10, 2009.

Applicant filed an extension in which to file a petition for an administrative hearing on March 13, 2009.

Comments dated March 23, 2009 from Mosaic, received on March 24, 2009.

DEP Order granting request for extension of time up to May 12, 2009, clerked on March 31, 2009.

Proof of Publication of Public Notice received on April 2, 2009.

NOTICE AND PUBLICATION

The Department distributed a Written Notice of Intent to Issue Permit package on March 3, 2009. The applicant published the Public Notice of Intent to Issue in the Tampa Tribune on March 10, 2009. The permitting authority received the proof of publication on April 2, 2009.

COMMENTS

Comments on the Draft Permit were received from the applicant.

Applicant

FINAL DETERMINATION

On March 24, 2009, the Department received comments dated March 23, 2009 from Golder Associates Inc. on behalf of Mosaic Fertilizer, LLC (Mosaic), the applicant. The following summarizes the comments verbatim and the Department's response to each comment.

Additions to the permit are indicated below by a double underline. Deletions from the permit are indicated below by a ~~strike through~~.

Air Construction Permit

1. Page 6, Condition 1: The current TV permit is permit No. 0570008-051-AV.

Response: The referenced Title V air operation permit, permit No. 0570008-045-AV, is the 5-year permit which expires May 31, 2011. As indicated, a more recent Title V air operation permit was issued on October 27, 2008, permit No. 0570008-051-AV. This permit also includes emission unit identification numbers (EU ID Nos.) -022, -023 & -024, the Nos. 3 & 4 MAP Plant and the South Cooler.

The permit and effective date cited in specific condition 3.A.1. are changed to read as follows:

1. Permanent Shutdown: The permittee permanently shutdown the Nos. 3 & 4 MAP Plant and the South Cooler (Emission unit identification numbers (EU ID Nos.) -022, -023 & -024) in September 2004. These emissions units are included in the current Title V air operation permit, Permit Number 00570008-045-051-AV, effective ~~May 31, 2006~~October 27, 2008. As part of this BART exemption determination, these units are not allowed to operate. These units were not included in the applicant's BART analysis. Since these units are deemed to be permanently shutdown, a BART analysis was not required for these units. If any of these units resume operations a BART analysis shall be performed as though they had not been shutdown. Other preconstruction review requirements may apply. [Rule 62-296.340(5)(c) (escape BART), F.A.C. and Applicant's Request dated January 31, 2007]
2. Page 8 of 13: Under descriptions for the EUs, the current catalyst loadings for No. 7 SAP do not correspond to the BART exemption application, which shows 102,000 liters in the 1st pass, 112,000 liters in the 2nd pass, 155,000 liters in the 3rd pass, and 209,000 liters in the 4th pass, for a total of 578,000 liters. Also, in the paragraph under Stack Parameters, the second sentence should read "SAP Nos. 7, 8, and 9" (SAP No. 7 is left out).

Response: As indicated, the BART exemption application on page 5 of the BART Exemption Analysis document does indicate the total catalyst to be 578,000 liters. Thank you for the individual breakdowns of the catalyst beds. Previous information on file had been slightly different. The second sentence in the paragraph under Stack Parameters should read "SAP Nos. 7, 8, and 9." The requested changes are made.

The emissions unit description on page 8 of Section 3.C. is changed to read as follows:

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EU ID No.	Emissions Unit Description
-004	No. 7 Sulfuric Acid Plant
-005	No. 8 Sulfuric Acid Plant
-006	No. 9 Sulfuric Acid Plant
...	...
	<p><i>Air pollution control systems and measures:</i> The control of SO₂ emissions is by the process itself primarily. Currently, a double conversion, double absorption plant efficiently converts SO₂ to SO₃, then SO₃ reacts in a mixture of water and sulfuric acid to produce sulfuric acid. In a double absorption system, the conversion efficiency from SO₂ to SO₃ is at least 99.7%. All three plants use a vanadium catalyst in the converters except that in the 4th pass of the SAP Nos. 9 a cesium promoted catalyst is used. The current catalyst bed volumes in the No. 7 SAP are 112,000102,000 liters in the 1st pass, 154,000112,000 liters in the 2nd pass, 154,000155,000 liters in the 3rd pass, and 208,000209,000 liters in the 4th pass; for a total of 628,000578,000 liters. The current total catalyst volume in the No. 8 SAP is 472,000 liters. The current total catalyst volume in the No. 9 SAP is 508,000 liters. Sulfuric acid mist (SAM) emissions are controlled by the use of high efficiency acid mist eliminators (demister pads) or impaction-type glass fiber collection devices. Best operational practices are followed to minimize excess emissions during startup and shutdown.</p> <p>...</p>
	<p><i>Stack Parameters:</i> Emissions not absorbed by each double absorption system are vented through each individual SAP's 150 foot stack. The stack exhaust gas characteristics for SAP Nos. <u>7</u>, 8 and 9 are: exhaust gas temperatures of 170, 150, & 152 °F; exhaust gas flow rates 122,000, 105,000, & 149,000 acfm; and, stack diameters of 7.5, 8.0, & 9.0 feet.</p>

3. Page 9, Condition 5: Condition 5 references that future catalyst loadings should be stated as “approximately”, per the BART exemption application. The permit should also allow higher catalyst loadings if these are necessary in order to meet the BART emission limits.

Response: The Department relied upon the study by the catalyst supplier for reasonable assurances of compliance (Rule 62-4.070(1)&(3), F.A.C. - Reasonable Assurance) with the reduced SO₂ and SAM emission limits. Specific condition number 3.C.6. requires the permittee to use the specific catalyst loadings & types as cited in the study by the permittee’s catalyst supplier in Appendix C of the Application. Requests for other specific catalyst loadings & types must be submitted in writing to the Bureau for review and approval prior to use. The permit allows higher catalyst loadings if they are necessary in order to meet the BART SO₂ emission limits.

Specific condition number 3.C.5. of the permit is clarified as follows:

5. Proposed Work: The applicant is required to perform the following specific work activities under this project in order to escape BART:

SAP No.	Work Activities
7	<ul style="list-style-type: none"> • Increase the catalyst loading ratio from <u>approximately</u> 181 liters per ton H₂SO₄ per day (L/TPD) to <u>approximately</u> 202 L/TPD {increases the current catalyst loading from <u>approximately</u> 578,000 liters to <u>approximately</u> 647,000 liters}; and,

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8	<ul style="list-style-type: none"> • Replace the cold gas-to-gas heat exchanger. • Increase the catalyst loading ratio from <u>approximately</u> 175 L/TPD to <u>approximately</u> 213 L/TPD {increases the current catalyst loading from approximately 472,000 liters to <u>approximately</u> 575,000 liters. The 468,000 liters cited in the study was with the existing converter}; • Replace the cold gas-to-gas heat exchanger; • Replace the superheater; and, • Replace the converter with a larger one. <p>Note: These work activities are permitted under Permit No. 0570008-060-AC.</p>
9	<ul style="list-style-type: none"> • Increase the catalyst loading ratio from <u>approximately</u> 149 L/TPD to <u>approximately</u> 195 L/TPD {increases the current catalyst loading from approximately 508,000 liters to <u>approximately</u> 663,000 liters}; and, • Install a heat recovery system (HRS) to replace the interpass absorption (IPA) tower.

Additional catalyst may be added as necessary in order to meet the BART SO₂ emission limits. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rules 62-4.160(2) and 62-4.070(1)&(3) (Reasonable Assurance), and, Proposed by the Applicant in the Application]

4. Page 10, Condition 6: The wording of this condition does not necessarily have to be changed, but Mosaic would like to clarify that this condition does not mean that a specific supplier (i.e., Haldor Topsoe) must be used unless written approval is obtained from FDEP. A specific catalyst supplier should not be specified in the permit. The condition should only refer to the specific catalyst loadings and type of catalyst (i.e., vanadium or cesium-enhanced catalyst).

Response: That is correct; a specific catalyst supplier is not specified in the permit.

As previously mentioned, specific condition number 3.C.6. does require the permittee to use the specific catalyst loadings & types as cited in the study by the permittee's catalyst supplier in Appendix C of the Application. Note, the study did cite in addition to the chemical composition of the catalyst, e.g., vanadium, the size e.g., 12-millimeter (mm), and shape, e.g., daisy, of the specified catalyst. The size and shape of the catalyst affect the performance of the catalyst. Any deviations from the catalyst type described in the study need to be submitted to the Bureau for review and approval prior to use. If another catalyst supplier is used a written guarantee along with the catalyst product literature will need to be submitted showing that the SO₂ emission limits specified in the permit will be met. No change to the permit is made.

5. Page 10, Conditions 9 and 10: It should be clarified that the 24-hour (daily) block average can start and end at a time selected by the permittee (i.e., the block does not have to be from midnight to midnight; another 24-hour block, i.e., 6 am to 6 am, may be selected).

Response: The current BACTs from the PSD permits, PSD-FL-250 (specific conditions 3. and 11.) and PSD-FL-315 (specific conditions 4. and 9.), specify 24-hour "daily" and "block" averages respectively for SO₂ emissions. Both permits do specify that SO₂ emissions are to be calculated on an "operating day" (see specific condition 11. of PSD-FL-250 and specific condition 9. of PSD-FL-315). For consistency with the BACTs, the averaging period must be calculated in the same fashion. No change is made to the permit.

6. Page 12, Condition 19: It should be clarified that the final compliance date for complying with the sulfur dioxide (SO₂), sulfuric acid mist (SAM), and visible emission limits is June 30, 2013, coinciding with the permit expiration date. Condition C.19 states that the new SAM limits must be

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met by April 1, 2012 (since initial compliance testing must be conducted); Condition C.21 states that all construction must be completed by December 31, 2012; and Condition C.9 states that the permittee must comply with the new SO₂ limit using continuous emission monitoring systems, but it does not state when. The compliance deadline should be after all construction is complete. Therefore, it is suggested that the initial compliance testing, completion of construction, and compliance with the new limits all be specified as June 30, 2013, which is when the construction permit expires.

Response: The April 1, 2012 date had been fixed to ensure a test would be performed and the test results would be submitted well in advance of the permit's expiration date. The permit expiration date was established with a six (6) month buffer before the BART compliance deadline of December 31, 2013. Completion of the compliance test and submittal of the test results two (2) months prior to the permit expiration date encompasses the 45 day test report submittal requirement. An initial compliance test date of April 30, 2013 {June 30, 2013 - 2 months} should provide sufficient time for completion of testing and submittal of the test results prior to the expiration date of the permit.

The initial compliance test date contained in specific condition number 3.C.19. is changed from April 1, 2012 to April 30, 2013 as indicated below:

19. Compliance Test Schedule: In accordance with the following schedule, the permittee shall have stack tests conducted to demonstrate compliance with the emissions standards specified in this permit.
- a. *Initial Test:* On or before April 30, 2013, an initial test shall be conducted for SAM emissions from each SAP {October 1, 2012 - 6 months. October 1, 2012 being the start of the federal fiscal year in which the expiration date of this permit falls within June 30, 2013 - 2 months.}. The initial compliance test report for SAM shall be submitted within 45 days of completion of testing. [Rules 62-296.340(5)(c) (escape BART) and 62-297.310(7)(a)1, F.A.C.]

...

7. Page 13, Condition 21. There is no date specified for when the Construction Plan has to be submitted. Also, it is not specified when exactly the Progress Reports are due each year.

Response: To avoid confusion, specific condition number 3.C.21. is changed to read as follows:

21. Construction Plan & Progress Reports: The permittee shall submit a Construction Plan within sixty (60) days of the effective date of this permit which shall contain the necessary milestones to comply with this permit. The Plan shall include at a minimum the necessary actions and corresponding scheduled due dates to complete those actions to comply with this permit.
- a. The permittee shall submit progress reports based on the anniversary date (one year from the effective date) of this permit regarding the status of the milestones in the Construction Plan to the Department and to the Compliance Authority, no less than annually in 2009 - 2013.
- b. The permittee shall complete all required construction & modifications no later than December 31, 2012 {June 30, 2013 {6 months prior to the expiration date of this permit, June 30, 2013 - 6 months}}.

[Rules 62-296.340(5)(c) (escape BART), 62-4.070(1)&(3) (Reasonable Assurance), and 62-213.440(1) (Assurance of Compliance), F.A.C.]

8. And as discussed previously, Condition 19 requires that SAM testing be performed prior to April 12, 2012, which would require construction to be completed in order to do the testing, but Condition 21.b requires completion of construction by December 31, 2012. These need to be reconciled. It is suggested all these dates be stated as June 30, 2013.

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Response: To avoid confusion, specific condition number 3.C.21. is changed to read as follows:

21. Construction Plan & Progress Reports: The permittee shall submit a Construction Plan which shall contain the necessary milestones to comply with this permit. The Plan shall include at a minimum the necessary actions and corresponding scheduled due dates to complete those actions to comply with this permit.
 - a. The permittee shall submit progress reports regarding the status of the milestones in the Construction Plan to the Department and to the Compliance Authority, no less than annually in 2009 - 2013.
 - b. The permittee shall complete all required construction & modifications no later than ~~December 31, 2012~~ June 30, 2013 ~~{6 months prior to the expiration date of this permit, June 30, 2013 - 6 months}~~.
- [Rules 62-296.340(5)(c) (escape BART), 62-4.070(1)&(3) (Reasonable Assurance), and 62-213.440(1) (Assurance of Compliance), F.A.C.]

DEPARTMENT INITIATED CHANGES

Changes initiated by the Department were made in this final permit.

Air Construction Permit

The applicant had previously notified the Department of the specific chemical composition of the catalysts in each SAP, i.e., vanadium and/or cesium. As indicated by the applicant, SAP No. 9 has cesium promoted catalyst in the 4th bed. The emissions unit description for the SAP Nos. 7, 8 & 9 reflects this, however, specific condition number 3.C.4. did not recognize the cesium catalyst currently in use.

To recognize the current cesium catalyst in use, specific condition number 3.C.4. is clarified to read as follows:

4. SO₂ Controls: This BART exemption determination ~~does~~ require new, modified or additional air pollution control systems for SO₂. To control emissions of sulfur dioxide (SO₂) from each SAP, the permittee shall continue the use of the existing double absorption system technology with vanadium and/or cesium catalyst in the converters and the use of good combustion practices & best operational practices to minimize excess emissions during startup and shutdown. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rule 62-210.700(1), F.A.C.; and, Proposed by the Applicant in the Application]

CONCLUSION

The final action of the Department is to issue the permit with the minor revisions, corrections, and clarifications as described above.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

~ FOR SETTLEMENT DISCUSSION PURPOSES ~
version dated April 8, 2009

PERMITTEE

Mosaic Fertilizer, LLC
8813 U.S. Highway 41 South
Riverview, FL 33569

Authorized Representative:
Mr. Alan Lulf, Plant Manager

Air Permit No. 0570008-061-AC Expiration Date: June 30, 2013 Riverview Facility BART Exemption Project

PLANT AND LOCATION

The Mosaic Fertilizer, LLC operates the Riverview Facility, which is located at 8813 U.S. Highway 41 South, Riverview in Hillsborough County, Florida. The facility is an existing phosphate fertilizer manufacturer, which is identified by Standard Industrial Classification (SIC) code No. 2874.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). Pursuant to Rule 62-296.340(5)(c) (escape BART), F.A.C., the permittee shall install the air pollution control equipment and/or implement the air pollution control measures that are specified by this permit to be exempt from a Best Available Retrofit Technology (BART) determination.

EFFECTIVE DATE

Unless otherwise specified by this permit, the affected emissions units shall comply with the conditions of this permit as expeditiously as practicable, but not later than the expiration date of this permit. [Rule 62-296.340(3)(b)2., F.A.C.]

Executed in Tallahassee, Florida

Joseph Kahn, Director
Division of Air Resource Management

Effective Date

JK/tlv/jkh/sms

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

This facility consists of several industrial processes that convert insoluble rock containing phosphorus ore into a soluble form suitable for agricultural use. The processes consist of a molten sulfur storage & handling system, one material handling system, three (3) sulfuric acid plants, one (1) phosphoric acid plant (two trains), two (2) diammonium phosphate (DAP) plants, two (2) monoammonium phosphate (MAP) plants, one auxiliary boiler, and two (2) animal feed plants.

FACILITY REGULATORY CLASSIFICATIONS

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate emissions units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source pursuant to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

AFFECTED EMISSIONS UNITS

This permitting action affects the following emissions units at the plant:

EU ID No.	Brief Description
-022	No. 3 MAP Plant
-023	No. 4 MAP Plant
-024	South Cooler
-063	Molten Sulfur Storage and Handling System -- Storage Tank Nos. 1, 2 and 3
-066	Molten Sulfur Storage and Handling System -- Storage Pit No. 7
-067	Molten Sulfur Storage and Handling System -- Storage Pit No. 8
-068	Molten Sulfur Storage and Handling System -- Storage Pit No. 9
-004	No. 7 Sulfuric Acid Plant
-005	No. 8 Sulfuric Acid Plant
-006	No. 9 Sulfuric Acid Plant

SECTION 1. GENERAL INFORMATION

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Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Units Specific Conditions

Section 4. Appendices

Appendix A. Citation Formats

Appendix B. General Conditions

Appendix C. Standard Testing Requirements

Appendix D. Memorandum of Understanding Regarding Best Operational Start-up Practices for Sulfuric Acid Plants

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SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The **Permitting Authority for this project is the Bureau of Air Regulation** in the Division of Air Resource Management of the Florida Department of Environmental Protection. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.
 2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the **Compliance Authority, the Environmental Protection Commission of Hillsborough County (EPCHC)**. The Compliance Authority's mailing address is:

Environmental Protection Commission Hillsborough County
3629 Queen Palm Drive
Tampa, Florida 33619
Telephone: 813/627-2600, Fax: 813/627-2660
 3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats); Appendix B (General Conditions); Appendix C (Standard Testing Requirements); and, Appendix D (Memorandum of Understanding Regarding Best Operational Start-up Practices for Sulfuric Acid Plants).
 4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to the applicable provisions of: Chapter 403, F.S.; Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.; and the applicable parts and subparts of Title 40, Code of Federal Regulations (CFR). Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
 5. Title V Air Operation Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the **Permitting Authority, the Florida Department of Environmental Protection, Southwest District Office which is different from the Office cited in Condition No. 1** with copies to the Compliance Authority. The mailing address for the Southwest District Office is:

Florida Department of Environmental Protection Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813/632-7600, Fax: 813/744-6458
- [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]
6. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 (five) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2., F.A.C.]
 7. Annual Operating Report (AOR): 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 May 1, 2009 and April 1st of each year, thereafter. [Rule 62-210.370(3), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

NEW & PREVIOUS PERMIT SPECIFIC CONDITIONS

8. Pursuant to Rule 62-296.340(5)(c) (escape BART), F.A.C., the specific terms and conditions of this permit are required in order to escape a Best Available Retrofit Technology Determination. These specific terms and conditions apply to each emissions unit and are in addition to any other applicable standards. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Proposed by the Applicant in the Application; and, Rules 62-4.070(1)&(3) (Reasonable Assurance), and 62-213.440(1) (Assurance of Compliance), F.A.C.]
9. A relaxation of the specific terms and conditions of this permit may subject the facility to a BART determination. Any request to change the specific terms and conditions of this permit must be submitted to the Bureau of Air Regulation in the Division of Air Resource Management of the Florida Department of Environmental Protection. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; and, Rules 62-4.070(1)&(3) (Reasonable Assurance), and 62-213.440(1) (Assurance of Compliance), F.A.C.]
10. Some of the proposed work under this project to escape a BART determination is also permitted under a PSD avoidance permit, Permit No. 0570008-060-AC. A relaxation of the specific terms and conditions of this permit may subject the facility to a BART and/or a BACT determination. A copy of any request to change the specific terms and conditions of Permit No. 0570008-060-AC must be submitted to the Bureau of Air Regulation in the Division of Air Resource Management of the Florida Department of Environmental Protection. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; and, Rules 62-4.070(1)&(3) (Reasonable Assurance), and 62-213.440(1) (Assurance of Compliance), F.A.C.]
11. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining the appropriate air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
12. Source Obligation:
 - (a) Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit. [Rule 62-212.400(12)(a), F.A.C.]
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12)(b), F.A.C.]
 - (c) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12)(c), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. No. 3 MAP Plant, No. 4 MAP Plant, South Cooler (EU-022, -023, -024)

This subsection addresses the following affected emissions units:

EU ID No.	Emissions Unit Description
-022	No. 3 MAP Plant
-023	No. 4 MAP Plant
-024	South Cooler

PERMANENTLY SHUTDOWN EMISSIONS UNITS

1. Permanent Shutdown: The permittee permanently shutdown the Nos. 3 & 4 MAP Plant and the South Cooler (Emission unit identification numbers (EU ID Nos.) -022, -023 & -024) in September 2004. These emissions units are included in the current Title V air operation permit, Permit Number 00570008-051-AV, effective October 27, 2008. As part of this BART exemption determination, these units are not allowed to operate. These units were not included in the applicant's BART analysis. Since these units are deemed to be permanently shutdown, a BART analysis was not required for these units. If any of these units resume operations a BART analysis shall be performed as though they had not been shutdown. Other preconstruction review requirements may apply. [Rule 62-296.340(5)(c) (escape BART), F.A.C. and Applicant's Request dated January 31, 2007]
2. Notification of Removal: The permittee shall notify the Department's Bureau of Air Regulation, SWD Office and the Compliance Authority upon the physical removal of these emissions units from on-site. [Rule 62-296.340(5)(c) (escape BART), F.A.C. and Applicant's Request dated January 31, 2007]

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SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Molten Sulfur Storage and Handling System -- Storage Tank Nos. 1, 2 & 3 (EU-063) and Storage Pit Nos. 7, 8, and 9 (EU-066, -067, -068)

EU ID No.	Emissions Unit Description
-063	Molten Sulfur Storage and Handling System -- Storage Tank Nos. 1, 2 and 3
-066	Molten Sulfur Storage and Handling System -- Storage Pit No. 7
-067	Molten Sulfur Storage and Handling System -- Storage Pit No. 8
-068	Molten Sulfur Storage and Handling System -- Storage Pit No. 9
	<p><i>Descriptions:</i></p> <p>The Molten Sulfur Storage and Handling System consists of storage tank nos. 1, 2 and 3 (capacity of 19,845 tons each), covered storage pit nos. 7, 8 and 9 (capacity of 127 tons, 127 tons, and 160 tons respectively), a ship unloading dock, truck loading station and associated transfer pumps and piping for storage and handling of molten sulfur.</p> <p>Molten sulfur from ships may be transferred to any combination of the three molten sulfur storage tanks at a combined maximum total of 2,277,081 tons of molten sulfur per any consecutive 12-month period. These tanks then transfer molten sulfur to the molten sulfur storage pits at the sulfuric acid plants (SAPs) and also to the molten sulfur truck loading station.</p> <p>The three molten sulfur storage pits are located at the three sulfuric acid plants. The pits receive molten sulfur from the molten sulfur storage tanks and/or by truck. Each of the storage pits may receive molten sulfur at a constant rate of 336 tons per hour. Each storage pit is allowed to transfer molten sulfur to each SAP at a maximum throughput rate of 492,361 tons per consecutive 12-month period.</p> <p>Initial construction of the three molten sulfur storage tanks and three molten sulfur storage pits was before August 7, 1977.</p> <p><i>Air Pollution Control Systems and Measures:</i> A wet scrubber is currently used to control particulate matter (PM) emissions from the molten sulfur storage tank nos. 1, 2 and 3 as well as the truck loading station. Emissions from loading the three molten sulfur storage pits are uncontrolled, although they are equipped with covers.</p> <p><i>Monitoring:</i> The scrubber pressure drop and liquid flow rate are recorded once every 8-hour shift.</p>

{Permitting notes: These emissions units are currently regulated under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) PSD-FL-315/0570008-036-AC; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards; and Rule 62-296.411, F.A.C., Sulfur Storage and Handling Facilities.}

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Molten sulfur from ships may be transferred to any combination of the three molten sulfur storage tanks at a combined maximum total not to exceed 2,277,081 tons of molten sulfur per any consecutive 12-month period. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rules 62-4.160(2) and 62-4.070(1)&(3) (Reasonable Assurance), and, Proposed by the Applicant in the Application]
2. Each storage pit is allowed to transfer molten sulfur to each SAP at a maximum throughput rate of 492,361 tons per consecutive 12-month period. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rules 62-4.160(2) and 62-4.070(1)&(3) (Reasonable Assurance), and, Proposed by the Applicant in the Application]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Nos. 7, 8 and 9 Sulfuric Acid Plants (EU-004, -005, -006)

This subsection addresses the following affected emissions units:

EU ID No.	Emissions Unit Description
-004	No. 7 Sulfuric Acid Plant
-005	No. 8 Sulfuric Acid Plant
-006	No. 9 Sulfuric Acid Plant
<p><i>Descriptions:</i></p> <p>Sulfuric Acid Plants (SAPs) No. 7, No. 8, and No. 9 have a design capacity of 3,200 tons per day (TPD), 2,700 TPD, and 3,400 TPD of 100% sulfuric acid, respectively. Each SAP recovers a portion of the waste heat (steam) for process use and to generate electricity. Waste heat recovery reduces plume visibility. There are two electrical generators at each SAP, rated at 35 kilowatts (kW) and 36 kW for a total of 71 kW. These plants are sulfur burning, double conversion, double absorption plants of Leonard-Monsanto design. Sulfur is burned with dried atmosphere oxygen to produce sulfur dioxide (SO₂). The sulfur dioxide is catalytically oxidized to sulfur trioxide (SO₃) over a catalyst bed. The sulfur trioxide is then absorbed in sulfuric acid. The remaining sulfur dioxide, not previously oxidized, is passed over a final converter bed of catalyst and the sulfur trioxide produced is then absorbed in sulfuric acid. SAP Nos. 7, 8 and 9 began operating in 1961, 1965, 1974, respectively.</p> <p><i>Air pollution control systems and measures:</i> The control of SO₂ emissions is by the process itself primarily. Currently, a double conversion, double absorption plant efficiently converts SO₂ to SO₃, then SO₃ reacts in a mixture of water and sulfuric acid to produce sulfuric acid. In a double absorption system, the conversion efficiency from SO₂ to SO₃ is at least 99.7%. All three plants use a vanadium catalyst in the converters except that in the 4th pass of the SAP Nos. 9 a cesium promoted catalyst is used. The current catalyst bed volumes in the No. 7 SAP are 102,000 liters in the 1st pass, 112,000 liters in the 2nd pass, 155,000 liters in the 3rd pass, and 209,000 liters in the 4th pass; for a total of 578,000 liters. The current total catalyst volume in the No. 8 SAP is 472,000 liters. The current total catalyst volume in the No. 9 SAP is 508,000 liters. Sulfuric acid mist (SAM) emissions are controlled by the use of high efficiency acid mist eliminators (demister pads) or impaction-type glass fiber collection devices. Best operational practices are followed to minimize excess emissions during startup and shutdown.</p> <p><i>Monitors:</i> Each SAP is equipped with an existing SO₂ continuous emissions monitoring system (CEMS). The SO₂ CEMS have been required by the circa 1977 Standards of Performance for New Stationary Sources (NSPS). The CEMS installed for SAP No. 7 is an Ametek Model 4600B. SAP Nos. 8 and 9 each have an Ametek/Dupont Model 40/460 CEMS.</p> <p><i>Stack Parameters:</i> Emissions not absorbed by each double absorption system are vented through each individual SAP's 150 foot stack. The stack exhaust gas characteristics for SAP Nos. 7, 8 and 9 are: exhaust gas temperatures of 170, 150, & 152 °F; exhaust gas flow rates 122,000, 105,000, & 149,000 acfm; and, stack diameters of 7.5, 8.0, & 9.0 feet.</p>	

{Permitting notes: The SAPs are currently regulated under NSPS 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants, adopted and incorporated by reference in Rule 62-204.800(7)(b)10., F.A.C.; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), PSD-FL-209 (AC29-241660) - 1st BACT for SAP Nos. 8 & 9, PSD-FL-250 (0570008-025-AC) - 1st BACT for SAP No. 7, PSD-FL-315 (0570008-

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Nos. 7, 8 and 9 Sulfuric Acid Plants (EU-004, -005, -006)

036-AC) - 2nd BACT for SAP Nos. 8 & 9; Rule 62-296.402, F.A.C., Sulfuric Acid Plants; and, Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Design Capacity: The existing design capacity of each SAP shall not be changed as a result of the proposed work under this project, Permit No. 0570008-061-AC. The existing design capacity of each SAP shall not exceed the following:

SAP No.	Design Production Capacity, TPD of 100% H ₂ SO ₄ (sulfuric acid)
7	3,200
8	2,700
9	3,400

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

2. Design Capacity: Any request to change the design capacity of each SAP must be submitted to the Bureau of Air Regulation in the Division of Air Resource Management of the Florida Department of Environmental Protection. [Rules 62-4.160(2) and 62-210.200 (Definitions - Potential to Emit (PTE)), F.A.C.]
3. Design Capacity & Permitted Production: The permittee shall submit a statement from the responsible official within 30 days after the completion of all of the proposed work under this project indicating whether or not in fact the design capacity or permitted production of each SAP was changed. [Rules 62-4.160(2) and 62-210.200 (Definitions - Potential to Emit (PTE)), F.A.C.]

AIR POLLUTION CONTROL TECHNOLOGIES & MEASURES

4. SO₂ Controls: This BART exemption determination does require new, modified or additional air pollution control systems for SO₂. To control emissions of sulfur dioxide (SO₂) from each SAP, the permittee shall continue the use of the existing double absorption system technology with vanadium and/or cesium catalyst in the converters and the use of good combustion practices & best operational practices to minimize excess emissions during startup and shutdown. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rule 62-210.700(1), F.A.C.; and, Proposed by the Applicant in the Application]
5. Proposed Work: The applicant is required to perform the following specific work activities under this project in order to escape BART:

SAP No.	Work Activities
7	<ul style="list-style-type: none">• Increase the catalyst loading ratio from approximately 181 liters per ton H₂SO₄ per day (L/TPD) to approximately 202 L/TPD {increases the current catalyst loading from approximately 578,000 liters to approximately 647,000 liters}; and,• Replace the cold gas-to-gas heat exchanger.
8	<ul style="list-style-type: none">• Increase the catalyst loading ratio from approximately 175 L/TPD to approximately 213 L/TPD {increases the current catalyst loading from approximately 472,000 liters to approximately 575,000 liters. The 468,000 liters cited in the study was with the existing converter};• Replace the cold gas-to-gas heat exchanger;• Replace the superheater; and,• Replace the converter with a larger one. <p>Note: These work activities are permitted under Permit No. 0570008-060-AC.</p>

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Nos. 7, 8 and 9 Sulfuric Acid Plants (EU-004, -005, -006)

9	<ul style="list-style-type: none">• Increase the catalyst loading ratio from approximately 149 L/TPD to approximately 195 L/TPD {increases the current catalyst loading from approximately 508,000 liters to approximately 663,000 liters}; and,• Install a heat recovery system (HRS) to replace the interpass absorption (IPA) tower.
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Additional catalyst may be added as necessary in order to meet the BART SO₂ emission limits. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rules 62-4.160(2) and 62-4.070(1)&(3) (Reasonable Assurance), and, Proposed by the Applicant in the Application]

6. **SO₂ Controls:** The permittee shall use the specific catalyst loadings & types as cited in the study by the permittee's catalyst supplier in Appendix C of the Application. The specific catalyst loadings & types in Appendix C of the Application provide the permitting authority reasonable assurances of compliance with this permit. The study confirms that with the proposed modifications to each SAP, the SAPs can achieve the SO₂ emission rates of 2.8 to 3.0 lb SO₂/ton 100% H₂SO₄. Other specific catalyst types may be considered by the Bureau of Air Regulation upon written request. The permittee shall submit a written request for other specific catalyst loadings & types to the Bureau of Air Regulation with a copy to the Compliance Authority for review and approval prior to use. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rules 62-4.160(2) and 62-4.070(1)&(3) (Reasonable Assurance), F.A.C.; and, Proposed by the Applicant in the Application]
7. **SAM Controls:** This BART exemption determination does not require new, modified or additional air pollution control systems for SAM. By controlling sulfuric acid mist (SAM) emissions PM/PM₁₀ and visible emissions are minimized. To control emissions of SAM, the permittee shall continue the use of the existing packed-fiber mist eliminators or demister pads to remove SAM. Other SAM control technologies may be considered by the Bureau of Air Regulation upon written request. The permittee shall submit a written request for other SAM control technologies to the Bureau of Air Regulation with a copy to the Compliance Authority for review and approval prior to use. [Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rule 62-210.700(1), F.A.C.; and, Proposed by the Applicant in the Application]
8. **Circumvention:** The permittee shall not circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

EMISSION STANDARDS & LIMITATIONS

9. **SO₂ Emission Standards & Limitations:** This BART determination specifies new SO₂ emission standards. Emissions of SO₂ shall not exceed the following as determined by certified CEMS data:

SAP No.	lb/hour
7	400
8	315
9	425

Emissions of SO₂ shall not exceed 400 pounds per hour for No. 7 SAP, 315 pounds per hour for No. 8 SAP, and 425 pounds per hour for No. 9 SAP based on a 24-hour (daily) block average as determined by CEMS data.

{The equivalent lb SO₂/ton 100% H₂SO₄ values for SAP Nos. 7, 8, and 9 at design capacity are: 3.0 lb SO₂/ton 100% H₂SO₄; 2.8 lb SO₂/ton 100% H₂SO₄; and, 3.0 lb SO₂/ton 100% H₂SO₄, respectively. The equivalent lb/ton values corresponding to the lb/hour limits are less than the current existing standards. The equivalent tons per year (TPY) values for SAP Nos. 7, 8, and 9 are: 1,752 TPY; 1,380 TPY; and, 1,862 TPY, respectively. This permit requires CEMS to be used to demonstrate compliance on a continuous basis on a

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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24-hour (daily) block average. A 24-hour (daily) block average was established based on the emission rate averaging period of 24-hour (daily) used in the air dispersion modeling.}

[Rule 62-296.340(5)(c) (escape BART), F.A.C.; and, Proposed by the Applicant in the Application]

10. SO₂ Continuous Emissions Monitoring System (CEMS): This BART exemption determination requires an SO₂ CEMS to be used to demonstrate continuous compliance with the SO₂ emission standards and limitations specified in this section.

- a. In accordance with the NSPS (40 CFR 60, Subpart H) requirements for sulfuric acid plants, the permittee shall continue to properly calibrate, maintain, and operate a CEMS to measure and record emissions of SO₂. In accordance with PSD-FL-250 & PSD-FL-315 the permittee shall continue to use SO₂ CEMS data to demonstrate compliance.
- b. A CEMS shall be properly calibrated, maintained, and operated to comply with: 40 CFR 60 Subpart A, General Provisions; 40 CFR 60 Appendix B, Performance Specification 2; and, 40 CFR 60, Appendix F, Quality Assurance Procedures for Gas CEMS Used for Compliance Determination.
- c. The emissions data collected with the certified CEMS shall be used to demonstrate continuous compliance with the standards and limitations specified in this section.

[Rules 62-296.340(5)(c) (escape BART), 62-4.070(1)&(3) (Reasonable Assurance), and 62-213.440(1) (Assurance of Compliance), F.A.C.; and, Proposed by the Applicant in the Application]

11. SAM Emission Standards & Limitations: This BART determination specifies new SAM emission standards. Emissions of SAM shall not exceed the following as demonstrated by stack test data:

SAP No.	lb/hour
7	6.7
8	5.6
9	7.1

Emissions of SAM shall not exceed 6.7 pounds per hour for No. 7 SAP, 5.6 pounds per hour for No. 8 SAP, and 7.1 pounds per hour for No. 9 SAP based on a 3-hour average as determined by stack test data.

{The equivalent lb SAM/ton 100% H₂SO₄ values for SAP Nos. 7, 8, and 9 at design capacity for each SAP is 0.05 lb SAM/ton 100% H₂SO₄. The equivalent lb/ton value corresponding to the lb/hour limits is less than the current existing standards. The equivalent tons per year (TPY) values for SAP Nos. 7, 8, and 9 are: 29.3 TPY; 24.5 TPY; and, 31.1 TPY, respectively. This permit requires stack test data to be used to demonstrate compliance. Compliance with the 3-hour average by stack test assures compliance with a numerical standard on a 24-hour (daily) average basis. The air dispersion modeling was performed using a 24-hour (daily) average.}

[Rule 62-296.340(5)(c) (escape BART), F.A.C.; and, Proposed by the Applicant in the Application]

EXCESS EMISSIONS

- 12. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
- 13. Excess Emissions Allowed: Unless otherwise specified by permit, excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case

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exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

14. Excess Emissions Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

15. Best Operational Practices to Minimize Excess Emissions:

- a. The permittee shall follow the best operational practices to minimize excess emissions during startup and shutdown as described in the most recent Title V permit application.
- b. Best operational practices to minimize excess SO₂ and SO₃ emissions during startup are governed by this condition. The permittee shall follow the best operational practices to minimize excess emissions during startup contained within the attached Appendix D - Memorandum of Understanding Regarding Best Operational Start-up Practices for Sulfuric Acid Plants initially executed on October 25, 1989.

[Rule 62-296.340(5)(c) (escape BART), F.A.C.; Rule 62-210.700(1), F.A.C.; and, Proposed by the Applicant in the Application]

16. Best Operational Practices to Minimize Leaks of SO₂ and SO₃, or Other Fugitive Process Emissions: Best operational practices to minimize leaks of SO₂ and SO₃, or other fugitive process emissions shall be adhered to and shall include regular inspections and the prompt repair or correction of any leaks or other fugitive emissions. [Rules 62-4.070(1)&(3) and 62-296.320, F.A.C.]

EMISSIONS TESTING

17. Test Methods: The following reference methods (or more recent versions) shall be used to conduct any required emissions tests.

Method	Description of Method and Comments
1 - 4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
6 or 6C	Determination of SO ₂ Emissions from Stationary Sources
8	Determination of SAM & SO ₂ Emissions from Stationary Sources
9	Visual Determination of Opacity from Stationary Sources

EPA Methods 1, 2, 3, 4, and 19 shall be used as necessary to support the other test methods. The above methods are described in 40 CFR 60, Appendix A, which is adopted by reference in Rule 62-204.800, F.A.C. No other methods shall be used without prior written approval from the Permitting Authority. [Rules 62-204.800 and 62-297.100, F.A.C.; and 40 CFR 60, Appendix A]

18. Standard Testing Requirements: All required emissions tests shall be conducted in accordance with the requirements specified in Appendix C (Standard Testing Requirements) of this permit. [Rules 62-204.800 and 62-297.100, F.A.C.; and 40 CFR 60, Appendix A]

19. Compliance Test Schedule: In accordance with the following schedule, the permittee shall have stack tests conducted to demonstrate compliance with the emissions standards specified in this permit.

- a. *Initial Test*: On or before April 30, 2013, an initial test shall be conducted for SAM emissions from each SAP {June 30, 2013 -2 months.}. The initial compliance test report for SAM shall be submitted within

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45 days of completion of testing. [Rules 62-296.340(5)(c) (escape BART) and 62-297.310(7)(a)1, F.A.C.]

- b. *Initial & Special Test:* A visible emissions (VE) test shall be conducted concurrently with one run of the SAM stack test to demonstrate initial compliance with the existing VE standards after the proposed work has been completed for each SAP. The VE test results shall be submitted with the SAM stack test report. [Rules 62-4.070(1)&(3) and 62-297.310(7)(b), F.A.C.]
- c. *Tests Prior to Renewal:* Within the 12-month period prior to renewing the Title V air operation permit, tests shall be conducted for SAM emissions from each SAP. [Rules 62-296.340(5)(c) (escape BART), and 62-297.310(7)(a)3, F.A.C.]

{Note: Under this permit SO₂ CEMS are required to demonstrate compliance on a continuous basis, therefore, no initial or annual compliance tests are necessary.}

RECORDS & REPORTS

20. Quarterly Reporting Requirements: The owners or operators of facilities for which monitoring is required shall submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.402, F.A.C., for each calendar quarter. The nature and cause of the excessive emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of 5 (five) years. {The permittee is required to use SO₂ continuous emissions monitoring systems for continuous compliance demonstrations.} [Rules 62-296.402(5) and 62-213.440(1)(b)2., F.A.C.]
21. Construction Plan & Progress Reports: The permittee shall submit a Construction Plan within sixty (60) days of the effective date of this permit which shall contain the necessary milestones to comply with this permit. The Plan shall include at a minimum the necessary actions and corresponding scheduled due dates to complete those actions to comply with this permit.
 - a. The permittee shall submit progress reports based on the anniversary date (one year from the effective date) of this permit regarding the status of the milestones in the Construction Plan to the Department and to the Compliance Authority, no less than annually in 2009 - 2013.
 - b. The permittee shall complete all required construction & modifications no later than June 30, 2013.
[Rules 62-296.340(5)(c) (escape BART), 62-4.070(1)&(3) (Reasonable Assurance), and 62-213.440(1) (Assurance of Compliance), F.A.C.]