



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

January 2, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert Stewart, Sr.
Sr. Vice President, Operations & Administration
Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, FL 34221

RECEIVED
JAN 08 1997
BUREAU OF
AIR REGULATION

Re: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0810002-001-AV
Piney Point, Manatee County

Dear Mr. Stewart:

Your initial Title V permit application for Piney Point Phosphates was "timely and complete" for purposes of the initial Title V application submission (see Rule 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Facility Supplemental Information

1. Please submit a Compliance Certification. The certification statement must be signed by the responsible official, submitted in hard-copy form, and read as follows:
"I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete."

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

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2. Please submit Attachments 1 through 17 that were not submitted with the Title V application received on June 13, 1996.

3. Please submit the Process Flow Diagram, the Facility Plot Plan, the Area Map, the Precautions to Prevent Emissions of Unconfined Particulate Matter Plan, and the Fugitive Emissions Identification Document for the facility. The process flow diagram should show any proposed new or modified emissions units and all existing emissions units at your facility. Indicate the operating rate of each emissions unit, and identify the pathways by which raw materials and products flow from unit to unit. Alternatively, you may make a statement that the information requested above is identical to the information contained in the prior applications that we have on file.

Emission Point Information

Point 1 of 7 (Sulfuric Acid Plant)

4. Please submit the process flow diagram, the emissions unit description, the UTM coordinates, the percent water vapor, the maximum dry standard flow rate, and the Start-up Procedures for the Sulfuric Acid Plant. Alternatively, you may make a statement that the information requested above regarding the Sulfuric Acid Plant, is identical to the information contained in the air operating permit number A041-197112 and the permit applications we have on file.

5. Please provide calculations for the estimation of NO_x emissions from the Sulfuric Acid Plant.

Point 3 of 7 (Phosphoric Acid Plant)

6. Please submit the process flow diagram, the detailed description of control equipment, and the maximum dry standard flow rate for the Phosphoric Acid Plant. Alternatively, you may make a statement that the information requested above concerning the Phosphoric Acid Plant is identical to the information contained in the air operating permit number A041-164317 and the permit applications we have on file.

Point 4 of 7 (Diammonium Phosphate Plant)

7. Please submit the process flow diagram, the description of the emissions unit, the percent water vapor, fuel analysis, the detailed description of the control equipment, the maximum dry standard flow rate, and the description of stack sampling points of the DAP Plant. Alternatively, you may make a statement that the information requested

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concerning the DAP Plant is identical to the information contained in the air operating permit number A041-164882 and the permit applications we have on file.

8. Please provide calculations for the estimation of NO_x emissions from the Diammonium Phosphate Plant.

Point 5 of 7 (Auxiliary Boiler)

9. Please submit the process flow diagram, the emission unit description, the percent water vapor, the maximum dry standard flow rate, the maximum throughput rate, the maximum heat input rate, the fuel analysis, and the description of stack sampling points for the new 190 mmBTU/hr auxiliary boiler.

10. Please provide calculations for the estimation of PM/PM₁₀, CO and NO_x emissions from the auxiliary boiler.

Point 6 of 7 (Lime Storage Silo)

11. Please submit the process flow diagram, the emission unit description, the percent water vapor, the fuel analysis, the description of control equipment, the description of stack sampling points, and the maximum dry standard flow rate for the Lime Storage Silo. Alternatively, you may make a statement that the information requested concerning the Lime Storage Silo is identical to the information contained in the air operating permit number A041-183874 and the permit applications we have on file.

Point 7 of 7 (Fugitive Emissions)

12. Please provide calculations for the estimation of PM/PM₁₀, SO₂, VOC and fluoride emissions from fugitive sources.

Phosphogypsum Stack

13. The phosphogypsum stack at your facility is subject to 40 CFR 61 Subpart A and R (National Emission Standards for Hazardous Air Pollutants -- General Provisions and National Emission Standards for Radon Emissions from Phosphogypsum Stacks.). The phosphogypsum stack, emitting Radon 222 is considered an unregulated emissions unit for Title V permitting purposes. Please provide the following information from the Air Permit Application form with regard to the phosphogypsum stack:

- a. Subsection B. General Emissions Unit Information
- b. Subsection F. Segment Information
- c. Subsection G. Emissions Unit Pollutants

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Sulfuric Acid Plant Repairs

14. In Exhibit II of Ivan Nance's letter dated December 17, 1996, Gerald W. Hartman P.E., certified that the estimated repair costs and estimated new plant costs for a double contact wet process Sulfuric Acid Plant would be \$16.9 million, and in excess of \$40 million, respectively. Please provide detailed costs for building a new 2,000 TPD double contact wet process Sulfuric Acid Plant.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested in Item number(s) 1 above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to Item number(s) 5, 8, 10 and 12 above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).


The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. A copy of your response should be sent to Air Quality Division of the Manatee County Environmental Management Department (MCEMD).

Note: In the PSD application (PSD-FL-144) for a new 2,700 tons per day (TPD) contact sulfuric acid plant, it was stated that the 2,000 TPD contact sulfuric acid plant would be permanently shut down once the new sulfuric acid plant becomes operational. If Piney Point Phosphates, Inc. intends to build a new 2,700 TPD contact sulfuric acid plant as well as repairing the existing 2,000 TPD sulfuric acid plant, then the permitting process would have to be revisited.

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If you should have any questions, please call me at 813-744-6100, ext. 117.

Sincerely,



P. Roger Cawkwell
Air Permitting Engineer
Southwest District

copy to:
John B. Koogler, Ph.D., P.E.
Koogler & Associates
4014 NW 13th Street
Gainesville, FL 32609

A. Linero, DEP
Karen Collins, MCEMD

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cc: J. Reynolds, BAR
J. Brown, BAR
D. Beason, OGC