



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

PROJECT 527-97-02

FAX TRANSMITTAL FORM

TO: AL Linaero
FDER Tallahassee

FAX NO. _____

FROM: Rudolf Ravel

DATE: 12/26/97 SENT BY: RR

The text being transmitted consists of 8 page(s) PLUS this one. If you do not receive all of the pages or if there are difficulties with this transmission, please call (352) 377-5822.

REMARKS: PPP response. Hope you got my
earlier message regarding a fax from you
on the intent/ACT/draft permit at your
earliest convenience for our comments. TX.

Regards,
RR

P.S. Original by mail w/ disk.

This message is intended for use only by the individual to whom it has been addressed and may contain confidential or privileged information. If you are not the intended recipient, please note that the use, copying or distribution of this information is not permitted. If you have received this FAX in error, please destroy the original and notify the sender immediately at (352) 377-5822 so that we may prevent any recurrence. Thank you.



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ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 527-97-02

December 26, 1997

Mr. A. A. Linero
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Manatee County - AP
Piney Point Phosphates, Inc.
PSD Permit Application for
Existing Sulfuric Acid Plant

Dear Mr. Linero:

This is in response to your letters dated November 7, 17, 26 and December 9, 1997, requesting additional information on the above referenced project. Your questions are addressed in the order they were raised.

1. We do not waive the requirement for items listed in the Facility Supplementary Information. This includes basic flow diagrams which specifically reflect the existing and planned configuration. We agree that much of the information is actually in our files on the facility and we will access it in our review. However, this specific application should stand on its own and the information should be more easily accessible to anyone other than our staff who wishes to inspect it.

RESPONSE:

The process flow diagrams for the sulfuric acid plant at Piney Point Phosphates (PPP), requested under Facility Supplemental Information Item 3, are presented in Attachment 1. It should be noted that the proposed plant repair project results in no change in the actual process flow.

Item 5 requests the identification of fugitive emissions associated with the sulfuric acid plant. It should be noted that fugitive emissions of sulfur dioxide (SO₂), sulfuric acid mist (SAM) and nitrogen oxides (NO_x) can occur during normal operations from the plant, as recognized by Department permits for many sulfuric acid plants, however, these fugitive emissions are not quantifiable. The fugitive emissions are minimized by proper plant maintenance.

Mr. A.A. Linero
Florida Department of
Environmental Protection

December 26, 1997
Page 2

2. The Best Available Control Technology Review was very instructive. Please submit an analysis of a scenario wherein certain plant components are designed (or "overdesigned") such that present production objectives are met and emission levels of 3.5 and 3.0 pounds sulfur dioxide per ton of sulfuric acid (averaged for periods longer than one day but less than thirty days) are maintained throughout the turn-around cycle of the plant.

RESPONSE:

It is not within the scope of the proposed plant repairs to over-design the existing plant. All components of the existing plant are designed for the existing permitted and operating capacity. While the scenario FDEP is requesting to be evaluated is not an option for the existing plant, it could be evaluated for a new plant.

3. Evaluate the scenario wherein the plant (if not overdesigned) must be de-rated to meet the above values throughout the same cycle. Include benefits such as less wear and tear as well as costs.

The scenario of de-rating the existing plant to lower the projected SO₂ emissions is discussed below.

The plant capacity, in tons per day of acid (tpd), at a SO₂ emission rate of 3.0 and 3.5, as opposed to 4 pounds per ton of sulfuric acid (lb/ton acid) cannot be estimated without a detailed analysis of contact time, plant temperatures and SO₂/SO₃ vapor pressure equilibrium. This analysis is beyond the scope of this response. Based on input from Monsanto, the de-rating can be estimated as follows:

$$\text{Capacity @ 3.0} = 2000 \text{ tpd} \times 0.84 = 1680 \text{ tpd}$$

$$\text{Capacity @ 3.5} = 2000 \text{ tpd} \times 0.92 = 1840 \text{ tpd}$$

Estimated cost of acid lost versus SO₂ reduced:

For 3.0 lb/ton:

$$\begin{aligned} \text{SO}_2 \text{ Reduction} &= (4 \text{ lb/ton} \times 2000 \text{ tpd} \times \text{ton}/2000 \text{ lbs}) \\ &\quad - (3 \text{ lb/ton} \times 1680 \text{ tpd} \times \text{ton}/2000 \text{ lbs}) \\ &= 1.48 \text{ tpd} \end{aligned}$$

$$\begin{aligned} \text{Cost of Acid} &= (2000 - 1680) \text{ tpd} \times \$35/\text{ton} \\ &= \$11,200 \text{ per day} \end{aligned}$$



Mr. A.A. Linero
 Florida Department of
 Environmental Protection

December 26, 1997
 Page 3

Cost of Reduction = \$11,200 / 1.48 tpd SO₂
 = \$7570 per ton SO₂

For 3.5 lb/ton:

SO₂ Reduction = (4 lb/ton x 2000 tpd x ton/2000 lbs)
 - (3.5 lb/ton x 1840 tpd x ton/2000 lbs)
 = 0.78 tpd

Cost of Acid = (2000 - 1840) tpd x \$35/ton
 = \$5600 per day

Cost of Reduction = \$5600 / 0.78 tpd SO₂
 = \$7180 per ton SO₂

It should be noted that there is no saving on wear and tear from plant derating.

Based on this analysis, the derating of the existing plant in order to reduce SO₂ emissions, is rejected as BACT.

4. ...Please evaluate separately and in combination, the costs and benefits of both additional catalyst replacement scenarios discussed above...(replacement of Type 210 and Type 11 vanadium containing (VC) pelletized catalyst in Converter 1 with low pressure LP 120 and LP 110 ring catalyst and replacement of all pelletized VC catalyst in Converter 2 with LP 110 VC ring catalyst ... or cesium-promoted CS 110 catalyst.)

RESPONSE:

This issue was addressed in the application in sufficient detail to determine that additional sulfur dioxide emissions reduction could not be expected from the alternate use of cesium-promoted catalyst. Although the use of ring catalyst would be expected to reduce the pressure drop, it does not alter the SO₂ conversion rate.

5. ...Please provide the technical and cost evaluations of all the options described above to allow the Department to make a thorough BACT determination ..(Centaur Process and peroxide scrubbing).



Mr. A.A. Linero
Florida Department of
Environmental Protection

December 26, 1997
Page 4

RESPONSE:

Based on a telephone conversation with the manufacturer, it is our understanding that the Centaur process has the same SO₂ emissions guarantee as the double absorption process. There is, however, a cost difference. For small sulfuric acid plants, of around 1000 tons per day, the Centaur process results in a lower cost. For a plant the size of PPP's, the Centaur process would be more expensive than the double absorption process. Regardless of cost, at this time the Centaur process has not been demonstrated in commercial operation.

6. An assessment of the degree of overdesign (such as the typical 10-15%) that will be included in the proposed project at the existing plant, i.e. the ultimate maximum production capability of the refurbished plant.

RESPONSE:

No over-design is planned for the existing plant as part of this repair project. The existing and proposed capacity of the plant is reflected by the permitted rate.

7. A complete ambient air quality impact analysis for SO₂ and NO₂ for all averaging times. Modeling receptors should extend out to 20 km from the facility. This analysis should include a background monitored concentration and all applicable sources within 50 km of the facility.

RESPONSE:

Although not necessary for the technical evaluation of this project, additional modeling was conducted to satisfy FDEP's request. The results of the requested analyses indicate that the ambient air impacts from the SO₂ and NO_x emitting units at PPP are well within the ambient air quality standards (see disk).

8. Based on the information obtained from the AAQS analysis, provide an update of the additional impacts analyses. These analyses address the impacts on soils, vegetation and visibility, and the impacts on air quality related values (AQRV) in the PSD Class I Chassahowitzka National Wilderness Area.



Mr. A.A. Linero
Florida Department of
Environmental Protection

December 26, 1997
Page 5

RESPONSE:

The results of the requested analyses indicate that the ambient air impacts from the SO₂ and NO_x emitting units at PPP are well within the ambient air quality standards. As there is no change in the ambient air impacts assessed, a re-evaluation of the additional impact analyses previously submitted is not required.

9. Comments from Manatee County (by RTP)...

RESPONSE:

The issues raised by Manatee County have been resolved through an agreement signed by applicant and Manatee County. It is our understanding that FDEP has a copy of that agreement. Therefore, the issues are not addressed herein.

10. Comments from NPS (similar in substance to FDEP and Manatee County comments)...

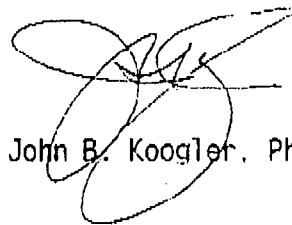
RESPONSE:

The substantive issues raised by NPS have been resolved through an agreement signed by applicant and Manatee County and are, therefore, not addressed in greater detail herein.

As the technical evaluation of this project is complete, we look forward to FDEP's prompt issuance of the draft permit. If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES



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

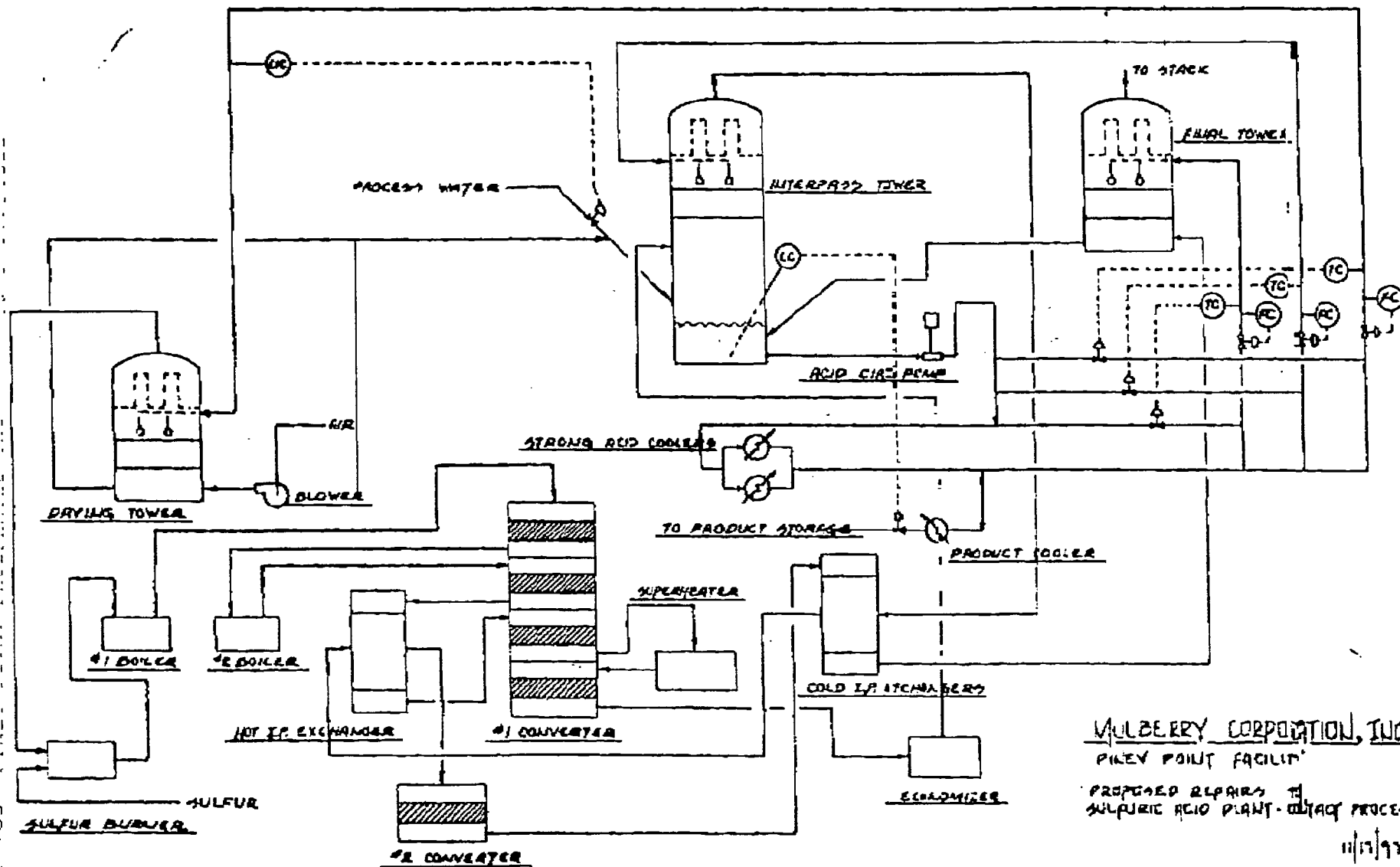
JBK:par
encl.

c: Ivan Nance. PPP



ATTACHMENT 1
PROCESS FLOW DIAGRAMS





MULBERRY CORPORATION, INC.
 PIKEY POINT FACILITY
 PROPOSED REPAIRS TO
 SULFURIC ACID PLANT - CONTACT PROCESS

11/17/97

THIS DISK CONTAINS SULFUR DIOXIDE (SO2), AND NITROGEN DIOXIDE (NOX) MODELING FILES FOR THE PINEY POINT PHOSPHATES PLANT IN MANATEE COUNTY, FLORIDA.

THE FOLLOWING FILES CONTAIN ISCST3 MODELING OF:

SIA FOR CHASSAHOWITZKA NWR PSD CLASS I AREA,
FLORIDA AMBIENT AIR QUALITY STANDARD (FAAQS), AND
BUILDING DOWNWASH, BUILDING PROFILE INPUT PROGRAM (BPIP)
THE EXE FILES ARE IN SELF EXTRACTING ARCHIVE FORMAT.

SO2 ASI ANALYSIS OF CHASSAHOWITZKA NWR PSD CLASS I AND FAAQS:
SO2 EXE 288,763 12-25-97

FAAQS CULPABILITY FOR OCCURRENCES OF STANDARD VIOLATION
CUL5-YR WK1 7,488 12-25-97 6:55p (IN LOTUS FORMAT)

NOX ASI ANALYSIS OF CHASSAHOWITZKA NWR PSD CLASS I AND CLASS 2 AREA:
NOX EXE 109,923 12-25-97 AND:

PNY-BPIP EXE 20,752 12-25-97 BUILDING DOWNWASH CALCULATIONS

TO UNARCHIVE THESE FILES COPY THEM TO A HARD DISK DRIVE AND TYPE THE FILE NAME.

FOR EXAMPLE TO UNARCHIVE THE SO2 ASI CLASS 2 ISCST3 OUTPUT FILES, TYPE "SO2" AND PRESS ENTER. THE FILES WILL AUTOMATICALLY UNARCHIVE TO THE HARD DISK DRIVE.

THESE ARCHIVED FILES CONTAIN THE MODELING AND ANALYSIS FILES IN ASCII FORMAT DESCRIBED AS FOLLOWS;

SO2 MODELING FILES FOR THE CHASSAHOWITZKA NWR PSD CLASS 1, FAAQS ARE PROVIDED:

C1PNY87 OUT 54,571 12-05-97 PSD CLASS 1 ASI FOR 1987
C1PNY88 OUT 54,571 12-05-97 PSD CLASS 1 ASI FOR 1988
C1PNY89 OUT 54,571 12-05-97 PSD CLASS 1 ASI FOR 1989
C1PNY90 OUT 54,571 12-05-97 PSD CLASS 1 ASI FOR 1990
C1PNY91 OUT 54,571 12-05-97 PSD CLASS 1 ASI FOR 1991

SO2AQS87 OUT 268,602 12-09-97 FAAQS FOR 1987
SO2AQS88 OUT 268,602 12-09-97 FAAQS FOR 1988
SO2AQS89 OUT 268,602 12-09-97 FAAQS FOR 1989
SO2AQS90 OUT 268,602 12-09-97 FAAQS FOR 1990
SO2AQS91 OUT 268,602 12-09-97 FAAQS FOR 1991

NOX MODELING FILES FOR THE CHASSAHOWITZKA NWR PSD CLASS 1, SIGNIFICANT IMPACT ANALYSIS (SIA) & FAAQS ARE PROVIDED:

C1NOX87 OUT 31,161 10-22-97 PSD CLASS 1 ASI FOR 1987
C1NOX88 OUT 31,161 10-22-97 PSD CLASS 1 ASI FOR 1988
C1NOX89 OUT 31,161 10-22-97 PSD CLASS 1 ASI FOR 1989
C1NOX90 OUT 31,161 10-22-97 PSD CLASS 1 ASI FOR 1990
C1NOX91 OUT 31,161 10-22-97 PSD CLASS 1 ASI FOR 1991

C1PNY87 OUT 54,571 12-05-97 FAAQS FOR 1987
C1PNY88 OUT 54,571 12-05-97 FAAQS FOR 1988

C1PNY89 OUT 54,571 12-05-97 FAAQS FOR 1989
C1PNY90 OUT 54,571 12-05-97 FAAQS FOR 1990
C1PNY91 OUT 54,571 12-05-97 FAAQS FOR 1991

THERE ARE RECEPTORS AT 100 METER INTERVALS ALONG THE PROPERTY LINE,
DISCRETE
POLAR RECEPTORS FROM 700 METERS TO 1100 METERS AND POLAR RECEPTORS AT 1200,
1500, 1750, 2000, 2500, 5000, 7500, 10000, 11000 12000 13000 14000
15000 16000 17000 18000 19000 & 20000 METERS. POLAR RECEPTORS ARE
CENTERED AT X=315, Y=260 THE APPROXIMATE GEOMETRIC CENTER OF THE FACILITY.

BUILDING INPUT PROFILE PROGRAM (BPIP) FILES USED IN MODELING ARE PROVIDED:
PINY-BPI INP 1,782 12-09-97 INPUT FOR SO2 & NOX SOURCES
PINY-BPI OUT 4,867 12-09-97 OUTPUT FOR SO2 & NOX SOURCES
PINY-BPI SUM 80,726 12-09-97 SUMMARY FOR SO2 & NOX SOURCES

IF I MAY PROVIDE ADDITIONAL FILES, OR CLARIFICATION PLEASE CONTACT ME.

MARK KOLETZKE, P.E.
KOOGLER AND ASSOCIATES
(352) 377-5822
KOOGLER@WORLDNET.ATT.NET
DECEMBER 25, 1997

□



KOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

RECEIVED

JAN 06 1998

**BUREAU OF
AIR REGULATION**

KA 527-97-02

December 30, 1997

Mr. Cleve Holladay
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Manatee County - AP
Piney Point Phosphates, Inc.
PSD Permit Application for
Existing Sulfuric Acid Plant

Dear Mr. Holladay:

This is a follow up to your telephone conversation with Pradeep Raval regarding the above referenced project.

You had requested information on the air dispersion modeling and a revised regional haze analysis to include all the sulfur dioxide emissions from the plant for the Class I area. As you are aware, this issue has been addressed in the permit application. In our opinion, the requested information is not required for the technical evaluation of the proposed project. However, the requested information has been sent to you by E-Mail in order to address the issues.

Also, an updated process flow diagram has been enclosed for your files. Please substitute this for Attachment 1 in our letter dated 12-26-97.

As the technical evaluation of this project is complete, we look forward to FDEP's prompt issuance of the draft permit. If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOGLER & ASSOCIATES

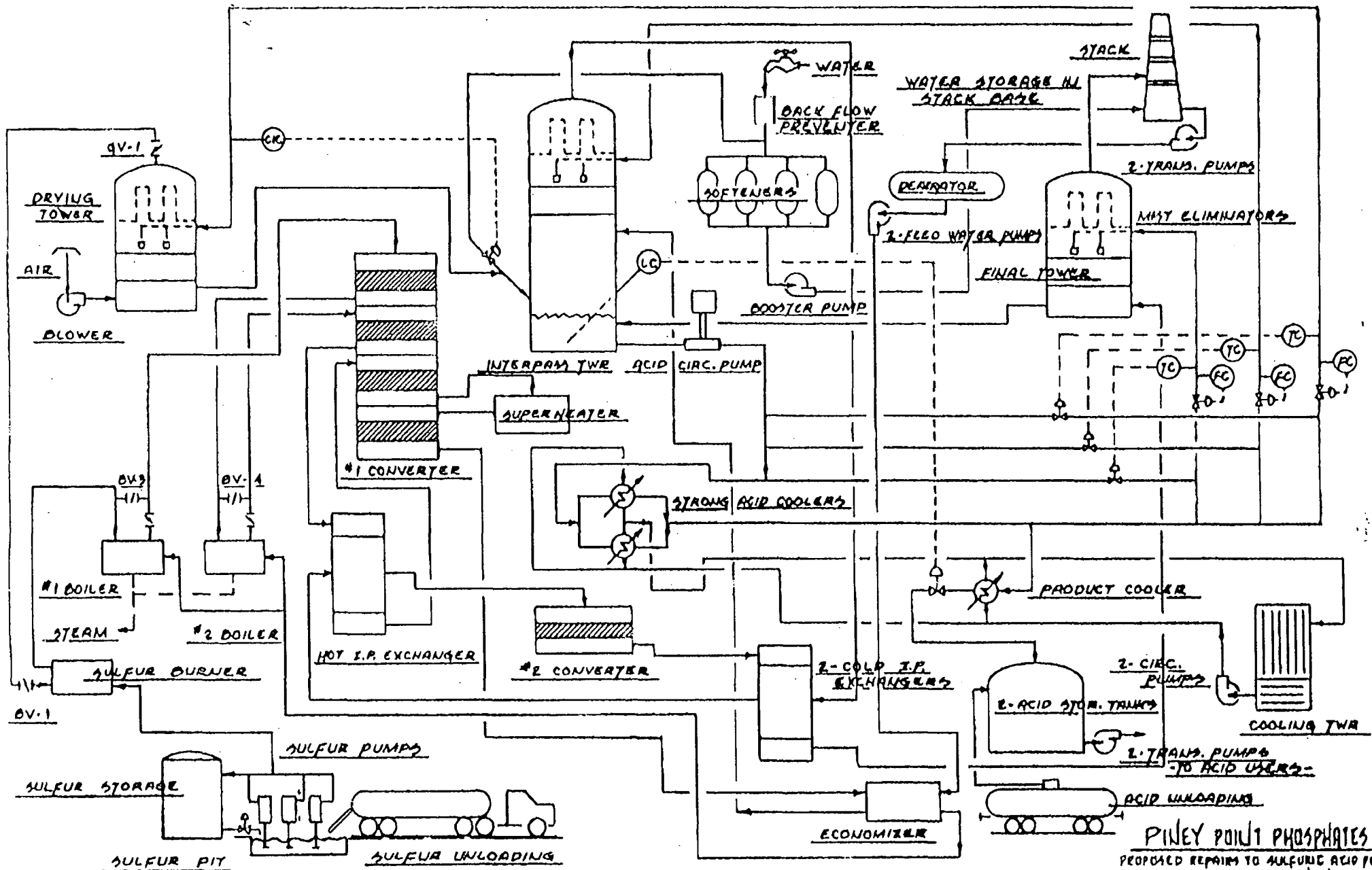
John B. Koogler, Ph.D., P.E.

JBK:par
encl.

c: Ivan Nance, PPP

ATTACHMENT 1
UPDATED PROCESS FLOW DIAGRAM





PINEY POINT PHOSPHATES
 PROPOSED REPAIRS TO SULFURIC ACID PLANT
 11/30/99



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

PROJECT 527-97-02

FAX TRANSMITTAL FORM

TO: Cleve H. Maday
FRED - Tallahassee

FAX NO. _____
FROM: Pradeep Ranal
DATE: 12/30/97 SENT BY: [Signature]

The text being transmitted consists of 1 page(s) PLUS this one. If you do not receive all of the pages or if there are difficulties with this transmission, please call (352) 377-5822.

REMARKS: HAZARDOUS ANALYSIS. Will try telecon
with MRS/KWS @ 4:00 PM TODAY.

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Regional Haze Analysis For
 Piney Point Phosphates - Manatee County, Florida
 CLASS I CHASSAHOWITZKA N.W.R.

(1) SO2 ($\mu\text{g}/\text{m}^3$)	(2) Background visibility (km)	(3) Ambient b(ext)a	(4) Acid Mist Impact H2SO ($\mu\text{g}/\text{m}^3$)	(5) SO4 ($\mu\text{g}/\text{m}^3$)	(6) (NH4)SO2 ($\mu\text{g}/\text{m}^3$)	(7) Transport Time (hrs)	(8) Conversion
0.6390	65	0.0602	0.02347	0.9585	1.3502	11.32	28.5%
(9) AT 28.5% (NH4)SO2 CONVERSION ($\mu\text{g}/\text{m}^3$)	(10) Relative Humidity FACTOR @ 83%	(11) PM-10 ($\mu\text{g}/\text{m}^3$)	(12) Source b(ext)s (NH4)SO2	(13) Source b(ext)s PM10	(14) Total Source b(ext)s	(15) Deciview	Is Deciview Greater than 1
0.3844	4.2	0.0000	0.00484	0.00000	0.00484	0.774	NO

- (1) Maximum 24-hour SO2 Impact at Class I Receptor (Table 5-2).
- (2) Measured Background Visibility Range as recommended by TWS
- (3) Ambient b(ext)a = $3.912 / \text{Background Visibility}$
- (4) Acid Mist Impact = $0.15/4 * \text{SO2 Impact} * 96/98$.
- (5) SO4 = SO2 Impact * 1.5
- (6) 100 % (NH4)SO2 Impact = $1.375 * (\text{SO4} + \text{Acid Mist})$
- (7) Transport Time (hours) = Maximum Distance / Average daily wind speed - from 1996 Modeling.
- (8) Conversion = Transport Time * 0.03 (% / hour) - Computations Below
- (9) (NH4)SO2 Conversion = % Conversion * (NH4)SO2
- (10) Relative Humidity Factor From Meteorology and Figure E-1 IWAQM
- (11) Maximum 24-hour PM10 Impact at Class I Receptor. (None)
- (12) Source b(ext)s (NH4)SO4 = $0.003 * \text{Relative Humidity Factor} * (\text{NH4})\text{SO4}$
- (13) Source b(ext)s PM10 = $0.003 * \text{Relative Humidity Factor} (1) * \text{PM10}$
- (14) Total Source b(ext)s = b(ext)s (NH4)SO4 + b(ext)s PM10
- (15) Deciview = $10 * \text{LN} [1 + (\text{Total b(ext)s} / \text{b(ext)a})]$

HOOPER & ASSOC. PDR TALL 002/002



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

PROJECT 527-97-02

FAX TRANSMITTAL FORM

TO: Cleve Holladay
FOEP - Tallahassee

FAX NO. _____
FROM: Pradeep Raval
DATE: 12/31/97 SENT BY: PR

The text being transmitted consists of 1 page(s) PLUS this one. If you do not receive all of the pages or if there are difficulties with this transmission, please call (352) 377-5822.

REMARKS: Have analysis based on FOEP's
assessed SO₂ emissions for PPP. I have also
faxed this to NPS. Note that this analysis
used 214.8 lbs/hr; PPP's actual #s were
222.3 lbs/hr. Therefore, the updated haze
analysis is conservative. Regards. PR

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Regional Haze Analysis For
Piney Point Phosphates – Manatee County, Florida
CLASS I CHASSAHOWITZKA N.W.R.

(1) SO2 ($\mu\text{g}/\text{m}^3$)	(2) Background Visibility (km)	(3) Ambient b(ext)a	(4) Acid Mist Impact H2SO ($\mu\text{g}/\text{m}^3$)	(5) SO4 ($\mu\text{g}/\text{m}^3$)	(6) (NH4)SO2 ($\mu\text{g}/\text{m}^3$)	(7) Transport Time (hrs)	(8) Conversion
0.2261	65	0.0602	0.00830	0.3391	0.4777	11.32	28.5%
(9) AT 28.5% (NH4)SO2 CONVERSION ($\mu\text{g}/\text{m}^3$)	(10) Relative Humidity FACTOR @ 83%	(11) PM-10 ($\mu\text{g}/\text{m}^3$)	(12) Source b(ext)s (NH4)SO2	(13) Source b(ext)s PM10	(14) Total Source b(ext)s	(15) Deciview	Is Deciview Greater than 0.5?
0.1360	4.2	0.0000	0.00171	0.00000	0.00171	0.2807	NO

- (1) Maximum 24-hour SO2 Impact at Class I Receptor (Table 5-2).
- (2) Measured Background Visibility Range as recommended by FWS
- (3) Ambient b(ext)a = $3.912 / \text{Background Visibility}$
- (4) Acid Mist Impact = $0.15/4 * \text{SO2 Impact} * 96/98$.
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ROUGLER & ASSOCIATES
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PROJECT 527-97-02

FAX TRANSMITTAL FORM

TO: Cleve Holladay
FOEP - Tallahassee

FAX NO. _____
FROM: Pradeep Raval
DATE: 12/31/97 SENT BY: [Signature]

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KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4114 NW THIRTIETH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 527-97-02

December 30, 1997

Mr. Cleve Holladay
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Manatee County - AP
Pinoy Point Phosphates, Inc.
PSD Permit Application for
Existing Sulfuric Acid Plant

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As the technical evaluation of this project is complete, we look forward to FDEP's prompt issuance of the draft permit. If you have any questions, please call Pradeep Raval or me.

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KOOGLER & ASSOCIATES



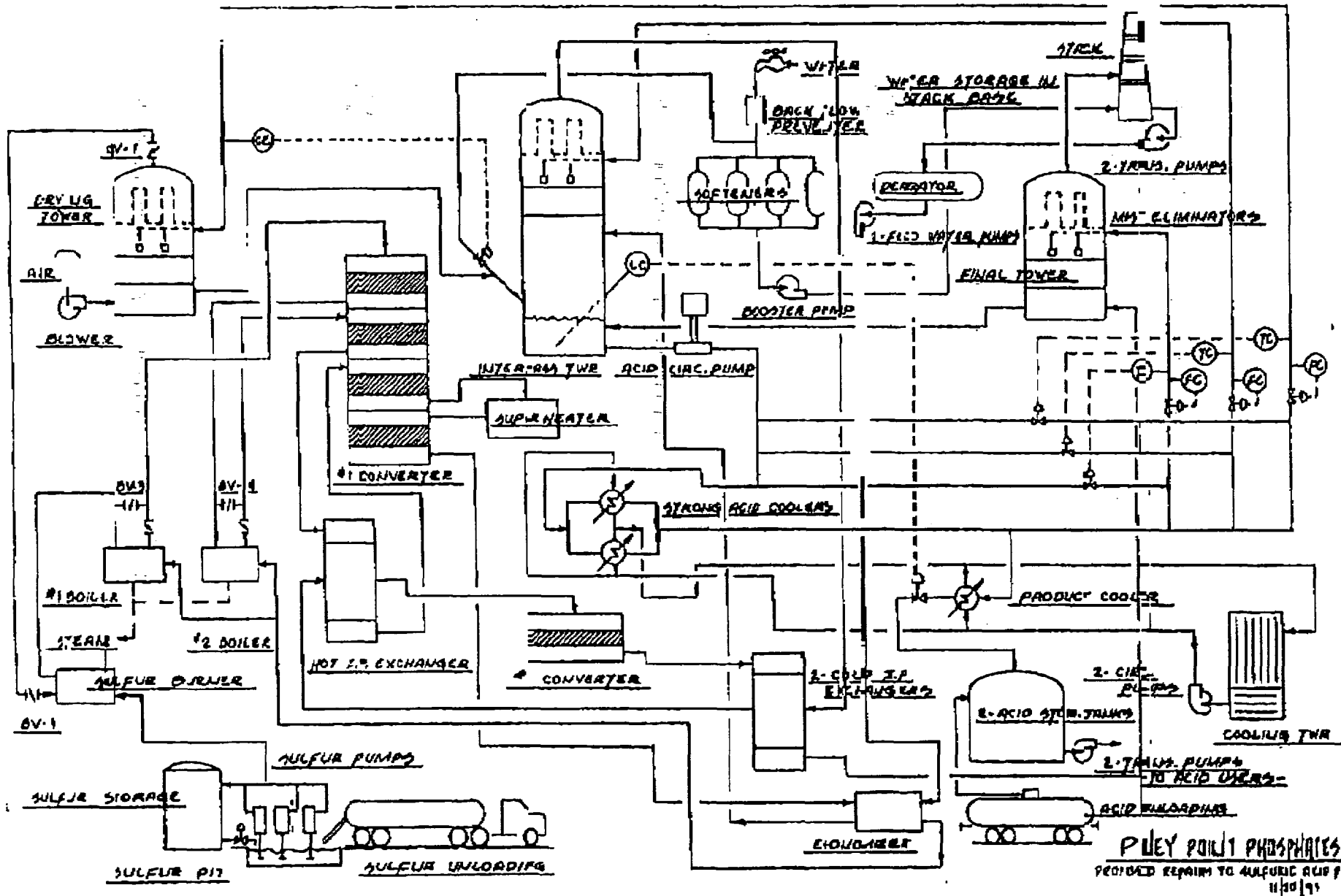
John B. Kogler, Ph.D., P.E.

JBK:par
encl.

c: Ivan Nance, PPP

ATTACHMENT 1
UPDATED PROCESS FLOW DIAGRAM





PULEY POULI PHOSPHATES
 PROVIDED REPAIRS TO SULFURIC ACID #1
 11/20/95



**U.S. FISH & WILDLIFE SERVICE
AIR QUALITY BRANCH**

P.O. BOX 25287, Denver, CO 80225-0287

FACSIMILE COVER SHEET

Date: 12/11/07

Telephone: (303) 969-2617

Fax: (303) 969-2822

To: Cleve Holladay

From: Ellen Porter

Subject: Interim Visib. Guidance - Visib gurus (Notar, Vimont, etc.) are developing more detailed paper to be released in late Jan. - Feb.

Number of Pages:
(Including this cover sheet) 2

Office Location: 7333 West Jefferson Ave, Suite 450, Lakewood, CO 80235

make a case-by-case adverse impact determination regarding the proposed project, considering the predicted frequency, magnitude, and duration of impacts.

Contact: Bud Rolofson, FWS Air Quality Branch (303) 969-2804