

**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

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

KA 173-03-01

MEMORANDUM

TO: Bobby Bull, FDEP

FROM: Pradeep Raval

DATE: January 21, 2005

SUBJECT: AC-AV Application  
US Agri-Chemicals Corporation

Enclosed is an application for an AC-AV permit change, as discussed.

The application is being sent to you by email as well as regular mail.

If you have any questions, please call me.

C: R. Brunk, USAC



# Department of Environmental Protection

## Division of Air Resource Management

### APPLICATION FOR AIR PERMIT - LONG FORM

#### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)**  
– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>US Agri-Chemicals Corporation</b>	
2. Site Name: <b>Bartow Chemical Plant</b>	
3. Facility Identification Number: <b>1050050</b>	
4. Facility Location...: Street Address or Other Locator: <b>SR 60, 2 miles W. of Bartow</b> City: <b>Bartow</b> County: <b>Polk</b> Zip Code: <b>33830</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Pradeep Raval, Consultant</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Koogler &amp; Associates</b> Street Address: <b>4014 N.W. 13th Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(352) 377-5822</b> Fax: <b>(352) 377-7158</b>	
4. Application Contact Email Address: <b>praval@kooglerassociates.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**APPLICATION INFORMATION**

**Purpose of Application**

**This application for air permit is submitted to obtain: (Check one)**

**Air Construction Permit**

Air construction permit.

**Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit  
(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

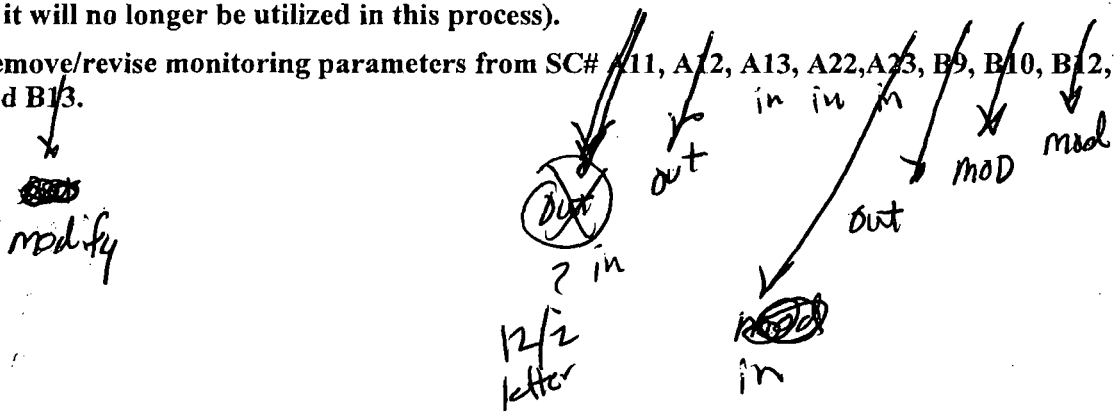
**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

**Application Comment**

**This application is submitted for documenting the removal of conditions previously identified in the TV permit renewal application, including monitoring parameters identified in past project numbers 009, 010 and 011 ; and, for the removal of the bag collector in the loadout operation (for EU 039, remove the bag collector from the permit as it will no longer be utilized in this process).**

**Remove/revise monitoring parameters from SC# A11, A12, A13, A22, A23, B9, B10, B12, and B13.**







## APPLICATION INFORMATION

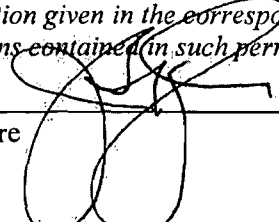
### Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: <b>Phong T. Vo, General Manager of Engineering and Technical Services</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>US Agri-Chemicals</b> Street Address: <b>3225 State Road 630 West</b> City: <b>Ft. Meade</b> State: <b>FL</b> Zip Code: <b>33841-9799</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(863) 285-8121</b> Fax: <b>(863) 285-7088</b>
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: <p>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</p> <p>Signature: <u>Phong T. Vo</u> Date: <u>1/21/05</u></p>

**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: <b>John B. Koogler, Ph.D., P.E.</b> Registration Number: <b>12925</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler and Associates, Inc.</b> Street Address: <b>4014 N.W. 13th Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 377-5822</b> Fax: <b>(352) 377-7158</b>
4. Professional Engineer Email Address: <b>jkoo@kooglerassociates.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature (seal)  _____ Date <u>1/21/05</u>

\* Attach any exception to certification statement.





## FACILITY INFORMATION

### Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1.	<input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2.	<input type="checkbox"/> Synthetic Non-Title V Source	
3.	<input checked="" type="checkbox"/> Title V Source	
4.	<input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5.	<input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6.	<input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7.	<input type="checkbox"/> Synthetic Minor Source of HAPs	
8.	<input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9.	<input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10.	<input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11.	<input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12.	Facility Regulatory Classifications Comment:	

**FACILITY INFORMATION**

**List of Pollutants Emitted by Facility**

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM	A	N
PM10	A	N
NOX	B	N
SO2	B	N
FL	B	N



## FACILITY INFORMATION

### C. FACILITY ADDITIONAL INFORMATION

#### Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: _____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: _____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: _____

#### Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: <b>Application</b>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <b>Application</b>
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**FACILITY INFORMATION**

**Additional Requirements for FESOP Applications**

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):  
 Attached, Document ID: \_\_\_\_\_  Not Applicable (no exempt units at facility)

**Additional Requirements for Title V Air Operation Permit Applications NA**

1. List of Insignificant Activities (Required for initial/renewal applications only):  
 Attached, Document ID: \_\_\_\_\_  Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):  
 Attached, Document ID: \_\_\_\_\_  
 Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):  
 Attached, Document ID: \_\_\_\_\_  
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):  
 Attached, Document ID: \_\_\_\_\_  
 Equipment/Activities On site but Not Required to be Individually Listed  
 Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :  
 Attached, Document ID: \_\_\_\_\_  Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:  
 Attached, Document ID: \_\_\_\_\_  Not Applicable

**Additional Requirements Comment**



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

KA 173-03-01  
November 30, 2004

RECEIVED

DEC 02 2004

BUREAU OF AIR REGULATION

Mr. Bobby Bull  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Subject: Additional Information on Title V Permit Renewal  
US Agri-Chemicals Corporation  
Bartow Facility**

Dear Mr. Bull:

This is a follow up to our conversation of November 17, 2004 regarding the Title V permit renewal for the USAC Bartow facility.

First, it is my understanding that the Department has determined that the Bartow facility is not subject to 40 CFR 63, Subparts AA and BB, based on the information previously submitted, and secondly suggested revisions to the current monitoring requirements, in draft form and submitted for the sake of consistency, are presented in Attachment 1.

Copies of the required R.O. and P.E. certifications are included as Attachment 2.

If you have any additional questions, please call me.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK/lt

Encl.

cc: Ron Brunk, USAC

**ATTACHMENT 1**

**Suggested Revisions to Monitoring Conditions in Title V Permit**

## Bartow Facility

### Suggested Revisions to Monitoring Conditions in Title V Permit

#### GENERAL MONITORING CONDITIONS

- 1) Identify all monitoring requirements as a "daily average" for consistency with federal requirements in the NESHAPS.
- 2) Clarify that incidents of upset conditions or malfunction of less than two hours in a 24-hour period, do not require reporting.

#### SPECIFIC CONDITIONS

##### 1. DAP Venturi Scrubbers

Delete the requirement for total pressure drop and the acid flow/DAP ratio.

##### 2. DAP Tailgas scrubbers

- a. For pressure drop (surrogate for air flow)

###### Parameter limits:

1) dP (min/max) OR 2) dP (min) AND fan amps (min/max) OR 3) Fan amps (min/max) (backup- no more than 1 week)

###### Instruments:

dP- pressure sensors OR manometer (backup- no more than 1 week)

fan amps- ammeter

###### Data recording:

dP or Fan amps: Continuous recorder OR Computer files OR manually log 1/shift (backup- no more than 1 wk)

- b. For liquid flow

###### Parameter limits:

1) gpm (min/max) OR 2) pump amps (min/max)

###### Instruments:

Flow: flowmeter or ammeter (backup- no more than 1 week)

###### Data recording:

1) Log 1/shift OR 2) continuous recorder OR 3) computer files

- c. For P<sub>2</sub>O<sub>5</sub> input



Parameter limits:

Totalized acid input (x density x % P<sub>2</sub>O<sub>5</sub>) OR Production totalizer (x %P<sub>2</sub>O<sub>5</sub>) (backup- no more than 1 week)

Instruments:

Flow: Flowmeter or Production totalizer (backup- no more than 1 week)

Data recording:

1) Acid totalizer OR 2) Production totalizer

**3. DAP Loadout Oiling**

a. For oiling rate

Parameter limits:

gpt (min) (gallons/ton)

Instruments:

Flow: flowmeter or volumetric cylinder (backup- no more than 1 week) AND production totalizer

Data recording: (eliminate minimum in favor of logging once per day)

1) Log 1/day OR 2) continuous recorder OR 3) computer files

**ATTACHMENT 2**

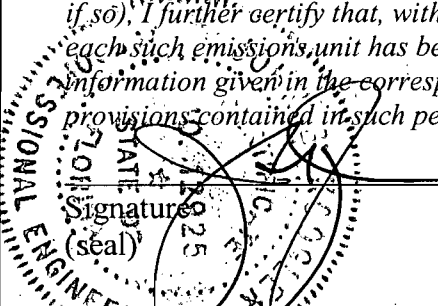
**R.O. & P.E. Certifications**

**Application Responsible Official Certification**

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: <b>Phong T. Vo, General Manager of Engineering and Technical Services</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>US Agri-Chemicals Corporation</b> Street Address: <b>3225 State Road 630 West</b> City: <b>Ft. Meade</b> State: <b>FL</b> Zip Code: <b>33841-9799</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(863) 285-8121</b> ext. Fax: <b>(863) 285-7088</b>
5. Application Responsible Official Email Address: <b>PVO@USAGRICHEM.COM</b>
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.  Signature <u>Phong T. Vo</u> Date <u>11/11/04</u>

Professional Engineer Certification

1. Professional Engineer Name: <b>John B. Koogler, Ph.D, P.E.</b> Registration Number: <b>12925</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler and Associates, Inc.</b> Street Address: <b>4014 NW 13<sup>th</sup> Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 377-5822</b> ext. Fax: <b>(352) 377-7158</b>
4. Professional Engineer Email Address: <b>jkoogler@kooglerassociates.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  _____ Signature (seal) Date <u>4/30/04</u>

\* Attach any exception to certification statement.



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

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

KA 173-03-01

November 1, 2004

**RECEIVED**

NOV 04 2004

**BUREAU OF AIR REGULATION**

Mr. Bobby Bull  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal  
US Agri-Chemicals Corporation – Bartow Facility  
DEP File No. 1050050-014-AV

Dear Mr. Bull:

This is a follow up to the FDEP letter dated August 10, 2004, requesting additional information on the above referenced Title V renewal project. The responses are in the order of the questions raised.

Item 1: It is unfortunate that for CAM, FDEP is unable to include indicator ranges in the permit in a way that could avoid the unnecessary effort and expense associated with a permit revision, even for a small change to the indicator ranges. It is our understanding that indicator ranges used for MACT compliance can be revised without permit revision. We urge FDEP to find a practical and reasonable approach to accomplish this in our permit for CAM.

The appropriate operation indicator range for the MAP/DAP Plant (EU 038) for CAM purposes, determined from the historical data, is included in the attached table. The format of the revised table and justification of the selected indicator range is based on the recent discussions with you and Jonathan Holtom and represents an acceptable approach to submitting the requested information without having to resubmit the entire CAM Plan.

Item 2: Regarding EU 039, please remove the baghouse from the permit as it will no longer be utilized in this process.

The requested PE and RO certification forms are also attached.

Mr. Bobby Bull  
Florida Department of  
Environmental Protection

November 1, 2004

If you have any additional questions, please call me.

Very truly yours,

KOOGLER & ASSOCIATES

A handwritten signature in black ink, appearing to read "Raval", with a horizontal line extending to the right from the end of the signature.

Pradeep Raval

Par  
Encl.

C: Ron Brunk, USAC

MAP/DAP Plant (EU 038)

Monitoring Approach

	Indicator No. 1	Indicator No. 2
Indicator	Pressure drop across each scrubber.	Scrubber liquid flow rate to each scrubber.
Measurement Approach	Differential pressure transducer.	micromotion flow meter.
Indicator Range	An excursion is defined as a daily average pressure drop outside of the following range:  RGCV Scrubber: 3.0 - 12.2 in. H <sub>2</sub> O Dryer Scrubber: 2.4 – 13.1 in. H <sub>2</sub> O  Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a daily average liquid flow rate outside of the following range:  RGCV Scrubber: 1463 – 2884 gpm Dryer Scrubber: 865 – 1336 gpm  Excursions trigger an inspection, corrective action, and a reporting requirement.
Data Representativeness	The minimum accuracy of the device is 5 percent.	The minimum accuracy of the device is 5 percent.
Verification of Operational Status	Operator check with computer alarm.	Operator check with computer alarm.
QA/QC Practices and Criteria	The differential pressure transducer is calibrated periodically.	The flow sensor is calibrated periodically.
Monitoring Frequency	The pressure drop is monitored continuously.	The scrubber liquid flow is monitored continuously.
Data Collection Procedures	Daily averages are computed.	Daily averages are computed.
Averaging Period	Daily average	Daily average

NOTE: The above indicator ranges may be revised based on future test data.

Justification of Selection of Performance Indicator Range

The indicator range chosen for each scrubber was selected based on historical test data (previously submitted to FDEP) that indicated operation of the emissions unit in compliance with the permit limit with a reasonable margin of safety.

Professional Engineer Certification

1. Professional Engineer Name: <b>John B. Koogler, Ph.D, P.E.</b> Registration Number: <b>12925</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler and Associates</b> Street Address: <b>4014 NW 13<sup>th</sup> Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 377-5822</b> ext. Fax: <b>(352) 377-7158</b>
4. Professional Engineer Email Address: <b>jkoogler@kooglerassociates.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>11/1/04</u> (seal)

\* Attach any exception to certification statement.



**Application Responsible Official Certification**

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: <b>Phong T. Vo, General Manager of Engineering and Technical Services</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>US Agri-Chemicals Corporation</b> Street Address: <b>3225 State Road 630 West</b> City: <b>Ft. Meade</b> State: <b>FL</b> Zip Code: <b>33841-9799</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(863) 285-8121</b> ext. Fax: <b>(863) 285-7088</b>
5. Application Responsible Official Email Address: <b>PVO@USAGRICHEM.COM</b>
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.  Signature: <u>Phong T. Vo</u> Date: <u>11/01/04</u>

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. *Bobby Dull*

3. \_\_\_\_\_

4. \_\_\_\_\_

2. \_\_\_\_\_

5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

\_\_\_\_ SECRETARY'S SIGNATURE

\_\_\_\_ DIV/DIST DIR SIGNATURE

\_\_\_\_ MY SIGNATURE

\_\_\_\_ YOUR SIGNATURE

\_\_\_\_ DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

\_\_\_\_ DISCUSS WITH ME

\_\_\_\_ COMMENTS/ADVISE

\_\_\_\_ REVIEW AND RETURN

\_\_\_\_ SET UP MEETING

\_\_\_\_ FOR YOUR INFORMATION

\_\_\_\_ HANDLE APPROPRIATELY

\_\_\_\_ INITIAL AND FORWARD

SHARE WITH STAFF

\_\_\_\_ FOR YOUR FILES

COMMENTS:

FROM: \_\_\_\_\_

*[Signature]*

DATE: 8/10/04

PHONE: \_\_\_\_\_



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

August 10, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Phong Vo  
General Manager  
Engineering and Technical Services  
US Agri-Chemicals Corporation  
3225 SR 630 West  
Fort Meade, FL 33841-9778

Re: Bartow Plant Title V Renewal: Request for Additional Information for CAM  
Permit 1050050-014-AV

Dear Mr. Vo,

On July 15, 2004, the Department received your information for your CAM Plan required for the renewal of US Agri-Chemicals Bartow Plant Title V Permit. The Application is still incomplete because not all of the information needed to process the application has been provided. Specifically, the following information remains outstanding:

1. Indicator ranges were not provided for the MAP/DAP Plant (EU 038). The following is your response to the request: "The requested approach was submitted to FDEP to allow the revision of the "acceptable/allowable operating range" without requiring a revision to the Title V permit that would require a public notice each time." This approach to "off permit" changes is unacceptable. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please select an indicator range and provide justification of the range in your CAM Plan, submitted in the proper format.
2. The facility currently is permitted to use both a baghouse and oil suppressant to control PM at the MAP/DAP Storage and Loadout (EU 039). No test data or indicator ranges were provided for the baghouse. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Provide the CAM plan with test data and indicator ranges, submitted in the proper format, for the period when the baghouse will be in operation to control PM. Indicate if you intend to no longer use the baghouse, and wish to remove it from your permit.

The CAM plan was not submitted in the proper format. Format examples can be found on the EPA Website. Please refer to <http://www.epa.gov/ttn/emc/cam.html> (Appendix A) for format examples, and submit your CAM plan in this manner.

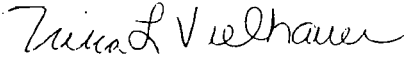
*"More Protection, Less Process"*

*Printed on recycled paper.*

Mr. Phong Vo  
8/10/04  
Page 2 of 2

Please submit all requested information, postmarked by October 1, 2004, to Mr. Bobby Bull at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If the Department does not receive a full and complete response postmarked by October 1, 2004, the Department will determine and take appropriate agency action to process your application. If you have any questions regarding this request for additional information, please contact Mr. Bull at [Robert.bull@dep.state.fl.us](mailto:Robert.bull@dep.state.fl.us) or (850) 921-9585. To discuss the specific CAM requirements, please contact Mr. Jonathan Holtom at (850) 921-9531 or [jonathan.holtom@dep.state.fl.us](mailto:jonathan.holtom@dep.state.fl.us).

Sincerely,



Trina Vielhauer, Chief  
Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD  
Pradeep Raval, Consultant, Koogler and Associates  
John B. Koogler, Ph.D., P.E.



KOGLER & ASSOCIATES  
ENVIRONMENTAL SERVICES

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

KA 173-03-01

July 12, 2004

RECEIVED

JUL 15 2004

BUREAU OF AIR REGULATION

Ms. Cindy Phillips, P.E.  
Florida Department of  
Environmental Protection  
MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal  
US Agri-Chemicals Corporation – Bartow Facility  
DEP File No. 1050050-014-AV

Dear Ms. Phillips:

This is a follow up to your letter dated April 9, 2004, requesting additional information on the above referenced Title V renewal project. The responses are in the order of the questions raised.

**1. Please quantify the annual amount of HF emissions coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pond water. If applicable, please also provide information concerning the closure of these ponds.**

#### RESPONSE

The Bartow plant does not have an active stack or phosphoric acid production facility. The only pond at the facility is a dedicated scrubber water pond for the granular DAP plant. The pH of this pond is typically 6.1 standard units and the fluorides concentration is less than 100 ppm, which would result in an extremely small quantity, if any, of HF emissions.

**2. The indicator range in the submitted CAM plan for the MAP/DAP plant (EU 038) references an "indicator range in the permit". Please clarify what indicator range is being referenced and provide a justification why the indicator range is not specifically stated in the CAM plan. Please provide test results that support the chosen indicator range.**

July 12, 2004

RESPONSE

The requested approach was submitted to FDEP to allow the revision of the "acceptable/allowable operating range" without it requiring a revision to the Title V permit that would require a public notice each time. The provisions of the current Title V permit allow this procedure, which is advantageous to FDEP and the applicant as it reduces unnecessary paperwork and expense.

Available test data are presented in Attachment 1.

**3. The CAM applicability determination included with the response state that CAM is not applicable to the MAP/DAP Storage and Loadout (EU 039) because no control device is required for oiled product. However, the permit states that "particulate emissions are controlled by a baghouse and/or application of a dust suppressant oil to the product." Please provide either a CAM plan for the baghouse for periods when it is being used or a statement that you wish the permit to be changed to only allow the use of the dust suppressant to meet the particulate emissions limit. With this statement, provide reasonable assurance that RACT avoidance limit can be met solely through the use of the dust suppressant and that the baghouse is not needed in conjunction with the dust suppressant.**

RESPONSE

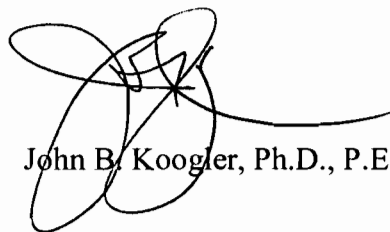
In order to preserve the use of the baghouse as and when necessary, a CAM plan for the baghouse is presented in Attachment 2.

The requested PE and RO certification forms are presented in Attachment 3.

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:par  
Encl.

C: Ron Brunk, USAC



**KOOGLER & ASSOCIATES**  
ENVIRONMENTAL SERVICES

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

Project No. 173-02-03

RECEIVED

JUL 13 2004

BUREAU OF AIR REGULATION

# Fax

To: <u>Cindy Phillips / Bobby Bull</u> <u>FDER Tallahassee</u>	
Fax No.:	
From: <u>Pradeep Raul</u>	Fax No.: 352-377-7158
Date: <u>7-12-04</u>	Time: <u>4:15 pm</u>
Sent By: <u>[Signature]</u>	

*This message consists of 2 page(s) PLUS this cover sheet.  
If you experience difficulties with this transmission, please call 352-377-5822.*

Remarks: <u>Original w/ attachments sent by regular mail. [Signature]</u>
---------------------------------------------------------------------------

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 we can prevent any recurrence. Thank you.



**KOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

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

KA 173-03-01

July 12, 2004

Ms. Cindy Phillips, P.E.  
Florida Department of  
Environmental Protection  
MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal  
US Agri-Chemicals Corporation – Bartow Facility  
DEP File No. 1050050-014-AV

Dear Ms. Phillips:

This is a follow up to your letter dated April 9, 2004, requesting additional information on the above referenced Title V renewal project. The responses are in the order of the questions raised.

**1. Please quantify the annual amount of HF emissions coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pond water. If applicable, please also provide information concerning the closure of these ponds.**

RESPONSE

The Bartow plant does not have an active stack or phosphoric acid production facility. The only pond at the facility is a dedicated scrubber water pond for the granular DAP plant. The pH of this pond is typically 6.1 standard units and the fluorides concentration is less than 100 ppm, which would result in an extremely small quantity, if any, of HF emissions.

**2. The indicator range in the submitted CAM plan for the MAP/DAP plant (EU 038) references an “indicator range in the permit”. Please clarify what indicator range is being referenced and provide a justification why the indicator range is not specifically stated in the CAM plan. Please provide test results that support the chosen indicator range.**



Ms. Cindy Phillips  
Florida Department of  
Environmental Protection

July 12, 2004

RESPONSE

The requested approach was submitted to FDEP to allow the revision of the "acceptable/allowable operating range" without it requiring a revision to the Title V permit that would require a public notice each time. The provisions of the current Title V permit allow this procedure, which is advantageous to FDEP and the applicant as it reduces unnecessary paperwork and expense.

Available test data are presented in Attachment 1.

**3. The CAM applicability determination included with the response state that CAM is not applicable to the MAP/DAP Storage and Loadout (EU 039) because no control device is required for oiled product. However, the permit states that "particulate emissions are controlled by a baghouse and/or application of a dust suppressant oil to the product." Please provide either a CAM plan for the baghouse for periods when it is being used or a statement that you wish the permit to be changed to only allow the use of the dust suppressant to meet the particulate emissions limit. With this statement, provide reasonable assurance that RACT avoidance limit can be met solely through the use of the dust suppressant and that the baghouse is not needed in conjunction with the dust suppressant.**

RESPONSE

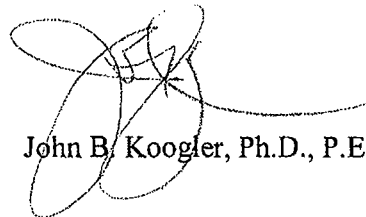
In order to preserve the use of the baghouse as and when necessary, a CAM plan for the baghouse is presented in Attachment 2.

The requested PE and RO certification forms are presented in Attachment 3.

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:par  
Encl.

C: Ron Brunk, USAC

## **Bull, Robert**

---

**From:** Pradeep Raval [praval@kooglerassociates.com]  
**Sent:** Wednesday, July 14, 2004 11:31 AM  
**To:** Bull, Robert  
**Cc:** Ron Brunk  
**Subject:** Title V - USAC BARTOW response on permit renewal

Hi Bobby: This is a follow up to our telephone conversation this morning. I had called you to give you heads up that while a CAM plan for the bag collector located in MAP/DAP storage and loadout was included in our recent submittal for USAC's Bartow facility, there was no current test data to provide you a range of operating pressure drop(dP). As the unit is not likely to be used any time soon, future test data availability is unknown. However, for the purposes of the CAM plan, you may use dP values stated in the Title V permit, Table 2-1, of 0.7 "H2O minimum and 6 "H2O maximum.

If you have any questions, please call me. Regards, Pradeep.

---

Outgoing mail is certified Virus Free.  
Checked by AVG anti-virus system (<http://www.grisoft.com>).  
Version: 6.0.713 / Virus Database: 469 - Release Date: 6/30/2004



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**  
4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 ▪ FAX/377-7158

KA 173-03-01

July 12, 2004

**RECEIVED**

JUL 15 2004

BUREAU OF AIR REGULATION

Ms. Cindy Phillips, P.E.  
Florida Department of  
Environmental Protection  
MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal  
US Agri-Chemicals Corporation – Bartow Facility  
DEP File No. 1050050-014-AV

Dear Ms. Phillips:

This is a follow up to your letter dated April 9, 2004, requesting additional information on the above referenced Title V renewal project. The responses are in the order of the questions raised.

**1. Please quantify the annual amount of HF emissions coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pond water. If applicable, please also provide information concerning the closure of these ponds.**

#### RESPONSE

The Bartow plant does not have an active stack or phosphoric acid production facility. The only pond at the facility is a dedicated scrubber water pond for the granular DAP plant. The pH of this pond is typically 6.1 standard units and the fluorides concentration is less than 100 ppm, which would result in an extremely small quantity, if any, of HF emissions.

**2. The indicator range in the submitted CAM plan for the MAP/DAP plant (EU 038) references an “indicator range in the permit”. Please clarify what indicator range is being referenced and provide a justification why the indicator range is not specifically stated in the CAM plan. Please provide test results that support the chosen indicator range.**

July 12, 2004

RESPONSE

The requested approach was submitted to FDEP to allow the revision of the "acceptable/allowable operating range" without it requiring a revision to the Title V permit that would require a public notice each time. The provisions of the current Title V permit allow this procedure, which is advantageous to FDEP and the applicant as it reduces unnecessary paperwork and expense.

Available test data are presented in Attachment 1.

**3. The CAM applicability determination included with the response state that CAM is not applicable to the MAP/DAP Storage and Loadout (EU 039) because no control device is required for oiled product. However, the permit states that "particulate emissions are controlled by a baghouse and/or application of a dust suppressant oil to the product." Please provide either a CAM plan for the baghouse for periods when it is being used or a statement that you wish the permit to be changed to only allow the use of the dust suppressant to meet the particulate emissions limit. With this statement, provide reasonable assurance that RACT avoidance limit can be met solely through the use of the dust suppressant and that the baghouse is not needed in conjunction with the dust suppressant.**

RESPONSE

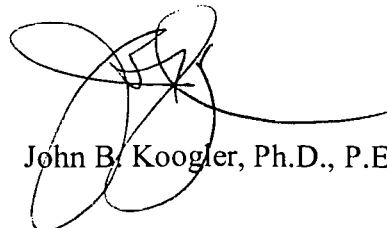
In order to preserve the use of the baghouse as and when necessary, a CAM plan for the baghouse is presented in Attachment 2.

The requested PE and RO certification forms are presented in Attachment 3.

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:par  
Encl.

C: Ron Brunk, USAC

**ATTACHMENT 1**

**MAP/DAP PLANT TEST DATA**

MAP/DAP PLANT TEST DATA

Test date	DAP	P2O5	Fluoride		Particulates	RGCE		Dryer	
	tph	tph	lb/ ton P2O5 (0.06 max)	lb/ hr (4.17)	lb/ hr (38.59)	flow (gpm)	dP, "H2O	flow (gpm)	dP, "H2O
14-Apr-98	146	74.0	0.002	0.18	1.8	2072	4.4	1105	6.0
12-Mar-99	146	70.0	0.048	3.38	8.7	2262	9.3	1163	8.3
23-Mar-99	150	73.0	0.056	4.12	9.8	1754	3.0	949	6.0
2-Mar-00	146	67.7	0.009	0.64	7.0	2135	6.0	1201	10.7
28-Apr-00	148	72.3	0.007	0.53	3.4	1463	7.8	1254	6.3
19-May-00	147	68.1	0.025	1.67	2.8	2884	8.6	935	7.4
29-Jun-00	139	62.8	0.052	2.92	9.7	2728	12.2	1128	7.9
2-Apr-01	149	77.7	0.013	1.03	3.0	1860	7.2	1122	8.4
29-Jun-01	143	65.8	0.007	0.43	9.6	1893	9.2	1333	11.9
20-Jul-01	149	74.8	0.003	0.19	6.1	2121	7.6	1336	13.1
18-Dec-01	107	49.4	0.006	0.28	26.5	1878	9.3	1038	9.7
24-Jun-02	146	67.7	0.001	0.09	8.7	2269	10.8	1300	4.8
17-Sep-02	170	79.2	0.001	0.08	7.5	2308	5.3	865	2.4
5-Aug-03	154	71.4	0.008	0.55	6.9	2169	5.5	1075	5.9
11-May-04	151	70.1	0.005	0.34	25.5	1905	6.1	1080	6.2
					min	1463	3.0	865	2.4
					max	2884	12.2	1336	13.1

**ATTACHMENT 2**

**CAM PLAN FOR BAG COLLECTOR**

## CAM PLAN FOR MAP/DAP STORAGE and LOADOUT (EU 039)

The MAP/DAP Storage and Loadout (EU 039) has a maximum processing rate of 300 tons per hour (TPH), 24-hour average basis, and has emissions limits for particulate matter.

The unit would only use a bag collector to control particulate matter emissions if the material being handled is not treated with dust suppressant oil. The maximum potential uncontrolled PM emissions, in this case would be greater than the major source threshold. A CAM-equivalent plan is therefore presented below for this unit for PM.

### 1. Emissions Unit Description: MAP/DAP Storage and Loadout

#### Applicable Regulations, Emission Limits, and Monitoring Requirements

Regulations: 62-296.700(2)(b), FAC.

#### Emissions Limits:

Particulate Matter: 22.7 lb/hr

Opacity: 20% [Rule 62-296]

Monitoring Requirements: Permit requires annual visible emissions testing.

Control Technology: As described above, no control equipment is required during normal operations. However, a bag collector can be utilized for controlling emissions, when needed (if material is not oiled).



## 2. Monitoring Approach

	Indicator No. 1	
Indicator	Pressure drop across bag collector.	
Measurement Approach	Differential pressure gauge.	
Indicator Range	An excursion is defined as operation outside of the indicator range allowed. Excursions trigger an inspection, corrective action, and a reporting requirement.	
Data Representativeness	The minimum accuracy of the device is 5 percent.	
Verification of Operational Status	Operator check	
QA/QC Practices and Criteria	The differential pressure gauge is calibrated periodically.	
Monitoring Frequency	The pressure drop is checked when in use.	
Data Collection Procedures	Daily	
Averaging Period	Daily	

## 3. Justification

### Rationale for Selection of Performance Indicator

Based on industry practice and facility choice, the performance indicator selected is pressure drop. This parameter has been widely accepted by the Department to provide reasonable assurance of proper bag collector operation and the resulting emission control.

### Rationale for Selection of Performance Indicator Range

The monitoring approach is based on previously accepted criteria. The indicator range will be based on historical tests that establish a range of acceptable values. An excursion is defined as operation outside of the established indicator range. If an excursion occurs, the corrective action plan will include an evaluation of the occurrence to determine cause and then determine the best course of action required to correct the situation. All excursions will be documented. An excursion shall not constitute a violation of the emission limitation.