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Bobby

Project No. 173-03-01



Fax

To:	Teri Donaldson, Esq.	
	FDEP Tallahassee	
	Office of General Counsel	
Fax No.:	850-245-2302	
From:	John B. Koogler, Ph.D., P.E.	Fax No.: 352-377-7158
Date:	April 15, 2005	Time: 1:36 pm
Sent By:		

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

KA 173-03-01

April 15, 2005

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

Subject: Comments on Draft Construction and Title V Permits
US Agri-Chemicals Corporation - Bartow Facility
DEP File Nos. 1050050-015-AC and 1050050-014-AV

Dear Mr. Bull:

We have reviewed the above referenced draft permits, issued for USAC's Bartow facility, and have the following comments for your consideration:

Comments on Draft Construction Permit

B.G.

1. Page 11, Specific Condition B.5. - It is requested that the time frame for submitting the requested information on oil be made consistent with the time frame allowed for submittal of the compliance test report (within 45 days of completion of test).

2. Page 11, Specific Condition B.5. - Regarding the oil application, please update the following:

NO. CONDITION 3/4

SAW

- a. The oil application rate is determined as a daily average.
- b. The oil currently used is Dustrol 3015.
- c. The minimum oiling rate at which compliance has been demonstrated is 0.2 gallon per ton of product.

METH 22

Call SWD

3. Page 13, Item 1 - The HF emissions limitation should be expressed as "less than 10 tons per year".

4. Page 13, Item 2 - The total HAP emissions limitation should be expressed as "less than 25 tons per year".

NO
NO

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April 15, 2005

Mr. Bobby Bull
Florida Department of
Environmental Protection

NO 5. Page 13, Item 3 - This condition is satisfied by complying with Specific Condition B.7. Additional fluoride emissions calculations, based on dependent variables, are not meaningful.

NO STMA LISTED 6. Page 14, Item (ii) - It should be noted that the AFPC Method IX, Method 3C, represents the appropriate test method for determining P2O5 content. It is our understanding that the AOAC method referenced in the draft permit is outdated.

REVIEW OF Subp + 60.17

Comments on Draft Title V Permit

NO 7. Page 6 of 7, Item 1 - The fluoride emissions limitation should be expressed as "less than 10 tons per year".

NO

NO 8. Page 6 of 7, Item 1 - The total HAP emissions limitation should be expressed as "less than 25 tons per year".

NO

ADD LANG

9. Page A2, Specific Condition A.6. - It is not clear what the Department expects as "all reasonable precautions" to minimize fugitive fluoride emissions.

NO *6 10. Page A3, Specific Condition A.12. - It should be noted that the AFPC Method IX, Method 3C, represents the appropriate test method for determining P2O5 content. It is our understanding that the AOAC method referenced in the draft permit is outdated.

11. Page A4, Specific Condition A.15. - This condition should be deleted as it is replaced by the new CAM requirements.

AP YES ACID FLOW NO

NO *6 12. Page A4, Specific Condition A.19. - It should be noted that the AFPC Method IX, Method 3C, represents the appropriate test method for determining P2O5 content. It is our understanding that the AOAC method referenced in the draft permit is outdated.

NO 13. Page A5, Specific Condition A.21. - This condition is satisfied by complying with Specific Condition A.3. Additional fluoride emissions calculations, based on dependent variables, are not meaningful.

NO or add lang.

14. Page A6, Specific Condition A.26. - USAC proposes to have back-up monitoring of other pertinent parameters to provide reasonable assurance of compliance for the periods when the required monitoring devices are out-of-service.

NO 15. Page A6, Specific Condition A.27 - The averaging time should reflect a daily period.

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Mr. Bobby Bull
Florida Department of
Environmental Protection

April 15, 2005

OK 16. Page B1, Specific Condition B.5. - Please delete EPA Method 5, as it is not applicable. It is requested that EPA Method 22 be added as an alternative method to EPA Method 9.

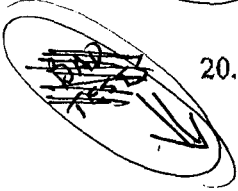
OK 17. Page B2, Specific Condition B.7. - It is requested that the time frame for submitting the requested information on oil be made consistent with the time frame allowed for submission of the compliance test report (within 45 days of completion of test)

18. Page B2, Specific Condition B.7. - Regarding the oil application, please update the following:

- See #2 a. The oil application rate is determined as a daily average.
- b. The oil currently used is Dustrol 3015.
- c. The minimum oiling rate at which compliance has been demonstrated is 0.2 gallons per ton of product.

Comments on CAM Monitoring Approach

CAM Parameters
19. It is requested that the required data collection and excursion determinations be based on a daily average, consistent with requirements imposed by MACT for such plants located at facilities that are major HAP emitters. It would be reasonable to expect that minor sources of HAPs would be subject to less stringent data averaging periods than that for the major sources of HAPs.



20. The following need to be updated:
- a. RGCV scrubber liquid flow rate range should reflect 1463 - 2884 gpm.
 - b. Dryer scrubber pressure drop range should reflect 2.4 - 13.1 in. H2O.
 - c. Dryer scrubber liquid flow rate range should reflect 865 - 1336 gpm.

We look forward to a discussion with FDEP staff regarding these issues of concern and an amicable resolution to this matter.

Enclosed is a request for an additional extension of time to allow FDEP to review and consider the comments provided herein.

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Mr. Bobby Bull
Florida Department of
Environmental Protection

April 15, 2005

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: R. Brunk, USAC
T. Donaldson, OGC - FDEP
J. Waters, FDEP - Tampa

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application
for Air Permit by

US Agri-Chemicals Corporation
3225 State Road 630 West
Ft. Meade, FL 33841

FDEP File Nos. 1050050-014-AV,
1050050-015-AC
Polk County - AP

MOTION FOR EXTENSION OF TIME

The Applicant, US Agri-Chemicals Corporation, by and through its undersigned Engineer of Record and pursuant to Rule 28-106, FAC, requests the Secretary of FDEP to grant an additional 30-day extension of time in which to file a petition. This will allow FDEP to review and consider the issues of concern to the applicant.

Dated the 15th day of April, 2005, in Gainesville, Alachua County, Florida.

Koogler & Associates, Inc.
Environmental Services

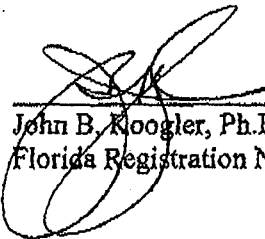


John B. Koogler, Ph.D., P.E.
Engineer of Record
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Teri Donaldson, Office of the General Counsel, 2500 Blair Stone Road, Tallahassee, Florida 32399-2400, and Mr. Jason Waters, FDEP Southwest District, 3804 Coconut Palm Drive, Tampa, Florida 33619, and Mr. Ron Brunl, US Agri-Chemicals Corporation, 3225 State Road 630 West, Ft. Meade, FL 33841, by FAX and by U.S. Mail, this 15th day of April, 2005.



John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925

U.S. Postal Service
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 or PO Box No. 3225 SR 630 West
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 Fort Meade, Florida 33841-9778
 PS Form 3800, January 2001 See Reverse for Instructions

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

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C. Signature *Mary Thomas* Agent Addressee

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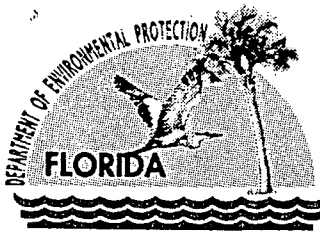
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DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION - TITLE V
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400
M& 5508
BUREAU OF AIR REGULATION

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AUG 16 2004





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.

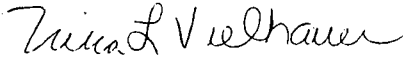
"More Protection, Less Process"

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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 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.

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.

8/10/04 cc = Bobby Bull
Pradeep Raval

U.S. Postal Service
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 Mr. Phong T. Vo., General Manager

Street, Apt. No.; or PO Box No.
 3225 SR 630 West

City, State, ZIP+4
 Fort Meade, Florida 33841-9778
 PS Form 3800, May 2000 See Reverse for Instructions

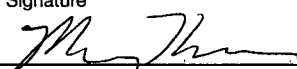
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1 Article Addressed to:
 Mr. Phong T. Vo
 General Manager
 Engineering and Technical Services
 US Agri-Chemicals Corporation
 3225 SR 630 West
 Fort Meade, Florida 33841-9778

2 Article Number
(Transfer from service label) 7000 2870 0000 7028 0061

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION - TITLE V
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

M& 5505

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MAR 7 2005

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0052+62



Friday, Barbara

From: Bull, Robert

Sent: Tuesday, March 01, 2005 9:50 AM

To: Friday, Barbara

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

5505

5515

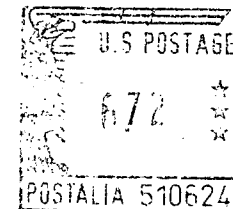
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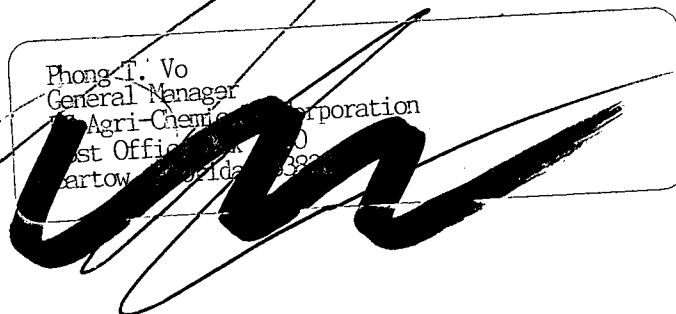


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Department of Environmental Protection
2600 Blair Stone Rd
Tallahassee FL 32399-2400



Phong T. Vo
General Manager
Agri-Chemical Corporation
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Tartow, Florida 32380



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