



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

April 9, 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 DEP File No. 1050050-014-AV

Dear Mr. Vo,

On March 11, 2004 the Department received your additional information for the renewal of the Title V permit for the US Agri-Chemicals Bartow Plant. The application is still incomplete because not all of the information the Department requested from you on January 22, 2004, and April 24 and October 7, 2003 has been provided. Specifically, the following information remains outstanding:

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 pondwater. If applicable, please also provide information concerning the closure of these ponds.
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.
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 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 the 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.

As a reminder, rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

"More Protection. Less Process"

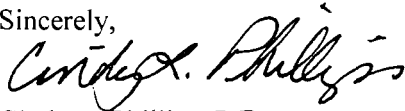
Printed on recycled paper.

FILE

Mr. Phong Vo
April 9, 2004
Page 2 of 2

Please submit all requested information immediately to Mr. Bobby Bull at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. 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,



Cindy L. Phillips, P.E.
Bureau of Air Regulation

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

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To MR. Phong Vo
 Street, Apt. No., or PO Box No. 3225 SR 630 West
 City, State, ZIP Fort Meade, FL 33841-9778
 PS Form 3800, May 2000 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

MR. PHONG VO
 GENERAL MANAGER
 ENGINEERING AND TECHNICAL SERVICES
 S AGRI-CHEMICALS CORPORATION
 3225 SR 630 WEST
 FORT MEADE, FLORIDA 33841-9778

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 1-26-04

C. Signature Agent
 Addressee

D. Is delivery address different from item 1? Yes
 No
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 Certified Mail Express Mail
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Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd, MS 5505
Tallahassee, FL 32399-2400

RECEIVED

JAN 30 2004

BUREAU OF AIR REGULATION



Jeb Bush
Governor

January 22, 2004

Department of Environmental Protection

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

David B. Struhs
Secretary

FILE

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 DEP File No.1050050-014-AV

Dear Mr. Vo,

The Title V permit for this facility will expire on February 16, 2004. The Department has not received a complete response to its request for additional information within the timeframes afforded by Rule 62-213.420(b), F.A.C, as set forth below.

On November 7, 2003 the Department electronically received your additional information for the renewal of the Title V permit for the US Agri-Chemicals Bartow Plant. The application is still incomplete because not all of the information the Department requested from you on April 24, 2003 and October 7, 2003 has been provided. Specifically, the following information remains outstanding:

1. Please provide reasonable assurance that the facility is not a Major Source of Hazardous Air Pollutants (HAPs).
2. Please provide reasonable assurance that the facility is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP), in particular 40 CFR63 Subparts AA and BB.
3. Please provide a Compliance Assurance Monitoring (CAM) Plan for all applicable emission units for the facility.
4. Please provide a facility plot plan for the facility. The previous application did not have the applicable attachment.
5. Please provide the process flow diagram(s) for the facility.
6. Please provide the precautions to prevent emissions of unconfined particulate matter for the facility.
7. Please provide a list of insignificant activities for the facility. The previous application did not have the applicable attachment.
8. Please provide a compliance report and plan for the facility. The previous application did not have the applicable attachment.
9. Please provide any applicable supplementary items for each emission unit in the facility.

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Mr. Phong Vo
January 22, 2004
Page 2 of 2

10. Please provide a list of any fugitive emissions from the facility.
11. Please provide the area map showing the facility location.

As a reminder, rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

Please submit all requested information immediately to Mr. Bobby Bull at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. 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.

Sincerely,



Cindy L. Phillips, P.E.
Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD
James K. Pennington, FDEP - DARM
Pradeep Raval, Consultant, Kooger and Associates
John B. Koogler, PhD., P.E., Kooger and Associates



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

CERTIFIED MAIL

October 7, 2003

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

RECEIVED

NOV 20 2003

Re: Title V Renewal Application dated February 20, 2003
Additional Information received September 23 and 29, 2003
Reference Permit No. 1050050-014-AV
Bartow Facility

BUREAU OF AIR REGULATION

Dear Mr. Vo:

On September 23 and 29, 2003, the Department received additional information relating to your Title V air permit application to renew your existing permit. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Application Responsible Official Certification. The September 23, 2003 submittal contained one application certification. It is unclear which source (this facility, 1050050 or the Ft. Meade facility, 1050051) was certified. It is the department's understanding that you and/or your consultant will be using EPSAP (Electronic Permit Submittal And Processing system) to submit your application. In this case, the certification will be using a PIN (Personal Identification Number). Please contact the Division of Air Resource Management Help Desk at 850-921-9557 to obtain the necessary PIN. Please obtain the PIN number in advance as the Department cannot waive the processing clock to wait on a PIN.
2. Paper Application and EPSAP Applications. The September 29, 2003 submittal was submitted by using a few pages of the Paper Form DEP 62-210.900(1) and the summary screen from the EPSAP Application. Application must be made on either the Paper Form OR the EPSAP Application.
3. PE Seal. The September 29, 2003 submittal contained a PE Certification that appears to be a photocopy and the raised seal is illegible. Please take necessary steps to insure the signature (i.e., blue ink) and seal are legible and original.

1050050014inc2.doc

Page 1 of 3

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4. Facility Supplemental Information. Page 10 of the application lists "waiver requested" for items 1. through 5. Page 11 lists Compliance Certification "Not Applicable". All information must be submitted at time of renewal application for Title V permit renewal. Please submit new pages 10 and 11 with all applicable information and/or attachments. (See Note 1) *Note: This information was requested in the April 24, 2003 letter from the department and has not been provided.*
5. Emission Unit Information. The application did not contain emission unit information (Section III). All information must be submitted at time of renewal application for Title V permit renewal. Please submit the applicable pages with all the applicable information for this facility. (See Note 1) *Note: This information was requested in the April 24, 2003 letter from the department and has not been provided.*
6. Compliance Assurance Monitoring (CAM). The additional information (this was indicated as not included) did not contain a discussion of CAM applicability. Please submit a CAM applicability determination, and a CAM plan for each pollutant specific emission unit, if necessary.
7. Maximum Achievable Control Technology (MACT) applicability. The additional information (this was indicated as not included) did not contain a discussion of MACT applicability for 40 CFR 63 Subparts AA and BB (National Emission Standards for Hazardous Air Pollutants – Phosphoric Acid Manufacturing and Phosphate Fertilizers Production). Please submit a MACT applicability determination.

¹Per Rules 62-213.420(1)(b) and 62-213.430(3), F.A.C., applications for permits that are being renewed shall be submitted on the DEP Form 62-210.900(1) and contain all the information identified in Rule 62-213.420(3), F.A.C. Please submit the necessary pages to correct your Title V operation permit renewal application with all the required information as well as any supporting calculations, assumptions, and reference material with the completed application form (DEP Form 62-210.900(1) Effective 6/16/03). Include with this application all required attachments and supplemental information, such as, but not limited to, diagrams and compliance assurance monitoring (CAM) plans. Please note that up to date versions of the application form can be down loaded from the Department's webpage:

<http://www.dep.state.fl.us/air/forms/application.htm#airpermit>

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the DEP Form 62-210.900(1), effective June 16, 2003 or use the EPSAP Application.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to response to Department requests for additional information of an engineering nature. Please complete and submit a new P.E. certification statement page from DEP Form 62-210.900(1), effective June 16, 2003 or use the EPSAP Application.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6, F.A.C. If you have any questions, please call me at (813) 744-6100, extension 105.

Sincerely,



Jason W. Waters
Air Permitting Engineer

CC: John B. Koogler, Ph.D., P.E.
Koogler and Associates

7002 2410 0003 3962 8795

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CERTIFIED MAIL™ RECEIPT	
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For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage \$	
Re (Endors)	Mr. Phong T. Vo, General Manager
Restrict (Endors)	Engineering & Technical Services
	US Agri-Chemicals Corporation
	3225 SR 630 West
	Ft Meade, FL 33841-9778
Total I	1050051-019-AV & 1050050-014-AV 10/7/2003
Sent To	
Street, Apt. No., or PO Box No.	
City, State, ZIP+4	
PS Form 3800, June 2002	See Reverse for Instructions

PERMIT TRANSFER

FACILITY ID: 1050050

FACILITY NAME: US Agri-Chemicals Corp.-Bartow Plant

DATE: 11/18/2003

TRANSFER TO: Scott Sheplak, Title V Administrator, Tallahassee

FROM: Jason Waters, Environmental Engineer, Southwest District

Per the request Trina Vielhauer, I am transferring the above referenced Title V Renewal Application to your office.

RECEIVED

NOV 20 2003

BUREAU OF AIR REGULATION

Application Routing and Transmittal Sheet

Air Permitting Supervisor - Required Information for Project Setup by Admin

Owner/(Facility Name, if needed): US Agri-Chemicals Corp./Bartow		Facility ID No.: 1050050
New Facility (Y/N): N	Relocatable (Y/N): N	Project Description: Renewal of 001-AV (initial) and its revisions. 1 or more CAM plans are required.
Project Name: Title V Renewal		
Type/Subtype: av05	Received: 2-28-2003	
Fee Submitted: <input type="checkbox"/> correct <input type="checkbox"/> incorrect <input checked="" type="checkbox"/> na	Should Be \$ 0	Override Reason (if needed):
Fee Checked By: EP	Submitted \$ 0	
Date: 3-7-2003	Needed/Refund \$ 0	

Admin - Project Setup Information

Project No.: 014	Initial ARMS Entry (Initials & Date): EP 3-7-2003	Virus Scan Date: na
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Air Permitting Supervisor - Application Information

Application Assigned To: JW	Date: 3-7-2003	
No. of Hardcopies: 3	No. of Disks: na	Confidential Information (Y/N): N
Application Distribution (hardcopy/disk): DEP Engineer: 3 County: 0 Other: <i>Send copy of app. to Scott/S. when incompleation letter go so out</i>		

Air Permitting - Permit Transmittal (add initials & date completed)

Permit No.: Project No.: <i>1050050-014-AV</i>	Intent/ Draft	Proposed (Title V Only)		Final	Day 30/60/90:
		Stage I	Stage II		
Engineer → permit supervisor					C/E Review Y/N:
Permit supervisor → DAPA					Y
DAPA → clerk/engineer					
Permit Package Mailed/Emailed					
ARMS Events Entry					
Posted to DARM Common					

Need EU info and all other info even if previously submitted: CAM plan(s) needed.

Air Permitting Supervisor - Data Fields for Access System (add at final issuance)

Permit No.:	Issue Date:	Engineer:
Facility Description:	Source Description:	
296:	MACT:	NSPS:
Fuels:	Control Equipment:	
Project Description/Comments:		

Air Permitting - System Updates (add initials & date completed)

Engineer – Final Permit Copied (read only) to Air_Common\Permits\PermitXX\
Engineer – (Final TV Permit only) Zipped file copied to Air_Common\Permits\TV_Zip\
Engineer – Complete ARMS Summary Screen (TV drafts and Admin Cor.):
Permitting Supervisor – Permit to be posted on DARM website? (Y/N) yes, by DARM Posted by/date:
Engineer - ARMS Inventory Data Entry: Permitting Clerk:
Permitting Clerk - Permit List Data Entry (Access):
Permitting Supervisor – Send permit to compliance section? (Y/N) Y
Permitting Supervisor – Copy of transmittal sheet to Nancy Knight (new facility)? (Y/N) N
Permitting Supervisor - Copy of Permit/Intent to Party of Interest? (Y/N) N

ARMS Facility

POINT AIRS ID 1050050 STATUS A OFFICE SWD SW: TAMPA
 SITE NAME U S AGRI-CHEMICALS - BARTOW COUNTY POLK
 OWNER/COMPANY U S AGRI-CHEMICALS CORP.

Project

AIR Permit # - - Project # 014 CRA Reference #
 Permit Office SWD (DISTRICT) Agency Action Pending
 Project Name TITLE V RENEWAL Desc Renewal of 001-AV (initial) and its revisions. 1 or more CAM plans ar
 Type/Sub/Des AV /05 Title V - Renewal Logged 03/07/2003
 Received 02/28/2003 Issued Expires OGC
 Fee 0.00 Fee Recd Dele Override NONE

Related Party

Role APPLICANT Begin 03/07/2003 End
 Name VO, PHONG T. Company U.S. AGRI-CHEMICALS
 Address 3225 STATE ROAD 630 WEST
 City FT. MEADE State FL Zip 33841 - 9778 Country
 Phone 863-285-8121 Fax 863-285-7088

Processors

Processor WATERS_J Y Active 03/07/2003 Inactive Events

Events Scheduled

90 of 90

AIRS ID: 1050050 Site Name: U S AGRI-CHEMICALS - BARTOW

Permit #: Type/Subtype: AV / 05 Received: 02/28/2003

Project #: 014 Project Name: (TITLE V RENEWAL)

> Receive Request: Done

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Receive Request	02/28/2003	1	03/01/2003		Done	02/28/2003
Initial Completeness Review	02/28/2003	60	04/29/2003		Incomplete	04/24/2003
RESET CLOCK	04/24/2003	1	04/25/2003		Done	04/30/2003
Awaiting Additional Information	04/24/2003	150	09/21/2003		Received	09/24/2003
Completeness Review	09/24/2003	30	10/24/2003		Incomplete	10/07/2003
RESET CLOCK	10/07/2003	1	10/08/2003		Done	10/07/2003
Awaiting Additional Information	10/07/2003	90	01/05/2004	-4	Pending	10/07/2003
Office Transfer	11/18/2003	3	11/21/2003		Done	11/18/2003
Office Transfer	12/15/2003	3	12/18/2003		Done	12/15/2003
Office Verification	12/15/2003	1	12/16/2003		Correct	12/15/2003

Permitting Application - Permit Detail and Log Permit

POINT AIRS ID 1050050 STATUS A OFFICE SWD SW: TAMPA

SITE NAME U S AGRI-CHEMICALS - BARTOW COUNTY POLK

OWNER/COMPANY U S AGRI-CHEMICALS CORP.

Project

AIR Permit # [] - [] - [] Project # 014 CRA Reference # []

Permit Office TAL (HEADQUARTERS) Agency Action Pending

Project Name TITLE V RENEWAL Desc Renewal of 001-AV (initial) and its revisions. 1 or more CAM plans are

Type/Sub/Des AV / 05 Title V - Renewal Logged 03/07/2003

Received 02/28/2003 Issued [] Expires [] OGC []

Fee 0.00 Fee Recd [] Dele [] Override NONE

Related Party

Role APPLICANT Begin 03/07/2003 End []

Name VO, PHONG T. Company U.S. AGRICHEMICALS

Address 3225 STATE ROAD 630 WEST

City FT. MEADE State FL Zip 33841 - 9778 Country []

Phone 863-285-8121 Fax 863-285-7088

Processor BULL R Y Active 12/15/2003 Inactive [] Events

Permitting Application - Events

Events Scheduled 90 of 90

AIRS ID 1050050 Site Name U S AGRI-CHEMICALS - BARTOW

Permit # [] Type/Subtype AV / 05 Received 02/28/2003

Project # 014 Project Name (TITLE V RENEWAL)

> Awaiting Additional Information: Pending

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Receive Request	02/28/2003	1	03/01/2003		Done	02/28/2003
Initial Completeness Review	02/28/2003	60	04/29/2003		Incomplete	04/24/2003
RESET CLOCK	04/24/2003	1	04/25/2003		Done	04/30/2003
Awaiting Additional Information	04/24/2003	150	09/21/2003		Received	09/24/2003
Completeness Review	09/24/2003	30	10/24/2003		Incomplete	10/07/2003
RESET CLOCK	10/07/2003	1	10/08/2003		Done	10/07/2003
Awaiting Additional Information	10/07/2003	90	01/05/2004	21	Pending	
Office Transfer	11/18/2003	3	11/21/2003		Done	11/18/2003
Office Transfer	12/15/2003	3	12/18/2003		Done	12/15/2003
Office Verification	12/15/2003	1	12/16/2003		Correct	12/15/2003



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

April 9, 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

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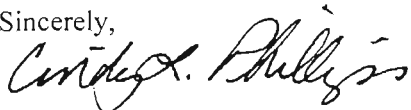
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Mr. Phong Vo
April 9, 2004
Page 2 of 2

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Sincerely,



Cindy L. Phillips, P.E.
Bureau of Air Regulation

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

USS AGREEMENT
1050050

DAP LOAD.
EV 039

Visible Emissions Observation Form

COMPLIANCE STATUS
YES NO

Source/Process Information				Opacity Readings										
FACILITY NAME U.S. AGRI. CHEMICALS CORP				OBSERVATION DATE 8-21-98		START TIME 8:30		STOP TIME 9:00						
SOURCE NAME Bartow DAP Loadout		PERMIT NO. A053-221967		MIN	0	15	30	45	MIN	0	15	30	45	
LOCATION/ADDRESS Hwy 60 West Bartow				1	0	0	0	0	31					
CONTACT Viet TA		PHONE NO. (941) 285-7123 ext 115		2	0	0	0	0	32					
PROCESS/PRODUCTION RATE 338 Tons/hour		CONTROL EQUIPMENT Baghouse		3	0	0	0	0	33					
OPERATING MODE AP0.2H₂		PERMITTED RATE 300 Ton/hr.		4	0	0	0	0	34					
FUEL TYPE/RATE NONE		MATERIAL TYPE/RATE Granular DAP		5	0	0	0	0	35					
DESCRIBE EMISSION POINT 23" - 31" Rectangular Duct				6	0	0	0	0	36					
HEIGHT ABOVE GROUND LEVEL 90 ft		HEIGHT RELATIVE TO OBSERVER 84 ft		7	0	0	0	0	37					
Emissions Description				8	0	0	0	0	38					
DESCRIBE EMISSIONS START clear END SAME		PLUME COLOR clear PLUME TYPE SAME		9	0	0	0	0	39					
WATER DROPLETS PRESENT? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		IF YES IS PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		10	0	0	0	0	40					
Meteorological Information				11	0	0	0	0	41					
BACKGROUND START Building END SAME		BACKGROUND COLOR START Grayish Blue END SAME		12	0	0	0	0	42					
SKY CONDITIONS/CLOUD COVER START clear END SAME		AMBIENT TEMP START 79°F END 81°F		13	0	0	0	0	43					
WIND SPEED START 5-10 END SAME		WIND DIRECTION START From SE END SAME		14	0	0	0	0	44					
Observation Data, Site Diagram				15	0	0	0	0	45					
				16	0	0	0	0	46					
				17	0	0	0	0	47					
				18	0	0	0	0	48					
				19	0	0	0	0	49					
				20	0	0	0	0	50					
				21	0	0	0	0	51					
				22	0	0	0	0	52					
				23	0	0	0	0	53					
				24	0	0	0	0	54					
				25	0	0	0	0	55					
				26	0	0	0	0	56					
				27	0	0	0	0	57					
				28	0	0	0	0	58					
				29	0	0	0	0	59					
				30	0	0	0	0	60					

Compliance Information

RANGE OF OPACITY READINGS MIN **0** MAX **0**

RANGE OF HIGHEST 24 CONSECUTIVE READINGS **0**

SHORT TERM AVERAGE DAILY
MEASURING PERIOD **6** MINUTES ACTUAL AVERAGE **0.0**

REMARKS
1 P on Baghouse. 0.2" H₂O SEE R.E. Hall And Viet TA. REVERSE

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

THIS IS TO CERTIFY THAT
ROBERT E HALL
has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.

THIS CERTIFICATE EXPIRES **8/27/98**
Feb 27, 1997

Robert E. Hall

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Form Number _____ Page _____ of _____
 Continued on VEO Form Number _____

Method Used (Circle One)
 Method 9 203A 203B Other: _____

Company Name: **US AGRI CHEMICALS**
 Facility Name: **DAP LOADOUT**
 Street Address: **HW 60 WEST**
 City: **BARTOW** State: **FLA** Zip: **33**

Process: **DAP LOADOUT** Unit #: _____ Operating Mode: **251 TPH**
 Control Equipment: **BARHOUSE** Operating Mode: **OTAP "HYD"**

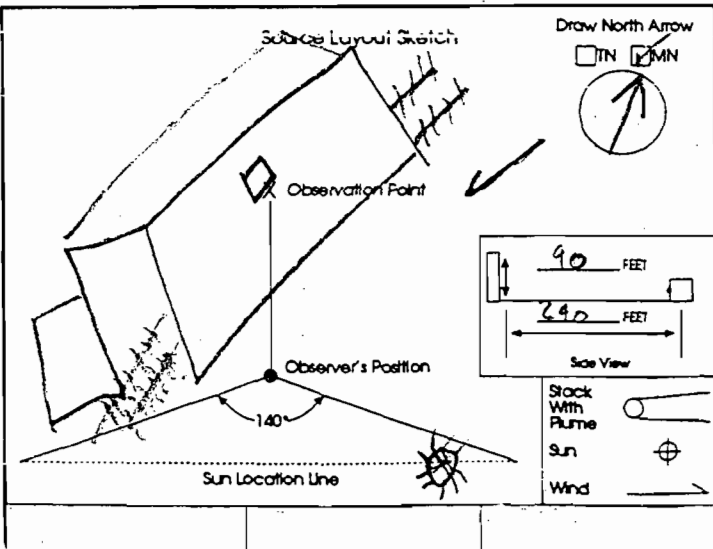
Describe Emission Point:
23" - 31" RECTANGULAR DUCT

Height of Emiss. Pt., Start **90'** End **90'** Height of Emiss. Pt., Rel. to Observer Start **84'** End **84'**
 Distance to Emiss. Pt., Start **240'** End **240'** Direction to Emiss. Pt. (Degrees) Start **NW** End **NW**

Vertical Angle to Obs. Pt., Start **27°** End **27°** Direction to Obs. Pt. (Degrees) Start **347°** End **347°**
 Distance and Direction to Observation Point from Emission Point Start **240' NW** End **240' NW**

Describe Emissions
 Start **CLEAR** End **SAME**
 Emission Color Start **CLEAR** End **SAME** Water Droplet Plume Attached Detached None

Describe Plume Background
 Start **BUILDING** End **BUILDING**
 Background Color Start **SAME** End **SAME** Sky Conditions Start **SCARRED** End **SAME**
 Wind Speed Start **5-10** End **8-10** Wind Direction Start **5 SW** End **5 SW**
 Ambient Temp. Start **45°F** End **45°F** Wet Bulb Temp. **34%** RH Percent **96**



Sec Min	Time Zone				Comments
	0	15	30	45	
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print): **HENRY MEDLEY**
 Observer's Signature: *Henry Medley* Date: **2/23/99**
 Organization: **US AGRI CHEMICALS**
 Certified By: **EASTERN TECH ASS.** Date: **2/17/99**

Additional Information

Visible Emission Observation Form *Today prior to 2/27 planning purposes only*

PLANT NAME
AGRI-CHEMICALS

ADDRESS
3225 STATE RD. 630 WEST

CITY FL MEADE **STATE** FLA **ZIP** 33834

PHONE 41-285-7123 **SOURCE ID NUMBER** EU ID # 039

PROCESS EQUIPMENT DAP LOADOUT **OPERATING MODE** 300TPH 287 TPH 96%

CONTROL EQUIPMENT BAGHOUSE **OPERATING MODE** 1.0-6.0in H₂O ΔP-1.1" H₂O

DESCRIBE EMISSION POINT 23" x 31"
START RECTANGULAR DUCT STOP SAME

HEIGHT ABOVE GROUND LEVEL **HEIGHT RELATIVE TO OBSERVER**
START STOP START STOP

DISTANCE FROM OBSERVER **DIRECTION FROM OBSERVER**
START 250 FT STOP 250 FT START SE STOP SE

DESCRIBE EMISSIONS
START CLEAR & VISIBLE STOP SAME

EMISSION COLOR **PLUME TYPE** CONTINUOUS FUGITIVE INTERMITTENT

START CLEAR STOP SAME

WATER DROPLETS PRESENT **IF WATER DROPLET PLUME**
NO YES ATTACHED DETACHED

POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED
START 3 FT. DUCT FROM STOP SAME

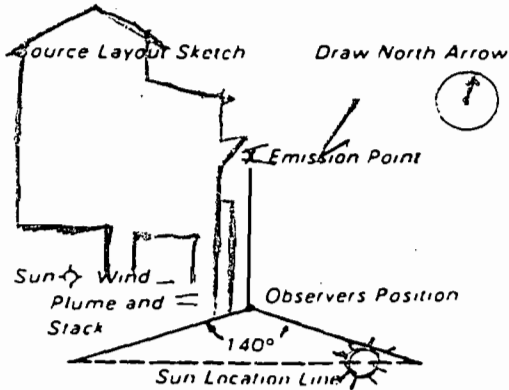
DESCRIBE BACKGROUND
START BLUE & GREEN STOP SAME

BACKGROUND COLOR **SKY CONDITIONS**
START BLUE GR STOP SAME START CLOUDY STOP SAME

WIND SPEED **WIND DIRECTION**
START 2.5 MPH STOP SAME START NE STOP NE

AMBIENT TEMP **WET BULB TEMP** **RH. percent**
START 70°F STOP SAME 40%

OBSERVATION DATE		START TIME					STOP TIME																						
7-28-00		0900					0930																						
MIN	SEC	0	15	30	45	MIN	SEC	0	15	30	45																		
	1						2					3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
0	31	0	0	0	0	0	31																						
0	32	0	0	0	0	0	32																						
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0	58	0	0	0	0	0	58																						
0	59	0	0	0	0	0	59																						
0	60	0	0	0	0	0	60																						



AVERAGE OPACITY FOR HIGHEST PERIOD 5% 0


NUMBER OF READINGS ABOVE 0% WERE 0

RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0

COMMENTS
TITLE PERMIT # 1050050-001-AV

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS

SIGNATURE _____ **DATE** _____

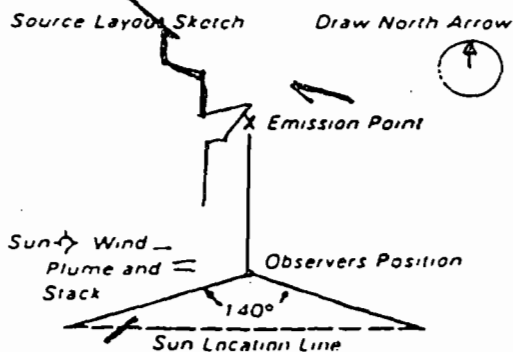
State of Florida

 Department of Environmental Protection

This is to Certify That
 EUGENE WILLIAMS
 has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.
 I WAS RECERTIFIED ON 2/16/00
 This Certificate Expires Feb 17, 2000

[Signature] Certificate Officer *[Signature]* Observer's Signature

Visible Emission Observation Form

SOURCE NAME US AGRICHEMICALS			OBSERVATION DATE 5-2-01				START TIME 0900		STOP TIME 0930			
ADDRESS STATE RD. Hwy 60 WEST			SEC MIN	0	15	30	45	SEC MIN	0	15	30	45
CITY BARTOW	STATE FL	ZIP 33860	1	0	0	0	0	31				
PHONE 863-285-7123	SOURCE ID NUMBER 039		2	0	0	0	0	32				
PROCESS EQUIPMENT DAP RAIL LOADOUT	OPERATING MODE 264 TONS/HR		3	0	0	0	0	33				
CONTROL EQUIPMENT BAGHOUSE	OPERATING MODE AP-3.4" HD		4	0	0	0	0	34				
DESCRIBE EMISSION POINT START 23" X 31" RECT. STOP SAME			5	0	0	0	0	35				
HEIGHT ABOVE GROUND LEVEL START STOP			6	0	0	0	0	36				
HEIGHT RELATIVE TO OBSERVER START STOP			7	0	0	0	0	37				
DISTANCE FROM OBSERVER START 220' STOP 220'			8	0	0	0	0	38				
DIRECTION FROM OBSERVER START SE STOP SE			9	0	0	0	0	39				
DESCRIBE EMISSIONS START CLEAR & INVIS. STOP			10	0	0	0	0	40				
EMISSION COLOR START CLEAR STOP SAME			11	0	0	0	0	41				
PLUME TYPE CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>			12	0	0	0	0	42				
WATER DROPLETS PRESENT NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			13	0	0	0	0	43				
IF WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>			14	0	0	0	0	44				
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START APPROX. 3' FROM POINT STOP SAME			15	0	0	0	0	45				
DESCRIBE BACKGROUND START CLEAR SKY STOP SAME			16	0	0	0	0	46				
BACKGROUND COLOR START BLUE STOP BLUE			17	0	0	0	0	47				
SKY CONDITIONS START CLEAR STOP			18	0	0	0	0	48				
WIND SPEED START 5-8 MPH STOP SAME			19	0	0	0	0	49				
WIND DIRECTION START EAST STOP EAST			20	0	0	0	0	50				
AMBIENT TEMP START 75°F STOP 75°F			21	0	0	0	0	51				
WET BULB TEMP RH. percent 70%			22	0	0	0	0	52				
23			0	0	0	0	0	53				
24			0	0	0	0	0	54				
25			0	0	0	0	0	55				
26			0	0	0	0	0	56				
27			0	0	0	0	0	57				
28			0	0	0	0	0	58				
29			0	0	0	0	0	59				
30			0	0	0	0	0	60				
AVERAGE OPACITY FOR HIGHEST PERIOD								NUMBER OF READINGS ABOVE 20% WERE 0				
RANGE OF OPACITY READINGS MINIMUM 0								MAXIMUM 0				



COMMENTS

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE

TITLE

DATE



State of Florida

Department of Environmental Protection

This is to Certify That EUGENE WILLIAMS

has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.

This Certificate Expires Aug 16, 2001

[Signature]
Certificate Officer

[Signature]
Bea's Signature

EU 038

DAP PLANT

Executive Summary

This compliance test report covers U.S. Agri-Chemicals' (USAC) Di-Ammonium Phosphate (DAP) plant operated under the Department permit No. AO53-179587
In accordance with Facility wide condition #9, USAC conducted a compliance test on 29-Jun-00 . The results for the tested unit are as follows:

Emissions

Permitted	Actual	
4.17	2.92	lbs of fluorides per hour;
0.06	0.047	lbs of fluorides per ton of equivalent P2O5 feed
38.59	5.8	lbs of particulates per hour
20	0.0	% Opacity

Operating conditions

Average

62.8	Feedrate (tons P2O5/hr)
138.6	Production rate (tons DAP/hr)
12.2	RGCE Pressure drop.
25.3	Natural Gas Firing Rate

*in H₂O ?
MMBTU/lm ?*

RECEIVED
JUL 27 2000
Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

The results of the compliance test above showed that the plant meets the emissions standards.

Executive Summary

This compliance test report covers U.S. Agri-Chemicals' (USAC) Di-Ammonium Phosphate (DAP) plant operated under Department permit # 1050050-002-AV, E.U. ID No. 038. USAC conducted the annual compliance test on 2-Apr-01. The results for the tested unit are as follows:

Emissions

Permitted	Actual	
4.17	1.03	lbs of fluorides per hour;
0.06	0.013	lbs of fluorides per ton of equivalent P ₂ O ₅ feed
38.59	3.0	lbs of particulates per hour
20	5.0	% Opacity

Operating conditions

Average

77.4	Feedrate (tons P ₂ O ₅ /hr)
149.4	Production rate (tons DAP/hr)
23	Natural gas firing rate (MMBtu/hr.)

The results of the compliance test above showed that the plant meets the emissions standards.

Test Methods: 1, 2, 4, 5, 9, and 13B. (With modifications approved by FDEP)

Executive Summary

This compliance test report covers U.S. Agri-Chemicals' (USAC) Di-Ammonium Phosphate (DAP) plant operated under Department permit # 1050050-002-AV, E.U. ID No. 038.

This test was performed to show compliance with a lower ratio of venturi flow to production rate

The stack test was performed on December 18, 2001.

The test result summaries are as follows:

Emissions

Permitted	Actual	
4.17	0.28	lbs of fluorides per hour;
0.06	0.006	lbs of fluorides per ton of equivalent P2O5 feed
38.59	26.5	lbs of particulates per hour
20	5.0	% Opacity

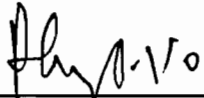
Operating conditions

Average

49.4	Feedrate (tons P2O5/hr)
107.4	Production rate (tons DAP/hr)
18.5	Natural gas firing rate (MMBtu/hr.)
0.8	Ratio of acid flow rate to venturis per TPH of P2O5.

Test Methods: 1, 2, 4, 5, 9, and 13B. (With modifications approved by FDEP)

I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in the attached documents are true, accurate, and complete.



Phong T. Vo, General Manager
Engineering and Technical Services

1/24/02
Date

I HAVE REVIEWED THIS REPORT AND IT DOES
NOT INDICATE COMPLIANCE WITH THE
PERMIT FOR THIS SOURCE.

DATE 3/12/02 BY HP

Executive Summary

This annual compliance test report covers U.S. Agri-Chemicals' (USAC) Di-Ammonium Phosphate (DAP) plant operated under Department permit # 1050050-012-AV, E.U. ID No. 038.

The stack test was performed on June 24, 2002

The test result summaries are as follows:

Emissions

Permitted	Actual	
4.17	0.09	lbs of fluorides per hour;
0.06	0.001	lbs of fluorides per ton of equivalent P2O5 feed
38.59	8.7	lbs of particulates per hour
20	0.0	% Opacity

Operating conditions

Average

67.7	Feedrate (tons P2O5/hr)
145.6	Production rate (tons DAP/hr)
20.3	Natural gas firing rate (MMBtu/hr.)
6.55	Tail Gas Scrubber pH
10.83	RGCE Pressure Drop
4.8	Dryer Pressure Drop
2269	RGCE Flow
1300	Dryer Flow

semi annual

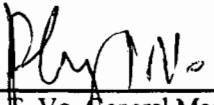
3.2 6M/TAD
3.7
3.6
2269
1300

3569

Natural gas was the only fuel burned during the past 12 months.

Test Methods: 1, 2, 4, 5, 9, and 13B. (With modifications approved by FDEP)

I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in the attached documents are true, accurate, and complete.


 Phong T. Vo, General Manager
 Engineering and Technical Services

7/8/02
 Date

Executive Summary

This annual compliance test report covers U.S. Agri-Chemicals' (USAC) Di-Ammonium Phosphate (DAP) plant operated under Department permit # 1050050-012-AV, E.U. ID No. 038.

The stack test was performed on September 17, 2002

The test result summaries are as follows:

D.E.P.

OCT 04 2002

Southwest District Tampa

Emissions

Permitted	Actual	
4.17	0.08	lbs of fluorides per hour;
0.06	0.001	lbs of fluorides per ton of equivalent P2O5 feed
38.59	7.5	lbs of particulates per hour
20	5.0	% Opacity

Operating conditions

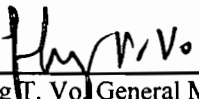
Average

79.2	Feedrate (tons P2O5/hr)
170.3	Production rate (tons DAP/hr)
13.9	Natural gas firing rate (MMBtu/hr.)
5.73	Tail Gas Scrubber pH
5.25	RGCE Pressure Drop
2.4	Dryer Pressure Drop
2308	RGCE Flow
865	Dryer Flow

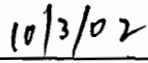
Natural gas was the only fuel burned during the past 12 months.

Test Methods: 1, 2, 4, 5, 9, and 13B. (With modifications approved by FDEP)

I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in the attached documents are true, accurate, and complete.



Phong T. Vo, General Manager
Engineering and Technical Services



Date

Executive Summary

This annual compliance test report covers U.S. Agri-Chemicals' (USAC) Di-Ammonium Phosphate (DAP) plant operated under Department permit # 1050050-012-AV, E.U. ID No. 038.

The stack test was performed on September 17, 2002

The test result summaries are as follows:

Emissions

Permitted	Actual	
4.17	0.08	lbs of fluorides per hour;
0.06	0.001	lbs of fluorides per ton of equivalent P2O5 feed
38.59	7.5	lbs of particulates per hour
20	5.0	% Opacity

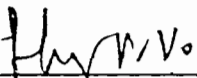
Operating conditions

Average	
79.2	Feedrate (tons P2O5/hr)
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13.9	Natural gas firing rate (MMBtu/hr.)
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2.4	Dryer Pressure Drop
2308	RGCE Flow
865	Dryer Flow

Natural gas was the only fuel burned during the past 12 months.

Test Methods: 1, 2, 4, 5, 9, and 13B. (With modifications approved by FDEP)

I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in the attached documents are true, accurate, and complete.



Phong T. Vo, General Manager
Engineering and Technical Services

10/3/02

Date



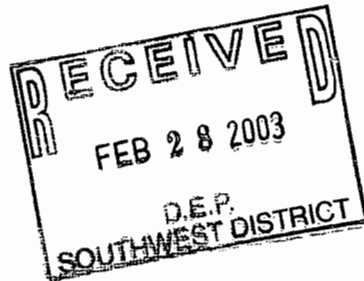
KOUGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

KA 173-03-01

February 20, 2003



Mr. Jerry Kissel, P.E.
Florida Department of
Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, FL 33619-8318

Subject: Title V Permit Renewal
U.S. Agri-Chemicals Corporation
Facility ID 1050050

Dear Mr. Kissel:

Enclosed are three copies of the Title V permit renewal application for the above referenced facility in a format discussed with FDEP staff.

If you have any questions, please call me.

Very truly yours,

KOUGLER & ASSOCIATES

Pradeep Raval

par
Encl.

c: R. Brunk, USAC



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

KA 173-03-01

March 8, 2004

RECEIVED

MAR 11 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 January 15, 2004, requesting additional information on the above referenced Title V renewal project.

The responses provided herein are in the format discussed with you and Bobby Bull in order to provide only the pertinent information.

1. Please provide reasonable assurance that the facility is not a Major Source of Hazardous Air Pollutants (HAPs).

RESPONSE

As the fluoride emissions limit for the MAP/DAP plant is 18.29 tons per year, even using conservative EPA factors (hydrogen fluoride at 30 percent of total fluorides), the plant is below major source threshold. As the site uses a dedicated neutralized scrubber water system, HF emissions are not expected from the scrubber water system. Other HAP emissions are not expected from the site based on the materials handled and/or processed.

2. Please provide reasonable assurance that the facility is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP), in particular 40 CFR63 Subparts AA and BB.

RESPONSE

As indicated above, the source is not a major source of HAPs. Therefore, the NESHAPs do not apply.

- 3. Please provide a Compliance Assurance Monitoring (CAM) Plan for all applicable emission units for the facility.**

RESPONSE

The CAM applicability and plan information is presented in Attachment 1.

- 4. Please provide a facility plot plan for the facility. The previous application did not have the applicable attachment.**

RESPONSE

The requested facility plot plan is presented in Attachment 2.

- 5. Please provide the process flow diagram(s) for the facility.**

RESPONSE

The requested process flow diagrams are presented in Attachment 3.

- 6. Please provide the precautions to prevent emissions of unconfined particulate matter for the facility.**

RESPONSE

The list of precautions to prevent emissions of unconfined particulate matter is presented in Attachment 4.

- 7. Please provide a list of insignificant activities for the facility. The previous application did not have the applicable attachment.**

RESPONSE

The list of insignificant activities is presented in Attachment 5.

- 8. Please provide a compliance report and plan for the facility. The previous application did not have the applicable attachment.**

RESPONSE

The compliance reports summary is presented in Attachment 6.

- 9. Please provide any applicable supplementary items for each emission unit in the facility.**

RESPONSE

The supplementary pertinent information is presented in the attachments herein.

- 10. Please provide a list of any fugitive emissions from the facility.**

RESPONSE

The list of fugitive emissions summary is presented in Attachment 7.

- 11. Please provide the area map showing the facility location.**

RESPONSE

The facility location map is presented in Attachment 8.

- 12. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.**

RESPONSE

The PE certification form is presented in Attachment 9.

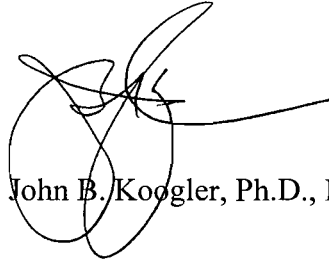
Ms. Cindy Phillips
Florida Department of
Environmental Protection

March 8, 2004

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

Very truly yours,

KOOGLER & ASSOCIATES

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

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

JBK:par
Encl.

C: Ron Brunk, USAC

ATTACHMENT 1

CAM APPLICABILITY ANALYSIS AND PLAN

CAM APPLICABILITY DETERMINATION

UNIT	DESCRIPTION	CAM APPLIES?	RATIONALE
038	MAP/DAP Plant	YES	Scrubber emissions > 100 tpy
039	MAP/DAP Storage and Loadout	NO	No control device required for oiled product

CAM PLAN FOR MAP/DAP PLANT

The MAP/DAP Plant at USAC's Bartow Facility (EU 038) has a maximum production rate of 150 tons per hour (TPH) of product and has emissions limits for particulate matter and fluorides. The plant uses tail gas scrubbers on the dryer and reactor/granulator exhaust streams to meet these emission limits and has uncontrolled PM and F emissions greater than the major source threshold. A CAM plan is therefore required for this source for PM and F.

1. Emissions Unit Description: MAP/DAP Plant, EU 038

Applicable Regulations, Emission Limits, and Monitoring Requirements

Regulations: Permit No. AC53-145424 (PM and F), 40CFR60.222 (F)

Emissions Limits:

Particulate Matter: 38.6 lb/hr

Fluoride: 0.06 lb/ton P₂O₅, 4.17 lb/hr

Opacity: 20% [Rule 62-296]

Monitoring Requirements: Permit requires monitoring of raw material input, liquid flow rate and pressure drop across the scrubbing systems.

Control Technology: Emissions from the plant are controlled by two packed tail gas scrubbers in parallel.

2. Monitoring Approach

	Indicator No. 1	Indicator No. 2
Indicator	Pressure drop across each tail gas scrubber.	Scrubber liquid flow rate to each tail gas scrubber.
Measurement Approach	Differential pressure transducer.	micromotion flow meter.
Indicator Range	An excursion is defined as operation outside of the indicator range in the permit. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as operation outside of the indicator range in the permit. 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

3. Justification

Rationale for Selection of Performance Indicators

Based on EPA regulations and industry practice, the performance indicators selected are the tail gas scrubber liquid flow rate and pressure drop. These parameters have been widely accepted by the Department to provide reasonable assurance of proper scrubber operation and the resulting emission control.

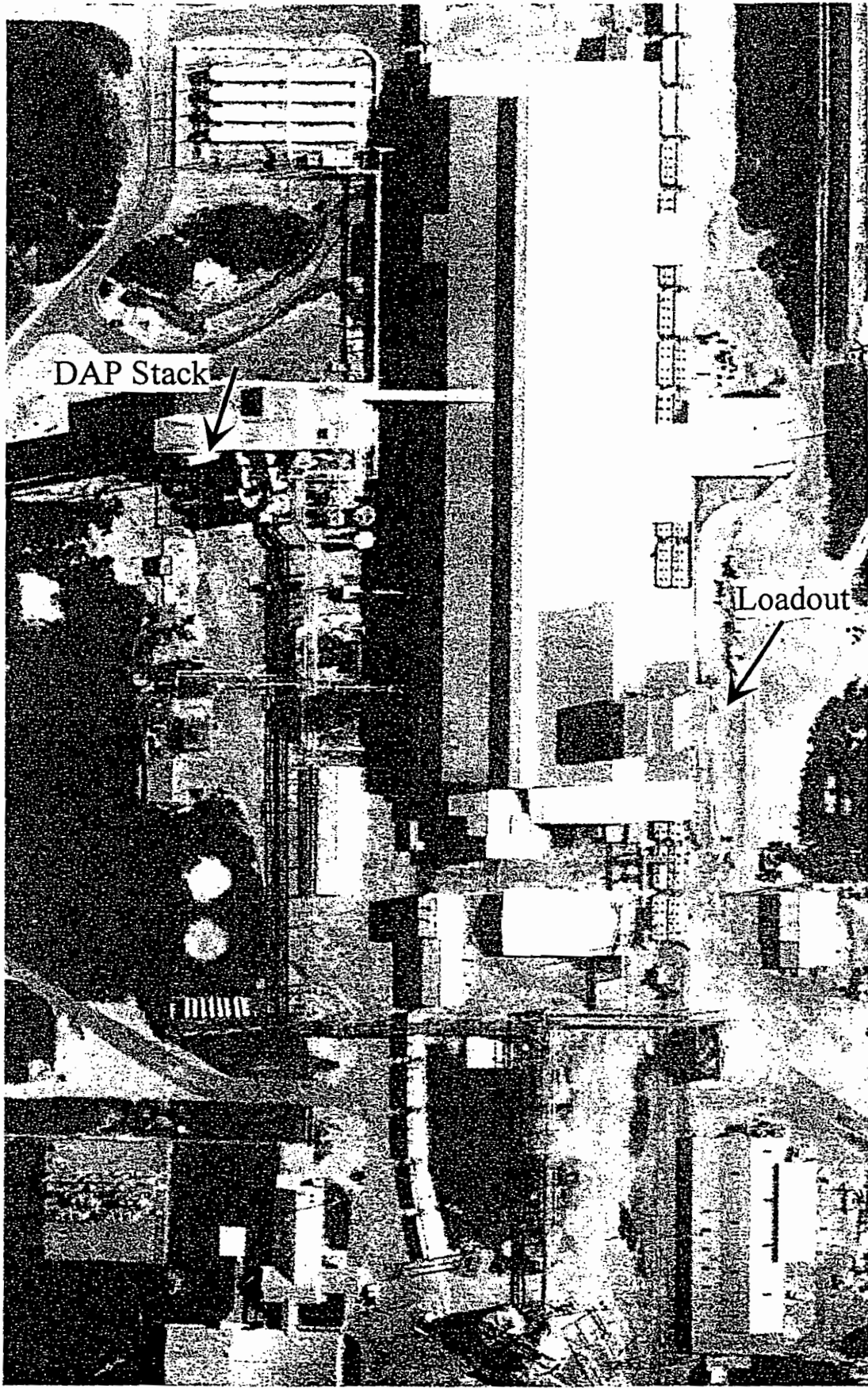
Rationale for Selection of Performance Indicator Ranges

The monitoring approach is based on EPA regulations for phosphate fertilizer plants. The indicator ranges are based on historical tests which 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.

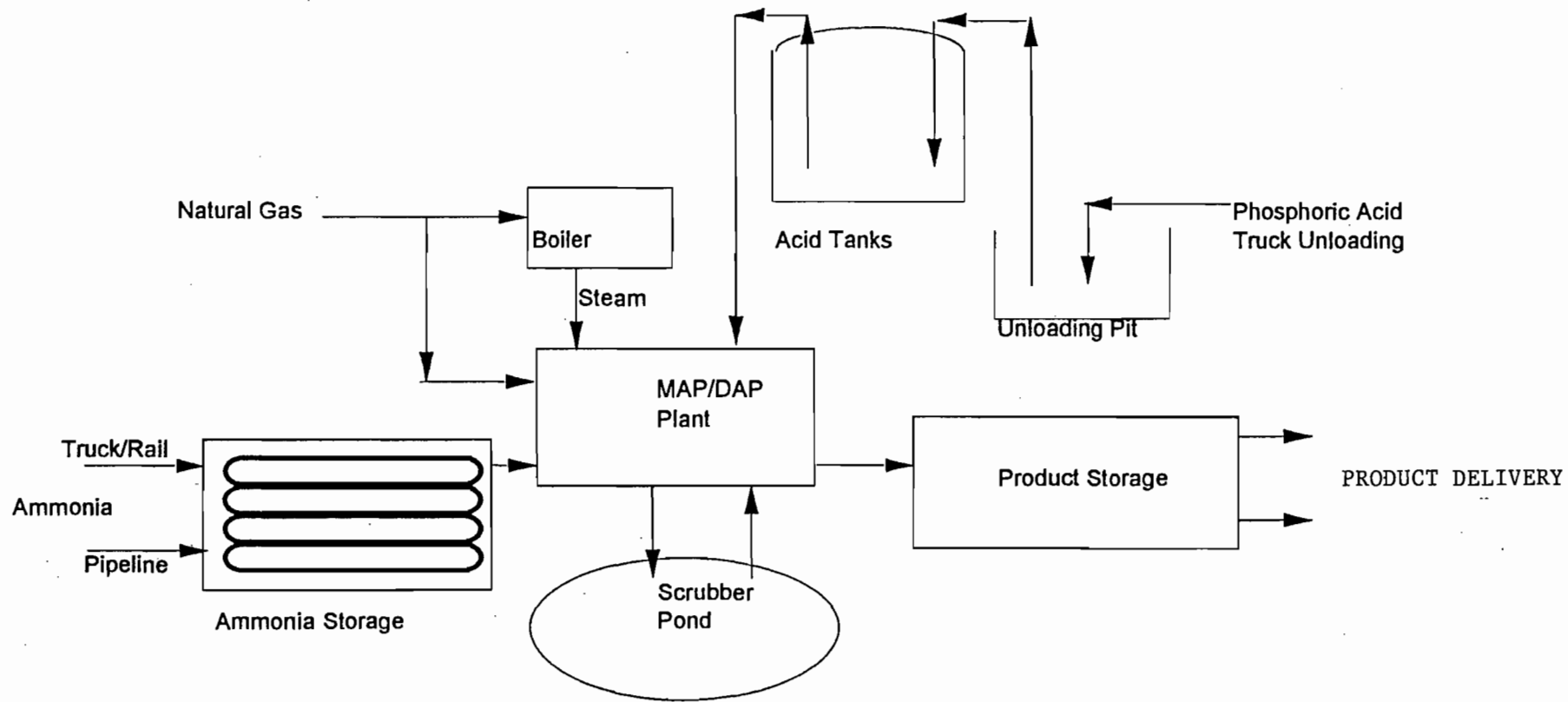
ATTACHMENT 2
FACILITY PLOT PLAN

U.S. Agri-Chemicals
Title V Facility Plot Plan

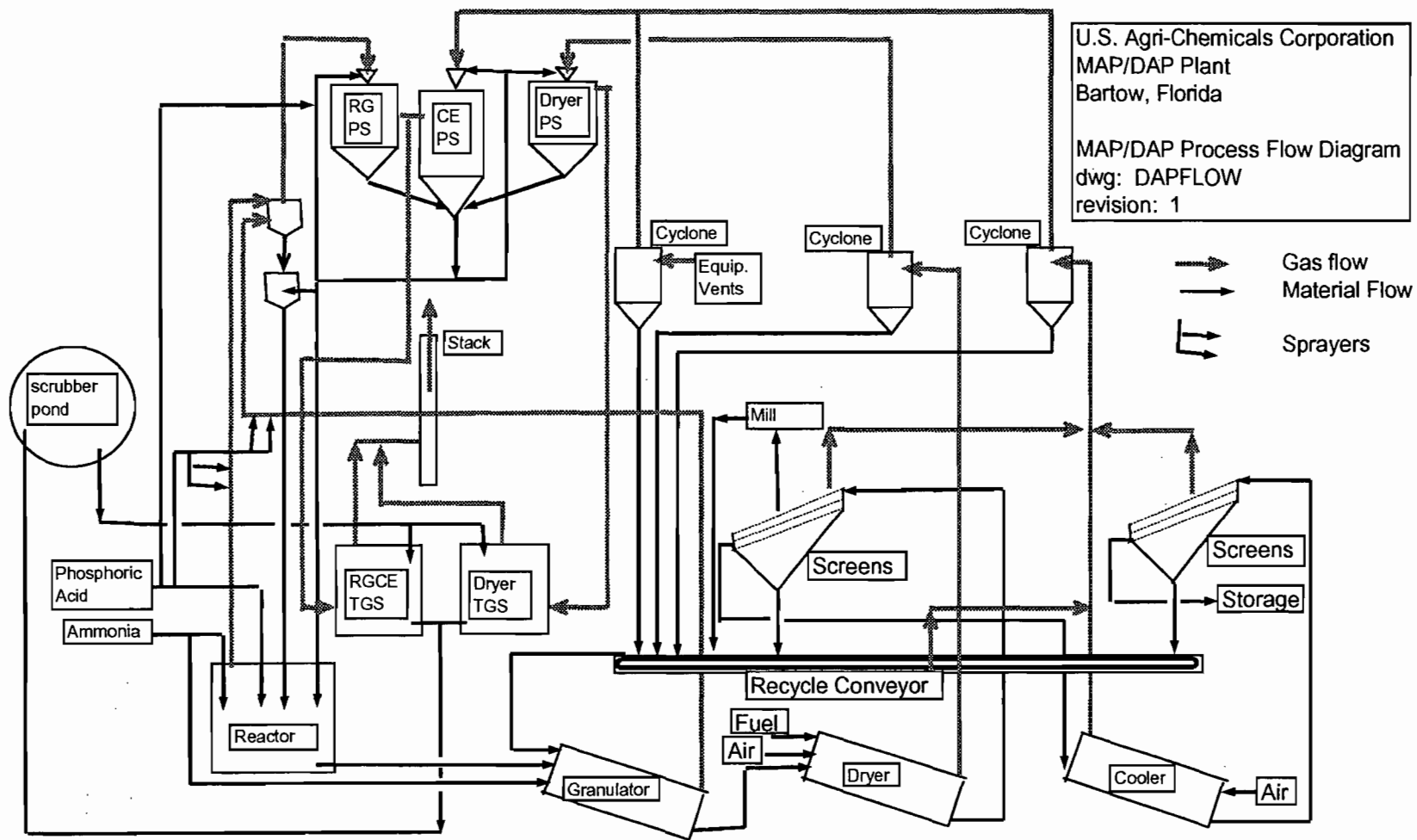
E.2. : BPLOT



ATTACHMENT 3
PROCESS FLOW DIAGRAMS



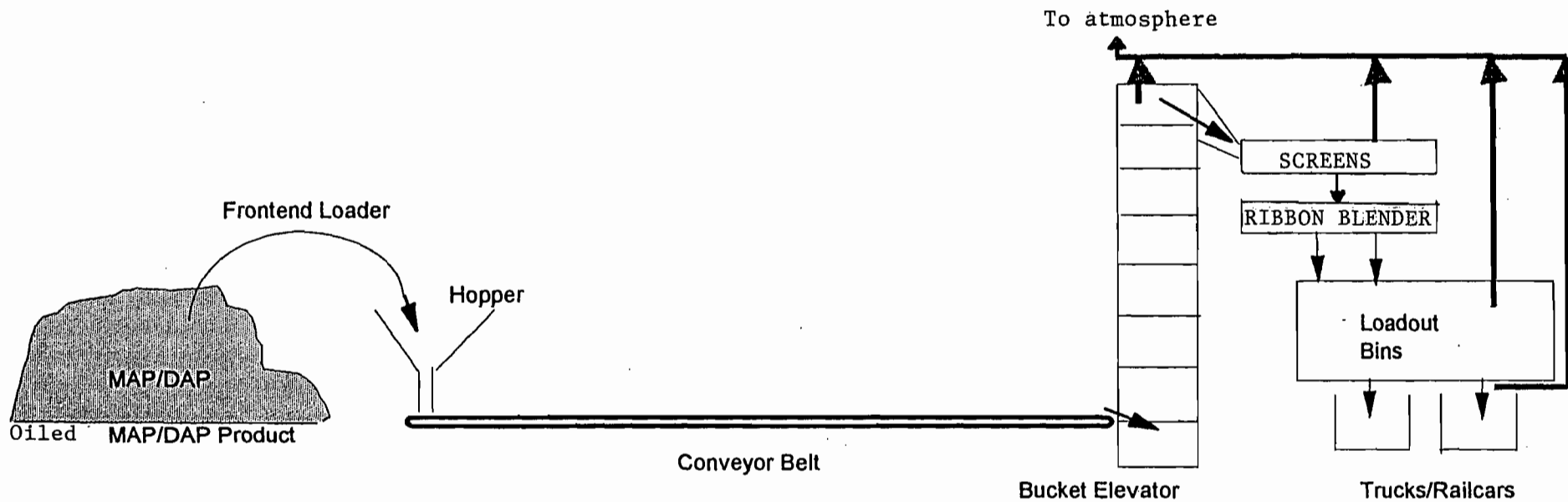
U.S. Agri-Chemicals Corporation
 MAP/DAP Plant
 Bartow, Florida
 Facility Process Flow Diagram
 dwg: BPROC





U.S. Agri-Chemicals Corporation
 MAP/DAP Plant
 Bartow, Florida

MAP/DAP Process Flow Diagram
 dwg: DAPFLOW
 revision: 1

➔ Gas flow
 ➔ Material Flow
 ↺ Sprayers



 Gas flow
 Material flow

U.S. Agri-Chemicals Corporation
 MAP/DAP Plant
 Bartow, Florida

Loadout Process Flow Diagram

dwg: LOADFLOW

ATTACHMENT 4

**PRECAUTIONS TO PREVENT EMISSIONS OF
UNCONFINED PARTICULATE MATTER**

PRECAUTIONS TO PREVENT EMISSIONS OF
UNCONFINED PARTICULATE MATTER

Reasonable precautions to minimize emissions of unconfined particulate matter may include, as necessary:

- Paved roadways; application of water to unpaved roads.
- Landscaping or planting of vegetation.
- Use of enclosures and windbreaks, where practical.
- Oiling of fertilizer products to reduce dust generation.

ATTACHMENT 5

LIST OF INSIGNIFICANT ACTIVITIES

LIST OF INSIGNIFICANT AND/OR UNREGULATED EMISSIONS UNITS FOR TITLE V PERMIT

GENERAL FACILITY WIDE

E	abrasive cleaning - indoors
E	agricultural related activities
E	air compressors
E	air conditioners
E	air vents in compressed air systems
E	ammonia bullets, pipeline, pop off valves, flanges, truck/rail unloading, flares and chillers
CD	asbestos, waste and haz-waste removal
CD	automatic oil/lube systems for mechanical equipment and fueling operations
E	automotive, tractor, locomotives and their repair shops
E	blueprint copiers
E	building ventilation systems
E	caustic tanks/vents
E	closed containers of maintenance chemicals
CD	cold cleaning degreasers (containing heavier than air solvents)
E	construction/repair of office, storage and residential units
E	containers, reservoirs, wax and grease
GD	containers and tanks for oils
CD	cooling ponds and process water storage ponds, gypsum stacks
GD	cooling towers (no heavy metals used as antiscalants or algacides)
E	degassifiers/deaerators
CD	diesel pump motors
E	drain vents
E	drinking water treatment area and wastewater treatment plant
E	ducts, chutes, equipment maintenance
E	dumpsters, other miscellaneous waste collection and handling
GD	electric substation/electric yard
E	electric-powered vehicles
E	electrical charging systems
E	electrically heated equipment for heat treating, drying, annealing, etc.
E	equipment cleaning, including steam cleaning
E	equipment for bonding brake shoes
E	equipment of hydraulic or hydrostatic testing
E	fire training exercises
E	food preparation, handling, consumption
E	fresh water tanks/vents
E	fuel tanks and dispensers
CD	gypsum stack process water re-circulation system (ditches, ponds, spillways)
E	hand held equipment
GD	handling of baghouse materials
E	hydroblasting
E	instrument air systems/vents
CD	laboratories (quality control, analytical, metallurgical)
E	landscaping and farm equipment
GD	lime silo with baghouse
E	lime tanks/vents
E	liming station
E	liquid sampling systems
E	maintenance of facilities
E	maintenance of grounds
E	maintenance shops
E	mechanical drives/gearboxes
CD	metal shops
GD	minor fugitive leaks from process equipment
E	mobile equipment fueling operations (diesel/gasoline)
E	mobile sources, including internal combustion engines, pumps, compressors, generators, welding , etc.
E	neutralization tanks/vents
E	non process mineral spirits use
E	open containers in use
E	painting /coating of equipment, tanks and structures (less than 6 gallons per day)

CD portable kerosene space heaters
 E pressure/steam relief valves
 GD process water treatment and management systems
 GD pump seals
 E purchased non-listed chemical tanks/vents (no HAP or VOC content)
 GD railcar/truck/tanker unloading
 E railroad flares
 GD raw material, reclaim/recycle material and product transfer and storage tanks
 GD reclaimed mined areas
 E reclaimed water tank vents
 CD refrigeration systems
 GD rock pile, rock hoppers, rock grinding mills
 CD safety devices
 CD safety klean solvent cleaners
 E sandbasters, welding equipment, compressors, wood shop, metal shop
 E service of air pollution control devices
 CD space heaters
 E steam vents/leaks
 E storage facilities for packaged materials
 E storage tanks and dispensers
 GD sulfuric acid tanks/vents
 E sweeping and general cleanup
 E temporary use of compressors, generators, water pumps with internal combustion engines
 GD transfer of materials on covered belt systems
 GD transformer vault/building
 E vacuum cleaning systems
 GD valves and flanges (no HAP or VOC content)
 E washing and cleaning equipment
 E waste preparation for disposal (in closed drums or other containers, spill cleanup)
 GD wastewater plants, water treatment area
 CD water pumps
 E water treatment aeration
 E water treatment chemical tanks/totes/drums
 GD wet limestone transfer, handling, storage
 E woodworking shops
 E fugitive emissions of PM/PM10, SO2, NOx, CO, VOCs, NH3 and HAPs

GRANULATION

GD choke feeder, covered conveyors, screening tower
 GD chutes, conveyor and hopper
 E coating oil tanks
 GD cooling tower, slurry pump, scrubber sump
 GD covered conveyor, surge bin, product screens, chute to truck/railcar
 GD material conveyors, elevators and screens
 E oil coating application systems
 E pond water sumps
 GD product recovery units
 GD raw material, reclaim material and product storage tanks, bins and buildings
 GD scrubber seal tanks
 E seal oil tanks

NOTES:

1. E reflects items to be exempted under EPA "trivial list" criteria
2. CD reflects items to be exempted under DEP's categorical exemption criteria
3. GD reflects items to be exempted under DEP's generic exemption criteria or criteria in 62-4.040 FAC

ATTACHMENT 6
COMPLIANCE REPORT

COMPLIANCE REPORT & PLAN

The compliance reports have been submitted for the listed emission units as follows:

EMISSION UNIT	COMPLIANCE TEST REPORT SUBMITTED
038 MAP/DAP Plant	August 5, 2003
039 MAP/DAP Storage & Loadout	August 5, 2003

As there are no emission units out of compliance, a compliance plan is not necessary for this facility.

ATTACHMENT 7

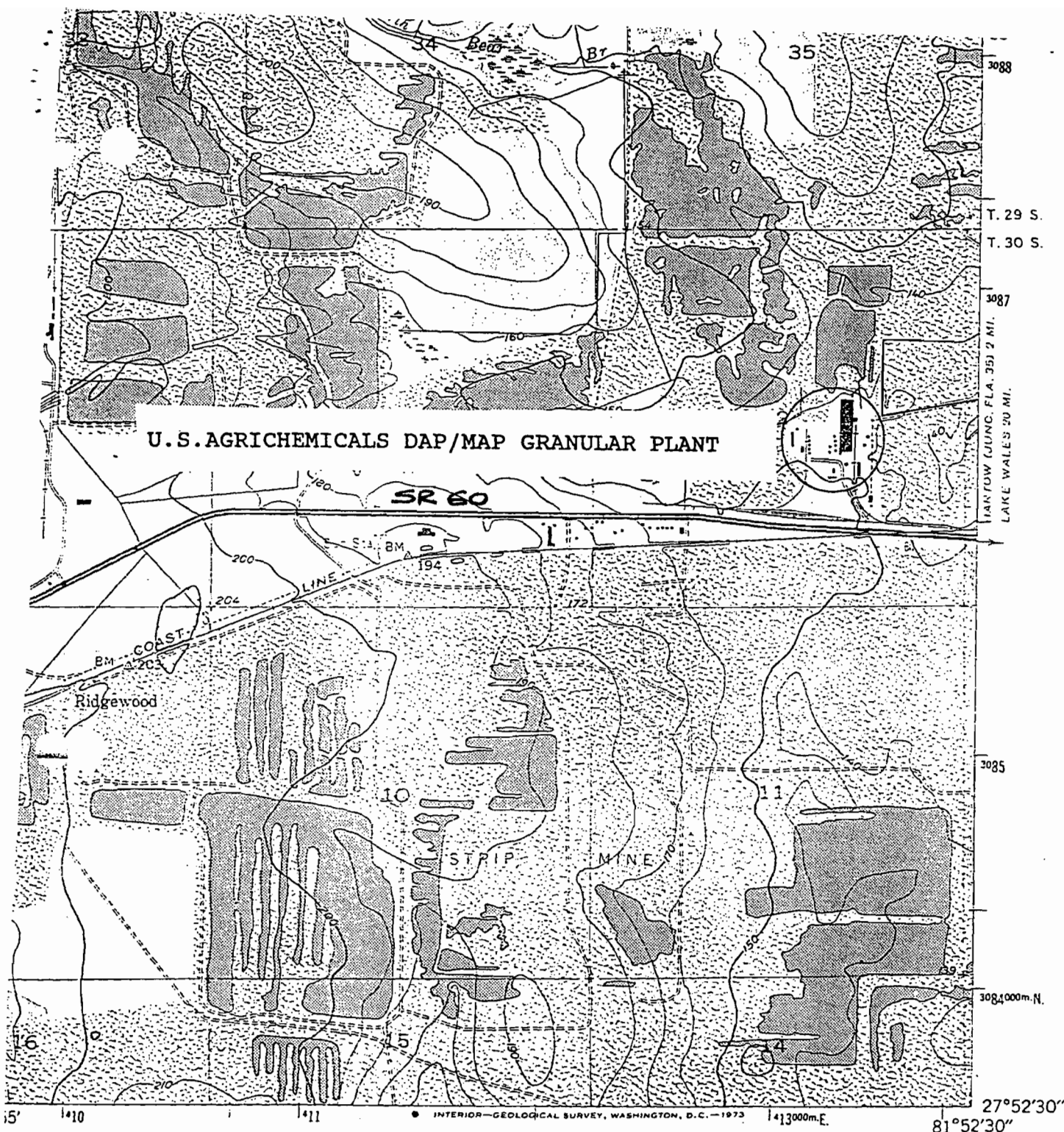
SUMMARY OF FUGITIVE EMISSIONS

FUGITIVE EMISSIONS

The phosphate fertilizer manufacturing process and associated activities result in fugitive emissions of PM/PM10, SO₂, NO_x, CO, VOCs, NH₃ and HAPs from the receiving, storage, handling, transfer and use of process, product and maintenance related materials. These fugitive emissions may occur both inside the manufacturing buildings and outside within the plant site.

ATTACHMENT 8

FACILITY LOCATION MAP



U.S. AGRICHEMICALS DAP/MAP GRANULAR PLANT

SR 60

Ridgewood

STRIPE MINE

U.S. Agri-Chemicals Corporation
 MAP/DAP Plant
 Bartow, Florida

Facility Location Map

dwg: BLOC

ROAD CLASSIFICATION

- | | | | |
|-------------------------------------------------------|---------------------|-------------------|-------|
| HARD-SURFACE ALL WEATHER ROADS | | DRY WEATHER ROADS | |
| Heavy-duty | _____ 4 LANE 6 LANE | Improved dirt | ===== |
| Medium-duty | _____ 4 LANE 6 LANE | Unimproved dirt | ----- |
| Loose-surface, graded, or narrow hard-surface - - - - | | | |
| ○ U. S. Route | | ○ State Route | |

MULBERRY, FLA.
 N2752.5-W8152.5/7.5

1949
 PHOTOREVISED 1972
 AMS 4639 IV NW-SERIES V847

(HOMELAND)
 4639 IV SE

ATTACHMENT 9

P.E. AND R.O. CERTIFICATION

Professional Engineer Certification

1. Professional Engineer Name: John B. Koogler, Ph.D, P.E. Registration Number: 12925
2. Professional Engineer Mailing Address... Organization/Firm: Koogler and Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377-5822 ext. Fax: (352) 377-7158
4. Professional Engineer Email Address: jkoogler@kooglerassociates.com
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>3/5/04</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: Phong T. Vo, General Manager of Engineering and Technical Services	
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: US Agri-Chemicals Corporation Street Address: 3225 State Road 630 West City: Ft. Meade State: FL Zip Code: 33841-9799	
4. Application Responsible Official Telephone Numbers... Telephone: (863) 285-8121 ext. Fax: (863) 285-7088	
5. Application Responsible Official Email Address: PVO@USAGRICHEM.COM	
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>3/8/04</u>	

U.S. Agri-Chemicals Corporation
3225 State Road 630 West
Fort Meade, FL 33841-9799
941 285 8121



A Sinochem Company

March 08, 2004

RECEIVED

MAR 10 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

RE: Additional Information on Title V Permit Renewal
U.S. Agri-Chemicals – Bartow Facility
DEP File No. 1050050-014-AV

Dear Ms. Phillips,

Enclosed please find the original Responsible Official Certification to match the response filed by Pradeep Raval of Koogler & Associates for the subject permit renewal.

Please feel free to contact me at (863) 285-8121, extension 279 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald L. Brunk".

Ronald L. Brunk, Manager
Environmental Engineering

CC: P. Raval- K&A



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: Phong T. Vo, General Manager of Engineering and Technical Services
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: US Agri-Chemicals Corporation Street Address: 3225 State Road 630 West City: Ft. Meade State: FL Zip Code: 33841-9799
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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>3/8/04</u></p>