

Bobby

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**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**US AGRI-CHEMICALS CORPORATION,
Bartow Chemical Plant,**

Petitioner,

v.

**OGC #05-0420
DEP Permit 1050050-014-AV**

**DEPARTMENT OF ENVIRONMENTAL
PROTECTION,**

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection upon receipt of a request made by petitioner, US Agri-Chemical Corporation, to grant an extension of time to file a petition for an administrative hearing to allow time to provide certain information to the FDEP on several specific permit conditions for its facility in Polk County, Florida. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until **April 15, 2005**, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 16th day of March, 2005, in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



**JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302**

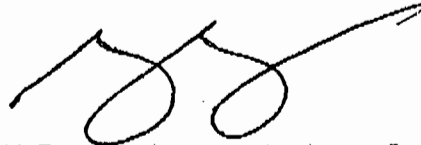
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
_ U. S. Mail facsimile only, this 13th day of March, 2005, to:

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

Fax 352-377-7158



W. Douglas Beason, Assistant General Counsel
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Boulevard - Mail Station 35
Tallahassee, FL 32399-3000
850-245-2242 facsimile 850-245-2302

with a courtesy copy to:

Trina L. Vielhauer
Chief
Bureau of Air Regulation

facsimile: 850-921-9533

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

US AGRI-CHEMICALS CORPORATION,
Bartow Chemical Plant,

Petitioner,

v.

OGC #05-0421
DEP Permit 1050050-015-AC

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING

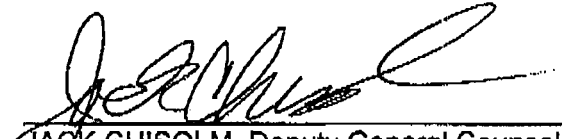
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IT IS ORDERED:

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DONE AND ORDERED on this 16th day of March, 2005, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
_ U. S. Mail facsimile or ly, this 23rd day of March, 2005, to:

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

Fax 352-377-7158



W. Douglas Beason, Assistant General Counsel
STATE OF FLORIDA DEPARTMENT
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IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until **June 24, 2005**, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 31 day of May, 2005, in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



**JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302**

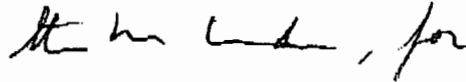
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I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
_ U. S. Mail facsimile only, this 31st day of May, 2005, to:

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

facsimile: 352-377-7158



W. Douglas Beason, Assistant General Counsel
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Boulevard - Mail Station 35
Tallahassee, FL 32399-3000
850-245-2242 facsimile 850-245-2302

with a courtesy copy to:

Trina L. Vielhauer ,
Chief
Bureau of Air Regulation

facsimile: 850-921-9533

Phong T. Vo
General Manager
US Agri-Chemicals Corporation

facsimile: 863-285-7088

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

US AGRI-CHEMICALS CORPORATION,
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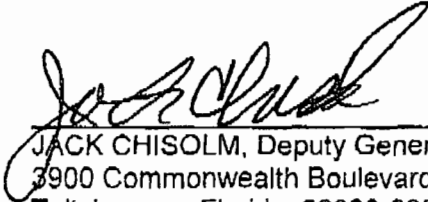
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DONE AND ORDERED on this 31 day of May, 2005, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302


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Koogler & Associates
4014 NW 13th Street
Gainesville, FL 32609

facsimile: 352-377-7158


W. Douglas Beason, Assistant General Counsel
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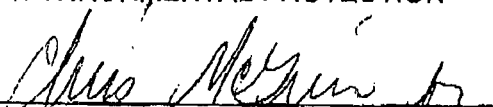
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IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until **May 18, 2005**, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 21st day of April, 2005, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

Best Available Copy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
_ U. S. Mail facsimile only, this 20th day of April, 2005, to:

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

facsimile: 352-377-7158



W. Douglas Beason, Assistant General Counsel
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Boulevard - Mail Station 35
Tallahassee, FL 32399-3000
850-245-2242 facsimile 850-245-2302

with a courtesy copy to:

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until **May 18, 2005**, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 27th day of April, 2005, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Chris McGinnis

JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

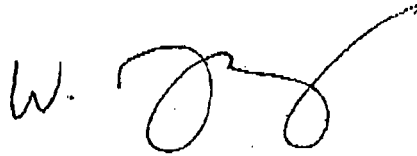
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
_ U. S. Mail facsimile only, this 29th day of April, 2005, to:

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

facsimile: 352-377-7158



W. Douglas Beason, Assistant General Counsel
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Boulevard - Mail Station 35
Tallahassee, FL 32399-3000
850-245-2242 facsimile 850-245-2302

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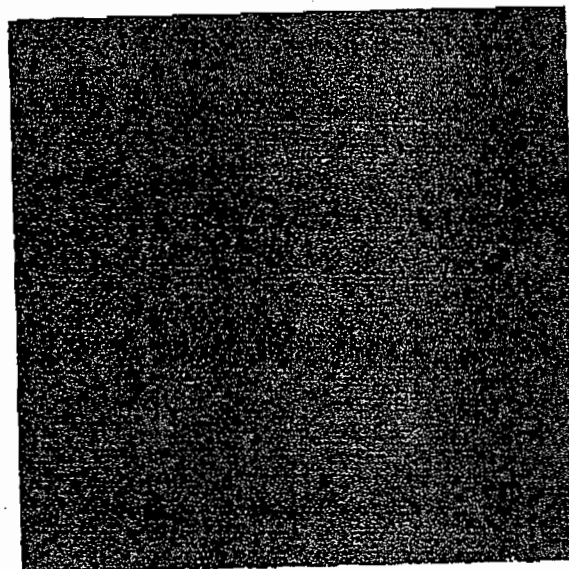


ENVIRONMENTAL SERVICES

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

KA 173-03-01

July 22, 2005



Teri Donaldson, Esquire
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Extension of Time to
File a Petition
US Agri-Chemicals Corporation
Polk County, Florida
DEP File Nos. 1050050-014-AV, 1050050-015-AC

Dear Ms. Donaldson:

Attached is a request for an extension of time to file for a hearing in accordance with Rule 28-106, FAC.

If you have any questions concerning this request, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

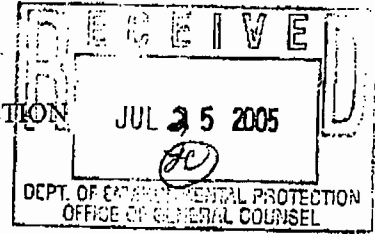
John B. Koogler, Ph.D., P.E.

JBK:par
Encl.

C: Jason Waters, FDEP
Ron Brunk, USAC

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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 60-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 22nd day of July, 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

POLK COUNTY DEMOCRAT

USAC To Close Plants; Mosaic To Be Polk's Sole Phosphate Giant

By S. L. FRISBIE, IV, Publisher

By the end of the year, Polk County's once-vibrant phosphate industry will be down to a single major player.

This week, The Mosaic Company, created last October by the merger of IMC and Cargill, announced that it has reached a multi-million-dollar settlement with U.S. Agri-Chemicals Corp. to terminate a long-term agreement under which IMC and Mosaic have sold phosphate ore to USAC since 1994.

USAC, which operates a phosphoric acid plant in Fort Meade and a dry fertilizer products plant in Bartow, will close both facilities. The Bartow plant produces diammonium phosphate and monammonium phosphate.

That will leave Mosaic as the only phosphate company with production operations in Polk County. CF Industries still has an office at what used to be its Bonnie Mine, but its processing plant is north of Plant City in Hillsborough County.

A few decades ago, there were more than a dozen phosphate companies digging up phosphate rock and processing it into fertilizers and other products in Polk County. The field has become smaller as some companies merged and others ran out of phosphate ore reserves.

Mosaic's announcement said that the two companies "intend to finalize definitive agreements and close on the transactions by mid-December, 2005."

The announcement also said that USAC "has informed Mosaic that it intends to cease phosphate operations at its Bartow and Fort Meade, Fla., facilities upon the exhaustion of its remaining raw materials inventories."

USAC officials have been instructed by their Chinese corporate owners, Sinochem Corp., not to comment on the company's plans, but word of the impending closure of the USAC plants spread quickly throughout what is left of Polk County's phosphate industry.

Employees have been told that the plants will be closed when existing inventory of phosphate ore has been processed into phos acid, DAP and MAP, which reportedly is expected to occur before the end of the year.

At the heart of the closure was IMC's decision last September to terminate a long-term agreement to sell approximately two million tons a year of ore from its phosphate mines to USAC. The latter company has not operated its own mines for many years.

Under terms of the agreement, IMC was to sell phosphate rock to USAC until 2014, but IMC had the option to terminate the agreement before then.

One month prior to the merger of IMC and Cargill that formed Mosaic, IMC gave notice to USAC that it would exercise that termination option on Oct. 1, 2007.

After the merger, Mosaic, which assumed all the prior contracts and obligations of IMC and Cargill, reviewed that decision and decided not to change it.

USAC officials reportedly tried to negotiate an extension with Mosaic, but in the end, the two companies agreed to terminate the contract much earlier than 2007.

Mosaic's phosphate reserves are believed to provide enough phosphate rock to keep the company's Polk County plants in operation for another 30 years.

The complex agreement between Mosaic and USAC, announced from Mosaic's headquarters in Plymouth, Minn., is subject to approval by the boards of directors of the two companies and by various regulatory agencies in the United States and China.

The agreement between the two companies, called "a global resolution" by Mosaic because of the variety of issues that it resolves, provides that:

€ The agreement by Mosaic to sell rock to USAC will be terminated.

€ Mosaic will pay \$84 million to USAC in exchange for that early termination. Included in the settlement is compensation for prepayment of \$57 million made by USAC to IMC in 2000.

€ Mosaic will pay an additional approximately \$10 million to USAC to settle a lawsuit over the price that IMC had charged USAC for the rock under the contract.

€ Mosaic will issue approximately \$38 million in Mosaic stock to USAC in exchange for land owned by USAC which is estimated to contain approximately three million tons of phosphate ore, plus various equipment and spare parts.

€ USAC will "be restricted" in its ability to sell those shares for 18 months.

€ Mosaic will not assume any liabilities, "including closure liabilities," of USAC. The primary closure liability in the phosphate industry is gypsum stacks.

Back to Top

1/2 PAY - OCTOBER MEETING

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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 24-106, 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 22nd day of June, 2005 in Gainesville, Alachua County, Florida.

Koogler & Associates, Inc.
Environmental Services

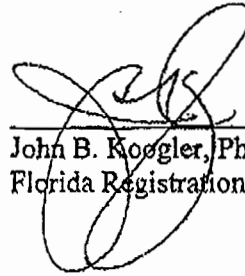


John B. Koogler, Ph.D., P.E.
Engineer of Record
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822

Best Available Copy

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Teri Donaldson, Office of the General Counsel, 1600 Blair Stone Road, Tallahassee, Florida 32399-2400, and Mr. Jason Waters, FDEP Southwest District, 3804 Coconut Palm Drive, Tampa, Florida 33619, and Mr. Ron Bruner, US Agri-Chemicals Corporation, 3225 State Road 630 West, Ft. Meade, FL 33841, by FAX and by U.S. Mail, this 22nd day of June, 2005.



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

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 |

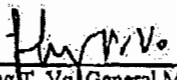
Operating conditions

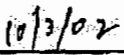
| Average | |
|---------|-------------------------------------|
| 79.2 | Feedrate (tons P2O5/hr) |
| 170.3 | Production rate (tons DAP/hr) |
| 13.9 | Natural gas firing rate (MMBtu/hr.) |
| 5.73 | Tail Gas Scrubber pH |
| 5.25 | RGCE Pressure Drop |
| → 2.4 | Dryer Pressure Drop |
| 2308 | RGCE Flow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

RE: DEP File No. 1050050-012-AV
Dedusting Oil Application at Bartow

Visible Emissions Observation

| | |
|------------------------------------|---|
| Date | January 13, 2003 |
| Source Name | U.S. Agri-Chemicals Corporation, Bartow |
| Address | Highway 60 West |
| Process Equipment | GMAP/DAP Storage and Shipping |
| Emission Source | GMAP/DAP Storage and Shipping |
| Oil Application Rate | 0.2 gallons per minute |
| Coating Oil | Custom Chemicals Corp. CDC-520 (See attached MSDS) |
| GMAP/DAP Storage/Shipping | Operating |
| Point of Application of Oil | GMAP/DAP Cooler |
| Description of Oiling Rate Control | The product feed rate to the cooler is measured by a weigh belt and a ratio controller adds oil to the cooler depending on the cooler input feed. |

MSDS
Dustrol
3015
attached

Results of Visible Emission Survey :

A visible emissions survey of the facilities showed visible emissions to be less than 5% from either the DAP storage building or the Rail Shipping facility.

Eugene Williams
Eugene Williams

1/13/03
Date

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.

2/19/2003

FIELD EXPIRATION DATE

298251

CERTIFICATION NUMBER

ORLS05

LECTURE EXPIRATION DATE

Eugene Williams
SEALERS SIGNATURE

Best Available Copy

04/15/2005 15:07

8632857008

US AGRICHEMICAL

PAGE 04/04

Visible Emission Observation Form

| | | | | | | | | | | | | | | |
|--|--|--|--|---|----|----|------------------------------|------|---|----|------------------------------------|----|--|--|
| Name: US AGRICHEMICALS | | | Observation Date: 1-13-03 | | | | Start Time: 2:55 PM | | | | Stop Time: 3:10 PM | | | |
| Address: 2560 HWY 60 WEST | | | Sec | 0 | 15 | 30 | 45 | Sec | 0 | 15 | 30 | 45 | | |
| | | | Min. | - | | | | Min. | | | | | | |
| City: BARTON | | | State: FLA | | | | Zip: 33830 | | | | | | | |
| Phone: 863-533-0471 | | | Source I.D. Number: | | | | | | | | | | | |
| Process Equipment: DAP RAIL LOADOUT | | | Operating Mode: 100% | | | | | | | | | | | |
| Control Equipment: BAGHOUSE | | | Operating Mode: DOWN DOWNG TEST | | | | | | | | | | | |
| Describe Emission Point | | | Start: RECT. DUCT 23'x31" | | | | Stop: SAME | | | | | | | |
| Height above Ground Level | | | Start: 90' | | | | Stop: 90' | | | | | | | |
| Distance from Observer | | | Start: 180' | | | | Stop: 180' | | | | | | | |
| Describe Emissions: | | | Start: CLEAR & INVISIBLE | | | | Stop: SAME | | | | | | | |
| Emission Color | | | Start: CLEAR | | | | Stop: SAME | | | | | | | |
| Water Droplets Present | | | No <input checked="" type="checkbox"/> | | | | Yes <input type="checkbox"/> | | | | | | | |
| Point in the Plume at which opacity was determined: | | | Start: 2' FROM VENT | | | | Stop: SAME | | | | | | | |
| Describe Background: | | | Start: CLOUDY SKIES | | | | Stop: SAME | | | | | | | |
| Background Color: | | | Start: GREY | | | | Stop: SAME | | | | | | | |
| Wind Speed: MPH | | | Start: 3-5 | | | | Stop: 3-5 | | | | | | | |
| Wind Direction: | | | Start: NE | | | | Stop: NE | | | | | | | |
| Ambient Temp. | | | Start: 63°F | | | | Stop: 63°F | | | | | | | |
| Source Layout Sketch | | | Wet Bulb Temp. | | | | RH Percent: | | | | Average Opacity for Highest Period | | | |
| | | | Range of Opacity Readings | | | | Minimum | | | | Maximum | | | |
| | | | | | | | | | | | | | | |
| Comments: OIL CONTROL RATE 0.3 GALS/MIN DOING OBSERVATIONS OUTSIDE BUILDING | | | | | | | | | | | | | | |
| I have received a copy of these opacity observations | | | | | | | | | | | | | | |
| Signature: | | | | | | | | | | | | | | |
| Title: | | | | | | | | | | | | | | |
| Date: | | | | | | | | | | | | | | |

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.

2/19/2003

FIELD EXPIRATION DATE

298251

CERTIFICATION NUMBER

ORLSOS

LECTURE EXPIRATION DATE

Eugene Williams
OBSERVER'S SIGNATURE

MAP/DAP PLANT TEST DATA

150

79

| Test date | DAP | P2O5 | Fluoride lb/ ton P2O5 (0.06 max) | Particulates lb/ hr (4.17) | RGCV | Dryer | | | |
|-----------|-----|------|---|----------------------------------|------------|----------|------------|----------|------|
| | tph | tph | | 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 | 1263 | 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 |

4.8

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 | <p><i>OR</i></p> <p>ANY 4 consecutive 15-minute block averages</p> <p>An excursion is defined as any 1-hour average excluding those events defined as startup, shutdown and malfunctions, pressure drop outside of the following range:</p> <p>RGCV Scrubber: 3.0-12.2 in H₂O Dryer Scrubber: 6.0-13.1 in H₂O</p> <p>Excursions trigger an inspection, corrective action, and reporting requirement. The corrective action must be conducted to restore the pressure drop to within the permitted range and assist in preventing future scrubber malfunctions from occurring.</p> | <p>An excursion is defined as any 1-hour average, excluding those events defined as startup, shutdown and malfunctions, liquid flow rate outside of the following range:</p> <p>RGCV Scrubber: 1463-2121 gpm Dryer Scrubber: 949-1336 gpm</p> <p>Excursions trigger an inspection, corrective action, and reporting requirement. The corrective action must be conducted to restore the liquid flow rate to within the permitted range and assist in preventing future scrubber malfunctions from occurring.</p> |
| 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 at least annually in accordance with manufacturer's specification. | Zero and span will be checked and calibration performed annually in accordance with manufacturer's specification. The operational status of the flow meter will be checked if the flow is below the proposed indicator. |
| Monitoring Frequency | The pressure Drop is monitored continuously. | The scrubber liquid is monitored continuously. |
| Data Collection Procedures | The transducer collects data and the data logger reduces the data to 15-minute block averages. A rolling 1-hour average is determined every 15-minutes based on the four previous 15-minute block averages. | The transducer collects data and the data logger reduces the data to 15-minute block averages. A rolling 1-hour average is determined every 15-minutes based on the four previous 15-minute block averages. |
| Averaging Period | The averaging period for pressure drop is a 15-minute block average. From this, the 1 hour average is determined. | The averaging period for pressure drop is a 15-minute block average. From this, the 1 hour average is determined. |

(135) 180
(21.1) 79

MAP/DAP PLANT TEST DATA

USAC
BARTON

PACKED
SCRUBBER

| Test date | DAP | P2O5 | Fluoride | | Particulates | RGCV | | 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 | 1263 | 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 | 11.0 |
| 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 |

1hr
excursion
3hr
exceedence

1463 4.4 949 6.0
2121 12.2 1336 13.1
(1105)

4.8
F
50%
or
less

ATTACHMENT 1

MAP/DAP PLANT TEST DATA

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.

ATTACHMENT 3

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: **jkogler@kooglerassociates.com**

5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(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

(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.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here , 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.

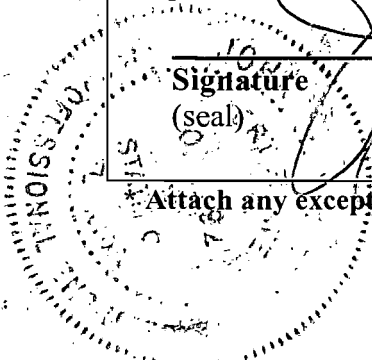
(4) If the purpose of this application is to obtain an air construction permit (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further 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.

(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 , 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.

Signature
(seal)

7/8/04
Date

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: <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>7/12/09</u></p> |

Best Available Copy

Bobby



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICE

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32607
352/377-5822 • FAX/377-7155

KOA 173-03-01

March 4, 2005

Teri Donaldson, Esquire
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Extension of Time to
File a Petition
US Agri-Chemicals Corporation
Polk County, Florida
DEP File Nos. 1050050-014-AV, 1050050-015-AC

Dear Ms. Donaldson:

Attached is a request for an extension of time to file for a hearing in accordance with Rule 28-106, FAC.

Mr. Bobby Bull, the permitting engineer, has no objection to this extension.

If you have any questions concerning this request, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES

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

JBK:par
Encl.

C: Jason Waters, FDEP
Ron Brunk, UAC

Best Available Copy

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 23-106, FAC, requests the Secretary of FDEP to grant a 60-day extension of time in which to file a petition. This will allow submittal of additional information to FDEP on the permit application review and allow time to resolve issues of concern.

Dated the 4th day of March, 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

Best Available Copy

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Teri Donaldson, Office of the General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and Mr. Jason Waters, FLEP Southwest District, 3804 Coconut Palm Drive, Tampa, Florida 33619, and Mr. Ron Brunk, US Agri-Chemicals Corporation, 3225 State Road 630 West, Ft. Meade, FL 33841, by FAX and by U.S. Mail, this 4th day of March, 2005.



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