



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

## NOTICE OF SURRENDERING OF TITLE V PERMIT

In the Matter of a Request for a  
Surrendering of Title V Permit:

Mr. Denver Phares  
Deputy Director  
U.S. Agri-Chemicals Corporation  
3225 SR 630 West  
Fort Meade, Florida 33841-9799

Title V Permit Renewal Application No. 1050050-014-AV  
Title V Permit Surrendered No. 1050050-001-AV  
Bartow Plant  
Polk County  
Facility ID No. 1050050

The Department received a letter, dated December 19, 2005, informing us that U.S. Agri-Chemicals Corporation had ceased operation of this facility and wished to surrender the Title V Air Operation Permit for this facility. On January 12, 2006, a Southwest's District Office inspector made a site visit that verified the Title V facility is closed for business and no longer requires a Title V Air Operation Permit. On January 25, 2006, the Department received a letter withdrawing the Title V Air Operation Permit application, project 1050050-014-AV which would renew the initial Title V Air Operation Permit, 1050050-001-AV. Therefore, this notification also serves to acknowledge the surrender of the Title V Air Operation Permit, 1050050-001-AV and by changing its expiration date to be the same as the DEP inspection date of January 12, 2006. Also, there is a requirement that the Responsible Official submit a Statement of Compliance within 60-days of permanent shutdown at Rule 62-213.440(3)(a)2.b., F.A.C., which, in this case, is being clocked from January 12, 2006.

This change in the expiration date will take effect fourteen (14) days from the clerking date unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.). The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed agency action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the owner or operator or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of receipt of this notice. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the

petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

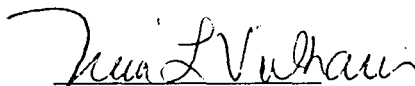
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the request for conditional exemption have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

#### NOTICE OF APPEAL RIGHTS

Any party to this order (permit) has the right to seek judicial review of the permit (letter) pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

  
Trina L. Vielhauer, Chief  
Bureau of Air Regulation

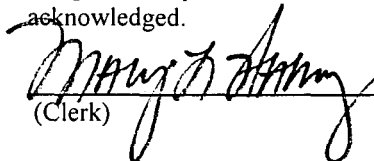
#### CERTIFICATE OF SERVICE

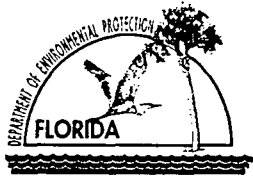
The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF SURRENDERING OF TITLE V PERMIT was sent by certified mail (\*) and copies were mailed by U.S. Mail or sent electronically before the close of business on 1/27/06 to the person(s) listed or as otherwise noted:

Denver Phares, U.S. Agri-Chemicals Corporation\*  
Mara Nasca, DEP-SWD  
John Koogler, P.E., Koogler & Associates  
U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4 , U.S. EPA)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk) 1/27/06  
(Date)



# Department of Environmental Protection

## Division of Air Resource Management

### RESPONSIBLE OFFICIAL NOTIFICATION FORM

**Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.**

**Identification of Facility**

1. Facility Owner/Company Name: U.S. Agri-Chemicals	
2. Site Name: Ft. Meade & Bartow Chemical Plants	3. County: Polk
4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications)</i> : 1050051 1050050	

**Notification Type** *(Check one or more)*

<input type="checkbox"/>	<b>INITIAL:</b> Notification of responsible officials for an initial Title V application.
<input type="checkbox"/>	<b>RENEWAL:</b> Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/>	<b>CHANGE:</b> Notification of change in responsible official(s). Effective date of change in responsible official(s) 12/1/05 _____

**Primary Responsible Official**

1. Name and Position Title of Responsible Official: Denver Phares, Deputy Director
2. Responsible Official Mailing Address: Organization/Firm: same Street Address: 3225 Highway 630W City: Ft. Meade State: FL Zip Code: 33841
3. Responsible Official Telephone Numbers: Telephone: (863)-285-8121 Fax: (863) - 285-7088
4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable)</i> : <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.
5. Responsible Official Statement:  <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i>  <div style="display: flex; justify-content: space-between;"> <div style="width: 45%; text-align: center;">               _____              Signature           </div> <div style="width: 45%; text-align: center;">             _____              Date           </div> </div>

U.S. Agri-Chemicals Corporation  
3225 State Road 630 West  
Fort Meade, FL 33841-9778  
863 285 8121

**US**

**Agri-Chemicals**

A Sinochem Company

20 Jan 06

**RECEIVED**

JAN 25 2006

BUREAU OF AIR REGULATION

Mr. Bobby Bull  
Florida Dept. of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

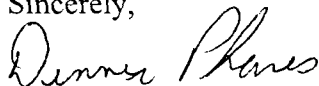
Subj: Responsible Official for Title V Permits  
Ft. Meade Chemical Plant 1050051  
Bartow Chemical Plant 1050050

Dear Mr Bull,

Enclosed please find the Responsible Official change form you discussed with Ron Brunk. Also included is a copy of the permit surrender letter. In addition, this letter is to notify you that USAC requests to withdraw the renewals of the subject permits.

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

Sincerely,



Denver Phares  
Deputy Director

cc: P. Raval, K&A



U.S. Agri-Chemicals Corporation  
3225 State Road 630 West  
Fort Meade, FL 33841-9778  
863 285 8121

**US**

**Agri-Chemicals**

A Sinochem Company

December 19, 2005

Ms. Yi Zhu  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RE: Surrendering Title V Permits  
DEP File No. 1050050 Bartow Chemical Plant and  
DEP File No. 1050051 Ft. Meade Chemical Plant  
US Agri-Chemicals Corp.**

Dear Ms. Zhu:

U.S. Agri-Chemicals Corp. has permanently shut down the above referenced facilities as of November 30<sup>th</sup>, 2005 and hereby surrenders the corresponding Title V permits.

Sincerely,



Denver Phares  
Deputy Director

cc: Jason Waters, FDEP Tampa  
Bobby Bull, FDEP Tallahassee  
Syed Arif, FDEP Tallahassee  
Pradeep Raval, K&A



## Best Available Copy

permanent shutdown of a Title V Source (the  
ole facility) and the Title V Permit is surrendered.

a. The RO submits a letter to the permitting authority requesting that the Title V Permit's Expiration Date be changed to reflect that the facility is closing for business on a specific date or that it has already shut down. The permitting authority should send an inspector out to the facility for a site visit to verify that the facility has shut down for business and that there is no further need for a Title V Permit. Upon documentation that the facility has shut down for business, then the permitting authority should send a certified letter to the RO that:

- 1) acknowledges receipt of the request;
- 2) validates that the facility has closed for business;
- 3) changes the new "Expiration Date" to the date of the site visit by the permitting authority's inspector; and,
- 4) reminds the RO that there is a requirement to submit a Statement of Compliance within 60-days of permanent shutdown at Rule 62-213.440(3)(a)2.b., F.A.C.

**NOTE:** The letter should contain the "rights language" and copy to the Title V Coordinator (Tallahassee) and the U.S. EPA's Region 4. Finally, ARMS should be updated to change the "Expiration Date" and the facility's status to "Inactive" ONLY after the 14 days have passed from the receipt date (count from the green card date or electronic acknowledgement) of the "NOTICE".

[Please see the "NOTICE OF CHANGE OF THE  
TITLE V AIR OPERATION PERMIT'S  
EXPIRATION DATE " template.]

b. The permitting authority sends an inspector to the facility for a site visit to confirm that the facility is shut down for business (or abandoned) and documentation of the site visit is prepared and placed in the file. Then the permitting authority should send a certified letter to the primary and any designated ROs stating that:

- 1) the permitting authority has confirmed, from a site visit, that the facility has shut down for business and/or the property is abandoned;
- 2) the permitting authority has changed the "Expiration Date" to the date of the site visit by the permitting authority's inspector; and,
- 3) the RO has a rule requirement to submit a Statement of Compliance within 60-days of permanent shutdown at Rule 62-213.440(3)(a)2.b., F.A.C.

**NOTE:** The letter should contain the "rights language" and copy to the Title V Coordinator (Tallahassee) and the U.S. EPA's Region 4. Finally, ARMS should be updated to change the "Expiration Date" and the facility's status to "Inactive" ONLY after the 14 days have passed from the clerking date.

[Please see the "NOTICE OF CHANGE OF THE  
TITLE V AIR OPERATION PERMIT'S  
EXPIRATION DATE " template.]



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

KA 173-03-01

September 21, 2005

RECEIVED

SEP 22 2005

BUREAU OF AIR REGULATION

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

Subject: Construction and Title V Permit Renewal  
US Agri-Chemicals Corporation – Bartow Facility  
DEP File Nos. 1050050-015-AC and 1050050-014-AV

Dear Mr. Bull:

This is a follow up to our recent conversations regarding the above referenced permits.

As discussed, USAC proposes to shutdown the above facility in the very near future. Some activities, including facility maintenance, may continue. As a result, no additional comments are being submitted on the above referenced projects. It is requested that FDEP issue revised draft permits that reflect our concurrence on several recently discussed issues, and include rewording of certain permit provisions to maintain consistency with permit provisions for similar facilities.

Your assistance in this matter is greatly appreciated.

If you have any questions, please do not hesitate to call me.

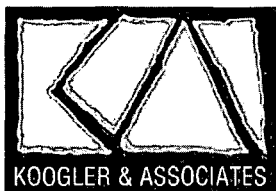
Very truly yours,

KOOGLER & ASSOCIATES

Pradeep Raval

Par.

C: R. Brunk, USAC.



**KOOGLER & ASSOCIATES**

**ENVIRONMENTAL SERVICES**

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

KA 173-03-01

May 11, 2005

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

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

Dear Mr. Bull:

This is a follow up to your recent conversations with Pradeep Raval regarding the above referenced permits.

The oil type and application rate has been historically been revised as an off-permit amendment, as part of the test report submittal. A sample letter is enclosed for your information. For permitting purposes, it is requested that the oil related requirements be reworded to allow such off-permit changes by not mentioning a particular oil type or the oiling rate. FDEP had taken just such an approach for a permit issued for a similar facility as recently as December 2004. Consequently, Specific Conditions 3D, B6, B7 and B8 in the draft AC permit; and, B7, B8 and B9 of draft AV permit will need to be reworded or deleted.

Based on the clarification provided by FDEP staff, we are hereby updating the CAM applicability for EU 038 MAP/DAP Plant. It was brought to our attention that for similar plants, FDEP has agreed that the initial process recovery scrubbers are not considered control devices for CAM purposes. As explained previously, the ammonia recovery scrubber design inherently reduces the particulate matter and fluoride loading to the tail gas scrubbers. The tail gas scrubber is designed to control fluoride emissions to comply with the fluoride emissions standard. It is not utilized for control of particulate matter. Based on an estimated 20 percent added fluoride control, the pre-control fluoride emissions can be estimated, using the allowable emission rate of 4.17 pounds per hour, at less than 25 tons per year. Therefore, this emissions unit is not subject to CAM.



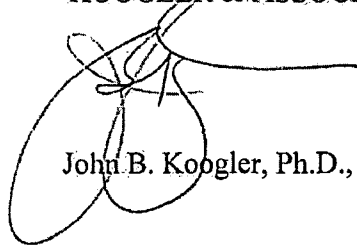
Mr. Bobby Bull  
Florida Department of  
Environmental Protection

May 11, 2005

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

A handwritten signature in black ink, appearing to read 'John B. Koogler', with a large, sweeping flourish extending to the right.

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

JBK: par  
Encl.

C: R. Brunk, USAC

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

**US**  
**Agri-Chemicals**

A Sinochem Company

August 22, 2002

Bill Proses  
Air Compliance Supervisor  
FDEP, Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

RE: **1050050-012-AV**  
**Oil Coating Material Change**

Dear Sir:

Enclosed please find the documentation required by condition B.10 in the above referenced permit. USAC has begun using a new coating oil and we are submitting the required VE along with the documentation required by the permit.

If you have any questions regarding this submittal, please let me know.

Sincerely,



Ronald L. Brunk, Manager  
Environmental Engineering

Enclosure:

xc: D. Taylor  
J. Girardin  
S. Allen



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

Visible Emissions Observation

Date August 21, 2002

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 0.3 gallons per <sup>ton</sup> 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.

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.

  
Michael Connelly

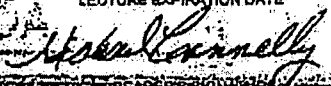
8/22/02  
Date

MICHAEL CONNELLY

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.

8/15/2002 ORLF03

FIELD EXPIRATION DATE LECTURE EXPIRATION DATE

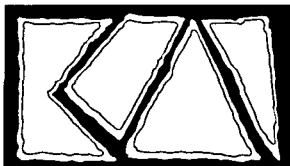
292304 

CERTIFICATION NUMBER BEARING REGION

Professional Engineer Certification

1. Professional Engineer Name: <b>John B. Koogler, Ph.D, P.E.</b> Registration Number: <b>12925</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler and Associates</b> Street Address: <b>4014 NW 13<sup>th</sup> Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 377-5822</b> ext. Fax: <b>(352) 377-7158</b>
4. Professional Engineer Email Address: <b>jkoo@kooglerassociates.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature (seal) _____ Date <u>5/11/05</u>

\* Attach any exception to certification statement.



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

KA 173-03-01

May 11, 2005

RECEIVED

MAY 16 2005

BUREAU OF AIR REGULATION

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

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

Dear Mr. Bull:

This is a follow up to your recent conversations with Pradeep Raval regarding the above referenced permits.

The oil type and application rate has been historically been revised as an off-permit amendment, as part of the test report submittal. A sample letter is enclosed for your information. For permitting purposes, it is requested that the oil related requirements be reworded to allow such off-permit changes by not mentioning a particular oil type or the oiling rate. FDEP had taken just such an approach for a permit issued for a similar facility as recently as December 2004. Consequently, Specific Conditions 3D, B6, B7 and B8 in the draft AC permit; and, B7, B8 and B9 of draft AV permit will need to reworded or deleted.

Based on the clarification provided by FDEP staff, we are hereby updating the CAM applicability for EU 038 MAP/DAP Plant. It was brought to our attention that for similar plants, FDEP has agreed that the initial process recovery scrubbers are not considered control devices for CAM purposes. As explained previously, the ammonia recovery scrubber design inherently reduces the particulate matter and fluoride loading to the tail gas scrubbers. The tail gas scrubber is designed to control fluoride emissions to comply with the fluoride emissions standard. It is not utilized for control of particulate matter. Based on an estimated 20 percent added fluoride control, the pre-control fluoride emissions can be estimated, using the allowable emission rate of 4.17 pounds per hour, at less than 25 tons per year. Therefore, this emissions unit is not subject to CAM.

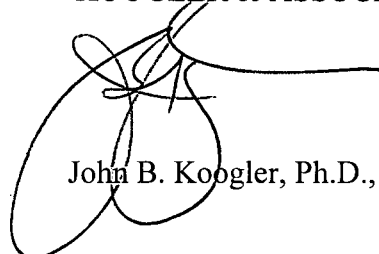
Mr. Bobby Bull  
Florida Department of  
Environmental Protection

May 11, 2005

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

A handwritten signature in black ink, appearing to read 'John B. Koogler', with a large, stylized flourish extending to the right.

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

JBK: par  
Encl.

C: R. Brunk, USAC

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

**US**

**Agri-Chemicals**

A Sinochem Company

August 22, 2002

Bill Proses  
Air Compliance Supervisor  
FDEP, Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

**RE: 1050050-012-AV**  
**Oil Coating Material Change**

Dear Sir:

Enclosed please find the documentation required by condition B.10 in the above referenced permit. USAC has begun using a new coating oil and we are submitting the required VE along with the documentation required by the permit.

If you have any questions regarding this submittal, please let me know.

Sincerely,



Ronald L. Brunk, Manager  
Environmental Engineering

Enclosure:

xc: D. Taylor  
J. Girardin  
S. Allen



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

Visible Emissions Observation

Date August 21, 2002

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 0.3 gallons per <sup>ton</sup> 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.

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.

  
Michael Connelly

8/22/02  
Date

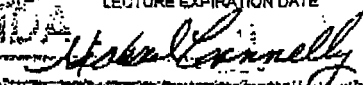
MICHAEL CONNELLY

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.

8/15/2002 ORLF03

FIELD EXPIRATION DATE LECTURE EXPIRATION DATE

FLORIDA

292304 

CERTIFICATION NUMBER BEARER SIGNATURE



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 13<sup>th</sup> 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, 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)

Date

5/11/05

\* Attach any exception to certification statement.