

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. 2.  Restricted Delivery  
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to:  Mr. C. M. Farris General Manager U.S. Agri-Chemicals 3225 State Road 630 West Ft. Meade, FL 33841-9799	4. Article Number P 778 940-851  Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail  Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b>
5. Signature - Addressee <b>X</b>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent <b>X</b> <i>[Signature]</i>	7. Date of Delivery <i>[Signature]</i>

LAKELAND, FL 33841

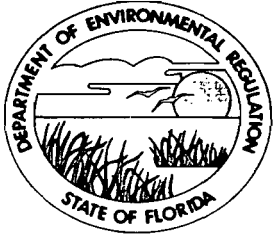
 886/ JUN 17 1988  
 PM 2  
 LAKELAND, FL 33841

Form 3811, Mar. 1987      U.S.G.P.O. 1987-178-268      DOMESTIC RETURN RECEIPT

**P 778 940 851**  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

PS Form 3800, June 1985

Sent to	
Mr. C. M. Farris	
Street and No. U.S. Agri-Chemicals	
3225 S.R. 630 West	
P.O., State and ZIP Code	
Ft. Meade, FL 33841-9799	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
Mailed: 6-15-88 Permit: AC 53-145424	



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. C. M. Farris, General Manager  
U.S. Agri-Chemicals  
3225 State Road 630 West  
Ft. Meade, Florida 33841-9799

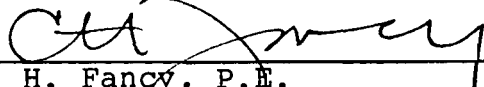
June 14, 1988

Enclosed is permit No. AC 53-145424, for the modification of the MAP/DAP plant at U.S. Agri-Chemicals Bartow phosphate fertilizer complex. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management

Copy furnished to:

W. Thomas, SW District  
J. Carroll, U.S. Agri Chemicals

Final Determination

U.S. Agri-Chemicals  
Polk County

Modification of MAP/DAP Plant  
State Permit No. AC 53-145424

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

June 7, 1988

## Final Determination

The Bureau of Air Quality Management completed its review of U.S. Agri-Chemical's application for a permit to construct/modify the MAP/DAP plant at their Bartow facility. On May 16, 1988, public notice of the Department's intent to issue the permit was published in the Polk County Democrat. Copies of the Technical Evaluation and Preliminary Determination were available for public inspection at the Department's offices in Tampa and Tallahassee.

Comments were submitted by the applicant to update the application flow sheet and to propose surrogate parameters for monitoring scrubber pressure drop. The Department has determined that the proposed surrogate parameters are acceptable and Specific Condition No. 6 has been modified accordingly. No other comments having been received, the permit will be issued as modified.



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

U.S. Agri-Chemicals  
3225 State Road 630 West  
Ft. Meade, Florida 33841-9799

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989  
County: Polk  
Project: Modification of  
Monoammonium/Diammonium Phos-  
phate Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of a monoammonium/diammonium phosphate plant located at the permittee's phosphate fertilizer complex near Bartow on State Road 630 West in Polk County, Florida. The UTM coordinates are Zone 17, 413.2 km E and 3086.3 km N.

The modification shall be in accordance with the attached permit application except as otherwise noted under the General Conditions and Specific Conditions set forth in this permit.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER form 17-1.202(1), and letter dated February 5, 1988.
2. Letter from U.S. Agri-Chemicals dated May 2, 1988.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.



PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. Maximum permitted production rate for this plant shall be 69.6 TPH P<sub>2</sub>O<sub>5</sub> input. If the production rate exceeds the maximum permitted rate by 10% or more at any time, a compliance test must be conducted after notifying the Department and the results of this test, along with other information listed in Specific Condition No. 9, must be submitted to the Department within 10 working days. Any emissions in excess of those listed in Specific Condition No. 2 shall constitute a violation of this permit. The plant may operate 8,760 hours per year if permitted emissions are not exceeded.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

SPECIFIC CONDITIONS:

2. The emissions from the 7 foot diameter, 131 foot high stack shall not exceed:

Pollutant	Standard	Max. Allowable Emissions	
		lbs/hr	T/yr
Particulate	38.59 lbs/hr	38.59	169.02
Fluoride	0.06 lb/T P <sub>2</sub> O <sub>5</sub>	4.17	18.29

3. Fugitive emissions from the process, conveying and storage equipment shall be controlled by sealing and/or venting to the pollution abatement system.

4. Fuel oil used in the drying operation shall contain no more than 2.5% sulfur.

5. The permittee shall install, calibrate, maintain, operate and record data from flow monitoring devices used to determine total P<sub>2</sub>O<sub>5</sub> input to the plant. A daily record of the P<sub>2</sub>O<sub>5</sub> input to the plant shall be maintained.

6. The permittee shall measure and record the total acid flow rate to each scrubber system. The total acid flow rate to the venturi scrubbers shall be within the range of 1.7 to 2.6 gpm acid per TPH of P<sub>2</sub>O<sub>5</sub>. Static pressure measured across the system must be within the range of -25 inches w.c. to -35 inches w.c. measured at the exhaust gas blower. These records shall be maintained for 2 years and be available for inspection by regulatory agency personnel on request.

7. Modification should commence and be completed within a reasonable time based on the projections in the application.

8. Reasonable precautions to prevent fugitive particulate emissions during modification, such as coating or spraying roads and construction sites used by contractors, shall be taken by the permittee.

9. Before the construction permit expires, the DAP plant shall be sampled for particulate and fluoride emissions. Test procedures shall be in accordance with EPA reference methods 1, 2, 3, 5, and 13A or 13B as published in 40 CFR 60. The Department shall be notified in writing 15 days or more prior to the compliance test. The test shall be conducted at permitted production capacity or no less than 90% thereof. P<sub>2</sub>O<sub>5</sub> input, pH of scrubber solution, and pressure drop across the scrubbers shall be reported to the Department along with the test data and results.

PERMITTEE:  
U.S. Agri-Chemicals

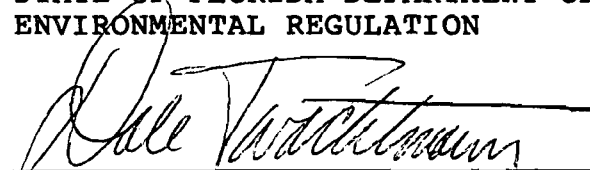
Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

**SPECIFIC CONDITIONS:**

The applicant must demonstrate compliance with the conditions of this permit and submit a complete application for an operating permit including an operating and maintenance plan to the Southwest DER office at least 90 days before the expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this permit until the expiration date or issuance of an operating permit.

Issued this 9 day of June, 1988

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Dale Twachtmann  
FROM: Howard L. Rhodes *HLR*  
SUBJ: Approval of Construction Permit No. AC 53-145424  
U.S. Agri-Chemicals  
DATE: June 8, 1988

Attached for your approval and signature is a permit prepared by Central Air Permitting for modification of U.S. Agri-Chemicals' MAP/DAP plant. The facility is located in Bartow, Polk County, Florida. Comments were received during the public notice period.

Day 90, after which this permit will be issued by default, is June 25, 1988.

I recommend your approval and signature.

HLR/aqm/jr  
attachments

RECEIVED

JUN 10 1988

DER-BAQM

RECEIVED

JUN 9 1988

Office of the Secretary

Check Sheet

Company Name: U.S. Agri. Chemicals  
Permit Number: AC53-145424  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

- |   |                          |
|---|--------------------------|
| <input checked="" type="checkbox"/> Initial Application | Cross References:        |
| <input type="checkbox"/> Incompleteness Letters         | <input type="checkbox"/> |
| <input type="checkbox"/> Responses                      | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action    | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response            |                          |
| <input type="checkbox"/> Other                          |                          |

**Intent:**

- Intent to Issue
  - Notice of Intent to Issue
  - Technical Evaluation
  - BACT or LAER Determination
  - Unsigned Permit
- Correspondence with:
- EPA
  - Park Services
  - Other
- Proof of Publication
  - Petitions - (Related to extensions, hearings, etc.)
  - Waiver of Department Action
  - Other

**Final**

**Determination:**

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other

Memorandum

Florida Department of  
Environmental Protection

TO: Jerry Kissel (SWD)  
FROM: John Reynolds (BAR) *JR*  
DATE: June 9, 1994  
SUBJ: US Agri-Chem Permit AC53-145424 (Issued 6/14/88)

This is in response to your May 18 memo to Preston Lewis inquiring about the basis for some of the emission estimates in the subject permit. It has been six years since this permit was issued so I don't remember all the reasons behind the numbers, but I will pass along what I remember from the discussions we had with US Agri-Chem.

The 2.76 lb/hr was based on 100 tons per hour X 46% P2O5 X 0.06 lb F. per ton. When multiplied by 8760/2000 this yields 12.09 tons per year. The modified rate was 150 tons per hour X 46% P2O5 X 0.06 lb F. per ton = 4.17 lb/hr = 18.13 tons per year. As the application shows, the company contended that PSD did not apply. The argument discussed in a meeting with Bill Thomas (Tallahassee) was that since the DAP/MAP plant involves two separate processes (MAP is not covered in the rule), individual tonnages of emissions from MAP vs. DAP could be considered less than 100 tons per year, i.e. minor for fluorides. Whether considered separate processes or not, the emission limit in the permit would have been 0.06 lb per ton since fluoride BACT limits for DAP plants at that time were the same as the fluoride New Source Performance Standard, so the end result would have been the same.

**BEST AVAILABLE COPY**

<p>3 and 4. Put your address in the "RETURN TO" Space on the reverse side. This card will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.</p> <p>1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge)      2. <input type="checkbox"/> Restricted Delivery (Extra charge)</p>	
<p>3. Article Addressed to: C.M. Farris, Gen. Mgr. U.S. Agri-Chemicals 3225 State Rd. - 630 West Ft. Meade, FL 33841-9799</p>	<p>4. Article Number P 256 396 214</p> <p>Type of Service:  <input type="checkbox"/> Registered      <input type="checkbox"/> Insured  <input checked="" type="checkbox"/> Certified      <input type="checkbox"/> COD  <input type="checkbox"/> Express Mail      <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>.</p>
<p>5. Signature - Addressee X <i>J.P. Washington</i></p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent X</p>	
<p>7. Date of Delivery 10 25</p>	

PS Form

RECEIPT

P 256 396 214

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

U.S.G.P.O. 1989-234-555          PS Form 3800, June 1985	Sent to <i>C.M. Farris</i>	
	Street and No. <i>U.S. Agri-Chemicals</i>	
	P.O., State and ZIP Code <i>3225 State Rd - 630 W</i>	
	Postage <i>Ft. Meade, FL</i>	\$
	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	
	Return Receipt showing to whom, Date, and Address of Delivery	
	TOTAL Postage and Fees	\$
Postmark or Date <i>10-23-90</i> <i>AC 53-145424</i>		



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

October 2, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. M. Farris, General Manager  
U. S. Agri-Chemicals  
3225 State Road 630 West  
Ft. Meade, Florida 33841-9799

Dear Mr. Farris:

Re: Modification of Permit No. AC 53-145424

The above permit is amended as stated below in response to Jim Carroll's letter dated September 28, 1990.

Specific Condition No. 6

Present:

The permittee shall measure and record the total acid flow rate to each scrubber system. Static pressure measured across the system must be within the range of -25 to -35 inches w.c. measured at the exhaust gas blower. The total acid flow rate to the venturi scrubbers shall be within the range of 1.7 to 2.6 gpm acid per ton per hour of P<sub>2</sub>O<sub>5</sub>. These records shall be maintained for 2 years and be available for inspection by regulatory agency personnel on request.

New:

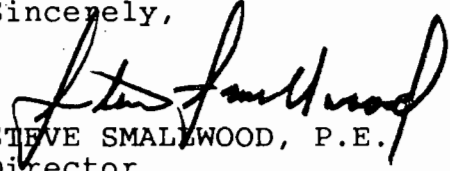
The permittee shall measure and record the total acid flow rate to the scrubber system. Static pressure measured across the system must be within the range of -25 to -35 inches w.c. measured at the exhaust gas blower. The total acid flow rate to the venturi scrubber system shall be within the range of 1.4 to 6.8 gpm acid per ton per hour of P<sub>2</sub>O<sub>5</sub>. These records shall be maintained for 2 years and be available for inspection by regulatory agency personnel on request.



Mr. C. M. Farris  
October 2, 1990  
Page 2

This amendment letter shall become part of your construction permit AC 53-145424.

Sincerely,



STEVE SMALLEYWOOD, P.E.  
Director  
Division of Air Resources  
Management

SS/JR/plm

c: W. Thomas, SW District  
J. Carroll, P.E., U.S. Agri-Chemicals



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Steve Smallwood  
FROM: Clair Fancy *CF*  
DATE: October 2, 1990  
SUBJ: Amendment to Construction Permit AC 53-145424

Attached for your approval and signature is a letter amending Specific Condition No. 6 for the above referenced construction permit.

The Bureau recommends approval of this amendment.

CF/JR/plm

Attachment

*OK*

U.S. Agri-Chemicals Corporation  
3225 State Road 630 West  
Fort Meade, FL 33841-9799  
813 285 8121



RECEIVED

September 28, 1990 **OCT 1 1990**

**DER-BAQM**

Mr. John Reynolds  
Bureau of Air Quality Measurements  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Construction Permit AC53-145424, Modification Request  
U. S. Agri-Chemicals MAP/DAP Plant

As we discussed on the telephone, USAC requests a modification of specific condition # 6 as follows:

The permittee shall measure and record the total acid flow rate to The Scrubber System. The total acid flow rate to the venturi scrubber system shall be within the range of 1.4. to 6.8 gpm acid per TPH of P205. (underlined is the requested modification).

This plant has been in operation for over 14 years without an air emission violation. It is reasonable, therefore, to expect the proposed changes in of the Permit will provide the Department with a reasonable assurance of Compliance as stated in Rule 17-4.070(3)FAC.

Your prompt and continued attention is appreciated.

Very truly yours,

James H. Carroll, PE  
Manager, Environmental Eng.

JHC:bab

cc: James M. Williams  
R. E. Knecht  
Gary Maier,  
Florida Department Environmental Regulation  
Tampa, Fl.

BA/CHF  
John Reynolds } 10/2/90 ARL

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. C. M. Farris General Manager U.S. Agri-Chemicals 3225 State Road 630 West Ft. Meade, FL 33841-9799	4. Article Number p 274 007 524 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Address X <i>Norme Washington</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 12-8-88	

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 274 007 524

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1985-480-794          PS Form 3800, June 1985	Sent to Mr. C. M. Farris, U.S. Agri-Chemicals
	Street and No. 3225 SR 630 W
	P.O., State and ZIP Code Ft. Meade, FL 33841-9799
	Postage      S
	Certified Fee
	Special Delivery Fee
	Restricted Delivery Fee
	Return Receipt showing to whom and Date Delivered
	Return Receipt showing to whom, Date, and Address of Delivery
	TOTAL Postage and Fees      S
Postmark or Date Mailed: 12-5-88 Permit: AC 53-145424	



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 22, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. M. Farris  
General Manager  
U.S. Agri-Chemicals  
3225 State Road 630 West  
Ft. Meade, Florida 33841-9799

Dear Mr. Farris:

The Department received your request for an extension of the expiration date for the construction permit referenced below. The request is acceptable and the following shall be changed:

Project: AC 53-145424

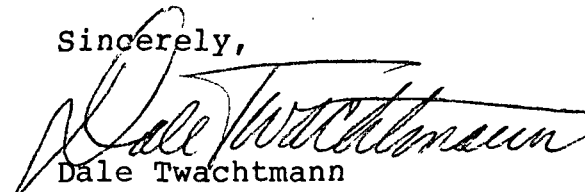
From: March 31, 1989  
To: June 30, 1990

Attachment to be Incorporated:

Letter from U.S. Agri-Chemicals dated October 31, 1988, requesting a change in the expiration date.

This letter must be attached to your construction permit AC 53-145424 and shall become a part of that permit.

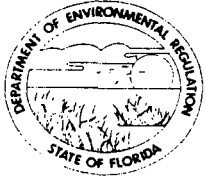
Sincerely,



Dale Twachtmann  
Secretary

DT/ks

cc: W. Thomas, SW District  
J. Carroll, U.S. Agri-Chemicals



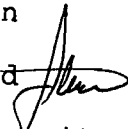
State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

RECEIVED

NOV 28 1988

TO: Dale Twachtmann  
FROM: Steve Smallwood   
SUBJ: Extension of Permit  
U.S. Agri-Chemicals  
DATE: November 22, 1988

Office of the Secretary

Attached for your approval and signature, is a letter extending the expiration date of a construction permit for U.S. Agri-Chemicals to modify their MAP/DAP plant located near Bartow, Florida.

I recommend your approval and signature.

SS/JR/s

attachment

RECEIVED

NOV 30 1988

DER-BAQMI

U.S. Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799  
813 285 8121

PM  
11-2-84  
St. Meade, FL

*file copy*

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

RECEIVED

NOV 7 1988

DER-BAQM

October 31, 1988

Mr. C. H. Fancy  
Deputy Bureau Chief  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Re: AC53-145424, MAP/DAP Plant Modification  
Issued June 14, 1988

This is a request for an extension of time to complete modifications to the referenced plant.

At the present time our construction plans are on-hold for the foreseeable future. Accordingly, we would like the Department to extend the expiration date from March 31, 1989 to June 13, 1990.

Please call if there are any questions or if you need additional information.

Very truly yours,

*C. M. Farris*

C. M. Farris  
General Manager  
Florida Phosphate Operations

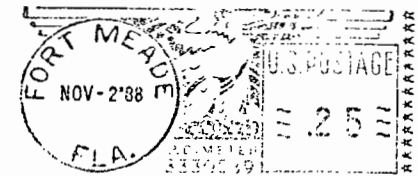
JHC/CMF-BB.104

CC: Mr. J. H. Carroll  
Mr. C. E. Neff  
Mr. J. M. Lowery

*copied: John Reynolds  
Bill Thomas, SW Dist.  
CHF/BT*

Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799

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



MR. C. H. FANCY  
DEPUTY BUREAU CHIEF  
BUREAU OF AIR QUALITY MANAGEMENT  
FLORIDA DEPARTMENT OF ENVIRONMENTAL REG.  
2500 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

A division of U.S. Diversified Group  
USX Corporation



U.S. Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799  
813 285 8121

PM  
17 May 1988  
H. Meade

File Copy

CM: P 429 385 295

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

**RECEIVED**

MAY 19 1988

DER-BAQM

May 17, 1988

Mr. Clair H. Fancy, P.E., Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

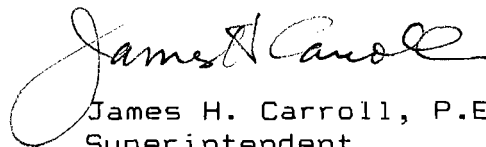
Subject: DER File No. AC53-15424, MAP/DAP Plant  
Modification, Public Notice

Dear Mr. Fancy:

Enclosed is the public notice which appeared in the May 16, 1988 issue of the Polk County Democrat stating the Departments' Intent To Issue a permit to U.S. Agri-Chemicals for modification of the Monoammonium/Diammonium Phosphate Plant.

This notice was published as required in your letter dated April 21, 1988 and received on April 25, 1988.

Very truly yours,



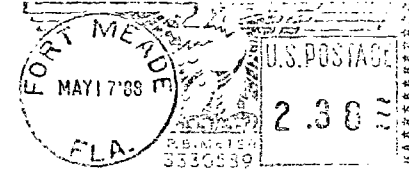
James H. Carroll, P.E.  
Superintendent  
Environmental Engineering

JHC-BB.42

CC: Mr. C. M. Farris  
Mr. C. E. Neff  
Mr. J. M. Lowery

Enclosure

Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799



**US**

**Agri-Chemicals**

*Fold at line over top of envelope to the right  
of the return address.*

**CERTIFIED**

P 429 385 295

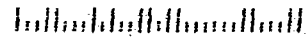
**MAIL**

Mr. Clair H. Fancy, P.E., Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

RETURN RECEIPT REQUESTED

RETURN RECEIPT  
REQUESTED

A division of U.S. Diversified Group  
USX Corporation



2:46 on May 19, 1988 - He had left for the  
day. Left name and # w/ secretary  
He returned my call May 20, and will send  
notarized copy.

(ii)

State of Florida  
Department of  
Environmental Regulation  
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to U. S. Agricultural Chemicals to modify the Monoammonium/Diammonium Phosphate plant at their facility near Bartow on State Road 630 West in Polk County. Since the increase in emissions of regulated air pollutants will be below significant levels, the modification is exempted from the new source review requirements under FAC Rules 17-2.500 and 17-2.510. The Department has determined that the proposed modification will not interfere with attainment of the ambient air quality standards. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a. m. to 5:00 p. m., Monday through Friday, except legal holidays, at: Dept. of Environmental Regulation, Bureau of Air Quality Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Dept. of Environmental Regulation, Southwest District, 4520 Live Oak Fair Blvd., Tampa, Florida 33610-7349.

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comment mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

May 16, 1988—1151

U.S. Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799  
813 285 8121

**US**

**Agri-Chemicals**

May 17, 1988

Mr. Clair H. Fancy, P.E., Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

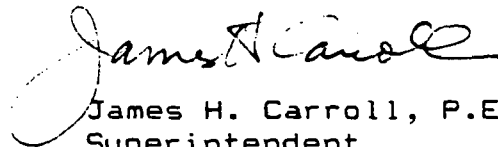
Subject: DER File No. AC53-15424, MAP/DAP Plant  
Modification, Public Notice

Dear Mr. Fancy:

Enclosed is the public notice which appeared in the May 16, 1988 issue of the Polk County Democrat stating the Departments' Intent To Issue a permit to U.S. Agri-Chemicals for modification of the Monoammonium/Diammonium Phosphate Plant.

This notice was published as required in your letter dated April 21, 1988 and received on April 25, 1988.

Very truly yours,



James H. Carroll, P.E.  
Superintendent  
Environmental Engineering

✓ JHC-BB.42

CC: Mr. C. M. Farris  
Mr. C. E. Neff  
Mr. J. M. Lowery  
John Reynolds 5/25/88 *REN*  
Enclosure

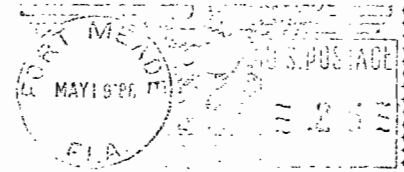
RECEIVED

MAY 24 1988

DER-BAQM

Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799

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



Ms Maggie Jones  
P.O. Box  
Florida DER  
2600 Blair Stone Rd

A division of U.S. Diversified Group  
USX Corporation

Tallahassee, FL 32301

REC'D

5-19-88

File copy

PM  
5-19-88  
Fort Meade, FL

5-25-88  
DK  
RDR

AFFIDAVIT OF PUBLICATION

The Polk County Democrat  
Published Semi-Weekly  
Bartow, Polk County, Florida

Case No. \_\_\_\_\_

STATE OF FLORIDA  
COUNTY OF POLK

Before the undersigned authority personally appeared \_\_\_\_\_

Louanna K. Locke, who on oath says that (s)he is

Head Bookkeeper of The Polk County Democrat, a newspaper pub-

lished at Bartow, in Polk County, Florida; that the attached copy of advertisement, being

a Notice of Intent in the

matter of U.S. Agri-Chemicals

in the \_\_\_\_\_ Court, was published in said newspaper in the issues

of May 16, 1988

Affiant further says that The Polk County Democrat is a newspaper published at Bartow, in said Polk County, Florida, and that said newspaper has heretofore been continuously published in said Polk County, Florida, each Monday and Thursday, and has been entered as second class matter at the post office in Bartow, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission, or refund for the purpose of securing this advertisement for publication in said newspaper.

Signed Louanna K. Locke

Sworn to and subscribed before me this 17th day of

May, 19 88

Nancy M. Day

Notary Public

My Commission Expires:  
Notary Public, State of Florida at Large  
My Commission Expires Nov. 18, 1988



State of Florida  
Department of  
Environmental Regulation  
Notice of Intent  
The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to U. S. Agri-Chemicals to modify the Monoammonium/Diammonium Phosphate plant at their facility near Bartow on State Road 630 West in Polk County. Since the increase in emissions of regulated air pollutants will be below significant levels, the modification is exempted from the new source review requirements under FAC Rules 17-2.500 and 17-2.510. The Department has determined that the proposed modification will not interfere with attainment of the ambient air quality standards. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.  
Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.  
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings) Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.  
The application is available for public inspection during normal business hours, 8:00 a. m. to 5:00 p. m., Monday through Friday, except legal holidays, at: Dept. of Environmental Regulation, Bureau of Air Quality Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Dept. of Environmental Regulation, Southwest District, 4520 Live Oak Fair Blvd., Tampa, Florida 33610-7349.  
Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comment mailed within 14 days of the publication of this notice will be considered in the Department's final determination.  
May 16, 1988-1151

00000000

00000000

Attention  
Maggie Jans

NOTRIFIED  
PUBLIC NOTICE  
ENCLOSED.

J Heausell  
5-20-88

U.S. Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799  
813 285 8121

PM  
2 May 1988  
Fort Meade, FL

File Copy

RECEIVED

MAY 4 1988

DER-BAQM

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

May 2, 1988

Mr. Clair H. Fancy, P.E., Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Attention: Mr. John Reynolds

Re: AC53-145424, Draft Permit April 21, 1988

Dear Sir:

As we had discussed last week there are several changes needed to Specific Condition Number 6. Accordingly we have, based on our discussions, changed the application flow sheet showing phosphoric acid flow recorders to the Primary Scrubbers and Reactor. Referring to enclosed DAP Flow Sheet 199-1, stream (1) will be recorded on FMR 1411 and stream (2) will be recorded on FMR 1401. The overall pressure (vacuum) drop across the plant is to be measured and recorded at the inlet to Blowers 116A and 116B.

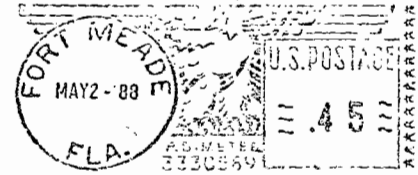
The acid flow rate to the Primary Scrubbers and pressure drop across the system is proposed as an acceptable surrogate method to measure and record the total pressure drop across the Venturi Scrubber system.

Total acid flowrates, stream 119-1(2) flow to the Primary Scrubbers is to be in the ratio of 1.7 to 2.6 GPM  $P_2O_5$  Acid Feed/Ton of  $P_2O_5$  per hour of production. In addition the system pressure (vacuum) is to be in the operating range of (-)25 to (-)35 inches water column and measured at Blowers 116A and 116B.

The above changes are shown on revisions to the application Section III (A) page 4 of 12 and page 7 of 12.



Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799



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

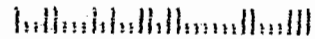
5/4/88

~~CH~~  
~~SA~~ ) FBI  
④

Mr. Clair H. Fancy, P.E., Chief  
Bureau of Air Quality Management  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Attention: Mr. John Reynolds

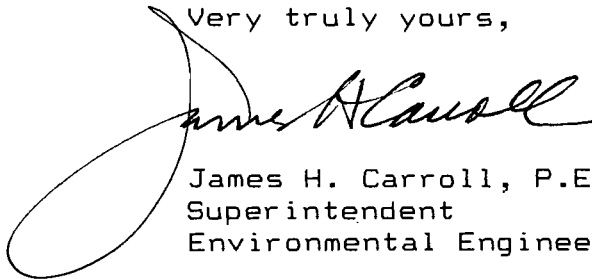
A division of U.S. Diversified Group  
USX Corporation



Mr. Clair H. Fancy, P.E., Chief  
May 2, 1988  
Page 2

Your consideration of the application changes are appreciated.  
Call me if there are any questions.

Very truly yours,



James H. Carroll, P.E.  
Superintendent  
Environmental Engineering

JHC-BB.31

CC: Mr. W. C. Thomas, P.E., Southwest District, DER  
Mr. C. M. Farris  
Mr. C. E. Neff  
Mr. J. M. Lowery

Enclosures: Flowsheet 119-1 R-2, DAP Making 150 TPH  
Application Pages 4 and 12.

Copied }  
John Reynolds } 5.4.88  
CHF/BT }  
Bill Thomas, SW Dist }

**SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)**

**A. Raw Materials and Chemicals Used in your Process, if applicable:**

Description	Contaminants		Utilization* Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
P2O5 Acid	F	1.42	69,600 69,600	199-1-(1) 199-1-(2)
Ammonia	-	-	66,600	199-1-(3)
Sulfuric Acid	-	-	8,100	199-1-(11)
Inerts	-	-	86,100	
			* Moisture Free	Basis

**B. Process Rate, if applicable: (See Section V, Item 1)**

- Total Process Input Rate (lbs/hr): 300,000
- Product Weight (lbs/hr): 300,000, there is approximately 1% P2O5 and 3% ammonia loss to cooling pond and scrap.

**C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)**

Name of Contaminant	Emission <sup>1</sup>		Allowed <sup>2</sup> Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Fluoride-F	4.17	18.29	2.600	4.17	*Not Applicable		199-1-(7)
Particulate	38.59	169.0	2.610	38.59	*Not Applicable		199-1-(7)

<sup>1</sup>See Section V, Item 2. The plant cannot be operated without control because emission controls are built into the unit process operations.

<sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3).

Brief description of operating characteristics of control devices: All primary absorbers and tail gas scrubbers are in place. No modifications are needed. Scrubbing fluid for

#147 and #148 is pond water at pH range of 6 to 7. #117, #118, #119, #125 are in line

process recycle primary raw material scavenging venturi absorbers (scrubbers). #147, #148

are tail gas packed scrubbers with three feet of three inch intalox saddles. Diameter: #147  
dryer scrubber - 12 ft., #148 granulator scrubber - 15.5 ft.

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

#1401, 1411 are acid flow recorders each 0-150 GPM (69,600 LB/HR) P<sub>2</sub>O<sub>5</sub>.

#116A, 116B are blowers which draw all process gas through the process

and scrubber systems. Typical pressure (vacuum) range is

(-)25 to 35 inches water column.

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

#### SECTION V: SUPPLEMENTAL REQUIREMENTS

Refer to attached  
exhibits

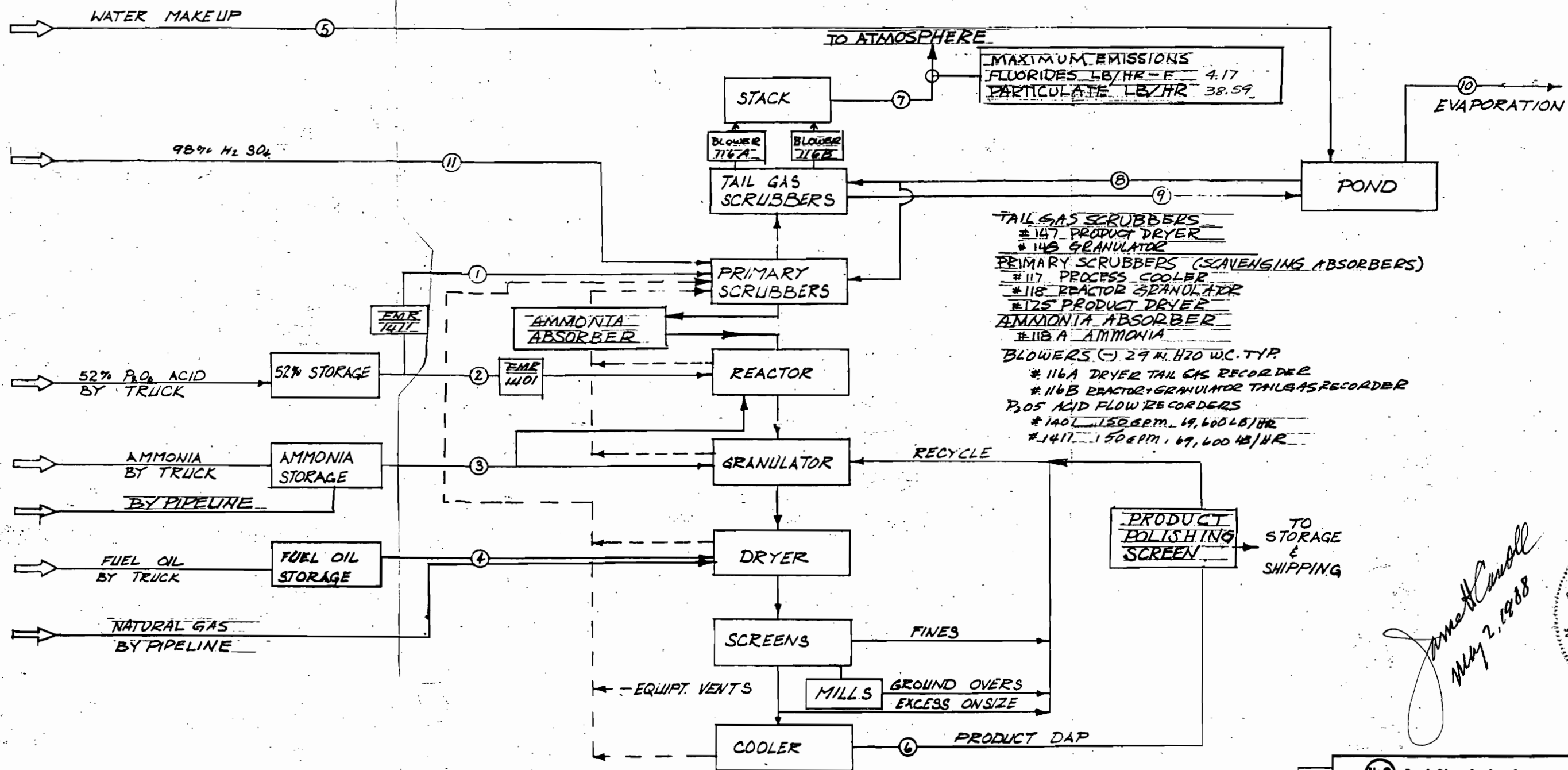
Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

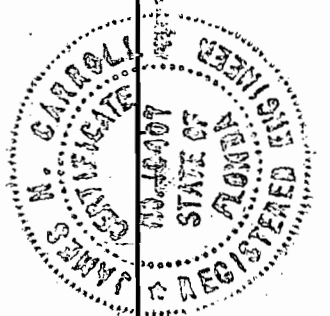
RAW MATERIALS

DAP PROCESS  
(CONVEYORS NOT SHOWN)

PRODUCT



*James H. Cunniff*  
 May 2, 1988



NO.	TITLE	NO.	DESCRIPTION	ZONE	DATE	NO.	DESCRIPTION	ZONE	DATE
5-82	ADDED POLISHING SCREENS								
6-78	INSTALLED INTERMEDIATE AMMONIA ABSORBER								
3-82	INSTALLED PIPELINE AMMONIA BY PIPELINE								
	INSTALLED PIPELINE NATURAL GAS								
	TABLE OF EMISSIONS BASED ON								

NO.	TITLE	NO.	DESCRIPTION	ZONE	DATE	NO.	DESCRIPTION	ZONE	DATE
5-82									
6-78									
3-82									

NO.	TITLE	NO.	DESCRIPTION	ZONE	DATE	NO.	DESCRIPTION	ZONE	DATE
5-82									
6-78									
3-82									

**Agri-Chemicals, Inc.**  
 Division of United States Fertilizer Corporation  
 BARTOW, FLORIDA  
 DAP MAKING 150 TPH  
 PERMIT FLOW SHEET

SCALE: NONE NO. 199-1 R-1, R-2

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address.  Restricted Delivery  
 †(Extra charge)† †(Extra charge)†

3. Article Addressed to: Mr. C.M. Farris General Manager U.S. Agri-Chemicals 3225 State Road 630 West Ft. Meade, FL 33841-9799	4. Article Number P 274 010 499 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail
Always obtain signature of addressee or agent and <u>DATE DELIVERED.</u>	
5. Signature — Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X <i>Jackie Arnold</i>	
7. Date of Delivery 4-25-88	

PS Form 3811, Mar. 1987

\* U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

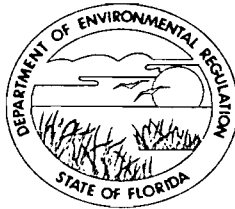
P 274 010 499

**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

U.S.G.P.O. 1985-480-794          PS Form 3800, June 1985	S. M. Farris, Gen. Mgr. U.S. Agri-Chemicals Registered No. 3225 State Road 630 West
	P.O. State and ZIP Code Ft. Meade, FL 33841-9799
	Postage \$
	Certified Fee
	Special Delivery Fee
	Restricted Delivery Fee
	Return Receipt showing to whom and Date Delivered
	Return Receipt showing to whom, Date, and Address of Delivery
	TOTAL Postage and Fees \$
	Postmark or Date Mailed: 04/21/88 Permit: AC 53-145424

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

April 21, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. M. Farris  
General Manager  
U.S. Agri-Chemicals  
3225 State Road 630 West  
Ft. Meade, Florida 33841-9799

Dear Mr. Farris:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to modify the MAP/DAP plant at your phosphate facility.

Please submit written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/jr

Attachments

cc: W. Thomas, SW District  
J. Carroll, U.S. Agri-Chemicals

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

U.S. Agri-Chemicals  
3225 State Road 630 West  
Ft. Meade, Florida 33841-9799

---

DER File No. AC 53-145424

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, U.S. Agri-Chemicals, applied on February 11, 1988, to the Department of Environmental Regulation for a permit to modify the MAP/DAP plant located at their existing facility near Bartow, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.


The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the



Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



---

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

W. Thomas, SW District  
J. Carroll, U.S. Agri-Chemicals

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 4-21-88.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Martha J. Wise  
Clerk

4-21-88  
Date

RULES OF THE ADMINISTRATIVE COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to U.S. Agri-Chemicals to modify the Monoammonium/Diammonium Phosphate plant at their facility near Bartow on State Road 630 West in Polk County. Since the increase in emissions of regulated air pollutants will be below significant levels, the modification is exempted from the new source review requirements under FAC Rules 17-2.500 and 17-2.510. The Department has determined that the proposed modification will not interfere with attainment of the ambient air quality standards. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation  
Southwest District  
4520 Live Oak Fair Blvd.  
Tampa, Florida 33610-7349

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

U.S. Agri-Chemicals  
Polk County

Modification of DAP/MAP Plant  
Proposed State Permit No. AC 53-145424

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

April 21, 1988

I. Application Information

A. Applicant

U.S. Agri-Chemicals  
3225 State Road 630 West  
Ft. Meade, Florida 33841-9799

B. Request

The Department received an application on February 11, 1988, for a permit to increase the production and emission rates of the Diammonium Phosphate/Monoammonium Phosphate (DAP/MAP) plant in U.S. Agri-Chemicals' phosphate facility near Bartow. The application was deemed complete on March 7, 1988.

C. Project Location

U.S. Agri-Chemicals' facility is located approximately three miles west of Bartow off State Road 630 West. The UTM coordinates of the site are: Zone 17, 413.2 km E and 3086.3 km N.

II. Project Description

The project involves increasing the production rate of the DAP/MAP plant from 100 tons per hour to a new rate of 150 tons per hour by debottlenecking material handling equipment and drives. Existing scrubbers have adequate capacity to accommodate the increased production rate without modification. Allowable emissions that will result from these changes are shown below:

Pollutant	Present lb/hr	Present TPY	New TPY	Increase TPY
Fluoride	2.76	12.09	18.29	6.20
Particulate	36.17	158.42	169.02	10.60

III. Rule Applicability

The proposed modification is subject to review under provisions of Chapter 403, Florida Statutes and Rules 17-2 and 17-4, Florida Administrative Code (FAC). Since the facility is major for particulate matter and is located in a county designated as a PSD area for particulate matter, the modification would be subject to the PSD review requirements of Rule 17-2.500(5) if it resulted in an increase in particulate emissions of at least 25 tons per year. However, the increase in particulate emissions is only 10.6 tons per year, therefore, PSD review for particulate matter is not required. The general particulate emission limiting standards in Rule 17-2.610(1) apply.

Fluoride regulation comes under the performance standard for new plants listed in Rule 17-2.600(3)(a)6.. Since the facility is classified as minor for fluoride emissions (less than 100 tons of fluoride per year) and the modification alone would not be the equivalent of a new major facility, Rule 17-2.500(2)(d)3. dictates that PSD review for fluoride is not required. Therefore, the project is exempted from the PSD provisions of Rule 17-2 and comes under Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

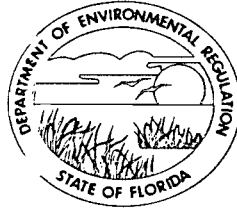
#### IV. Conclusion

The project will not interfere with attainment of ambient air quality standards and the Department finds the requested permit approvable.



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

PERMITTEE:  
U.S. Agri-Chemicals  
3225 State Road 630 West  
Ft. Meade, Florida 33841-9799

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989  
County: Polk  
Project: Modification of  
Monoammonium/Diammonium Phos-  
phate Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code, Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of a monoammonium/diammonium phosphate plant located at the permittee's phosphate fertilizer complex near Bartow on State Road 630 West in Polk County, Florida. The UTM coordinates are Zone 17, 413.2 km E and 3086.3 km N.

The modification shall be in accordance with the attached permit application except as otherwise noted under the General Conditions and Specific Conditions set forth in this permit.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER form 17-1.202(1), and letter dated February 5, 1988.

PERMITTEE:  
U.S. Agri-Chemicals.

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. Maximum permitted production rate for this plant shall be 69.6 TPH P<sub>2</sub>O<sub>5</sub> input. If the production rate exceeds the maximum permitted rate by 10% or more at any time, a compliance test must be conducted after notifying the Department and the results of this test, along with other information listed in Specific Condition No. 9, must be submitted to the Department within 10 working days. Any emissions in excess of those listed in Specific Condition No. 2 shall constitute a violation of this permit. The plant may operate 8,760 hours per year if permitted emissions are not exceeded.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

SPECIFIC CONDITIONS:

2. The emissions from the 7 foot diameter, 131 foot high stack shall not exceed:

Pollutant	Standard	Max. Allowable Emissions	
		lbs/hr	T/yr
Particulate	38.59 lbs/hr	38.59	169.02
Fluoride	0.06 lb/T P <sub>2</sub> O <sub>5</sub>	4.17	18.29

3. Fugitive emissions from the process, conveying and storage equipment shall be controlled by sealing and/or venting to the pollution abatement system.

4. Fuel oil used in the drying operation shall contain no more than 2.5% sulfur.

5. The permittee shall install, calibrate, maintain, operate and record data from flow monitoring devices used to determine total P<sub>2</sub>O<sub>5</sub> input to the plant. A daily record of the P<sub>2</sub>O<sub>5</sub> input to the plant shall be maintained.

6. The permittee shall measure and record the total pressure drop across each scrubber system. Pressure drop across the venturi scrubbers must be at least 12 inches of water during plant operation. These records shall be maintained for 2 years and be available for inspection by regulatory agency personnel on request.

7. Modification should commence and be completed within a reasonable time based on the projections in the application.

8. Reasonable precautions to prevent fugitive particulate emissions during modification, such as coating or spraying roads and construction sites used by contractors, shall be taken by the permittee.

9. Before the construction permit expires, the DAP plant shall be sampled for particulate and fluoride emissions. Test procedures shall be in accordance with EPA reference methods 1, 2, 3, 5, and 13A or 13B as published in 40 CFR 60. The Department shall be notified in writing 15 days or more prior to the compliance test. The test shall be conducted at permitted production capacity or no less than 90% thereof. P<sub>2</sub>O<sub>5</sub> input, pH of scrubber solution, and pressure drop across the scrubbers shall be reported to the Department along with the test data and results.

PERMITTEE:  
U.S. Agri-Chemicals

Permit Number: AC 53-145424  
Expiration Date: March 31, 1989

**SPECIFIC CONDITIONS:**

The applicant must demonstrate compliance with the conditions of this permit and submit a complete application for an operating permit including an operating and maintenance plan to the Southwest DER office at least 90 days before the expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this permit until the expiration date or issuance of an operating permit.

Issued this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

ATTACHMENT 1

Available Upon Request.



U.S. Agri-Chemicals  
3225 State Road 630 West  
Fort Meade, FL 33841-9799  
813 285 8121

PM  
2-8-88  
Fort Meade, FL

file copy

DER

12226

FEB 11, 1988 (m)

**US**

**Agri-Chemicals**

**BAQM**

February 5, 1988

CERTIFIED MAIL #P 804 401 502  
RETURN RECEIPT REQUESTED

Mr. Clair H. Fancy, P.E., Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Dear Mr. Fancy:

Re: DAP Plant Expansion, Permit A053-97456

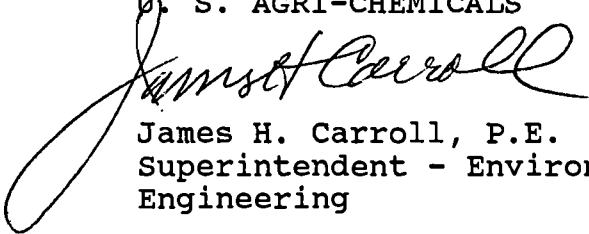
Enclosed is an application to construct an air pollution source modification for the existing diammonium/monoammonium phosphate manufacturing plant at the U. S. Agri-Chemicals facility in Bartow, Polk County.

The production rate is to be increased from a permitted rate of 100 tons/hour to 150 tons/hour.

Your consideration of this application is appreciated.

Very truly yours,

U. S. AGRI-CHEMICALS

  
James H. Carroll, P.E.  
Superintendent - Environmental  
Engineering

JHC:mea

Enclosures - Four Copies of Application  
\$1000 Application Fee

001031

cc: W. C. Thomas, P.E., DER Tampa Office  
C. M. Farris  
C. E. Neff  
J. M. Lowery

File: JHCPERMT

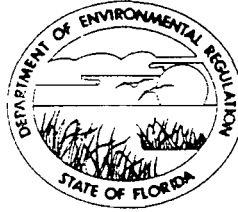
Receipt # 117517  
\$1000.00  
AC 53-145424  
Subcode 01

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



DER

BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

FEB 11, 1988

LIAM K. HENNESSEY  
DISTRICT MANAGER

BAQM

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Emission [ ] New<sup>1</sup> [X] Existing<sup>1</sup>

APPLICATION TYPE: [ ] Construction [ ] Operation [X] Modification

COMPANY NAME: U. S. Agri-Chemicals COUNTY: Polk

Identify the specific emission point source(s) addressed in this application (i.e. Lime Monoammonium and Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Diammonium Phosphate

SOURCE LOCATION: Street State Road 60 West Manufacture City Bartow

UTM: East 17-413200 North 3086300

Latitude - ° - ' - "N Longitude - ° - ' - "W

APPLICANT NAME AND TITLE: C. M. Farris, General Manager - Florida Phosphate Operations

APPLICANT ADDRESS: 3225 State Road 630 West, Ft. Meade, Florida 33841-9799

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of U. S. Agri-Chemicals

I certify that the statements made in this application for a modified permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: C. M. Farris

C. M. Farris, General Manager

Name and Title (Please Type)

Date: 2/5/88 Telephone No. 813-285-8121

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

<sup>1</sup> See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

0000

Signed James H. Carroll

James H. Carroll  
Name (Please Type)

U. S. Agri-Chemicals  
Company Name (Please Type)

3225 State Road 630 West, Ft. Meade, Florida  
Mailing Address (Please Type) 33841-9799

Florida Registration No. 19407 Date: February 5, 1988 Telephone No. 813-285-8121

**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

This project consists of modifying the existing permitted Diammonium Phosphate (DAP), Monoammonium Phosphate (MAP) Plant to take advantage of the potential capacity of installed major process units and scrubbers by debottlenecking material handling equipment and drives. Permitted rate is 100 ton/hour, requested rate is 150 ton/hour

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction March 15, 1988 Completion of Construction December 1988

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.) Note that emission scrubbers are existing and in place.

Blower Modification	\$ 50,000
Product Screens	\$100,000
Product Recycle Mill	\$ 40,000
Conveyor	\$100,000
Pumps, Drives, Etc.	\$ 50,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

A053-97456 Diammonium Phosphate and Monoammonium Phosphate Manufacture

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;  
if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_

F. If this is a new source or major modification, answer the following questions.  
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No  
a. If yes, has "offset" been applied? \_\_\_\_\_  
b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_  
c. If yes, list non-attainment pollutants. \_\_\_\_\_

2. Does best available control technology (BACT) apply to this source?  
If yes, see Section VI. No

3. Does the State "Prevention of Significant Deterioration" (PSD)  
requirement apply to this source? If yes, see Sections VI and VII. No

4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
apply to this source? Yes - See Note Below

5. Do "National Emission Standards for Hazardous Air Pollutants"  
(NESHAP) apply to this source? No

H. Do "Reasonably Available Control Technology" (RACT) requirements apply  
to this source? No

a. If yes, for what pollutants? \_\_\_\_\_

b. If yes, in addition to the information required in this form,  
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-  
cation for any answer of "No" that might be considered questionable.

Note: Reference to 4 above "yes" see Permit A053-97456 for the existing DAP/MAP plant.  
Specific Condition 4 states in part "This is an NSPS source....."

**SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)**

**A. Raw Materials and Chemicals Used in your Process, if applicable:**

Description	Contaminants		Utilization * Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
P2O5 Acid	F	1.42	139,200	199-1-(2)
Ammonia	-	-	66,600	199-1-(3)
Sulfuric Acid	-	-	8,100	199-1-(11)
Inerts	-	-	86,100	
			* Moisture Free	Basis

**B. Process Rate, if applicable: (See Section V, Item 1)**

- Total Process Input Rate (lbs/hr): 300,000
- Product Weight (lbs/hr): 300,000, there is approximately 1% P2O5 and 3% ammonia loss to cooling pond and scrap.

**C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point; use additional sheets as necessary)**

Name of Contaminant	Emission <sup>1</sup>		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Fluoride-F	4.17	18.29	2.600	4.17	*Not Applicable		199-1-(7)
Particulate	38.59	169.0	2.610	38.59	*Not Applicable		199-1-(7)

<sup>1</sup>See Section V, Item 2. The plant cannot be operated without control because emission controls are built into the unit process operations.

<sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type * (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
#117 Process Cooler Venturi Scrubber				
#118 Reactor Granulator Venturi Scrubber				
#125 Dryer Venturi Scrubber				
#147 Prod. Dryer Scrubber	F	99.8%		Refer to
#148 Granulator Scrubber	Particulate	99.7%		computation
*D.M. Weatherly PID No:	117, 118, 125, 147, 148			Sheet A

Refer to Drawing 199-1, R-1, 2-2-88

E. Fuels

Type (Be Specific)	Consumption* BTU/HR		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	19,000,000	25,000,000	25
#6 Fuel Oil	19,000,000	25,000,000	25

\*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 2.28% S Max.                      Percent Ash: 0.02%  
 Density: API 11.9                      lbs/gal      Typical Percent Nitrogen: NA  
 Heat Capacity: 18,520                      BTU/lb      152,000                      BTU/gal  
 Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average \_\_\_\_\_ Maximum \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal.

None. This is a zero effluent discharge plant.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): One stack  
 Stack Height: 131 ft. Stack Diameter: 7.0 ft.  
 Gas Flow Rate: 184,000 ACFM 182,000 DSCFM Gas Exit Temperature: 130 (592R) °F.  
 Water Vapor Content: 9.8 % Velocity: 80 FPS

**SECTION IV: INCINERATOR INFORMATION**

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste \_\_\_\_\_  
 Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_  
 Approximate Number of Hours of Operation per day \_\_\_\_\_ day/wk \_\_\_\_\_ wks/yr. \_\_\_\_\_  
 Manufacturer \_\_\_\_\_  
 Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_  
 Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: All primary absorbers and tail gas scrubbers are in place. No modifications are needed. Scrubbing fluid for #147 and #148 is pond water at pH range of 6 to 7. #117, #118, #119, #125 are in line process recycle primary raw material scavenging venturi absorbers (scrubbers). #147, #148 are tail gas packed scrubbers with three feet of three inch intalox saddles. Diameter: #147 dryer scrubber - 12 ft., #148 granulator scrubber - 15.5 ft. Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

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**NOTE:** Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

**SECTION V: SUPPLEMENTAL REQUIREMENTS**

Refer to attached exhibits

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.



9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY** Not Applicable

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes  No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes  No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- |                           |                          |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:*           | 4. Capital Costs:        |

\*Explain method of determining

- 5. Useful Life:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.    b. Diameter: ft.
- c. Flow Rate: ACFM    d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device: b. Operating Principles:
- c. Efficiency:<sup>1</sup> d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:<sup>2</sup> h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device: b. Operating Principles:
- c. Efficiency:<sup>1</sup> d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:<sup>2</sup> h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

- 3.
- a. Control Device:
  - b. Operating Principles:
  - c. Efficiency:<sup>1</sup>
  - d. Capital Cost:
  - e. Useful Life:
  - f. Operating Cost:
  - g. Energy:<sup>2</sup>
  - h. Maintenance Cost:
  - i. Availability of construction materials and process chemicals:
  - j. Applicability to manufacturing processes:
  - k. Ability to construct with control device, install in available space, and operate within proposed levels:

- 4.
- a. Control Device:
  - b. Operating Principles:
  - c. Efficiency:<sup>1</sup>
  - d. Capital Costs:
  - e. Useful Life:
  - f. Operating Cost:
  - g. Energy:<sup>2</sup>
  - h. Maintenance Cost:
  - i. Availability of construction materials and process chemicals:
  - j. Applicability to manufacturing processes:
  - k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:<sup>1</sup>
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:<sup>2</sup>
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration


(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration


(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

<sup>1</sup>Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

**SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

**A. Company Monitored Data**

1. \_\_\_\_\_ no. sites \_\_\_\_\_ TSP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/dir \_\_\_\_\_

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

\*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No
- b. Was instrumentation calibrated in accordance with Department procedures?  
[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year
- 2. Surface data obtained from (location) \_\_\_\_\_
- 3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_
- 4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

- 1. \_\_\_\_\_ Modified? If yes, attach description.
- 2. \_\_\_\_\_ Modified? If yes, attach description.
- 3. \_\_\_\_\_ Modified? If yes, attach description.
- 4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sup>2</sup>	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

27° 55' 00"

POINT OF DISCHARGE  
SERIAL # 001,002  
LAT - 27° 54' 29.5" N  
LONG - 81° 51' 28.7" W

001A  
LAT 27° 54' 31.5"  
LONG 81° 51' 58.1"

PLANT LOCATION

BARTOW

81° 52' 30"

SCALE

MULBERRY, FLA.

N2752.5-W8152.5/7.5

1949

PHOTOREVISED 1972

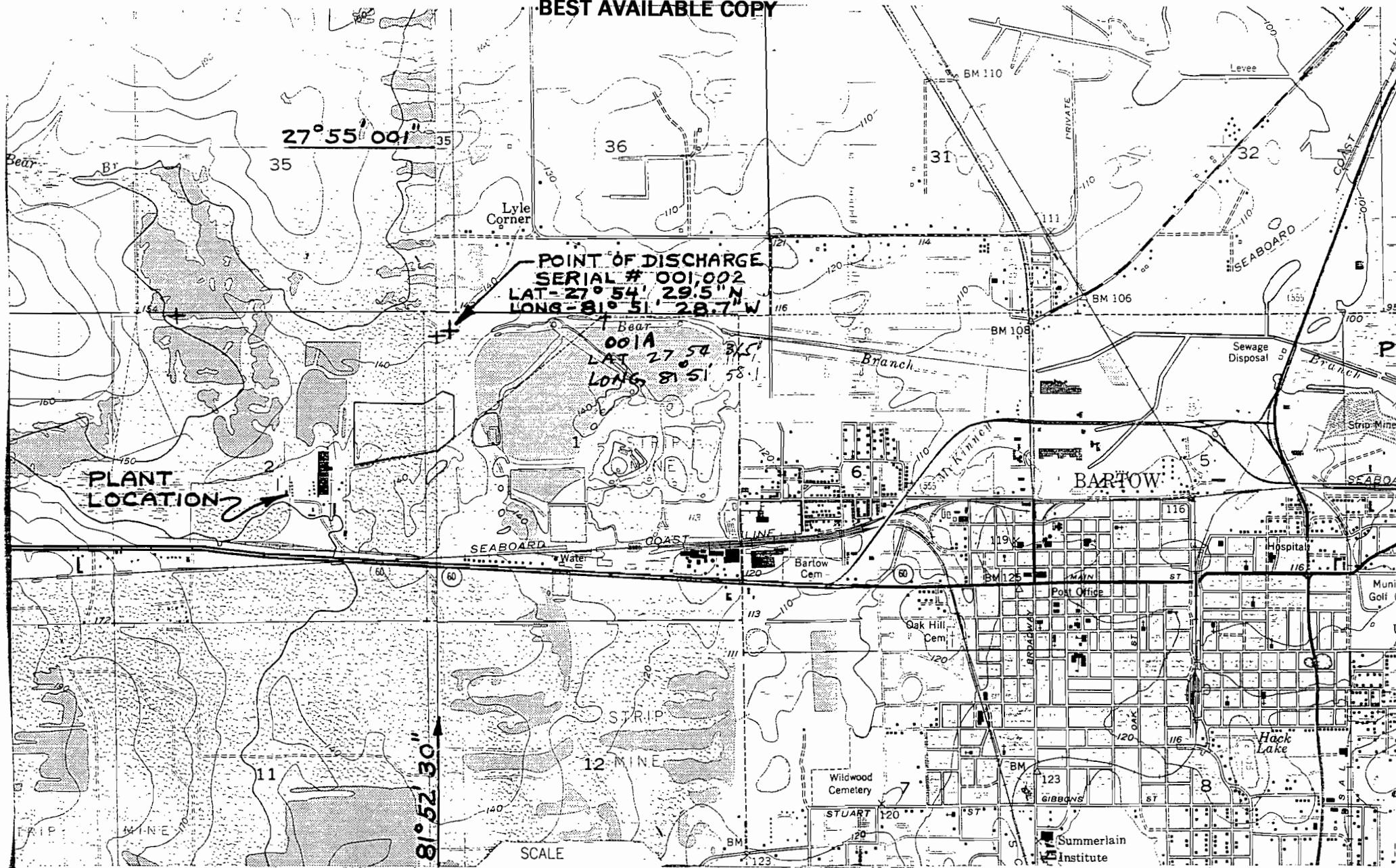
AMS 4639 IV NW-SERIES V847

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

USS AGRI-CHEMICALS  
PLANT LOCATION  
BARTOW, FLORIDA



SUBJECT: EMISSION COLLECTION EFFICIENCY

SHEET:      OF     

PLANT: 150 TPH - DAP COST CENTER:

DATE: 2-1-88

COMPUTED BY: JHC

CHKD. BY:     

JOB:     

RESPONSE TO SECTION II, PARAGRAPH D

SCRUBBER

EFFICIENCY CALCULATIONS

FLUORIDES

$$F_{IN} \text{ FEED } 0.0142 F \times 139,200 \frac{LB}{HR} = 1976.6 \frac{LB-F}{HR}$$

"F" IN EMISSIONS 4.17 <sup>LB</sup>/HR ALLOWED, SECTION III, C

$$EFFICIENCY = 100 \left[ 1 - \frac{4.17}{1976.6} \right] = 99.8\%$$

PARTICULATE

REFERENCE FOR UNCONTROLLED EMISSIONS

AP-42 TABLE 6.10-1

DRYER - COOLER 80 LB/TON

GRANULATOR 2

TOTAL 82 LB/TON

DESIGN EMISSIONS BASIS SECTION III, PARAGRAPH C

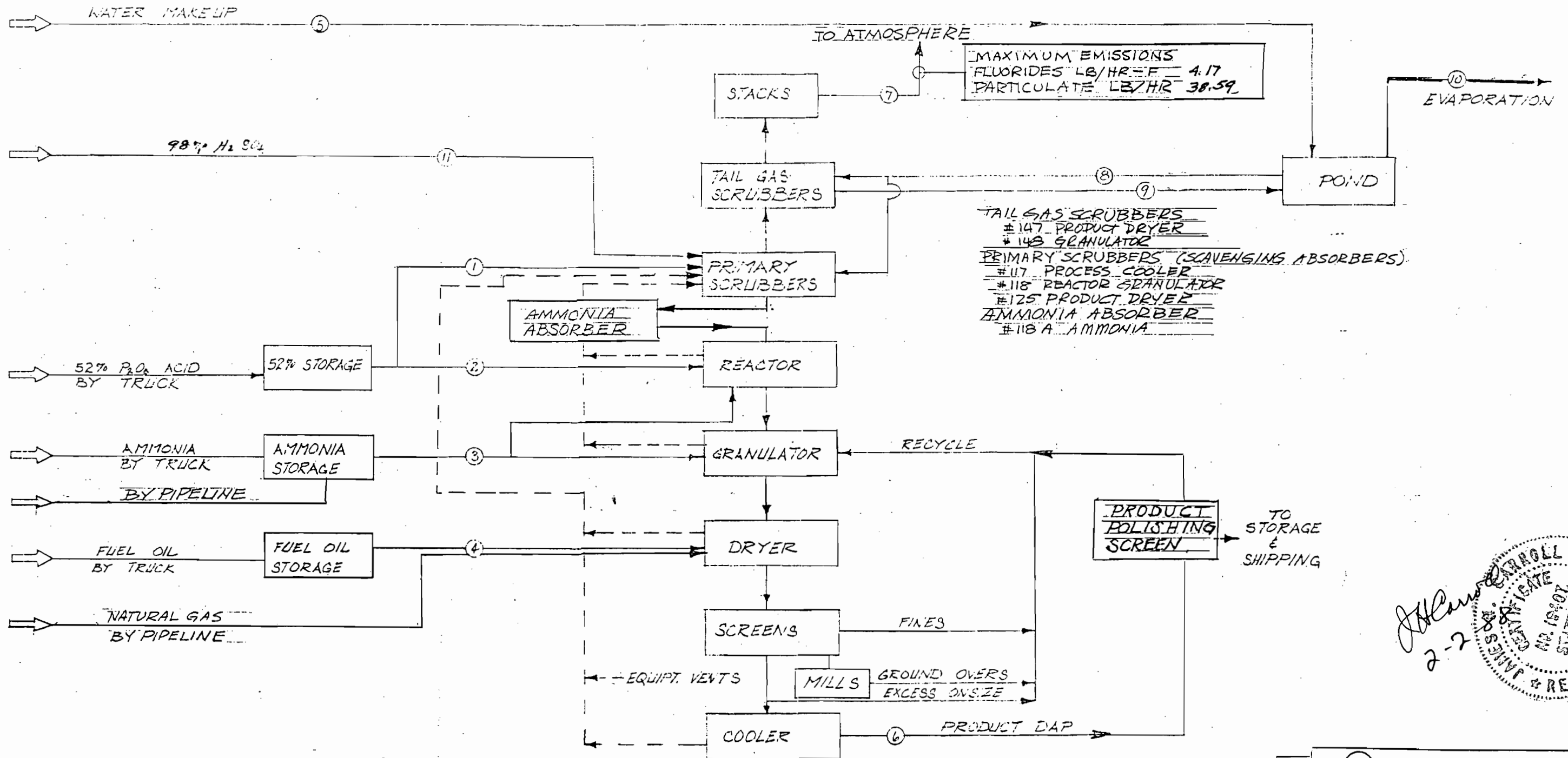
PARTICULATE = 38.59 <sup>LB</sup>/HR ALLOWED  
150 TON/HR

$$EFFICIENCY = 100 \left[ 1 - \frac{38.59 / 150 \frac{LB}{TON}}{82 \frac{LB}{TON}} \right] = 99.7\%$$

RAW MATERIALS

DAP PROCESS  
(CONVEYORS NOT SHOWN)

PRODUCT



ADDED POLISHING SCREENS  
 INSTALLED INTERMEDIATE AMMONIA ABSORBER  
 INSTALLED PIPELINE AMMONIA  
 INSTALLED PIPELINE NATURAL GAS  
 TABLE OF EMISSIONS BASED ON 150 TPH-DAP

NO	TITLE	NO	DESCRIPTION	ZONE	MADE BY	APPROVED BY	DATE	NO	DESCRIPTION	ZONE	MADE BY	APPROVED BY	DATE	REQUISITIONS
5-82														
5-82														
6-78	2-1	CAPACITY 150 TPH			JC	JM	2-80							
5-82		CAP INCR 72 TO 100 TPH			JC	JD	5-82							
2-82					A.H.	A.H.	10-82							

ISSUE	PURPOSE	REV	DATE
E-1	ISSUED Q-1 FOR 150 TPH REISSUED PRINT FOR PER FILE UPDATE		2/21/89

U.S.S. Agri-Chemicals, Inc.  
 Division of United States Steel Corporation  
 BARTOW, FLORIDA  
 DAP MAKING 150 TPH  
 PERMIT FLOW SHEET  
 SCALE: NONE NO. 197-1 R-1