

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

RECEIVED

OCT 30 1998

BUREAU OF
AIR REGULATION



October 27, 1998

Mr. A. A. Linero, PE Administrator
New Source Review Section
FDEP, Bureau of Air Regulation
2600 Blair Stone Rd (MS 5505)
Tallahassee, FL 32399-2400

RE: MAP Prill Plant, PSD-FL-222; AC53-260190, ARMS 1050051032

Dear Mr. Linero:

This is to request that the permit expiration date be extended sixty days beyond the current date of 12/30/98. The extension will allow USAC the time necessary to prepare the application to incorporate the MAP plant into the facility Title V Operating Permit.

Please feel free to contact Mr. Ronald L. Brunk at (941) 285-7123, extension 279, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Steven J. Susick".

Steven J. Susick, P.E., General Manager
Engineering & Technical Services

xc: J. Kissel, DEP SWD
P. Hartbarger
S. Susick
D. Nettles
J. Koogler

TO: File (U.S. Agri-Chemicals, Inc. - 1050059-024-AC/PSD-FL-222)

FROM: A.A. Linero

DATE: July 13, 1998

A proposed final determination dated April 28, 1998 along with a revised BACT determination and permit was provided to the applicant for review. A letter from the applicant dated May 7 was received by the Department. It contained a number of comments which are summarized below and followed by the Department's responses.

1. *The applicant objected to the Department's representation of the BACT process and asserted that in several areas the language is adversarial, objectionable and incorrect.*

The Department disagrees with this comment. The specific points are discussed below.

2. *The applicant quoted the Department as stating in the April 28, 1998 Draft Final Determination that "this facility will not be used as a precedent for future BACT determinations" and stated that this comment is inconsistent with Federal and State objectives for BACT determinations.*

The Department's statement was that "It (the BACT) will not be used as a precedent for future BACT determinations." The point is that the BACT determination is now pursuant to a different rule requirement rather than the requirement of the PSD rules. Therefore it does not set a precedent for PSD projects. Further, until the applicant's claimed scrubber performance of 6.0 mass transfer units is confirmed by a fluoride efficiency test, the Department will not consider it as representative of BACT under the PSD rules. The Department's comment has been retained above.

3. *The applicant stated that the facility has demonstrated that its emissions are amongst the lowest in the world with no tangential environmental impacts that would be associated with other emission control proposals and that the plant's emission control equipment is more reliable than other emission control equipment. The applicant concludes that the plant represents an excellent precedent for future BACT determinations.*

Future BACT determinations will be performed on a case-by-case basis as required by the rules. It is noted that this plant has not demonstrated achievement of the BACT limits at the production rates requested in the application. The scrubber was tested at only 62% of permitted plant capacity while using a 15% P2O5 recirculated slurry designed primarily for recycle of product back to the process. A second stage of scrubbing with a relatively clean scrubbing medium would be required before it could be termed an excellent precedent for future BACT determinations.

4. *The applicant states that the list of attachments to the final BACT determination are unnecessary as attachments to the final permit and requests that they be removed from the permit.*

The attachments are actually the references given in the Department's BACT determination and not in the permit *per se*. Four of the five references are expert opinions or publications addressing the efficacy of venturi scrubbing versus packed scrubbing for removal of gaseous fluorides. It is proper practice to cite references in technology review documents such as a BACT determination. The list of references will continue to be attached to the BACT determination which is an attachment to the permit.

5. *The applicant states that the final determination gives the plant production limit as 40.9 tons of product per hour (TPH) whereas the actual construction permit limits the plant operating rate to 37.2 TPH. The applicant indicates that the higher limit should be shown on the permit cover page and in Specific Condition 2.*

It was agreed that the production rate during the tests conducted in December of 1997 would represent 90% of the maximum operating rate. That value is 40.9 TPH.

6. *The applicant requested that the agreed-upon procedure for testing and increasing permitted capacity be reflected in an additional permit condition.*

The Department will add a new Specific Condition 7 and renumber Specific Conditions 8-13 as Specific Conditions 9-14. Normally, a public-noticed permit amendment is required before testing can be performed at a rate higher than 110% of the permitted rate. Since this plant was originally intended to operate at 60 tons per hour, the new condition will allow the plant to operate at levels greater than 40.9 tons per hour for up to 7 days at the higher production rate, for one time only, to conduct the tests. The plant must then resume operation at a rate not higher than the maximum operating rate. The applicant must then apply to the Department to increase the capacity of the plant and submit the appropriate fee per Rule 62-4, F.A.C. The tests must provide reasonable assurance as described in Rule 62-4.070, F.A.C that the plant will comply with the Department's rules. Following public notice, the final Department action will issue an amended permit at the higher rate.

7. *The applicant stated that no mention was made nor reasons given in the BACT determination for imposing the development of unique testing protocols. The applicant stated that the standard testing in the draft permit is sufficient for the source.*

The intent was to have the applicant simply list the test methods, sampling locations, process parameters to be recorded, etc. This is not a unique requirement but a very common practice to provide reasonable assurance that the proper variables (such as pressure drops) are monitored during testing.

8. *The Applicant reiterated that the Department should insert into the permit the process by which production can be increased and that certain BACT language should be removed.*

This comment was addressed in responses to previous comments.

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Mr. Bill Proses
Air Compliance Engineer Supervisor
FDEP, Southwest District
3804 Coconut Palm
Tampa, FL 33619-8318

RE: MAP Prill Plant, PSD-FL-222; AC53-260190, ARMS 1050051032

Dear Mr. Proses:

This is to request a waiver of the annual compliance tests specified in the referenced permit specific condition #6. Although USAC received the final amended permit on October 20, 1989, the current business condition indicates that the plant will remain shutdown for the remainder of this fiscal year. USAC will notify your office as soon as possible to schedule the tests if the plant is restarted.

Please feel free to contact me at (941) 285-7123, ext. 279 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald L. Brunk", written over a horizontal line.

Ronald L. Brunk, Manager
Environmental Engineering

xc: A. A. Linero, DEP BAR
P. Hartbarger
S. Susick
D. Nettles
J. Koogler