

Law Offices

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SEP 17 1998
DIVISION OF AIR
RESOURCES MANAGEMENT

Atlanta
Boca Raton
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Jacksonville
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Miami
New York

Northern Virginia
Orlando
San Francisco
St. Petersburg
Tallahassee
Tampa
Washington, D.C.
West Palm Beach

*Clair
Howard
9/16*

September 11, 1998

LAWRENCE N. CURTIN
850-425-5678

RECEIVED

SEP 13 1998

BUREAU OF
AIR REGULATION

VIA FAX

Douglas W. Beason, Esquire
Department of Environmental Protection
2600 BlairStone Road
Twin Towers Office Building, R. 659-E
Tallahassee, Florida 32399-2400

Re: U.S. Agri-Chemicals, Inc. v. Department of Environmental
Protection, Case No. 97-4542

Dear Doug:

Based upon our recent telephone conversation, I understand that the changes that we proposed to Specific Condition No. 7 of the draft permit that we received from Clair Fancy and Al Linero have been deemed by the Bureau to be unacceptable. You advised that the rationale for this rejection of our proposed revised language is that the addition is unnecessary.

As I understand the Department's interpretation of the language contained in Specific Condition No. 7, the production rate of the plant may be increased to 60 tons of MAP per hour upon the successful completion of emission testing indicating that the emission rate will be met at that level, and upon processing of an amendment to the current permit. No review of the adequacy of the technology will be performed under those circumstances. Based upon this interpretation, I understand that it has been determined that the language that we proposed does not clarify or add anything to the specific condition.

At the meeting with representatives of the Department, including Howard Rhodes, that occurred earlier this year, we had an understanding that the production rate of the facility could be increased to the originally intended capacity with a minimum review by the Department, assuming that the fluoride emission limit could be met at that level based upon test data. The language that we proposed was an attempt to ensure that this would be the result. Based upon your representations that the language proposed by the

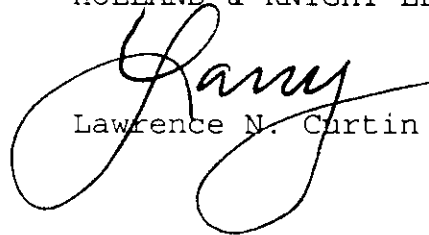
Mr. Beason
September 11, 1998
Page 2

Department would achieve that result, we will accept the language in Specific Condition No. 7 as proposed by the Department.

This should conclude the matter and obviate the need for a hearing on November 17. We need to discuss the best way to finalize the permit. Please call me so that we can discuss an appropriate procedure.

Sincerely,

HOLLAND & KNIGHT LLP



Lawrence N. Curtin

LNC/jfg

cc: Mr. Howard Rhodes ✓
Mr. Steven J. Susick
Mr. Ron Brunk

TAL-137939



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 11, 1998

Mr. David A. Ludder, General Counsel
Legal Environmental Assistance Foundation
1114-E Thomasville Road
Tallahassee, Florida 32303-6290

Re: Public Records Request
U. S. Agrichem Monoammonium Phosphate Plant

Dear Mr. Ludder:

Enclosed are the following documents in response to your request:

1. Construction Permit AC53-260190 (PSD-FL-222) dated September 29, 1995.
2. Draft Intent to Issue Amended Construction Permit (and associated documents) dated December 23, 1996.
3. Comments from U. S. Agrichem's consultant, Koogler and Associates dated February 7, 1997.
4. Proposed Amended Permit sent to U. S. Agrichem on July 28, 1998.

There are numerous documents related to control technology but none that appear to match your specifications. You may prefer to review the files yourself and request copies of documents at our standard cost per copy. Alternatively, we can copy all related documents and send them to you, again at the standard rate. The related documents comprise a couple hundred pages. Please contact Ms. Kim Tober or Mr. Clay Whitfield at 488-0114 who can help you further.

Sincerely,

A. A. Linero, Administrator
New Source Review Section

AAL/aal

Enclosures

cc: Kim Tober w/o encl.
Clay Whitfield w/o encl.
Doug Beason w/o encl.



September 9, 1998

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SEP 11 1998

BUREAU OF
AIR REGULATION

Mr. Al Linero, Administrator
New Source Review Section
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental Protection
Mail Station 5505
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero

Re: **U.S. Agri-Chemicals Corporation, Prilled Monoammonium Phosphate Plant, Fort Meade, Florida**

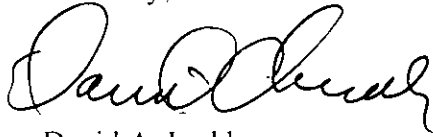
Dear Mr. Linero:

Pursuant to § 119.07, Fla. Stat. (1997), the Legal Environmental Assistance Foundation, Inc. requests that you provide copies of the following documents:

1. The construction permit (PSD-FL-222 (AC53-260190)) issued to U.S. Agri-Chemicals Corporation on September 29, 1995 for the installation of air pollution control equipment identified in an accompanying Best Available Control Technology Determination.
2. Any documents showing that any of the control technologies identified in the Best Available Control Technology Determination dated September 27, 1995 were installed by U.S. Agri-Chemicals Corporation.
3. Any documents showing that any control technology other than that described in the Best Available Control Technology Determination dated September 27, 1995 was installed by U.S. Agri-Chemicals Corporation.
4. Any documents which have established currently effective modifications of the construction permit (PSD-FL-222 (AC53-260190)) issued to U.S. Agri-Chemicals Corporation on September 29, 1995, or otherwise supplanted such permit.

If you have any questions regarding this request, please contact me at the above address or phone number.

Sincerely,


A handwritten signature in black ink, appearing to read "David A. Ludder". The signature is fluid and cursive, with the first name "David" being the most prominent.

David A. Ludder
General Counsel

Memorandum

Florida Department of Environmental Protection

TO: Doug Beason, OGC

FROM: Clair H. Fancy, Chief
Bureau of Air Regulation 

DATE: August 11, 1998

SUBJECT: U. S. Agrichem Prilled MAP Plant
Final Permit PSD-FL-222
Message From Larry Curtin

Al Linero and I listened to the message from Larry Curtin. We thought you should know that we made a very important clarification in the most recent version. It is that we will not revisit BACT following their testing at full capacity.

They want a system of obtaining an automatic permit modification by just submitting a report to the District who in-turn would immediately give them a permit. They understand now that the application must be sent to our office for review and a fee of \$250 submitted. We cannot automatically issue a permit until we review the test results. We believe the method of obtaining a permit modification is well described in our rules. Their recommended language is:

The Department shall modify this permit application to 100% of the rate of a special compliance test (not to exceed 60 tph) upon receipt of an application to modify this construction permit and proof of publication of the Department's Intent to Issue Amended Construction Permit at the higher production rate.

The first problem with this language is that it places a permit requirement on the Department. Recent practice has been to prepare permit with conditions on the applicant and not on the Department. The second problem is that the words "upon receipt" mean different things to different people. We basically would wind up changing their proposed language so much, that all we can say is that the rules adequately address the matter.

Please let Larry Curtin know that he has worked together with the Department on many issues for many years. He knows we will not act arbitrarily and capriciously on this matter. We will give the application immediate attention and will process it promptly and in Good Faith.

We appreciate that you are engaged in some very important cases. We would appreciate it if you could finalize the matter as early as your schedule permits. I do not want to deal with this anymore. Thanks.

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

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RECEIVED

AUG 05 1998

BUREAU OF
AIR REGULATION

US

Agri-Chemicals

A Sinochem Company

August 3, 1998

Mr. C. H. Fancy, P. E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blirstone Road
Tallahassee, Florida 32399-2400

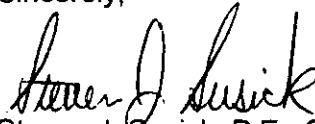
**Re: Prilled MAP Plant (PSD-FL-222/AC53-260190) U.S. Agri-
Chemicals Incorporated - Ft. Meade, Florida**

Dear Clair:

As we discussed please find attached minor language modifications to the latest draft Air Construction Permit for our Prilled Map facility in Ft. Meade, Florida. These minor changes reflect the agreement we reached in our meeting with you, Howard Rhodes, Doug Beason, Al Linero and John Reynolds on April 2, 1998. Upon receipt of a copy of the revised permit, we will forward it to our attorney for his attachment to a stipulation agreement withdrawing our petition for a hearing, thereby concluding the process of obtaining this permit.

We appreciate your efforts and help in bringing this matter to a conclusion. Thanks again.

Sincerely,



Steven J. Susick, P.E., General Manager
Engineering & Technical Services
U.S. Agri-Chemicals Corporation

SJS/kg

cc: John Koogler
Larry Curtin
Doug Beason

h:\files\sjs305.doc

cc: J. Reynolds, BAR



PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

GENERAL CONDITIONS:

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 corrected promptly.

SPECIFIC CONDITIONS:

1. Unless otherwise indicated, the construction and operation of the subject Prilled MAP production facility shall be in accordance with the capacities and specifications stated in the application. [Rule 62-210.300, F.A.C.]

2. The production rate of the Prilled MAP plant shall not exceed 40.9 tons MAP product per hour, except as allowed by Specific Condition No. 7 below. [Rule 62-210.200, F.A.C.]

3. The Prilled MAP plant may operate up to 8760 hours per year. [Rule 62-210.200, F.A.C.]

4. Visible emissions from the Prilled MAP plant loadout baghouse shall not exceed 5% opacity. [Rules 62-296.320 and 62-212.400, F.A.C.]

* 5. The following emission limits shall apply to the scrubber stack:

PM/PM10: ~~0.40 lb/TON MAP~~ 0.40 lb/TON MAP
Total Fluorides: 0.019 lb/ton P2O5 input ~~and 1.50 lb/ton P2O5 input~~
Visible Emissions: 15% opacity

[Rules 62-296.403 and 62-212.400, F.A.C.]

6. Annual compliance tests for total fluorides, PM/PM10 and visible emissions shall be conducted on the scrubber stack. The product loadout baghouse shall be tested annually for visible emissions only. For the duration of all tests the emission unit shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than capacity (i.e., less than 90 percent of maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.310, F.A.C.]

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

SPECIFIC CONDITIONS:

7.* In order to regain the originally intended plant capacity of 60 tons MAP product per hour, the permittee may conduct a performance test at a rate higher than 40.9 tons MAP product per hour and up to 60 tons MAP product per hour by notifying the Department at least 15 days in advance of the special test. The plant may be operated at the higher rate for only seven consecutive days and then must resume operation at no higher than 40.9 tons MAP product per hour. [Rule 62-297.310, F.A.C. and agreement of April 2, 1998]

8.* The Department's Bureau of Air Regulation Office in Tallahassee and the Southwest District office shall be notified in writing at least 15 days prior to any emission test. [Rule 62-297.310, F.A.C.]

9. The test procedures for fluorides shall be in accordance with EPA Reference Methods 1, 2, 3, and 13A or 13B, as published in 40 CFR 60, Appendix A. The test procedures for PM/PM10 and visible emissions shall be in accordance with EPA Reference Methods 1, 2, 3, 5 and 9, as appropriate, as published in 40 CFR 60, Appendix A. [Rules 62-204.800, F.A.C.]

10. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

11. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

12. The Prilled MAP plant shall be subject to the following:

a. Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700, F.A.C.]

b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700, F.A.C.]

c. Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. [Rule 62-210.700, F.A.C.]

7. In order to regain the originally intended plant capacity of 60 tons MAP product per hour, the permittee may conduct a performance test at a rate higher than 40.9 tons MAP product per hour and up to 60 tons MAP product per hour by notifying the Department at least 15 days in advance of the special test. The plant may be operated at the higher rate for only seven consecutive days and then must resume operation at no higher than 40.9 tons MAP product per hour *until this permit has been modified. The Department shall modify this permit to 110% of the rate of a successful special compliance test (not to exceed 60 tph) upon receipt of an application to modify this construction permit and proof of publication of the notice of the Department's Intent to Issue Amended Air Construction Permit at the higher production rate.* In the process of regaining the originally intended capacity of 60 tons MAP product per hour, the permittee shall not be required to undergo another PSD review and BACT determination for PM/PM10 under Rule 62-212.400, FAC or another BACT review for fluorides under Rule 62-296.403, FAC, unless the permittee submits an application to increase the plant's maximum operating capacity above 60 tons MAP product per hour. [Rules 62-212.400, 62-296.403 FAC and agreement of April 2, 1998]

8. The Department's ~~Bureau of Air Regulation Office in Tallahassee~~ and the Southwest District office shall be notified in writing at least 15 days prior to any emission test. *The Department's Bureau of Air Regulation Office in Tallahassee shall be notified in writing at least 15 days prior to any special emission test to increase the permitted operating rate.* [Rule 62-297.310, FAC]

Post-it* Fax Note	7671	Date 7/28	# of pages 7
To S. Susick	From A. Limer		
CC/Dist Note: PIZ	Co. DEP - Air. Div.		
EP/Env. see expanded	Phone #		
EA/Env. Condition 1 on	pg. 6 -		

ment of
al Protection

DRAFT

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

PERMITTEE:
US Agri-Chemicals Corp.
3225 State Road 630 West
Fort Meade, FL 33841-9799

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998
County: Polk
Latitude/Longitude: 27°44'25"N
81°51'05"W
Project: 40.9 TPH Prilled MAP
Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 212, 272, 275, 276, and 297, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the emission unit shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department) and specifically described as follows:

For the construction of a 40.9 TPH Prilled MAP Plant. The facility is located at 3225 State Road 630 West, Fort Meade, Polk County, Florida. The UTM coordinates are Zone 17: 416 km East and 3,069 km North.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. DEP's letter dated November 23, 1994
2. USDOJ's letter dated December 15, 1994
2. DEP's letter dated February 17, 1995
3. K&A's letter dated March 2, 1995
4. K&A's letter dated March 20, 1995
5. K&A's letter dated March 29, 1995
6. K&A's letter dated March 31, 1995
7. USAC's letter dated July 13, 1995
8. USEPA's letter dated August 7, 1995
9. K&A's letter dated August 14, 1995
10. K&A's letter dated September 12, 1995
11. K&A's letter dated June 4, 1996
12. DEP's letter dated July 3, 1996
13. K&A's letter dated October 1, 1996
14. K&A's letter dated February 7, 1997

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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.

6. The permittee shall 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

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

GENERAL CONDITIONS:

credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 provide the Department with the following information:

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

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (X) Determination of Best Available Control Technology (BACT) - attached and made a part of this permit.
- (X) Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

GENERAL CONDITIONS:

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 corrected promptly.

SPECIFIC CONDITIONS:

1. Unless otherwise indicated, the construction and operation of the subject Prilled MAP production facility shall be in accordance with the capacities and specifications stated in the application. [Rule 62-210.300, F.A.C.]

2. The production rate of the Prilled MAP plant shall not exceed 40.9 tons MAP product per hour, except as allowed by Specific Condition No. 7 below. [Rule 62-210.200, F.A.C.]

3. The Prilled MAP plant may operate up to 8760 hours per year. [Rule 62-210.200, F.A.C.]

4. Visible emissions from the Prilled MAP plant loadout baghouse shall not exceed 5% opacity. [Rules 62-296.320 and 62-212.400, F.A.C.]

5. The following emission limits shall apply to the scrubber stack:

PM/PM10:	24.0 lb/hr and 105.12 tons/yr
Total Fluorides:	0.019 lb/ton P2O5 input and 1.70 tons/yr
Visible Emissions:	15% opacity

[Rules 62-296.403 and 62-212.400, F.A.C.]

6. Annual compliance tests for total fluorides, PM/PM10 and visible emissions shall be conducted on the scrubber stack. The product loadout baghouse shall be tested annually for visible emissions only. For the duration of all tests the emission unit shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than capacity (i.e., less than 90 percent of maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.310, F.A.C.]

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

SPECIFIC CONDITIONS:

7. In order to regain the originally intended plant capacity of 60 tons MAP product per hour, the permittee may conduct a performance test at a rate higher than 40.9 tons MAP product per hour and up to 60 tons MAP product per hour by notifying the Department at least 15 days in advance of the special test. The plant may be operated at the higher rate for only seven consecutive days and then must resume operation at no higher than 40.9 tons MAP product per hour. In the process of regaining the originally intended capacity of 60 tons MAP product per hour, the permittee shall not be required to undergo another PSD review and BACT determination for PM/PM10 under Rule 62-212.400, F.A.C. or another BACT review for fluorides under Rule 62-296.403, F.A.C., unless the permittee submits an application to increase the plant's maximum operating capacity above 60 tons MAP product per hour. [Rules 62-212.400, 62-296.403, 62-297.310, F.A.C. and agreement of April 2, 1998]

8. The Department's Bureau of Air Regulation Office in Tallahassee and the Southwest District office shall be notified in writing at least 15 days prior to any emission test. [Rule 62-297.310, F.A.C.]

9. The test procedures for fluorides shall be in accordance with EPA Reference Methods 1, 2, 3, and 13A or 13B, as published in 40 CFR 60, Appendix A. The test procedures for PM/PM10 and visible emissions shall be in accordance with EPA Reference Methods 1, 2, 3, 5 and 9, as appropriate, as published in 40 CFR 60, Appendix A. [Rules 62-204.800, F.A.C.]

10. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

11. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

12. The Prilled MAP plant shall be subject to the following:

a. Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700, F.A.C.]

b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700, F.A.C.]

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

SPECIFIC CONDITIONS:

c. Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. [Rule 62-210.700, F.A.C.]

d. In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700, F.A.C.]

13. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(4) to the Department's Southwest District office by March 1 of the following year for the previous year's operation. [Rule 62-210.370, F.A.C.]

14. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rule 62-4.090, F.A.C.]

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes, Director
Division of Air Resources Management

DRAFT

HOLLAND & KNIGHT LLP

315 South Calhoun Street
Suite 600
P.O. Drawer 810 (ZIP 32302-0810)
Tallahassee, Florida 32301
850-224-7000
FAX 850-224-8632
<http://www.nklaw.com>

Atlanta	Northern Virginia
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RECEIVED
MAY 11 1998
BUREAU OF
AIR REGULATION

May 8, 1998

LAWRENCE N. CURTIN
850-425-5678

VIA HAND DELIVERY

Douglas W. Beason, Esquire
Department of Environmental Protection
2600 BlairStone Road
Twin Towers Office Building, R. 654-H
Tallahassee, Florida 32399-2400

Re: U.S. Agri-Chemicals, Inc. (PSD-FL-222/AC53-260190)

Dear Doug:

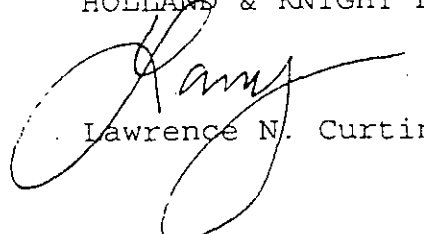
Attached for your information and review is a copy of a letter from Steve Susick to Clair Fancy containing comments on the draft BACT analysis and the redraft of the permit that we received this week. I do not believe that any of these issues are difficult to resolve. In fact, these are matters that were discussed at our meeting in April.

We would appreciate it if you could review the comments and advise us if you see any problems or issues.

Thank you for your cooperation.

Sincerely,

HOLLAND & KNIGHT LLP



Lawrence N. Curtin

LNC/jfg

Attachment

cc: Mr. C. H. Fancy
Mr. Steven J. Susick

TAL-130680

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



Agri-Chemicals

A Sinochem Company

May 7, 1998

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MAY 11 1998

BUREAU OF
AIR REGULATION

Mr. C. H. Fancy, P. E.
Chief Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Re: Prilled MAP Plant (PSD-FL-222/AC53-260190) U.S. Agri-Chemicals Incorporated - Ft. Meade, Florida

Dear Mr. Fancy:

We have received and reviewed the draft Final Determination along with the Final Construction Permit and BACT Determination for our Prilled MAP Plant in Ft. Meade, Florida. As a result of our review of these documents we have several comments that we would like you to incorporate into the Final Documents.

First, we would like to continue to register our objection to the Department's representation of the BACT process that both the Department and U.S. Agri-Chemicals has participated in over the past several years. In several areas of the BACT document this language is adversarial, objectionable and incorrect. In particular, we would like the record to reflect that U.S. Agri-Chemicals believes that the Department's comment in the Final Determination that "this facility will not be used as a precedent for future BACT determinations," is inconsistent with what we believe to be both Federal and State objectives for BACT determinations. The BACT process includes an economic analysis as well as overall environmental considerations. We believe the facility at U.S. Agri-Chemicals' Ft. Meade Chemical Complex 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. We also believe this plant's emissions control equipment is more reliable than other emission control equipment. We therefore believe that this plant, at its current tested operating rate, represents an excellent precedent for future BACT determinations. In addition, the list of attachments to the Final BACT Determination are unnecessary as attachments to the final permit, and we request that they be removed from the permit.

Our second comment is that while the final determination states that the plant will be allowed 40.9 tons of product per hour, the actual construction permit limits the plant operating capacity to 37.2 tons per hour. We believe the latter number to be an oversight and that the department, in accordance with our agreement in Tallahassee on April 2, should revise the construction capacity for the prilled MAP plant as being 40.9 tons per hour. This revision would appear in three places. First, on page 1 under the



project description, as well as paragraph 2 on this page and Specific Condition #2 of the Permit.

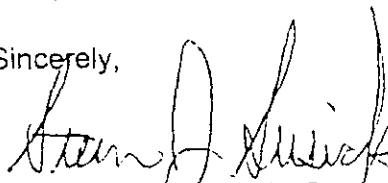
Our next request is that as a result of the permit processing for this facility that it is appropriate to modify Specific Condition #1 to properly reflect the process that occurred relative to this specific permit. We request that the following wording be added: "Any additional plant construction details not previously submitted to the Department will be included in the Title V Supplement submitted for this project".

Finally, as you recall, U. S. Agri-Chemicals and the Department agreed to a specific process by which U.S. Agri-Chemicals would be allowed to increase its permitted capacity for this facility. This process would involve U.S. Agri-Chemicals providing notice to the Department fourteen days in advance of a scheduled emission compliance test which would be conducted in accordance with Specific Condition #8 in the Draft Permit. Following completion of the emission compliance test, U.S. Agri-Chemicals would then be allowed to submit the compliance test data to the Department that would substantiate that the plant is within the emission limits and its permitted operating capacity would be modified appropriately. Additionally, U.S. Agri-Chemicals would be required to publicly notice the revision in the Construction Permit to the higher capacity as a result of this process. Furthermore, no mention was made, nor reasons given, in the BACT Final Determination for imposing the development of unique testing protocols. We agree that the standard testing specified in the draft permit is sufficient for this source.

Again, as we agreed to at our April 2, meeting in Tallahassee the Department was to insert this process as a Specific Condition in the Construction Permit. Therefore, we request that the Department add an additional Specific Condition to the Draft Permit to reflect this process and delete the contrary language in the BACT Final Determination.

If you have any questions to these modifications to the Permit Language please call me at (941) 285-8121, extension 344.

Sincerely,



Steven J. Susick, P.E., General Manager
Engineering & Technical Services
U.S. Agri-Chemicals Corporation

SJS/kg

cc: John Koogler
Larry Curtin
Doug Beason



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 17, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Steven J. Susick
General Manager
U.S. Agri-Chemicals, Inc.
3225 State Road 630 West
Fort Meade, Florida 33841-9799

Re: AC53-260190 (PSD-FL-222)
MAP Plant - Permit Requirements

Dear Mr. Susick:

This is to confirm that a proposal was made through Koogler & Associates to resolve the BACT noncompliance situation that exists with U.S. Agri-Chemicals' venturi scrubber for the MAP prill tower. The Department will require that the prill tower scrubber's cyclonic separator be retrofitted with a Department-approved packed section and be operated at all times with a sufficient countercurrent flow of pond water. If that is done, there will be only one remaining issue for resolution -- that of providing the Department with a written retraction of the venturi/packed scrubber equivalency claim. This claim, if not retracted, could have consequences under Rule 61G15-19.00(4) and (6)(b), F.A.C., impacting the professional engineers who made it.

It would be in the best interests of all concerned if these two issues are resolved in a timely manner. A reasonable deadline for confirming acceptance of the retrofit proposal and to retract the scrubber equivalency claim is May 1, 1998. If you have any questions regarding this letter, please contact me at 850/921-9536 or Doug Beason (Office of General Counsel) at 850/488-9730.

Sincerely,

J. M. Reynolds
Senior Permit Engineer
New Source Review Section

JMR/kt

cc: B. Thomas, SWD
J. Koogler, P.E.
D. Beason, OGC

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

P 265 659 318

US Postal Service
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PS Form 3800, April 1995

TO	
Steven Susick	
Street & Number	
US Agri Chem	
Post Office, State, & ZIP Code	
H. Meade, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
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Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	P50-FL-222 MAP Plant 3-18-98

Is your RETURN ADDRESS completed on the reverse side?

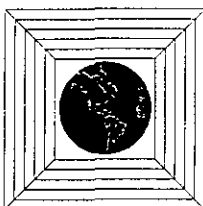
- SENDER:**
- Complete this form.
 - Print your name and address on the reverse of this form so that we can return the card to you.
 - Attach this form to the front of the mailpiece, or on the back if space does not permit.
 - Write "Return Receipt Requested" on the mailpiece below the article number.
 - The Return Receipt will show to whom the article was delivered and the date delivered.

- 1. Addressee's Address
 - 2. Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to: Steven J. Susick, Gen. Mgr US Agri Chemicals 3225 State Rd-630 West H. Meade, FL 33841-9799	4a. Article Number P 265 659 318
5. Received By: (Print Name)	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
6. Signature: (Addressee or Agent) X U. Washington	7. Date of Delivery 3-23-98
PS Form 3800, December 1994	8. Addressee's Address (Only if requested and fee is paid)

Domestic Receipt

Thank you for using Return Receipt Service.



Kimre, Inc.
PHASE SEPARATION TECHNOLOGY

March 3, 1998

Mr. John Reynolds
Florida State of
Dept. of Environmental Protection
Division of Air Resources Management
Bureau of Air Management
News Source Review Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

MAR 09 1998

**BUREAU OF
AIR REGULATION**

Subject: Scrubbers, specifically for the Phosphate Industry and for other applications.

Dear Mr. Reynolds:

I really enjoyed having an opportunity to talk with you and Al Linero by phone on the morning of March 2nd. For your background information, I am enclosing our Fertilizer information and a copy of the paper that I gave on Cross-Flow Scrubbers in Germany last June. I do not really know how many scrubbers we have done for the phosphate fertilizer industry, but it is a lot. Current technology is that we make these scrubbers for all fertilizer operations, 100% maintainable from the outside of the vessel, so essentially all maintenance can be done without ever shutting down or going out of compliance.

Under separate cover I am sending a general set of information about Kimre and its technology with a list of papers presented. We are used by most of the scrubber manufacturers in the U.S., we have done most of the chrome scrubbers in operation in the U.S., and our technology is directly competitive against any other technology for particulate or absorption. It is almost entirely a wet scrubber technology. I am also including a copy of my Curricula Vita for your information.

You had asked about the Venturi's competing with packed scrubbers for fluorine absorption. I will be happy to put it in a separate statement however, in my best professional opinion, Venturi's are not remotely comparable to packed scrubbers for fluorine absorption or any other kind of mass transfer. I would go somewhat further than that and say that we have found that fluorine scrubbers are considerably more complex than simple mass transfer. We design ours with simultaneous heat transfer, mass transfer and mist elimination internally in each stage. We have found that heat transfer is actually the limiting factor and the next limiting factor is mist elimination. Actual normal mass transfer is not even close to being the limiting factor for fluorine removal. This is particularly true when you consider that in some plants the fluorine load from the particulate is enough to have a significant influence. As I mentioned, we are designing scrubbers and guaranteeing emissions of 3 PPM as HF in the stack. These have become fairly sophisticated and are usually done with recycle of the liquid stream so that there is

no liquid waste stream, (the normal situation in Florida) and of course, having no liquid waste stream, presents much more stringent requirements.

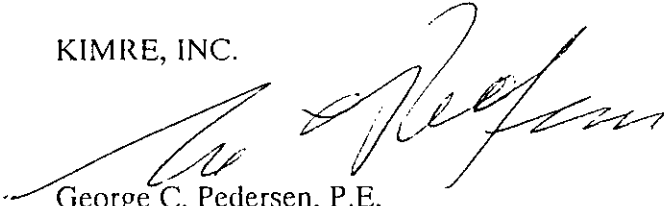
I mentioned Kimre's technology for Fluorine recovery and our process for Fluorine Recycle. It is feasible, and has been done to capture the fluorine as strong concentrations and recycle it to extinction, so there are basically no appreciable waste streams containing reactive fluorine. This is done routinely on single super Phosphate plants. The concepts are very simple, we are basically treating it like a cross-flow scrubber with multiple stages of liquid flowing counter current against the gas, but with each stage in a semi-cross flow mode. We can recover 18 - 25% FSA while recovering essentially all the fluorine from such streams as:

- The Evaporator Steam
- The Vacuum Cooler
- Reactor
- Acid Reactor
- Any Phosphate Fertilizer off gas streams
- etc.

I would love to meet with you and would like your suggestions as to a suitable time, actual timing can be coordinated with my Secretary Sharon Johnson and a list of some of the times I may be available after the middle of March are attached.

Sincerely,

KIMRE, INC.



George C. Pedersen, P.E.
President

GCP/jlf

Encl. Phosphate Mailing
Cross-Flow Scrubbers
Availability schedule

f: DEP 005
K/GCP/Technical//Phosphate/FSA Scrubbers
K/GCP/Technical/Phosphate/Fluorine Recycle



Department of Environmental Protection

Lawton Chiles
Governor

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

December 8, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Steven J. Susick
General Manager
U.S. Agri-Chemicals, Inc.
3225 State Road 630 West
Fort Meade, Florida 33841-9799

Re: AC53-260190 (PSD-FL-222)
MAP Plant - Permit Extension

Dear Mr. Susick:

The Department received your request on September 9, 1997 to extend the referenced permit until December 30, 1998. We have been advised not to act on the requested extension while there is a pending modification of that same permit and which is under challenge by U.S. Agrichem.

If you have any questions regarding this matter please call me at (850)488-1344 or Douglas Beason at (850)488-9730.

Sincerely,

A. A. Linero 12/8

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/kt

cc: J. Koogler, P.E.
D. Beason, OGC

Post-it* Fax Note	7671	Date	12/8	# of pages	1
To	John Koogler	From	A. Linero		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #		Fax #			

(John - we forgot to give this to you today)

no-green card 7/98
P 339 251 197

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	Steven J. Susick	
Street & Number	US Agri Chem	
Post Office, State & ZIP Code	Ft. Meade, FL	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date	12-9-97	
	PSD-FL-222 MAP Pl. Ext.	

PS Form 3800 April 1995

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12/8	TO: Hillsboro CO FAX #:	9	K-
12/8	TO: BOB BAKER FAX #: 352-371-3918	10	C. Phyllis
12/8	TO: Eve Ramey FAX #: 488-1739	2	BA
	TO: Bill Thomas FAX #: SW	1	Peggy (mg)
12/8	TO: Art Lyall FAX #: SD (E)	2	VP
12/8	TO: U.S. Agr. Admin - Steve Susick FAX #: (941) 285-7088	1	A-L.nero
12/8	TO: John Koogler FAX #: (352) 377-7158	1	A-L.nero
12-09	TO: Pat Comer FAX #: (850) 487-4938	7	Sandy Knight
12/9	TO: V. GIARUSSO, FPL FAX #: 561-691-7070	1	J. KML
	TO: FAX #:		
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LEASE

remember to log ALL fax transmittals. Thank you!!

** Transmit Journal **

P.1 No.	To:	Mode	Start	Time	Page	Code	Result	Dec 10 '97 9:59 Note
0012	SWD	NORMAL	8,17:38	0'50"	1	0000	0 K	
0013	65426458	NORMAL	8,18:04	0'49"	1	0000	0 K	
0014	619412857088	NORMAL	8,18:42	0'35"	1	0000	0 K	
0015	613523777158	NORMAL	8,18:44	0'38"	1	0000	0 K	
0001	94874938	NORMAL	9, 9:02	4'56"	7	0000	0 K	
0002	615616917070	NORMAL	9, 9:41	0'43"	1	0000	0 K	
0003	619414996683	NORMAL	9, 9:58	7'43"	13	0000	0 K	
0004	619416036335	NORMAL	9,11:01	6'36"	13	0000	0 K	
0005	DuvalCounty	NORMAL	9,12:04	2'59"	6	0000	0 K	
0006	HillsboroughCty	NORMAL	9,12:12	3'55"	7	0000	0 K	
0007	24144	NORMAL	9,12:16	1'31"	2	0000	0 K	
0008	619195413513	NORMAL	9,13:48	0'33"	1	0000	0 K	
0009	613052283400	NORMAL	9,15:31	2'32"	3	0000	0 K	
0010	94881739	NORMAL	9,16:30	3'58"	7	0000	0 K	
0011	HillsboroughCty	NORMAL	9,16:35	0'50"	2	0000	0 K	
0012	619416036335	NORMAL	9,16:44	3'47"	5	0000	0 K	
0001	613052951145	NORMAL	10, 9:06	1'27"	3	0000	0 K	
0002	613032972811	NORMAL	10, 9:08	1'35"	3	0000	0 K	
0003	615616917070	NORMAL	10, 9:19	5'15"	7	0000	0 K	

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

US

Agri-Chemicals

A Sinochem Company

RECEIVED

JAN 22 1998

**BUREAU OF
AIR REGULATION**

January 8, 1998

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 ^{Bill} Mr. Proses:

Enclosed please find report of the initial performance test required by the permit specific condition #6. The test was audited by Mr. Henry Gotsch of the Department SW District and observed by Dr. John Koogler of Koogler & Associates.

Please note that due to low ambient temperature and high wind conditions during the test, the filter box temperature could not be maintained in the range of $248 \pm 25^{\circ}\text{F}$ as specified in 40 CFR 60, App. A, Method 5, paragraph 4.1.5. Dr. Koogler has assured us that this should not affect the accuracy of the fluoride and particulate matter results.

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

Sincerely,



Ronald L. Brunk, Manager
Environmental Engineering

xc: Clair Fancy, DEP BAR w/summary only
A. A. Linero, DEP BAR w/ enclosure
Eugene/Robert
P. Hartbarger
D. Taylor
S. Susick
D. Nettles

cc: J. Reynolds-BAR
SWD



Summary

This is a report of the initial performance test conducted on 12/29/97 to determine Fluorides and particulate matter emissions from the MAP plant stack. The report also include the visible emissions test on the MAP loadout system on 12/30/97. The results are as follows:

Emissions

Permitted	Actual
-----------	--------

MAP Plant:

NA	0.14	lbs of fluorides per hour;
NA	0.0076	lbs of fluorides per ton of equivalent P2O5 feed
NA	2.2	lbs of particulates per hour

Loadout system:

5	0	% opacity
---	---	-----------

Operating conditions

MAP Plant:

18.6	Average Feedrate (tons P2O5/hr)
37.2	Average Production rate (tons MAP/hr)

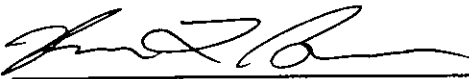
Venturi Scrubbers:	Flow (GPM)	Pressure Drop (" H2O)
Tower	1145	18
Cooler	332	14

7.28	Scrubber Liquid pH
------	--------------------

Loadout system:

149	Railcar loading rate (tons MAP/hr)
1	Pressure drop, " H2O

I hereby certify that to the best of my knowledge, all data submitted is true and correct.


 Ron Brunk
 Environmental Manager

1/13/97
 Date

MAP

INTRODUCTION

U.S. Agri-Chemicals (USAC) constructed a 60 TPH monoammonium phosphate (MAP) plant under the Department permit No. AC53-260190. The plant is located on highway 630, 2 miles west of Ft. Meade.

As a condition of the permit, USAC is required to conduct initial performance tests to provide data for setting fluorides (FL), particulate matter (PM), and visible emissions limits on the plant's stack. The required test methods and procedures are EPA 40 CFR, Part 60, methods 1, 2, 4, 5, and 13B. The sampling equipment is manufactured by NAPP, Inc. As authorized by the Department, USAC utilized simultaneous testing for PM and FL with alternative analytical procedure for method 13B. As specified in method 13B, a 50 ml of commercially prepared TISAB solution was added to each 50 ml of sample. A visible emission test on the product loadout baghouse vent is also required to determine compliance status with the 5% opacity standard. The test method and procedures are in accordance with EPA 40 CFR, Part 60, method 9.

PROCESS DESCRIPTION: Phosphoric Acid is reacted with vaporized ammonia in the pipe reactor and sprayed into the top of the tower to produce prill MAP. Ambient air entering the bottom of the tower removes moisture in the prill MAP as they fall by gravity to the bottom of the tower. The gas in the tower is evacuated to a venturi scrubber. The gas in the cooler is evacuated to a smaller venturi scrubber. The gas and liquid from both venturi scrubbers enter a cyclonic separator prior to discharged to the atmosphere via a stack. A portion of the scrubber liquid is used to adjust phosphoric acid concentration. Fresh water and/or cooling pond water is used to maintain scrubber water balance.

A scraper and conveyor system transfers MAP from the tower to a cooler to reduce product temperature. The cooler discharges to a transfer system which carry the MAP to a storage building. From the storage building, prill MAP is loaded into railcars by a loadout system. Dust from the loadout system is controlled by a baghouse.

The stack tests were conducted by Robert Hall and Eugene Williams. The visible emissions test on the loadout baghouse was conducted by Debbie Lovett. The report was prepared by Ronald Brunk and Viet Ta.

Attachment 1 is a diagram of the stack showing test location.

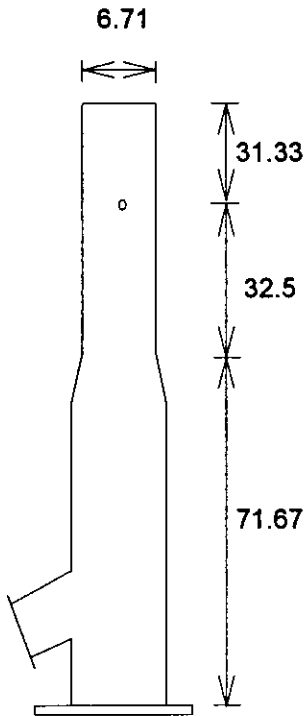
Attachment 2 contains computer printouts showing results calculated from raw data.

Attachment 3 contains raw data.

Attachment 4 is a diagram of the sampling equipment.

Attachment 5 contains equipment calibration results.

Attachment 6 contains the visible emissions observation.



Point #	inches
1	1.69
2	5.39
3	9.50
4	14.25
5	20.13
6	28.66
7	51.84
8	60.38
9	66.25
10	71.00
11	75.11
12	78.81

U.S. Agri-Chemicals Corp.
 MAP Plant
 Ft. Meade, Florida

Stack Diagram with traverse
 point locations

Note: 1. stack dimensions = feet
 2. Drawing NOT TO SCALE

Run # 1 Velocity Traverse Data Sheet

29-Dec-97	Date	57	F	Ambient Temperature
MAP	Plant	29.70	" Hg	Pbar = barometric pressure
Ft. Meade	City	02:30	mm:ss	Sample time interval
EW	Operator	0.00	" H2O	Pg = Static stack pressure
1	Filter #	0.9790	n/a	Y = Calibration factor for dry gas meter
0.008	cfm	6.71	ft	Ds = Stack Diameter
0.008	cfm	0.24	in	Dn = nozzle diameter
0.00	"H2O	0.00	" H2O	Pitot leak rate (before)
0.00	"H2O	0.00	" H2O	Pitot leak rate (after)
0.68	"H2O	0.00	" H2O	Pitot leak rate (after)

F Ambient Temperature
 " Hg Pbar = barometric pressure
 mm:ss Sample time interval
 " H2O Pg = Static stack pressure
 n/a Y = Calibration factor for dry gas meter
 ft Ds = Stack Diameter
 in Dn = nozzle diameter
 " H2O Pitot leak rate (before)
 " H2O Pitot leak rate (after)

Traverse Point	Clock Time (std)	Vaccum (" Hg)	Velocity Head dPs (" H2O)	Orifice Pdrop dH ("H2O)	Gas meter reading dVm (F3)	Gas sample temperatures			Temperature	
						After last impinger (F)	Meter Inlet Tmi (F)	Meter Outlet Tmo (F)	Filter (F)	Stack Ts (F)
0	11:23:00				833.90					
1	11:25:30	4.0	0.67	1.85	835.9	48	70	78	210	113
2	11:28:00	7.0	0.82	2.25	838.0	48	70	81	220	113
3	11:30:30	6.3	0.90	2.45	840.2	48	70	83	226	113
4	11:33:00	8.0	0.95	2.60	842.6	48	71	84	229	113
5	11:35:30	8.0	0.95	2.60	845.0	48	71	86	234	113
6	11:38:00	8.0	0.95	2.60	847.3	48	73	86	237	113
7	11:40:30	8.0	0.90	2.45	849.7	48	73	87	240	113
8	11:43:00	8.0	0.92	2.55	852.0	48	73	88	241	113
9	11:45:30	9.0	1.10	3.00	854.5	48	74	89	242	113
10	11:48:00	9.0	1.10	3.00	857.1	50	74	89	240	113
11	11:50:30	9.0	1.10	3.00	859.7	50	75	90	241	113
12	11:53:00	7.0	1.00	2.75	862.4	50	76	91	240	113
0	12:03:00				862.4					
1	12:05:30	4.0	0.78	2.10	864.5	56	77	88	180	115
2	12:08:00	4.7	0.92	2.55	866.8	56	78	91	185	115
3	12:10:30	5.0	1.05	2.90	869.3	56	78	93	190	116
4	12:13:00	5.0	1.00	2.75	871.8	56	78	93	196	116
5	12:15:30	5.0	1.00	2.75	874.2	56	79	94	196	116
6	12:18:00	5.2	1.05	2.90	876.8	56	79	95	196	116
7	12:20:30	8.0	1.05	2.90	879.3	56	79	93	190	116
8	12:23:00	8.2	1.10	3.00	881.8	56	79	93	190	116
9	12:25:30	8.4	1.15	3.15	884.4	56	80	93	185	116
10	12:28:00	8.5	1.15	3.15	887.0	56	80	93	185	116
11	12:30:30	8.5	1.15	3.15	889.7	56	80	93	185	116
12	12:33:00	7.7	1.00	2.75	892.20	56	80	93	180	116
	Sampling Time		Average of square roots	Average orifice Pdrop	Total Gas Volume	Max after last impinger	Average meter temp			Average Stack Temp
	tt		dPave	dH	Vm		Tm			Tsa
	60		0.993	2.71	58.30	56	82.5			114.4

Moisture content of stack gas			
Impinger	Impinger Volume (ml)		Moisture collected (ml)
	Before	After	
1	626.3	720.1	93.8
2	626.9	627.2	0.3
3	445.5	447.3	1.8
4	700.1	701.7	1.6
Total		Vlc =	97.5

	Total particulate weight (g)			
	Gross	Tare	Factor	Net
Probe wash	98.7114	98.711	10	0.0040
Filter	0.4296	0.4255	n/a	0.0041
Total			Mn =	0.0081

	F (mg/l)
Probe Wash	0.43
Filter	0.13
Impingers	0.22

Aliquot Calculations			
	Total Wash	Aliquot Dried	Factor
Probewash	1000	100	10

Run # 2 Velocity Traverse Data Sheet

29-Dec-97	Date	
MAP	Plant	
Ft. Meade	City	
EW	Operator	
2	Filter #	
0.005	cfm	Leak rate- (before @10" Hg)
0.005	cfm	Leak rate- (after @ 10" Hg)
0.00	"H2O	Pitot leak rate (before)
0.00	"H2O	Pitot leak rate (before)
0.68	"H2O	Reference DP

55
29.70
02:30
0.00
0.9790
6.7083
0.24
0.00
0.00

F Ambient Temperature
 " Hg Pbar = barometric pressure
 mm:ss Sample time interval
 " H2O Pg = Static stack pressure
 n/a Y = Calibration factor for dry gas meter
 ft Ds = Stack Diameter
 in Dn = nozzle diameter
 " H2O Pitot leak rate (after)
 " H2O Pitot leak rate (after)

Traverse Point	Clock Time	Vaccum (" Hg)	Velocity Head dPs (" H2O)	Orifice Pdrop dH ("H2O)	Gas meter reading dVm (f3)	Gas sample temperatures			Temperature	
						After last impinger (F)	Meter Inlet Tmi (F)	Meter Outlet Tmo (F)	Filter (F)	Stack Ts (F)
0	13:23:00				892.41					
1	13:25:30	6.0	0.77	2.10	894.5	48	78	83	180	116
2	13:28:00	7.0	0.90	2.45	896.8	48	77	87	185	116
3	13:30:30	8.0	1.00	2.75	899.2	48	77	87	185	116
4	13:33:00	8.8	1.10	3.00	901.7	48	77	87	180	116
5	13:35:30	8.8	1.10	3.00	904.2	48	76	88	182	116
6	13:38:00	8.8	1.10	3.00	906.8	48	77	88	178	116
7	13:40:30	9.6	1.20	3.25	909.4	48	77	88	172	116
8	13:43:00	8.8	1.10	3.00	912.1	48	77	88	177	116
9	13:45:30	8.8	1.10	3.00	914.6	48	77	89	179	116
10	13:48:00	8.8	1.10	3.00	917.3	48	78	90	182	116
11	13:50:30	8.3	1.05	2.90	919.8	50	78	90	185	116
12	13:53:00	7.0	0.90	2.45	922.2	50	78	90	188	116
0	14:04:00				922.2					
1	14:06:30	6.2	0.77	2.10	924.3	58	79	86	182	115
2	14:09:00	7.0	0.90	2.45	926.5	58	79	89	190	116
3	14:11:30	7.5	0.95	2.60	928.9	58	79	90	192	116
4	14:14:00	8.0	1.00	2.75	931.3	58	79	90	195	116
5	14:16:30	8.0	1.00	2.75	933.8	58	79	90	195	117
6	14:19:00	7.3	0.90	2.45	936.2	58	79	91	195	117
7	14:21:30	7.3	0.90	2.45	938.6	58	79	91	200	117
8	14:24:00	7.0	0.88	2.40	940.8	58	79	91	205	117
9	14:26:30	9.3	1.20	3.25	943.3	58	79	91	205	117
10	14:29:00	9.2	1.20	3.25	946.0	60	79	89	205	117
11	14:31:30	9.3	1.20	3.25	948.8	60	79	90	210	117
12	14:34:00	8.0	1.00	2.75	951.40	60	79	90	210	117
	Sampling Time		Average of square roots	Average orifice Pdrop	Total Gas Volume	Max after last impinger	Average meter temp			Average Stack Temp
	tt		dPave	dH	Vm		Tm			Tsa
	60		1.005	2.76	58.99	60	93.1			116.3

Moisture content of stack gas			
Impinger	Impinger Volume (ml)		Moisture collected (ml)
	Before	After	
1	633.8	709.4	75.6
2	635.6	650.8	15.2
3	438.7	440.5	1.8
4	694.3	696.3	2.0
Total	Vlc =		94.6

	Total particulate weight (g)			
	Gross	Tare	Factor	Net
Probe wash	98.8647	98.8642	10	0.0050
Filter	0.4297	0.4255	n/a	0.0042
Total			Mn =	0.0092

	F (mg/l)
Probe Wash	0.22
Filter	0.11
Impinger	0.14

Aliquot Calculations			
	Total Wash	Aliquot Dried	Factor
Probewash	1000	100	10

Run # 3 Velocity Traverse Data Sheet

29-Dec-97	Date	53
MAP	Plant	29.70
Ft. Meade	City	02:30
EW	Operator	0.00
3	Filter #	0.9790
0.006	cfm Leak rate- (before @10" Hg)	6.7083
0.008	cfm Leak rate- (after @ 12" Hg)	0.24
0.00	"H2O Pitot leak rate (before)	0.00
0.00	"H2O Pitot leak rate (before)	0.00
0.68	"H2O Reference dP	

F	Ambient Temperature
" Hg	Pbar = barometric pressure
mm:ss	Sample time interval
" H2O	Pg = Static stack pressure
n/a	Y = Calibration factor for dry gas meter
ft	Ds = Stack Diameter
in	Dn = nozzle diameter
" H2O	Pitot leak rate (after)
" H2O	Pitot leak rate (after)

Traverse Point	Clock Time	Vaccum (" Hg)	Velocity Head dPs (" H2O)	Orifice Pdrop dH ("H2O)	Gas meter reading dVm (f3)	Gas sample temperatures			Temperature	
						After last impinger (F)	Meter Inlet Tmi (F)	Meter Outlet Tmo (F)	Filter (F)	Stack Ts (F)
0	15:14:00				951.62					
1	15:16:30	7.5	0.80	2.20	953.7	46	76	84	175	116
2	15:19:00	7.7	0.87	2.40	956.1	46	76	85	175	116
3	15:21:30	6.7	0.95	2.60	958.5	46	75	87	175	116
4	15:24:00	6.8	0.90	2.70	960.7	46	75	87	180	116
5	15:26:30	10.0	1.05	2.90	963.2	46	75	87	183	116
6	15:29:00	10.0	1.05	2.90	965.7	46	75	87	200	116
7	15:31:30	10.0	1.05	2.90	968.2	46	75	88	230	116
8	15:34:00	9.0	1.00	2.75	970.8	46	76	89	215	116
9	15:36:30	9.0	1.00	2.75	973.3	46	76	89	210	116
10	15:39:00	7.0	0.90	2.45	975.7	46	76	91	220	116
11	15:41:30	6.2	0.85	2.30	978.00	48	76	91	225	116
12	15:44:00	6.2	0.85	2.30	980.21	48	77	91	222	116
0	15:53:00				980.21					
1	15:55:30	5.7	0.77	2.10	982.3	54	77	87	180	115
2	15:58:00	6.2	0.90	2.45	984.5	54	77	89	180	115
3	16:00:30	7.0	1.00	2.75	987.0	54	77	89	180	116
4	16:03:00	7.2	1.05	2.90	989.5	54	77	90	180	116
5	16:05:30	7.0	1.00	2.75	992.0	54	77	90	185	116
6	16:08:00	7.0	1.00	2.75	994.5	54	77	91	185	116
7	16:10:30	7.0	1.00	2.75	996.8	54	77	91	185	116
8	16:13:00	9.2	0.97	2.65	999.1	54	77	90	185	116
9	16:15:30	9.2	0.97	2.65	1001.7	54	77	90	180	116
10	16:18:00	7.2	0.97	2.65	1004.1	55	77	90	180	116
11	16:20:30	7.0	0.95	2.60	1006.5	55	77	91	180	116
12	16:23:00	6.2	0.85	2.30	1008.90	55	77	92	180	116
	Sampling Time		Average of square roots	Average orifice Pdrop	Total Gas Volume	Max after last impinger	Average meter temp		Average Stack Temp	
	tt		dPave	dH	Vm		Tm		Tsa	
	60		0.972	2.60	55.07	55	82.7		115.9	

Impinger	Moisture content of stack gas		
	Before	After	Moisture collected (ml)
1	648.0	731.7	83.7
2	660.4	670.4	10.0
3	447.5	448.8	1.3
4	695.8	697.2	1.4
Total		Vlc =	96.4

	Total particulate weight (g)			
	Gross	Tare	Factor	Net
Probe wash	98.6141	98.6136	10	0.0050
Filter	0.4239	0.4199	n/a	0.0040
Total			Mn =	0.0090

	F (mg/l)
Probe Wash	0.17
Filter	0.11
Impingers	0.13

	Aliquot Calculations		
	Total Wash	Aliquot Dried	Factor
Probewash	1000	100	10

Stack flow calculations

29-Dec-97 Date
MAP Plant

Run #1	Run #2	Run #3
0.24	0.24	0.24
0.0003	0.0003	0.0003
6.71	6.71	6.71
35.34	35.34	35.34
58.30	58.99	55.07
97.5	94.6	96.4
0.979	0.979	0.979
0.84	0.84	0.84
0.993	1.005	0.972
2.71	2.76	2.60
29.7	29.7	29.7
0.00	0.00	0.00
60.00	60.00	60.00
82.5	93.1	82.7
114.4	116.3	115.9
4.59	4.45	4.54
55.49	55.08	52.39
0.076	0.075	0.080
28.16	28.18	28.12
29.70	29.70	29.70
59.10	59.87	57.94
105,621	106,826	102,904
98.6	96.7	95.5
	29.92	
	68	
	29	

in Dn = nozzle diameter
 sqf An = nozzle cross sectional area
 ft Ds = stack diameter
 sqf As = stack cross sectional area
 cf Vm = Dry gas volume (cf)
 ml Vlc = Volume of liquid collected
 n/a Y = Calibration factor for dry gas meter
 n/a Cp = Pitot tube coefficient
 " H2O dPave = average of square roots of velocity heads dP
 " H2O dH = Orifice pressure drop
 " Hg Pbar = barometric (ambient)
 " H2O Pg = Static stack pressure
 min tt = total sampling time
 F Tm = average dry gas meter temperature
 F Tsa = average stack gas temperature
 cf Vwstd = volume water vapor @stp = 0.04707 * Vlc
 cf Vmstd = dry gas volume @stp = 17.64 Vm Y (Pbar + (dH/13.6)/(Tm + 460))
 % Bws = % moisture volume = Vwstd / (Vmstd + Vwstd)
 lb/mole Ms = molecular weight of stack gas dry = Md (1-Bws) + 18 Bws
 "Hg Ps = absolute stack pressure = Pbar + Pg/13.6
 f/s vs = average stack gas velocity
 dscf/m Qsd = Average dry stack flow rate
 n/a I = isokinetic factor
 " Hg Pstd = standard pressure
 F Tstd = standard temperature
 lb/mole Md = molecular weight of stack gas dry (lb/lb-mole) = 29

$$vs = \text{average stack gas velocity} = 85.49 * Cp * (dPave) * \sqrt{(Tsave + 460) / Ps Ms}$$

$$Qsd = \text{Average dry stack flow rate dry} = 60 (1-Bws) * vs * As (Tstd + 460) * Ps / ((Tsa + 460) * Pstd)$$

$$I = \text{isokinetic factor} = 0.0945 * Tsa (R) * Vmstd (cf) / [Ps ("Hg) * vs (f/s) * An (sqf) * tt(min) * (1-Bws)(\%)]$$

Analytical Worksheet

29-Dec-97 Date

MAP Plant

Fluorine content of stack gas

Run 1	Run 2	Run 3	
1,000	1,000	1,000	Vw = Total probe wash after final dilution (ml)
1,000	1,000	1,000	Vf = Total volume of filter wash after final dilution (ml)
1,000	1,000	1,000	Vi = Total volume of impinger wash after final dilution (ml)
0.43	0.22	0.17	Cw = Concentration of fluorine in probe wash (mg/l)
0.13	0.11	0.11	Cf = Concentration of fluorine in filter wash sample (mg/l)
0.22	0.14	0.13	Ci = Concentration of fluorine in impinger wash sample (mg/l)
0.78	0.47	0.41	Ft = Total fluoride recovered (mg) = (Vi * Ci + Vw * Cw + Vf * Cf) / 1,000 (ml/l)
55.49	55.08	52.39	Vmstd = dry gas volume @stp
0.0141	0.0085	0.0078	Cf = Concentration of fluorine in stack gas (mg/dscf) = Ft / Vmstd
0.20	0.12	0.11	Fh = lbs F1/hr = Cf (mg/dscf) Qsd (dscf/m) 2.205 eex-6(lb/mg) 60 (m/h)
0.0103	0.0065	0.0059	Ft = lbs F1/ton P2O5 feed = Fh (lbs F1/hr) / Feedrate (tons P2O5/hr)
		0.141	Fh ave lbs F1/hr
		0.008	Ft ave lbs F1/ton P2O5 feed

Particulate content of stack gas

Run 1	Run 2	Run 3	
0.0081	0.0092	0.0090	Mn = Mass of particulate matter collected (mg)
55.49	55.08	52.39	Vmstd = dry gas volume @stp
0.00015	0.00017	0.00017	Cp = Particulate concentration (g/dscf) = (0.001 g/mg) (Mn/Vmstd)
105,621	106,826	102,904	Qsd (dscf/m)
2.04	2.36	2.34	Particulates (lb/h) = Cp (g/dscf) 2.205 eex-3 (lb/g) Qsd (dscf/m) 60 (m/h)
0.0535	0.0635	0.0644	Particulates lbs/ton MAP
		2.246	Particulates lbs/hr (ave)
		0.060	Particulates lbs/ton MAP (ave)

feedrate

29-Dec-97 Date
 MAP Plant

P2O5 feed rate calculation (tons P2O5/hr)

RUN 1	Start		Stop		Feedrate (gpm)	Analyses		Feedrate P2O5 (tph)	Production MAP (tph)
	Time	Totalizer (gallons)	Time	Totalizer (gallons)		Specific Gravity	%P2O5		
Reactor	11:19	10,623	12:39	18,789	102.1				
Scrubber	11:19	1,550	12:39	2,636	13.6				
					88.5	1.712	50.33	19.1	38.2

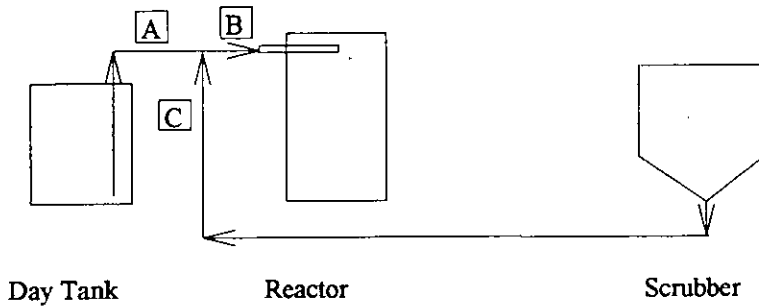
RUN 2

Reactor	1:17	22,539	2:31	30,128	102.6				
Scrubber	1:17	3,172	2:31	4,384	16.4				
					86.2	1.712	50.33	18.6	37.2

RUN 3

Reactor	3:11	34,083	4:20	41,107	101.8				
Scrubber	3:11	5,043	4:20	6,257	17.6				
					84.2	1.712	50.33	18.2	36.3

Average 18.6 37.2



Feed Rate Flow A = Reactor Input Flow B - Scrubber Recycle Flow C
 P2O5 input = A * Acid % P2O5 * Acid Sp. Gr.

MAP Plant Operating Data

Date: 12-29-97 Run: 1

Phosphoric Acid Input Rate:

Reactor Acid Totalizer reading
Scrubber liquid Totalizer reading

Start		Stop	
Time	Totalizer (gallons)	Time	Totalizer (gallons)
11:19	10622.8	12:39	18789
11:19	1549.7	12:39	2636

Venturi Scrubbers operating data:

	Flow (GPM)	Pressure Drop (" H2O)
Tower	1050	18
Cooler	307	14

MAP Plant Operating Data

Date: 12-29-97 Run: 2

Phosphoric Acid Input Rate:

Reactor Acid Totalizer reading
Scrubber liquid Totalizer reading

Start	Totalizer	Stop	Totalizer
Time	(gallons)	Time	(gallons)
13:17	22539.4	14:31	30128.3
13:17	3172.4	14:31	4384.4

Venturi Scrubbers operating data:

	Flow (GPM)	Pressure Drop (" H ₂ O)
Tower	1196	18
Cooler	349	14

MAP Plant Operating Data

Date: 12-29-97 Run: 3

Phosphoric Acid Input Rate:

Reactor Acid Totalizer reading
Scrubber liquid Totalizer reading

Start		Stop	
Time	Totalizer (gallons)	Time	Totalizer (gallons)
15:11	34082.7	16:20	41106.7
15:11	5042.7	16:20	6257.4

Venturi Scrubbers operating data:

	Flow (GPM)	Pressure Drop (" H ₂ O)
Tower	1189	18
Cooler	340	14

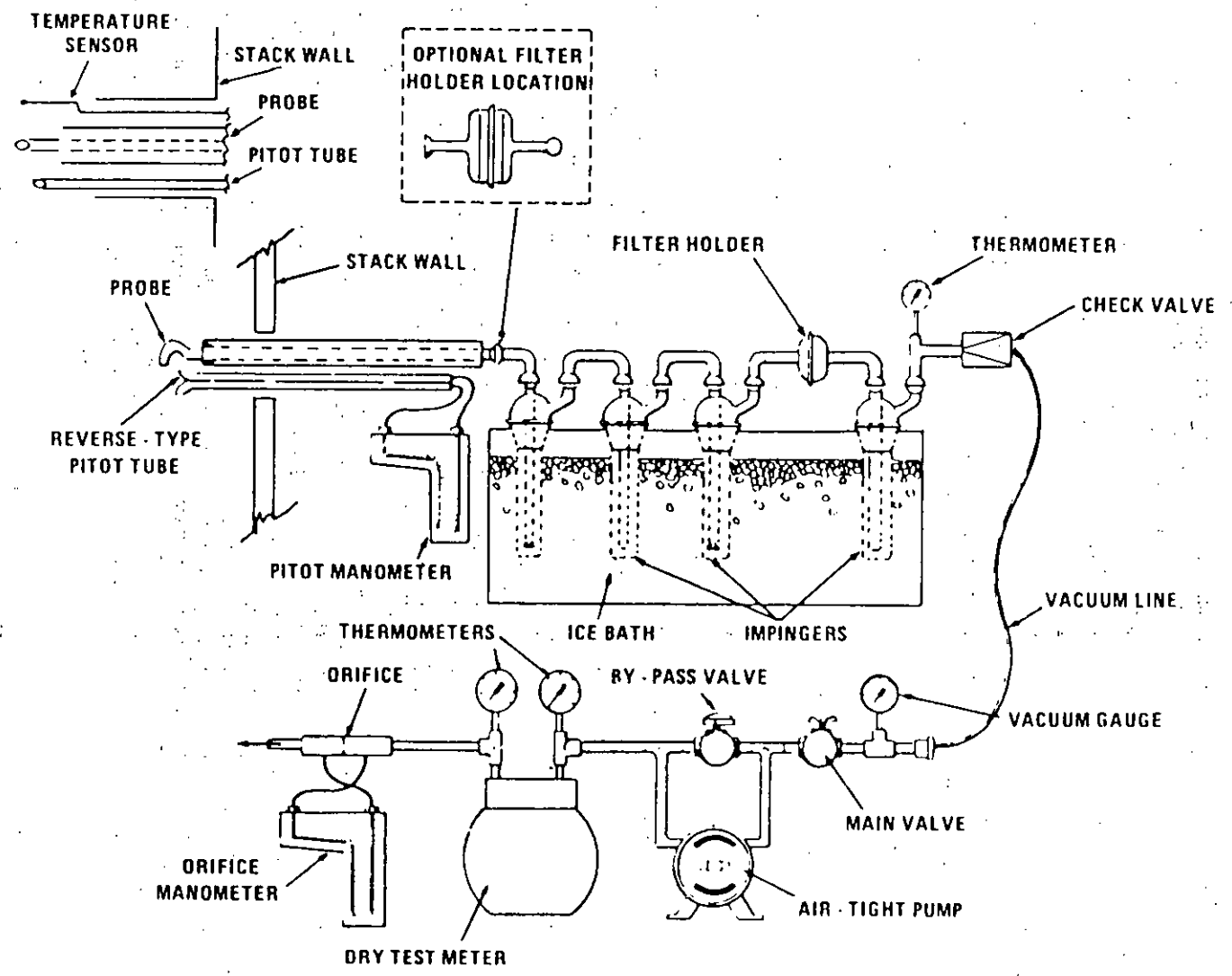


Figure 13A-1. Fluoride sampling train.

[Part 60, Appendix A, Method 13A]

Jan 7, 1998

Viet TA.

Load out TEST AT MAP on
Dec. 30, 1997 is as follows

TEST 45 min

Tons 112.0

lbs 224000

CAR # CSXT 254728

Paul HARTBARGER

WEIGHED ON A FAIRBANKS SCALE

Weighed at RR Coupled Uncoupled Date Weighed 12-31-97 M

Initials CSXT Car No. 254728

287 300
63 300

Gross
Tare Actual

Contents			
DRY	RAIN'G	SLEET'G	DOOR
WET	SNOW'G	SEALS	LEAK'G

224000 = 112 TONS
Net

Adjusted Bigford Weigher

Fairbanks Cat. 083534
(1147A) Printed in U.S.A.

Date 10, -7-97
 Calib. by Robert E. Hal
 & T. Meade

Meter # 31D - 639C Bar. 30.05 Pretest Y 98.68
 STD Meter # 208 Correction Factor .9860

	STD Meter FT. 3	Test Meter FT. 3	STD Meter Temp Inlet	STD Meter Temp Outlet	Test Meter Temp Inlet	Test Meter Temp Outlet	Time	Vac Inches Hg
0.2	294.172	787.239	71	71	85	95	7.18 ^{sec}	0.50 H ₂ O
	292.168	785.141	71	71	82	90		
	2.004	2.098	71	(531)	88	(548)		.037 Hg
0.8	299.178	792.465	71	71	88	105	9.40.4	1.4" H ₂ O
	294.172	787.239	71	71	85	97		
	5.006	5.226	71	(531)	93.8	(553.8)		.10 Hg
1.8	304.304	797.823	71	71	91	108	6.45.2	2.65" H ₂ O
	299.178	792.465	71	71	89	105		
	5.126	5.358	71	(531)	98.5	(558.5)		.195 Hg
3.4	314.325	808.242	71	71	93	116	9.30	4.85" H ₂ O
	304.304	797.823	71	71	91	110		
	10.021	10.419	71	531	102.5	562.5		.357 Hg
5.0	324.337	818.647	71	71	95	117	7.54	.42" Hg
	314.325	808.242	71	71	93	110		
	10.012	10.405	71	531	103.8	563.8		
8.0	334.367	828.990	71	71	97	118	6.77 ^{sec}	7.0 Hg
	324.337	818.647	71	71	95	114		
	10.030	10.343	71	531	106.0	566.0		

$Y = 0.9790$

Date 10-7-97
 Calib By RE Holt
 FT. Meade

Meter # 318-639C

ΔH inches
 H₂O

.2	$2.004 (30.05 - .037) (548) (.9860)$	$= 32,498.596$	$= 0.9703$
	$2.098 (30.05 + \frac{.2}{13.6}) (531)$	$33,493.2248$	
.8	$5.006 (30.05 - .10) (553.8) (.9860)$	$= 81,868.6329$	$= 0.9799$
	$5.226 (30.05 + \frac{.8}{13.6}) (531)$	$83,552.1659$	
1.8	$5.126 (30.05 - .195) (558.5) (.986)$	$= 84,274.4155$	$= 0.9814$
	$5.358 (30.05 + \frac{1.8}{13.6}) (531)$	$85,871.752$	
3.4	$10.021 (30.05 - .357) (562.5) (0.986)$	$= 165,030.6393$	$= 0.9845$
	$10.419 (30.05 + \frac{3.4}{13.6}) (531)$	$167,634.4167$	
5.0	$10.012 (30.05 - .42) (563.8) (0.986)$	$= 164,912.8431$	$= 0.9813$
	$10.405 (30.05 + \frac{5.0}{13.6}) (531)$	$168,059.173$	
8.0	$10.030 (30.05 - .70) (566.0) (0.986)$	$= 164,286.6919$	$= 0.9763$
	$10.343 (30.05 + \frac{8.0}{13.6}) (531)$	$168,269.2631$	

Total 5.8737

meter Avg γ .9790

$$.2 \quad \frac{(0.0317)(0.2) \left[\frac{531.0 \times 7.31_{min}}{2.004} \right]^2}{30.05 \times 548} \quad 1.4444$$

$$.8 \quad \frac{(0.0317)(0.8) \left[\frac{531.0 \times 9.67}{5.006} \right]^2}{30.05 \times 553.8} \quad 1.6033$$

$$1.8 \quad \frac{(0.0317)(1.8) \left[\frac{531 \times 6.753}{5.126} \right]^2}{30.05 \times 558.5} \quad 1.6638$$

$$3.4 \quad \frac{(0.0317)(3.4) \left[\frac{531 \times 9.5}{10.021} \right]^2}{30.05 \times 562.5} \quad 1.6158$$

$$5.0 \quad \frac{0.0317 \times 5.0 \left[\frac{531 \times 7.9}{10.012} \right]^2}{30.05 \times 563.8} \quad 1.6423$$

$$8.0 \quad \frac{0.0317)(8.0) \left[\frac{531 \times 6.283}{10.03} \right]^2}{30.05 \times 566} \quad 1.6497$$

9.6193

or size 1.6032

NOZZLE CALIBRATION

Nozzle 1364

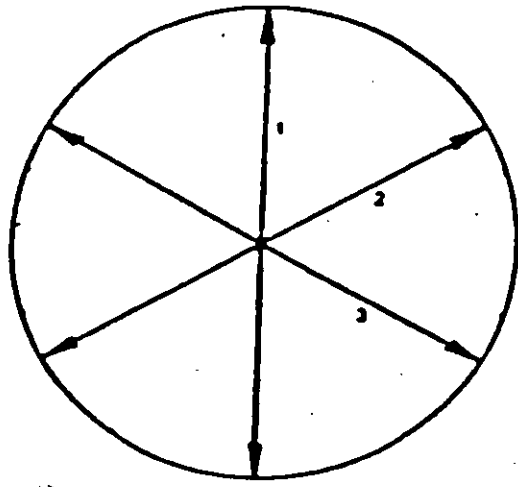
Date 12-29-97

<u>Measurement No.</u>	<u>Inside Diameter (inches)</u>
1	0.240
2	0.240
3	0.240

Average 0.240

Area of Nozzle 0.000314 Ft²

Calibrated by: Robert E. Hall



Nozzle X-section

Run # 1 Velocity Traverse Data Sheet

12-29-91
MAP
Ft. Meade
EW
1
0.008
0.008
0.0
0.0
0.68

Date	57
Plant	29.70
City	02:30
Operator	0.0
Filter #	0.979
cfm	6.71
Leak rate- (before @ 10" Hg)	0.24
Leak rate- (after @ 10" Hg)	0.0
"H2O + Pitot leak rate (before) 15 SEC.	0.0
"H2O - Pitot leak rate (before) 15 SEC.	0.0
"H2O Reference dP	

- F Ambient Temperature
- " Hg Pbar = barometric pressure
- mm:ss Sample time interval
- " H2O Pg = Static stack pressure
- n/a Y = Calibration factor for dry gas meter
- ft Ds = Stack Diameter
- in Dn = nozzle diameter
- " H2O + Pitot leak rate (after) 15 SEC
- " H2O - Pitot leak rate (after) 15 SEC

Traverse Point	Clock Time (std)	Vacuum ("Hg)	Velocity Head dPs ("H2O)	Orifice Pdrop dH ("H2O)	Gas meter reading dVm (F)	Gas sample temperatures			Temperature	
						After last impinger (F)	Meter Inlet Tmi (F)	Meter Outlet Tmo (F)	Filter (F)	Stack Ts (F)
0	11:23				833.9					
1	25.5	4.0	.67	1.85	835.4	48	70	78	210	113
2	28	7.0	.82	2.25	838.0	48	70	81	220	113
3	30.5	6.3	.9	2.45	840.2	48	70	83	226	113
4	33.0	8.0	.95	2.6	842.6	48	71	84	229	113
5	35.5	8.0	.95	2.6	845.0	48	71	86	234	113
6	38	8.0	.95	2.6	847.3	48	73	86	237	113
7	40.5	8.0	.9	2.45	849.7	48	73	87	240	113
8	43	8.0	.92	2.55	852.0	48	73	88	241	113
9	45.5	9.0	1.1	3.0	854.5	48	74	89	242	113
10	48	9.0	1.1	3.0	857.1	50	74	89	240	113
11	52.5	9.0	1.1	3.0	859.7	50	75	90	241	113
12	53.0	7.0	1.0	2.75	862.395	50	76	91	240	113
0	1203				862.395					
1	05.5	4.0	.78	2.1	864.5	56	77	88	180	114
2	08	4.7	.92	2.55	866.8	56	78	91	185	114
3	10.5	5.0	1.05	2.9	869.3	56	78	93	190	116
4	13.0	5.0	1.0	2.75	871.8	56	78	93	196	116
5	15.5	5.0	1.0	2.75	874.2	56	79	94	196	116
6	18.0	5.2	1.05	2.9	876.8	56	79	95	196	116
7	20.5	8.0	1.05	2.9	879.3	56	79	93	190	116
8	23.0	8.2	1.1	3.0	881.8	56	79	93	190	116
9	25.5	8.4	1.15	3.15	884.4	56	80	93	185	116
10	28.0	8.5	1.15	3.15	887.0	56	80	93	185	116
11	30.5	8.5	1.15	3.15	889.7	56	80	93	185	116
12	33.0	7.7	1.0	2.75	892.2	56	80	93	180	116

Moisture content of stack gas

Impinger	Impinger Volume (ml)		Moisture collected (ml)
	Before	After	
1	626.3	720.1	
2	626.9	627.2	
3	445.5	447.3	
4	700.1	701.7	
Total		Vlc =	

Total particulate weight (g)

	Total particulate weight (g)			Net
	Gross	Tare	Factor	
Probe wash	98.7114	98.7110	10	
Filter	0.4296	0.4255	n/a	
Total			Mn =	

Aliquot Calculations

	Aliquot Calculations		
	Total Wash	Aliquot Dried	Factor
Probewash	1000	100	10

F-STD

BLK - 0.023

STD - 1.0 - 1.0

" 10.0 - 10.0

SLOPE - 57.3

	F (mg/l)
Probe Wash	0.43
Filter	0.13
Impingers	0.22
Total	0.78

Run # Z Velocity Traverse Data Sheet

12-29-97	Date	
MAP	Plant	
Ft. Meade	City	
EW	Operator	
Z	Filter #	
0.005	cfm	Leak rate- (before @10" Hg)
0.005	cfm	Leak rate- (after @ 10" Hg)
0.0	+ "H2O	Pitot leak rate (before) 15 SEC
0.0	- "H2O	Pitot leak rate (before) 15 SEC
0.68	"H2O	Reference dP

55
29.7
02:30
0.0
0.979
6.71
0.24
0.0
0.0

F Ambient Temperature
 " Hg Pbar = barometric pressure
 mm:ss Sample time interval
 " H2O Pg = Static stack pressure
 n/a Y = Calibration factor for dry gas meter
 ft Ds = Stack Diameter
 in Dn = nozzle diameter
 " H2O + Pitot leak rate (after) 15 SEC
 " H2O - Pitot leak rate (after) 15 SEC

Traverse Point	Clock Time (std)	Vacuum (" Hg)	Velocity Head dPs (" H2O)	Orifice Pdrop dH ("H2O)	Gas meter reading dVm (E)	Gas sample temperatures			Temperature	
						After last impinger (F)	Meter Inlet Tmi (F)	Meter Outlet Tmo (F)	Filter (F)	Stack Ts (F)
0	B23				892.41					
1	25.5	6.0	.77	2.10	894.5	48	78	83	180	116
2	28.0	7.0	.9	2.45	896.8	48	77	87	185	116
3	30.5	8.0	1.0	2.75	899.2	48	77	87	185	116
4	33.0	8.8	1.1	3.0	901.7	48	77	87	180	116
5	35.5	8.8	1.1	3.0	904.2	48	76	88	182	116
6	38.0	8.8	1.1	3.0	906.8	48	77	88	178	116
7	40.5	9.6	1.2	3.25	909.4	48	77	88	172	116
8	43.0	8.8	1.1	3.0	912.1	48	77	88	177	116
9	45.5	8.8	1.1	3.0	914.6	48	77	89	179	116
10	48	8.8	1.1	3.0	917.3	48	78	90	182	116
11	50.5	8.3	1.05	2.9	919.8	50	78	90	185	116
12	53.0	7.0	.9	2.45	922.2	50	78	90	188	116
0	1404				922.2					
1	06.5	6.2	.77	2.1	924.3	58	79	86	182	115
2	09	7.0	.9	2.45	926.5	58	79	89	190	116
3	11.5	7.5	.95	2.6	928.9	58	79	90	192	116
4	14	8.0	1.0	2.75	931.3	58	79	90	195	116
5	16.5	8.0	1.0	2.75	933.8	58	79	90	195	117
6	19	7.3	.9	2.45	936.2	58	79	91	195	117
7	21.5	7.3	.9	2.45	938.6	58	79	91	200	117
8	24	7.0	.88	2.4	940.8	58	79	91	205	117
9	26.5	9.3	1.2	3.25	943.3	58	79	91	205	117
10	29	7.3	1.2	3.25	946.0	60	79	99	205	117
11	31.5	9.3	1.2	3.25	948.8	60	79	90	210	117
12	34	8.0	1.0	2.75	951.4	60	79	90	210	117

Moisture content of stack gas

Impinger	Impinger Volume (ml)		Moisture collected (ml)
	Before	After	
1	633.8	709.4	
2	635.6	650.8	
3	438.7	440.5	
4	694.3	696.3	
Total		Vlc =	

Total particulate weight (g)

	Total particulate weight (g)			Net
	Gross	Tare	Factor	
Probe wash	98.8647	98.8647	10	
Filter	0.4297	0.4255	n/a	
Total			Mn =	

Aliquot Calculations

Probewash	Aliquot Calculations		
	Total Wash	Aliquot Dried	Factor
1000	100	10	

	F (mg/l)
Probe Wash	0.22
Filter	0.11
Impingers	0.14

Total 0.47

Run #3 Velocity Traverse Data Sheet

12-29-97
MAP
Ft. Meade
FW
3
0.006
0.008
0.0
0.0
0.68

Date
Plant
City
Operator
Filter #
cfm
cfm
+ *H2O
- *H2O
*H2O
Leak rate- (before @ 10" Hg)
Leak rate- (after @ 10" Hg) 12"
Pitot leak rate (before) 15 sec
Pitot leak rate (before) 15 sec
Reference dP

S3
2970
02:30
0.0
0.979
6.71
0.24
0.0
0.0

F Ambient Temperature
* Hg Pbar = barometric pressure
mm:ss Sample time interval
* H2O Pg = Static stack pressure
n/a Y = Calibration factor for dry gas meter
ft Ds = Stack Diameter
in Dn = nozzle diameter
+ *H2O Pitot leak rate (after) 15 sec
- *H2O Pitot leak rate (after) 15 sec

Traverse Point	Clock Time (std)	Vaccum (* Hg)	Velocity Head dPs (* H2O)	Orifice Pdrop dH (*H2O)	Gas meter reading dVm (B)	Gas sample temperatures			Temperature	
						After last impinger (F)	Meter Inlet Tmi (F)	Meter Outlet Tmo (F)	Filter (F)	Stack Ts (F)
0	1514				951.62					
1	16.5	7.5	.8	2.2	953.7	46	76	84	175	116
2	19	7.7	.87	2.4	956.1	46	76	85	175	116
3	21.5	6.7	.95	2.6	958.5	46	75	87	175	116
4	24	6.8	.9	2.7	960.7	46	75	87	180	116
5	26.5	10.0	1.05	2.9	963.2	46	75	87	183	116
6	29	10.0	1.05	2.9	965.7	46	75	87	200	116
7	31.5	10.0	1.05	2.9	968.2	46	75	88	230	116
8	34	9.0	1.0	2.75	970.8	46	76	89	215	116
9	36.5	9.0	1.0	2.75	973.3	46	76	89	210	116
10	39	7.0	.9	2.45	975.7	46	76	91	220	116
11	41.5	6.2	.85	2.3	978.0	48	76	91	225	116
12	44	6.2	.85	2.3	980.25	48	77	91	222	116
0	1553				980.21					
1	55.5	5.7	.77	2.1	982.3	54	77	87	180	115
2	58	6.2	.9	2.45	984.5	54	77	89	180	115
3	1600.5	7.0	1.0	2.75	987.0	54	77	89	180	116
4	03.0	7.2	1.05	2.9	989.5	54	77	90	180	116
5	05.5	7.0	1.0	2.75	992.0	54	77	90	185	116
6	08.0	7.0	1.0	2.75	994.5	54	77	91	185	116
7	10.5	7.0	1.0	2.75	996.8	54	77	91	185	116
8	13.0	9.2	.97	2.65	999.1	54	77	90	185	116
9	15.5	9.2	.97	2.65	1001.7	54	77	90	180	116
10	18.0	7.2	.97	2.65	1004.1	55	77	90	180	116
11	20.5	7.0	.95	2.6	1006.5	55	77	91	180	116
12	23.0	6.2	.85	2.3	1008.9	55	77	92	180	116

Moisture content of stack gas

Impinger	Impinger Volume (ml)		Moisture collected (ml)
	Before	After	
1	648.0	731.7	
2	660.4	670.4	
3	447.5	448.8	
4	695.8	697.2	
Total		Vlc =	

Total particulate weight (g)

	Total particulate weight (g)			
	Gross	Tare	Factor	Net
Probe wash	98.641	98.6136	10	
Filter	0.4239	0.4199	n/a	
Total			Mn =	

Aliquot Calculations

	Aliquot Calculations		
	Total Wash	Aliquot Dried	Factor
Probewash	1000	100	10

	F (mg/l)
Probe Wash	0.17
Filter	0.11
Impingers	0.13

Total 0.41

**KOOGLER & ASSOCIATES****ENVIRONMENTAL SERVICES**4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-6822 • FAX/377-7158

KA 173-94-04

December 15, 1997

VIA FAX AND U.S. MAIL**Mr. W. C. Thomas
Florida Department of
Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, FL 33619-8318****Subject: U.S. Agri-Chemicals Corporation
Polk County, Florida
Permits AC53-260190/PSD-FL-222
Notification of Compliance Test****Dear Mr. Thomas:**

In accordance with Rule 62-297.310(1)(f), F.A.C. and Specific Condition No. 7 of the subject permit, the U.S. Agri-Chemicals Corporation (USAC) is providing the Department 15 days written notice of compliance testing to be conducted on the prilled MAP plant covered by the subject permit. The plant is at the USAC fertilizer complex located at 3225 State Road 630 West, Ft. Meade, Florida.

Pursuant to Specific Condition No. 8 of the subject permit, visible emissions observations and emission tests for fluorides and PM/PM10 will be conducted on the MAP plant stack. The visible emissions observations will be conducted in accordance with EPA Method 9, fluoride emission measurements will be conducted in accordance with EPA Methods 1, 2, 3 and 13B and PM/PM10 emission measurements will be conducted in accordance with EPA Method 1, 2, 3 and 5. All methods are published in 40 CFR 60, Appendix A.

The testing is scheduled to be conducted December 30, 1997. The testing will begin at approximately 9:00 a.m. and will continue until completed. It is anticipated

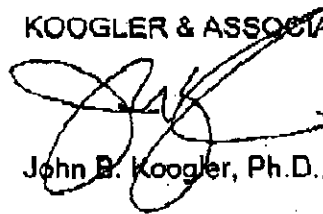
Mr. W. C. Thomas
Florida Department of
Environmental Protection

December 15, 1997
Page 2

that all of the testing can be conducted on December 30, 1997. If you have questions regarding this compliance testing, please contact me or Ron Brunk at USAC. Mr Brunk's phone number is 914-285-8121, Extension 279.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:wa

- c: Mr. Steve Susick, USAC
- Mr. Ron Brunk, USAC
- Mr. Larry Curtin, Holland & Knight



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

US

Agri-Chemicals

A Sinochem Company

November 19, 1997

Mr. C. H. Fancy, P.E.
Chief Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

NOV 21 1997

BUREAU OF
AIR REGULATION

**Re: Resolution of Air Construction Permit No.: ACS3-260190(PSD-FL-222)
Prilled/Granular MAP Plant**

Dear Mr. Fancy:

As we discussed on the phone this morning, U.S. Agri-Chemicals Corporation, is willing in an effort to conclude the permitting process for its prilled/granular MAP plant in Ft. Meade, Florida to perform a scrubber inlet sample at the time of the initial performance test for the facility while producing prilled MAP. This is in response to the Florida Department of Environmental Protection's request for inlet testing of both scrubbers and the scrubber stack during the initial performance test of the plant for total fluorides. This request was defined in Specific Condition Number 6 of the Draft Permit which was issued May 22, 1997.

With nearly 80% of the particulate fluoride and almost all of the gaseous fluorides from this plant coming from the prill tower during production of the prilled monoammonium phosphate, U.S. Agri-Chemicals is willing to conduct inlet scrubber sampling at an accessible location along the scrubber inlet duct from the prill tower. This information will be collected one time during the initial performance for this facility while the plant is producing prilled MAP and will be used by the Department for informational purposes only.

An additional change in the permit will be required to reflect the construction of a new granular process at this facility with the expiration date and compliance dates being adjusted to reflect this additional construction. To address these two modifications, U.S. Agri-Chemicals has re-drafted Specific Condition Number 5 and Specific Condition Number 6 which are attached on a separate sheet for your review and use for the re-draft of the final permit for this facility. U.S. Agri-Chemicals understands there will be standard permit language requiring compliance demonstration with particulate matter and fluoride emission limits while the plant is producing granular MAP; but on the scrubber stack only.



US

Agri-Chemicals

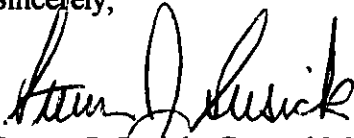
Mr. C.H. Fancy, P.E.

November 19, 1997

Page 2

If you have any questions about these modifications to the permit language, please contact me at (941) 285-8121, Ext. 344.

Sincerely,



Steven J. Susick, General Manager
Engineering and Technical Services
U.S. AGRI-CHEMICALS CORPORATION

SJS/cdd

Enclosure

xc: John Koogler
Larry Curtain

sjs278.doc

Language Modification to May 22, 1997
Air Construction Permit Number AC53-260190(PSD-FL-222)

Granular/Prilled MAP Plant

The following are modifications to previously issued Draft Specific Permit conditions relative to the prilled MAP Plant: In addition to the changes noted below the Draft Permit will also be revised to show combination of granular and prill MAP processes at this facility.

Specific Condition No. 5:

The permittee shall have one (1) year from the time of ~~plant~~ startup of the granulation facility to demonstrate compliance with these limits.

Specific Condition No. 6:

At the same time of the initial performance test for total fluoride emissions from the plants' scrubber stack, the permittee will collect a sample at the inlet to the prill tower scrubber. This initial sample at the prill tower scrubber inlet is a one (1) time only process which will be conducted at an accessible location in the duct between the prill tower and the scrubber. Since the duct between the prill tower and the scrubber inlet was not designed to accommodate sampling ports located as required by EPA method 1, the mass flow rate of total fluoride measured at this location may be of limited validity. Regardless of the quality of the scrubber inlet data, the data will be used by the Department for informational purposes only and will not be used by the Department for any other purposes in the future relative to this permit or this facility. Annual compliance testing for fluorides thereafter, shall be done on the scrubber stack only. PM/PM10 test shall be conducted on the scrubber stack. Visual emission tests shall be conducted on the product loadout baghouse. For the duration for all tests, the emission units shall be operating at permitted capacity. Permitting capacity is defined as 90 to 100% of the maximum operating rate allowed by the permit. If it is impractical to test at permitted capacity, then the emission unit may be tested at less than capacity (i.e., less than 90% of maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110% of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacity is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.340(1)(a), F.A.C.].

Language to be added by the Department regarding standard annual compliance testing at the scrubber stack only for total fluorides, particulate matter and visible emissions while producing granular MAP.

Finally, the expiration date for this permit should be revised to reflect an expiration date of 12/30/2000 to accommodate the construction of the new granulation facility at this plant.



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

KA 173-94-04

October 27, 1997

Mr. Clair Fancy
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

OCT 31 1997

**BUREAU OF
AIR REGULATION**

Subject: U.S. Agri-Chemical Corporation
Polk County, Florida
Permit AC53-260190/PSD-FL-222
Permit Amendment

Dear Mr. Fancy:

The referenced air construction permit was issued to U.S. Agri-Chemical Corporation (USAC) on or about September 29, 1995, for the construction of a 60 ton-per-hour prilled MAP plant. The permit is due to expire on December 30, 1997; however, a letter requesting an extension of this permit to December 30, 1998, was sent to your office on our letterhead dated September 8, 1997. Amendments to this permit are presently being processed.

By this letter, USAC is requesting an additional amendment to the permit that will allow MAP to be produced by the granular process as an alternative method of operation to the prill process currently covered by the subject permit. The granular MAP production system that is proposed to be added to the plant is typical of granular MAP production processes permitted and operating elsewhere in Florida. In addition, USAC is also offering permit conditions that will apply to the operation of the air pollution control system designed for the plant. The details of the granulation process and the conditions offered for the operation of the control system are described in the following paragraphs and in the attached process flow diagram.

To expedite the Department's processing of this request and to bring the permitting process to completion, USAC is willing to accept that when the plant operates in the granular MAP mode, the presently permitted production rate (60 tons per hour) and the presently permitted fluoride and particulate matter limits will apply. The fluoride emissions limit of 0.019 pounds of fluoride per ton of P₂O₅ from the plant while operating in the granular MAP mode will represent, to the best of our knowledge, the most stringent fluoride emission limit applicable to a granular MAP or DAP plant in Florida or elsewhere.

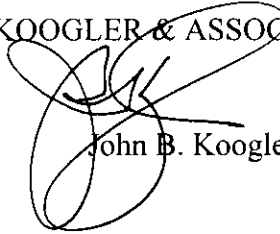
Regarding the fluoride control technology, USAC proposes to upgrade the present control system. The fluoride control system designed for the plant is a medium energy venturi scrubber using neutralized scrubber liquor recirculated through a scrubber water recirculation tank. To assure that the fluoride emission limit is achieved and to provide the Department with a meaningful and recorded scrubber operating parameter that will provide assurance that fluoride emission limits are met on a continuing basis, USAC will agree to pH limits for the recirculated scrubbing liquor. It is proposed that the pH limit be in the range of 6.0-8.5 and be established during initial compliance testing. Since the pH of the scrubbing liquor will be controlled, make-up water can be either fresh water or pond water.

With the addition of pH limits and monitoring as proposed permit conditions, the control technology is fundamentally consistent with the second option suggested by the Department in the BACT determination of the subject air construction permit; i.e., a medium energy venturi scrubber using neutralized scrubbing liquor. The water is recirculated through a scrubber water recirculation tank rather than the "dedicated scrubber pond" as stated in the BACT determination. With the addition of pH control by ammonia to maintain neutralization within the desired range, USAC is confident that the fluoride emission limit of 0.019 pounds per tons of P_2O_5 can be achieved.

We would appreciate your review and comments on this requested amendment and the proposed limits for scrubber operation. Attached please find a \$250 check to cover the processing fee for this minor amendment. If additional information is required, please do not hesitate to contact us.

Very truly yours,

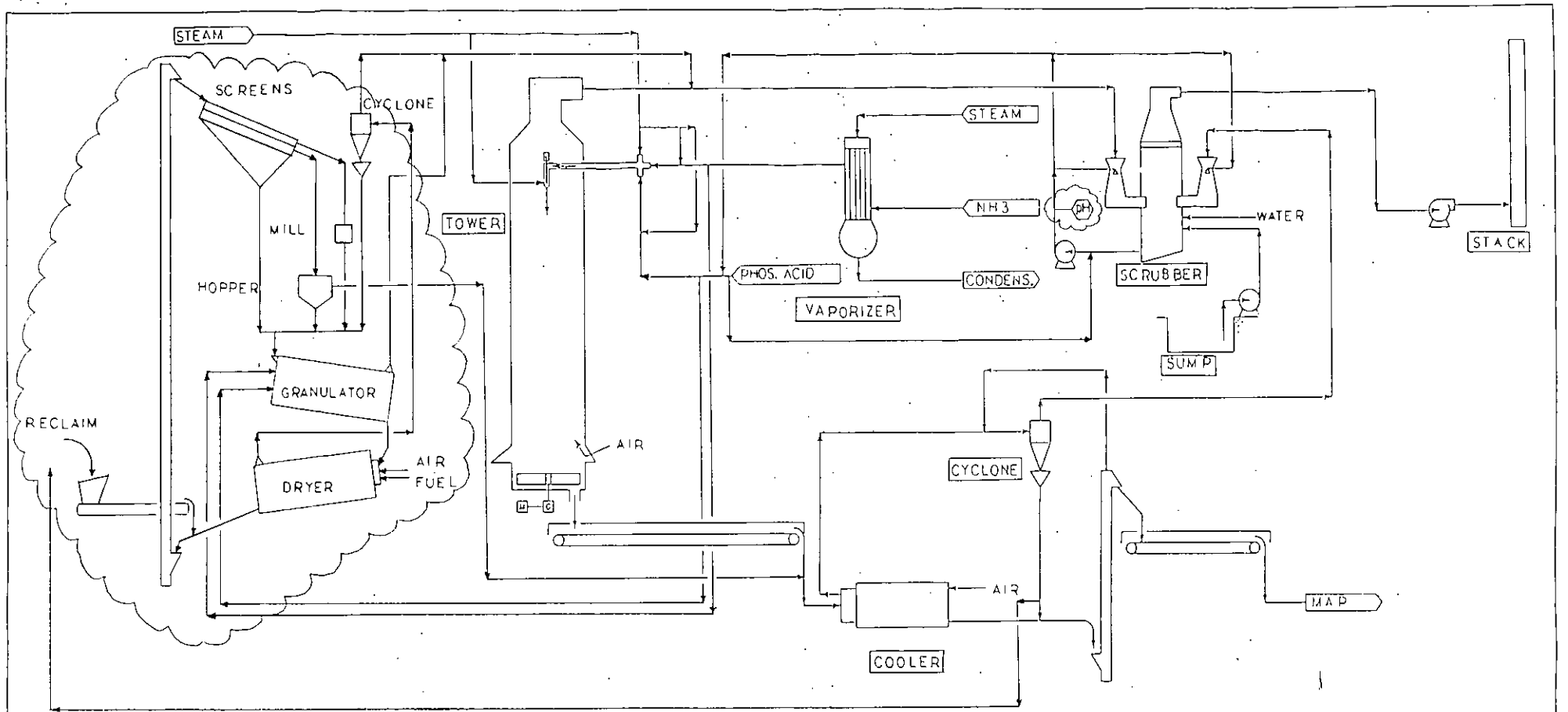
KOOGLER & ASSOCIATES


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

JBK:wa
Enc.

c: Mr. Steve Susick, USAC
Mr. Ron Brunk, USAC
Mr. Viet Ta, USAC
Mr. Larry Curtin, Holland & Knight







DEPARTMENT OF ENVIRONMENTAL PROTECTION
Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Fax Number (904) 921-3000
(850)

F A X C O V E R S H E E T

DATE: 9-24-97

TO: ~~Doug Beason~~
c/o Al Jiriso

PHONE: _____

FAX: _____

FROM: Heard

PHONE: _____

REGARDING: _____

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Message _____

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HOLLAND & KNIGHT

A Registered Limited Liability Partnership

315 South Calhoun Street
Suite 600
P.O. Drawer 810 (ZIP 32302-0810)
Tallahassee, Florida 32301
850-224-7000
FAX 850-224-8832

Atlanta	Orlando
Boca Raton	San Francisco
Fort Lauderdale	St. Petersburg
Jacksonville	Tallahassee
Lakeland	Tampa
Miami	Washington, D.C.
New York	West Palm Beach

September 11, 1997

LAWRENCE N. CURTIN
850-425-5678

VIA HAND DELIVERY

Douglas W. Beason, Esquire
Department of Environmental Protection
2600 Blair Stone Road
Twin Towers Office Building, R. 654-H
Tallahassee, Florida 32399-2400

Re: Permit No. PSD-FL-222 (AC53-260190)

Dear Doug:

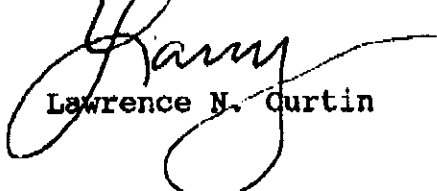
As we discussed, I have enclosed the original Best Available Control Technology recertification for the referenced permit prepared by Dr. John Koogler. Although the document is dated August 22, it was not transmitted to me until this week.

We need to discuss how best to proceed from here. As I understand it, the request for extension of time has been denied and we have been provided a period of time to request an administrative hearing. It is my understanding that this is the direction that we will be taking unless the testing condition is removed from the final permit.

We can discuss this at your convenience. Thank you for your cooperation.

Sincerely,

HOLLAND & KNIGHT LLP



Lawrence N. Curtin

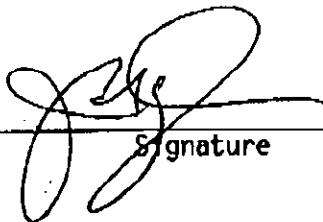
LNC/jfg

Enclosure

TAL-115527

**BEST AVAILABLE CONTROL TECHNOLOGY (BACT)
PROFESSIONAL ENGINEERING RE-CERTIFICATION**

I, the undersigned Professional Engineer, hereby certify that the PM/PM10, fluoride and V.E. emission limits established by the BACT determination prepared by the Department of Environmental Protection and described in the Intent to Issue dated December 26, 1996, Air Construction Permit Number PSD-FL-222 (AC53-260190), are technically achievable. To the best of my knowledge, there is reasonable assurance that these emission limits can be achieved by the application of sound engineering principles incorporated into the design of the plant and emission control equipment covered by this determination and by the proper operation and maintenance of all components of the affected facility.



Signature

8/22/97

Date

(Seal)



no check enclosed



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

KA 173-94-04

September 8, 1997

Mr. C. H. Fancy
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: U.S. Agri-Chemicals Corporation
Polk County
Permit AC53-260190/PAD-FL-222
Permit Extension

Dear Mr. Fancy:

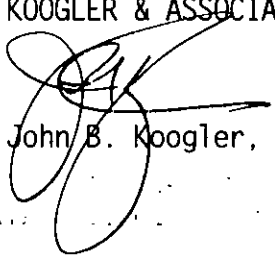
The referenced air construction permit was issued to the U.S. Agri-Chemicals Corporation (USAC) on or about September 29, 1995 for the construction of a 60 ton-per-hour prilled MAP plant. The permit is due to expire on December 30, 1997.

By this letter, I am requesting on behalf of USAC that the subject permit be extended to December 30, 1998. This extension is requested to provide USAC with the assurance that the plant will continue to be covered by permit while the final details of a modified permit are being worked out by the Department and USAC. I have enclosed a check in the amount of \$50 to cover the processing of the requested extension.

If you have any questions regarding this matter, please do not hesitate to contact me. I appreciate your cooperation on this matter.

Very truly yours,

KOOGLER & ASSOCIATES


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

JBK:wa
Enc.

c: Mr. S. Susick, USAC
Mr. R. Brunk, USAC
Mr. L. Curtin, Holland & Knight

cc: Al Unero, BAR
John Reynolds, BAR

RECEIVED

SEP 09 1997

BUREAU OF
AIR REGULATION



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

KA 173-94-04

July 24, 1997

RECEIVED

JUL 28 1997

**BUREAU OF
AIR REGULATION**

VIA FAX AND MAIL

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Motion for Extension of Time to
File an Appeal
U.S. Agri-Chemicals Corporation
Polk County, Florida

Dear Mr. Congden:

Attached is a request for an extension of time to file an Appeal in accordance with Rule 62-103.070, F.A.C.

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

Very truly yours,

KOOGLER & ASSOCIATES


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

JBK:wa
Enc.

c: Mr. Clair Fancy, FDEP, Tallahassee
Mr. A. A. Linero, FDEP, Tallahassee
Mr. Steven Susick, USAC
Mr. Ron Brunk, USAC
Mr. Larry Curtin, Holland & Knight, Tallahassee

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Air Permit for

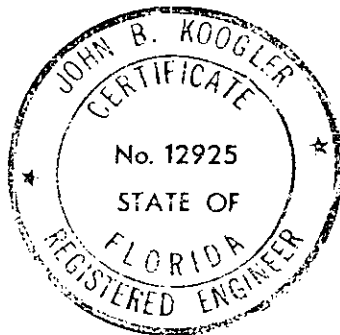
U.S. Agri-Chemicals Corporation
3225 S.R. 630, West
Ft. Meade, Florida 33841-9799

FDEP File No. AC53-260190 (PSD-FL-222)
OGC Case No. 97-0031
Polk County - AP

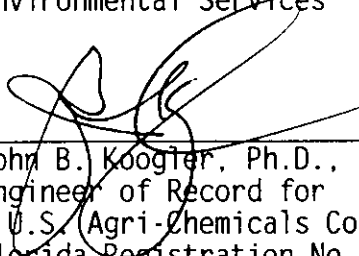
MOTION FOR EXTENSION OF TIME

The Applicant, U.S. Agri-Chemicals Corporation by and through its undersigned Engineer of Record and pursuant to Rule 62-103.070, F.A.C., requests the Secretary of the Florida Department of Environmental Protection to grant an extension of time until November 1, 1997, in which to file an Appeal. The additional time will allow U.S. Agri-Chemicals Corporation and the Florida Department of Environmental Protection adequate time to resolve disputed permit conditions.

Dated the 24th day of July 1997 in Gainesville, Alachua County, Florida.



Koogler & Associates
Environmental Services

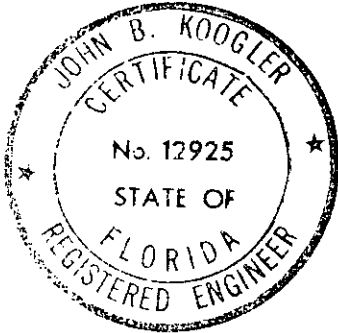


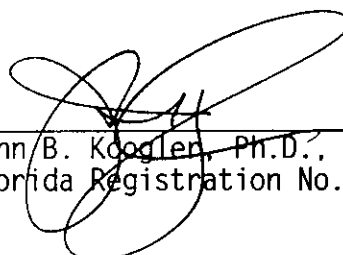
John B. Koogler, Ph.D., P.E.
Engineer of Record for
U.S. Agri-Chemicals Corporation
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, Office of the General Counsel, Mr. Clair Fancy and Mr. A. A. Linero, Florida Department of Environmental Protection, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; Mr. Steven Susick and Mr. Ron Brunk, U.S. Agri-Chemicals Corporation, 3225 S.R. 630 West, Ft. Meade, Florida 33841-9799; and Mr. Larry Curtin, Holland & Knight, P.O. Drawer 810, Tallahassee, Florida 32302, by FAX and by U.S. Mail this 24th day of July 1997.

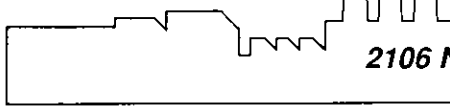




John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925



ACE
AIR CONSULTING
& ENGINEERING, INC.



2106 N.W. 67th Place • Suite 4 • Gainesville, Florida • 32653
(352) 335-1889 FAX (352) 335-1891

RECEIVED

JUN 26 1997

BUREAU OF
AIR REGULATION

June 20, 1997

Mr. John Reynolds
Florida Department of Environmental Protection
Bureau of Air Regulation
Mail Station 5505
2600 Blair Stone Road
Tallahassee, Florida 32399

Dear Mr. Reynolds:

Air Consulting and Engineering, Inc. (ACE) is pleased to provide a price quote for conducting Fluoride emissions testing on one outlet exhaust of a phosphate plant in Polk County, Florida.

ACE will provide a two-man team and all equipment necessary to perform testing according to United States Environmental Protection Agency (EPA) Method 13A as stated in the Code of Federal Regulations, Title 40, Part 60 Appendix A.

Charges are based on time and materials per the attached Professional Fee Schedule for a total estimated cost of \$2,715.00. A price break-down is included for your review. Should delays occur beyond the control of ACE personnel or equipment (i.e., plant downtime, bad weather conditions, etc.) additional charges may be made. Overtime rates are charged for time beyond 8 hours per day and for all hours on weekend and holidays. All pricing will remain firm for 90 days. Invoicing will be made upon submittal of final report and will be due in 30 days.

Four copies of the final report are included in the price.

Please contact me at with any questions concerning this quote. Thank you for allowing ACE to quote on this valued work.

Respectfully,

AIR CONSULTING AND ENGINEERING, INC.


Dagmar Fick
Mechanical Engineer

Enclosures

DF/cvt

ACE File: 999 97 043

ACE Bid 999-97-043; FEDP BUREAU OF AIR REGULATIONS

Category	Item	No.	Rate	hrs/units	Subtotal	Totals	
MOBILIZATION	Environmental Specialist		40		0		
	Sen. Environmental Specialist	2	50	3	300		
	Environmental Engineer		60		0		
	Sen. Engineer/Scientist		80		0		
Post Test Cal.	Environmental Specialist	1	40	1	40	340	
TRAVEL	Environmental Specialist		40		0		
	Sen. Environmental Specialist	2	50	7	700		
	Environmental Engineer		60		0		
	Sen. Engineer/Scientist		80		0		
	mileage	Van + Trailer	1	0.75	340	255	
	Van		0.50		0		
per diem	personnel	2	85	1	170	1125	
TESTING	Environmental Specialist		40		0		
	Sen. Environmental Specialist		50	10	0		
	Environmental Engineer		60		0		
	Sen. Engineer/Scientist		80		0		
	overtime labor	Environmental Specialist		60		0	
	Sen. Environmental Specialist	2	75	2	300		
	Environmental Engineer		80		0	300	
EQUIPMENT charges							
	O2 analyzer (EPA 3A)		50		0		
	CO2 analyzer (EPA3A)		100		0		
	Dioxin/Furan train (EPA 23)		100				
	HCL train (EPA 26)		100				
	Mercury train (EPA 101,101A)		100		100		
	Multi Metals train (EPA 29,12)		100				
	PM train (EPA 4,5,17)		100		0		
	Fluoride train (EPA 13A)	1	100	1	100		
	SO2 train (EPA 6,8)		100		0		
	SO2 analyzer (EPA 6C)		100		0		
	NOx analyzer (EPA 7E, 20)		100		0		
	CO analyzer (EPA 10)		100		0		
	VOC analyzer (EPA 25A)		100		0		
Reagent Charges							
	O2 calibration gases (EPA 3A)		25		0		
	CO2 calibration gases (EPA 3A)		50		0		
	SO2 calibration gases (EPA 6C)		50		0		
	NOx calibration gases (EPA 7E, 20)		50		0		
	CO calibration gases (EPA 10)		50		0		
	VOC calibration gases (EPA 25A)		50		0		
	Orsat Reagents (EPA 3)	1	10	3	30		
	Moisture Reagents (EPA 4)		10		0		
	Fluoride reagents (EPA 13A)	1	15	3	45		
	PM reagents (EPA 5, 17)		15		0		
	SO2 reagents (EPA 6, 8)		25		0		
	Dioxin Furan reagen (EPA 23)		35		0		
	VOC reagents (EPA 25)		25		0		
	HCl reagents (EPA 26)		25		0		
	Multi-Metals reagents (EPA 29)		30		0		
	Mercury reagents (EPA 101, 101A)		25		75		
Lab Charges							
	Particulate analysis (EPA 5, 17)		40		0		
	SOx analysis (EPA 6, 8)		40		0		
	Dioxins/Furans analysis (EPA 23)		1,250		0		
	VOC analysis (EPA 25)		275		0		
	HCl analysis (EPA 26)		65		0		
	Metals analysis (list) (EPA 29)		30		0		
	Hg analysis (EPA 101, 101A)		40		0		
	Fluoride analysis (EPA 13A)	1	50	4	200	350	
FORMAL REPORT							
	Sen. Engineer/Scientist	1	80	1	80		
	Environmental Engineer	1	60	5	300		
	Administrative	1	40	2	80		
	Clerical	1	20	2	40	500	
Copy Charges							
Communication					54	100	
Miscellaneous					41		
					Final Total	2715	

[6-20-97]; This bid is based on completing all travel and testing in (1) day.

AIR CONSULTING AND ENGINEERING, INC.
PROFESSIONAL FEE SCHEDULE
JUNE 1997

<u>CATEGORY</u>	<u>ITEM</u>	<u>RATE</u>
TRAVEL	milage, Van & Trailer	\$0.75/mile
	milage, Van or personal vehicle	\$0.50/mile
	** per diem (nominal)	\$85/day
	** Per Diems in larger cities or during special events will be charged at cost	
LABOR	Sen. Engineer/Scientist	\$80/hr
	Environmental Engineer	\$60/hr
	*Sen. Environmental Specialist	\$50/hr
	*Environmental Specialist	\$40/hr
	* Eligible for overtime at 1.5 x Rate for more than 8.0 hours/day or 40 hours/week	
EQUIPMENT CHARGES	O2 analyzer (EPA 3A)	\$ 50/day, \$250/wk
	CO2 analyzer (EPA 3A)	\$100/day, \$500/wk
	Dioxin/Furan train (EPA 23)	\$100/day, \$500/wk
	HCL train (EPA 26,26A)	\$100/day, \$500/wk
	Mercury train (EPA 101,101A)	\$100/day, \$500/wk
	Multi Metals train (EPA 29,12,13,104)	\$100/day, \$500/wk
	PM train (EPA 4,5,17)	\$100/day, \$500/wk
	SO2 train (EPA 6,8)	\$100/day, \$500/wk
	SO2 analyzer (EPA 6C)	\$100/day, \$500/wk
	NOx analyzer (EPA 7E, 20)	\$100/day, \$500/wk
	CO analyzer (EPA 10)	\$100/day, \$500/wk
	VOC analyzer or manual Train (EPA 25A,25)	\$100/day, \$500/wk
	Velocity & Moisture Train (EPA 2,4)	\$ 50/day, \$250/wk
REAGENT CHARGES	O2 calibration gases	\$25/day
	CO,CO2,NOx,SO2,VOC calibration gases	\$50/day/gas
	Orsat Reagents (EPA 3)	\$10/Run
	Moisture Reagents (EPA 4)	\$10/Run
	PM reagents (EPA 5, 17)	\$15/Run
	SO2 reagents (EPA 6, 8)	\$10/Run
	Dioxin Furan reagen (EPA 23)	\$60/Run
	VOC reagents (EPA 25)	\$25/Run
	HCl reagents (EPA 26,26A)	\$15/Run
	Multi-Metals reagents (EPA 29)	\$40/Run
	Mercury reagents (EPA 101, 101A)	\$15/Run
	LAB CHARGES	Particulate analysis (EPA 5, 17)
SOx analysis (EPA 6, 8)		\$40/sample
Dioxins/Furans analysis (EPA 23)		\$2000/sample
VOC analysis (EPA 25)		\$275/sample
HCl analysis (EPA 26)		\$65/sample
Metals analysis (list) (EPA 29)		\$40/sample/parameter
Mercury analysis (EPA 101, 101A)		\$40/sample
SUPPORT SERVICES	copy charges, black & white	\$0.10/copy
	copy charges, color reduction	\$1.50/copy
	communication	1.5% of total charges
	Shipping/Postage	at cost + 10%
	Outside Services	at cost + 10%

Air Consulting and Engineering, Inc.
2106 NW 67th Place, Suite 4
Gainesville, Florida 32653
Tel: (352) 335-1889 Fax: (352) 335-1891



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 173-94-04

May 28, 1997

RECEIVED

MAY 30 1997

BUREAU OF
AIR REGULATION

VIA FAX AND MAIL

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Motion for Extension of Time to
File an Appeal
U.S. Agri-Chemicals Corporation
Polk County, Florida

Dear Mr. Congden:

Attached is a request for an extension of time to file an Appeal in accordance with Rule 62-103.070, FAC.

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

Very truly yours,

KOGLER & ASSOCIATES

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

JBK:wa
Enc.

c: Mr. Clair Fancy, FDEP, Tallahassee
Mr. A. A. Linero, FDEP, Tallahassee
Mr. Steven Susick, USAC
Mr. Ron Brunk, USAC
Mr. Viet Ta, USAC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Air Permit for

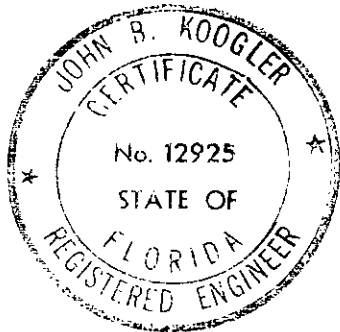
U.S. Agri-Chemicals Corporation
3225 S.R. 630, West
Ft. Meade, Florida 33841-9799

FDEP File No. AC53-260190 (PSD-FL-222)
OGC Case No. 97-0031
Polk County - AP

MOTION FOR EXTENSION OF TIME

The Applicant, U.S. Agri-Chemicals Corporation by and through its undersigned Engineer of Record and pursuant to Rule 62-103.070, FAC, requests the Secretary of FDEP to grant an extension of time until August 1, 1997, in which to file an Appeal. The additional time will allow U.S. Agri-Chemicals Corporation adequate time to review the permit and to request minor modifications, if necessary.

Dated the 28th day of May 1997 in Gainesville, Alachua County, Florida.



Koogler & Associates
Environmental Services

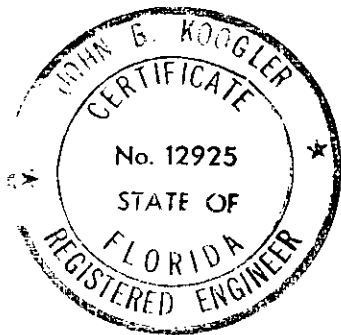
A handwritten signature in black ink, appearing to read "John B. Koogler", written over a horizontal line.

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



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, Office of the General Counsel, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Mr. Clair Fancy and Mr. A. A. Linero, FDEP, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Steven Susick, Mr. Ron Brunk and Mr. Viet Ta, U.S. Agri-Chemicals Corporation, 3225 S.R. 630 West, Ft. Meade, Florida 33841-9799 by FAX and by U.S. Mail, this 28th day of May 1997.



A handwritten signature in black ink, appearing to read "John B. Koogler", written over a horizontal line.

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





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 22, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Steven J. Susick
General Manager
U.S. Agri-Chemicals, Inc.
3225 State Road 630 West
Fort Meade, Florida 33841-9799

Re: P.E. Recertification of Final Amended Air Construction Permit No. AC53-260190 (PSD-FL-222)
Prilled MAP Plant

Dear Mr. Susick:

Before the above referenced final amended permit can be issued, a recertification of the BACT determination and final emission limits must be completed by the Professional Engineer (P.E.) who prepared the permit application.

Enclosed are drafts of the Final Amended Permit, the Final Determination addressing comments submitted by Koogler & Associates, and the Revised BACT determination. Also enclosed is a form for P.E. recertification. When the completed form is received, the Department will issue the permit.

If there are questions about the recertification requirement, please call me or John Reynolds at (904)488-1344.

Sincerely,

C.H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/kt

cc: J. Koogler, P.E.
B. Thomas, SWD

Best Available Control Technology (BACT)
PROFESSIONAL ENGINEERING RE-CERTIFICATION

I, the undersigned Professional Engineer, hereby certify that the BACT determination prepared by the Department of Environmental Protection and described in the Intent to Issue dated December 26, 1996, Air Construction Permit Number PSD-FL-222 (AC53-260190), is technically and economically achievable. I also have reasonable assurance that this standard can be achieved, when properly operated and maintained, by the application of sound engineering principles applicable to the control of emissions of the air pollutants covered by this determination.

Signature

Date

(Seal)

P 265 659 190

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to <i>Steven Susick</i>	
Street & Number <i>US Agri Chem</i>	
Post Office, State & ZIP Code <i>St. Meade, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>P.E. Recert. 5-23-97</i> <i>AC53-260190</i> <i>PSD-FL-222</i>	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Steven J. Susick, Gen Mgr
US Agri-Chemicals
3225 State Road 630 West
St. Meade, FL
33841-9799

4a. Article Number
P 265 659 190

4b. Service Type

Registered Certified

Express Mail Insured

Return Receipt for Merchandise COD

7. Date of Delivery
5-28-97

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X [Signature]

Thank you for using Return Receipt Service.

Final Determination

US Agri-Chemicals Corp.
Prilled Monoammonium Phosphate Plant
Polk County
Fort Meade, Florida

Permit Number
PSD-FL-222
AC 53-260190

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

May 22, 1997

Final Determination
US Agri-Chemicals Corp
PSD-FL-222
AC53-260190

The Intent to Issue Amended Air Construction Permit for a 60 tons per hour prilled monoammonium phosphate (MAP) plant at US Agri-Chemicals, Inc., 3225 State Road 630 West, Fort Meade, Florida 33841-9799, Polk County, Florida, was distributed on December 23, 1996. The Public Notice of Intent to Issue was published in the Ledger on February 24, 1997. Copies of the Intent to Issue were available for public inspection at the Department's offices in Tallahassee and Tampa.

Prior to the publication of the public notice, the Department received comments from the applicant. No other comments were received. The applicant's pertinent comments are addressed below.

1. The Department disagrees with the applicant's statement that the original BACT determination did not consider costs. The Department evaluated cost information from independent sources such as the Ceilcote Air Pollution Control Company and found that cost considerations did not prohibit the technology specified as BACT.
2. The Department cannot concur with the statement: "...there is a strong professional disagreement regarding the control technology that represents BACT with no evidence to demonstrate which opinion is correct or mostly correct." The applicant has not submitted any credible data, credible calculations, or credible explanation from a qualified expert as to how a venturi scrubber could possibly achieve 5-6 transfer units at the energy level proposed. The Department's analysis has been confirmed by two PhD-degreed experts in scrubber technology.
3. The original application receipt date need not be included in the Intent or Notice. Proper application means submitting a complete application which was done on April 4, 1995.
4. The applicant's contention that public notice is not required for this amendment is moot since the Department published the notice after the applicant declined to do so. This action appropriately allowed the public to be notified of the change in the basis for setting final emission limits.
5. The wording of Specific Condition No. 4 is standard and indicates that the opacity is being limited as a surrogate for PM/PM10. The rule cited is the only rule specific to phosphate processing that encompasses BACT. A BACT determination should include PM/PM10 for sources that generate particulate emissions. The reference to the additional rule the applicant requested has been added.
6. The applicant stated that the 15% opacity limit for the scrubber stack is too stringent compared to the 20% opacity "typically allowed" for PM emissions in the same mass range. The 15% opacity standard for the scrubber is actually less stringent than some recent BACT determinations for

11. The applicant stated that it did not propose a scrubber using recycled slurry. However, specification sheets submitted by the applicant show that the P2O5 content of the scrubbing liquid is as high as 15%, indicating high solids content in the recycled scrubbing liquid stream. (This is the first phosphate BACT facility that will be allowed to operate, at least initially, without using a relatively clean scrubbing medium such as pond water for last stage contact with exhaust gases).

12. The applicant argued that the control technology section of the BACT determination is not necessary. EPA's New Source Review Manual states (page B.56) that the technology upon which the BACT emissions limit is based should be specified in the permit. The applicant also contends it is not necessary to specify both an emission limit and a control technology. Specification of the control technology, in the alternative, resulted when the applicant did not follow the original BACT determination. Although the applicant claims it complied with the original BACT, in no way can the applicant be considered as being in compliance with the original BACT because it required the Department's approval before installing any "equivalent" option. The Department informed the applicant that its proposed scrubber design would not be approved as BACT for fluoride removal, yet the applicant installed it anyway. This action resulted in the revised BACT determination which provides the applicant a chance to meet the limit with its proposed system while still requiring the original approach if the limit is not achieved. This is the equivalent of "requiring the Department's approval" after the fact.

13. Regarding the events that led to the revised BACT determination, the BACT discussion should explain what occurred in order to clarify the Department's position with respect to the applicant's scrubber performance claims. The explanation should be provided in the BACT discussion in the event that similar claims need to be addressed again in future permits. The applicant stated that it considers the Department's analysis of the applicant's claims as "argumentative" and that the Department "should not place itself in the engineering business". One of the Department's functions in the permit review process is to make engineering judgments regarding the accuracy of claims made by applicants and their consulting engineers. In cases such as this where there has not been evidence presented to back up an applicant's claims, it is imperative that this be mentioned in the technical discussion so that others will understand the issues when basing their BACT decisions on this one. It is also necessary that the Department investigate the applicant's venturi scrubber performance claims so that, if true, this information can be used for future BACT determinations. This is the reason for on-site monitoring of the performance test by Department staff and the sampling of the scrubber inlet. If the applicant's claims prove to be true, the Department must know this so that it can change the way in which BACT decisions are made in the future.

scrubbers in similar applications. A BACT determination done by the Department in 1994 for Cargill's No. 4 DAP plant in Bartow (PSD-FL-211) included a 10% opacity limit for the scrubber. Cargill's mass PM emission limit was 22.8 lb/hr compared with the applicant's 24.0 lb/hr. The Department deemed that 15% is more appropriate in this case since the applicant claimed earlier than the percentage of fine particulate would be higher than for DAP emissions.

7. The wording of Specific Condition No. 5 will be changed to reflect the one year period for demonstrating compliance. This concession was made following the issuance of the original permit.

8. The applicant objected to the requirement in Specific Condition No. 6 that a one-time stack test be conducted simultaneously on the inlets of the scrubbers and the stack. The Department considers this as the only practical way to evaluate the claims of equivalent scrubber performance that have been made by the applicant. This evaluation must be made, not for compliance purposes, but to establish whether or not the applicant has a venturi scrubber design which will achieve 5-6 mass transfer units as the applicant has claimed. If this claim turns out to be factual, the Department needs to have this information for future BACT determinations. The applicant's claim can be evaluated based on a combination of inlet gas sampling and scrubber liquid sampling.

9. The applicant thought that Specific Condition No. 6 requires an EPA Method 5 test for the product loadout baghouse. It is clear from Specific Condition No. 5 and Specific Condition No. 8 that there is no mass emission limit for the baghouse and therefore there could be no requirement for a Method 5 test. Nevertheless, the words "and visible emissions" and "as appropriate" will be included in Specific Condition No. 8.

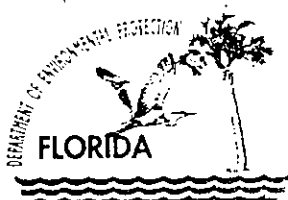
10. The applicant's representations regarding the original emission limit proposals are not entirely accurate. Page 17 of the original application states:

"The emission standard propose (sic) by the applicant is:

- Fluorides: 0.046 lbs. per ton of MAP product

The emissions standard selected by the applicant represents the fluorides emission limit imposed by the BACT standard for fluoride applied by FDEP to two MAP plants operated by Cargill Fertilizer in Florida. Cargill MAP BACT for each of two reactors is 0.037 lbs F/ton product and that for the cooler (which processes product from both reactors) is 0.018. Therefore, the combined BACT is $0.037 + (0.018/2) = 0.046$."

In the November 23, 1994 letter, the Department noted that the proposed 0.046 lb/ton of MAP product, since it is "per ton of MAP product" instead of the standard unit "per ton of P₂O₅ input", is considerably less stringent than the most recent (at that time) granular MAP BACT limit of 0.060 lb/ton P₂O₅, there being only about one-half ton of P₂O₅ in a ton of MAP product. The 0.060 limit was based on the federal new source performance standard for DAP plants since the granular process for MAP is very similar to that for DAP and there is no federal standard for MAP. The Department also noted that if one assumes equivalency of fluoride emissions from the prilled and granular processes, as well as from MAP and DAP processes, one would arrive at a limit lower than 0.060 because the most recent BACT limit for DAP was 0.0417 (lower than the most recent BACT limit for MAP). The Department was simply stating that the applicant selected the wrong BACT (and the wrong units) for its proposal.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
US Agri-Chemicals Corp.
3225 State Road 630 West
Fort Meade, FL 33841-9799

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998
County: Polk
Latitude/Longitude: 27°44'25"N
81°51'05"W
Project: 60 TPH Prilled MAP
Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 212, 272, 275, 276, and 297, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the emission unit shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department) and specifically described as follows:

For the construction of a 60 TPH Prilled MAP Plant. The facility is located at 3225 State Road 630 West, Fort Meade, Polk County, Florida. The UTM coordinates are Zone 17: 416 km East and 3,069 km North.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. DEP's letter dated November 23, 1994
2. USDOJ's letter dated December 15, 1994
2. DEP's letter dated February 17, 1995
3. K&A's letter dated March 2, 1995
4. K&A's letter dated March 20, 1995
5. K&A's letter dated March 29, 1995
6. K&A's letter dated March 31, 1995
7. USAC's letter dated July 13, 1995
8. USEPA's letter dated August 7, 1995
9. K&A's letter dated August 14, 1995
10. K&A's letter dated September 12, 1995
11. K&A's letter dated June 4, 1996
12. DEP's letter dated July 3, 1996
13. K&A's letter dated October 1, 1996
14. K&A's letter dated February 7, 1997

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PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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.
6. The permittee shall 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

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PERMITTEE:
US Agri-Chemicals Corp.

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GENERAL CONDITIONS:

credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 provide the Department with the following information:

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

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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

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PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

GENERAL CONDITIONS:

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 corrected promptly.

SPECIFIC CONDITIONS:

1. Unless otherwise indicated, the construction and operation of the subject Prilled MAP production facility shall be in accordance with the capacities and specifications stated in the application. [Rule 62-210.300, F.A.C.]

2. The production rate of the Prilled MAP plant shall not exceed 60 tons MAP product per hour. [Rule 62-212.200(223), F.A.C.]

3. The Prilled MAP plant may operate up to 8760 hours per year. [Rule 62-212.200(223), F.A.C.]

4. Visible emissions from the Prilled MAP plant loadout baghouse shall not exceed 5% opacity. [Rules 62-296.403 and 297.620(4), F.A.C.]

5. PM/PM10, total fluorides and visible emissions from the scrubber stack shall not exceed the following limits: [Rules 62-296.403 and 297.620(4) F.A.C.]

PM/PM10:	24.0 lb/hr and 105.12 tons/yr
Total Fluorides:	0.58 lb/hr and 2.54 tons/yr
Visible Emissions:	15% opacity

The permittee shall have one year from the time of plant startup to demonstrate compliance with these limits.

6. The initial performance test for total fluorides shall be done simultaneously on both scrubber inlets and the scrubber stack with monitoring of parameters by Department staff. Annual compliance tests for fluorides thereafter shall be done on the outlet only unless otherwise required by the Department. PM/PM10 tests shall be conducted on the scrubber stack. Visible emissions shall be tested for the product loadout baghouse. For the duration of all tests the emission unit shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than capacity (i.e., less than 90 percent of maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new

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PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1998

SPECIFIC CONDITIONS:

test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.340(1)(a), F.A.C.]

7. The Department's Southwest District office shall be notified in writing at least 15 days prior to the performance test. Compliance test results shall be submitted to that office within 45 days of test completion. [Rule 62-297.340(1)(i), F.A.C.]

8. The test procedures for fluorides shall be in accordance with EPA Reference Methods 1, 2, 3, and 13A or 13B, as published in 40 CFR 60, Appendix A. The test procedures for PM/PM10 and visible emissions shall be in accordance with EPA Reference Methods 1, 2, 3, 5 and 9, as appropriate, as published in 40 CFR 60, Appendix A. [Rules 62-296.800 and 62-297.401, F.A.C.]

9. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

10. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

11. The Prilled MAP plant shall be subject to the following:

a. Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

c. Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. [Rule 62-210.700(5), F.A.C.]

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SPECIFIC CONDITIONS:

d. In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

12. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(4) to the Department's Southwest District office by March 1 of the following year for the previous year's operation. [Rule 62-210.370, F.A.C.]

13. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rule 62-4.090, F.A.C.]

14. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit. [Rules 62-4.055 and 62-4.220, F.A.C.]

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes, Director
Division of Air Resources Management

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REVISED
Best Available Control Technology (BACT) Determination
U.S. Agri-Chemicals Corporation
Fort Meade, Polk County, Florida
PSD-FL-222
AC53-260190

The applicant proposes to construct a 60 tons per hour (TPH) prilled monoammonium phosphate (MAP) plant at their phosphate processing facility in Fort Meade. The proposed project will result in a significant increase in emissions of particulate matter (PM-PM10). The project is, therefore, subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). The BACT determination is part of the review required by Rules 62-212.400 and 62-296.403(1)(i), F.A.C.

Date of Receipt of Complete Application: April 4, 1995

BACT Determination Proposed by Applicant:

Emission Limits: Tower & Cooler - 0.0417 lb F/ton P₂O₅ input
- 0.40 lb PM-PM10/ton MAP
Product Loadout - 0.072 lb PM-PM10/ton MAP

Control Technology: - Medium-energy venturi scrubber using recycled slurry (for tower and cooler)
- Baghouse (for product loadout)

BACT Determination Procedure:

In accordance with F.A.C. Chapter 62-212, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, Rule 62-212.410(1), F.A.C., states that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.

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US Agri-Chemicals Corp.
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- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

Original BACT Determined by DEP:

Emission Limits: Tower and Cooler - Fluoride and PM/PM10 limits to be established after performance test
Product Loadout - No visible emissions

Control Technology:

Options for Tower & Cooler:

- Medium-energy venturi primary scrubber with packed secondary scrubber using recirculated gypsum/cooling pond water (minimum 99.3% removal of total gaseous fluorides and 99.0% removal by weight of PM/PM10 over 5 microns)
- Medium-to-high-energy venturi scrubber using neutralized water from dedicated scrubber pond with fresh water makeup (minimum 99.3% removal of total gaseous fluorides and 99.0% removal by weight of PM/PM10 over 5 microns)
- Other system with equivalent removal efficiencies approved by the Department

Product Loadout: Baghouse as proposed

Original BACT Determination Rationale:

The applicant based their proposed fluoride BACT emission limit of 0.0417 lb F per ton P2O5 on the Department's 1994 BACT determination for IMC-Agrico's granular Diammonium Phosphate plant in Polk County (PSD-FL-204). However, due to the substantial differences in air flow and other process variables that exist between the granulation and prill tower processes, the Department cannot rely on the granulation emissions to accurately predict emissions from the prill process.

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US Agri-Chemicals Corp.
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neutralized scrubbing water and a dedicated scrubber pond for settling of solids. USAC had accepted the permit and the BACT determination with this condition. Instead, USAC used a high-solids, environmentally inferior, recirculated scrubbing slurry (up to 15% P2O5) for product recovery reasons. This hot slurry (122 F.) will cause a higher fluoride content in the gas compared to pond water.

Due to the limited emission test data available for this type of plant, the Department issued an interim permit to USAC requiring that limits be established following completion of the compliance tests, as long as USAC followed the BACT requirements. USAC accepted the permit and its conditions, then submitted engineering calculations claiming that the venturi with its high-solids scrubbing water will provide gaseous fluoride removal equivalent to that of a packed scrubber system using much cleaner water from the cooling pond.

The Department responded by showing that USAC's scrubber would achieve only about half of the 5.3 transfer units claimed. This analysis was based in part on a technical paper that showed about 3.5 mass transfer units (vs. USAC's 5.3) would be the most that could reasonably be expected for a venturi removing fluorides using neutralized pond water. USAC's design engineers (the Jacobs Engineering Group in Lakeland, Florida) then sent a letter to USAC claiming 6.0 transfer units for their high-solids scrubbing water. This was based on their analysis of data in the above article. These data were obtained using neutralized, clean scrubbing water and not a slurry as the Jacobs design uses. A copy of Jacobs' original submittal, the Department's response, and Jacobs' followup letter is attached to the permit.

The Jacobs calculations are incorrect because of two improper assumptions. The extrapolated curve that Jacobs drew on Figure 5 of the article is not relevant for their unneutralized scrubbing water. Secondly, the data in Figure 5 cannot be infinitely extrapolated at constant L/G because the short contact time in the venturi throat prevents the mass transfer from increasing beyond a certain gas velocity. Attached is an extrapolation performed on Figure 6 which shows the variation of transfer units with the same variables as in Figure 5 but with pressure drop added. As shown, a maximum of 4.0 transfer units is obtained for the conditions specified by Jacobs, again keeping in mind that this is applicable only for neutralized water. The highest actual test result reported was 3.6 NTU with neutralized water, therefore, the Department's 2.7 NTU estimate is reasonable for the high-solids scrubbing slurry Jacobs has proposed.

The limitations on gas/liquid mass transfer in a venturi scrubber result primarily from the short contact time. Since the

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PM/PM10 emission limits were proposed by the applicant based on a 1980 BACT determination for a prilled MAP plant operated by IMC-Agrico. Since that is the only BACT determination available (15 years old) and technological advances have no doubt been made since 1980, the Department prefers not to rely on it for this new source.

This leaves the Department without an adequate basis for arriving at BACT limits for this project prior to construction. In such cases where relevant data are not available on which to base an enforceable BACT emission limit, the Department must require that the level of control and the emission control equipment capabilities be at least equivalent to those imposed in other BACT determinations for the same industry.

Based on a review of state-of-the-art fluoride scrubber capabilities in the phosphate industry, the Department finds that for this application the control equipment should be capable of achieving at least 99.3% removal of gaseous fluorides and 99.0% (wt.) removal of PM/PM10 above 5 microns. The applicant must submit scrubber design calculations and drawings to the Department prior to construction to show that the equipment will meet these removal efficiencies. The BACT emission limits will be established upon completion of the performance tests.

Revised BACT Determined by DEP:

Emission Limits: Tower & Cooler - 0.019 lb F/ton P2O5 input
0.40 lb PM-PM10/ton MAP
15% opacity
Product Loadout - No visible emissions

Control Technology:

Options for Tower & Cooler if Fluoride Limits Not Met:

- Venturi primary scrubber using recirculated slurry followed by secondary scrubber using once-through cooling pond water.
- Venturi scrubber using recirculated neutralized water from dedicated scrubber pond.

Product Loadout: Baghouse as proposed

Revised BACT Determination Rationale

This revised BACT determination was required since USAC did not follow the Department's BACT requirement for the venturi-only option listed in the original determination; namely, the use of

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US Agri-Chemicals Corp.
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time is so short, there is a point beyond which mass transfer will not increase as additional transfer area is created by the smaller liquid drops formed with increased pressure drop.

To further substantiate the Department's analysis, attached is a copy of Dr. Aaron J. Teller's October 4 letter describing what would be required to achieve greater than 3.5 NTU. As he states, a throat velocity of 400 ft/s (122 m/s vs. Jacobs' 74 m/s), L/G of 12 gpm/1000 cfm (1.60 m³/1000 m³ vs. Jacobs' 1.23 m³/1000 m³), and pressure drop of 130 in.wc. (3300 mm wc. vs. Jacobs' 483 mm wc.), would be required to achieve 4.2-5.2 NTU. The energy consumption required would be about 6-7 times higher than the Jacobs design calls for.

Conclusion:

As a result of the change in the basis for the emission limits, the fluoride BACT applicability comes under Rule 62-296.403(1)(i), F.A.C., instead of Rule 62-212.400, F.A.C. The Department believes that it will ultimately be necessary for the permittee to implement the technology specified by the Department to meet the BACT fluoride limit. If the permittee is unable to comply with the limit using the Jacobs scrubber design, the permittee will need to install the technology described by the Department or otherwise achieve the specified limit. The permittee will have one year to demonstrate compliance with the limit.

BACT Analysis Details Available From:

John Reynolds, Permit Engineer
New Source Review Section
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road (MS 5505)
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

C. H. Fancy, P.E., Chief
Bureau of Air Regulation

Howard L. Rhodes, Director
Division of Air Resources Management

_____, 1997
Date

_____, 1997
Date

DR. AARON J. TELLER
47 ST. JAMES DRIVE
PALM BEACH GARDENS, FL 33418

4 Oct 1996

Mr. John Reynolds
Dept of Environmental Protection
Twin Towers Office Bldg
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

RECEIVED

OCT 11 1996

BUREAU OF
AIR REGULATION

Dr. Mr. Reynolds,

It was indicated that a claim for achievement of 5.3 Transfer units was made for a fluoride scrubbing process using a venturi.

It should be noted that the venturi is inherently a particulate collection device and is used only as a scrubber of last resort. The reason is that the mass transfer is limited because of minimal surface renewal. The deficiency can be overcome by decreasing the particle size of the spray and increasing the U/G , provided cost of operation is not restrictive.

Inasmuch as a venturi is generally followed by a cyclone separator, an additional transfer unit can be attained due to wetted wall action.

A comparison of performance of venturi-cyclone systems is attached (Table I). As noted, the rational range of operation will provide in the region of 3.5 transfer units. The 5 transfer unit range can be achieved if the client will accept an energy consumption of 370 HP/10000 CFM.

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AJT

TABLE I
 VENTURI - CYCLONE SEPARATOR
 PERFORMANCE

SYSTEM	THROAT VEL, FPS	L/G GAL/1000CFM	AP IN W.G.	HP - GAS + LIQ / 1000CFM	NTU Transfer UNITS
VENTURI - CYCLONE	140	12	16	45	2.2 - 2.6
VENTURI - CYCLONE	250	12	50	150	3.2 - 4.0
VENTURI - CYCLONE	400	12	130	370	4.2 - 5.2

Acct. No. _____
 Date _____
 Cmp'd. By _____
 Date _____
 Ckd. By _____

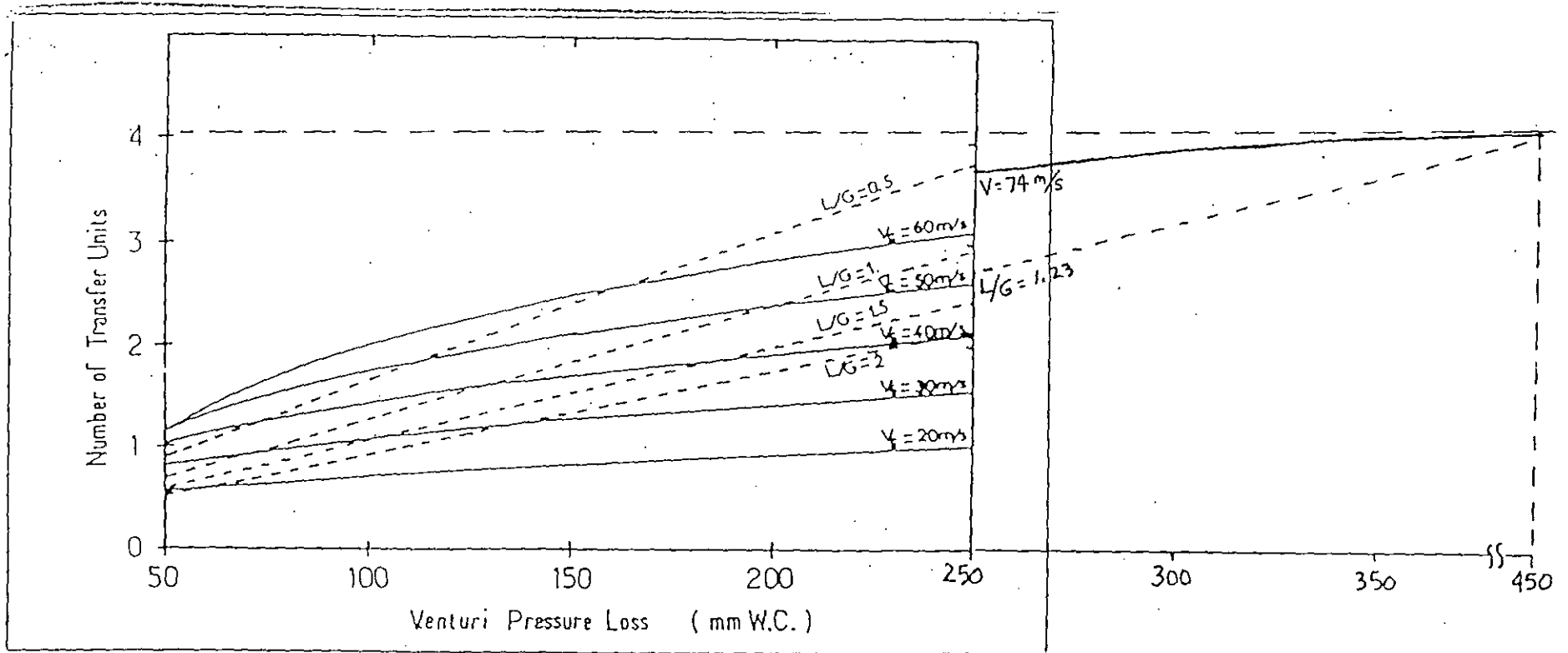


Figure 6. NTU vs. pressure loss. L/G and V_c are taken as parameters. $T_{ce} = 60^\circ\text{C}$ and $L_v/D_c = 9.5$.

MEMORANDUM

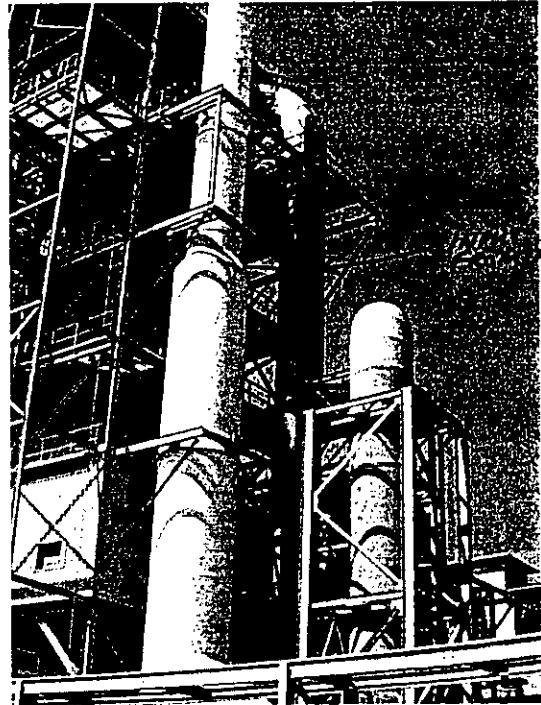
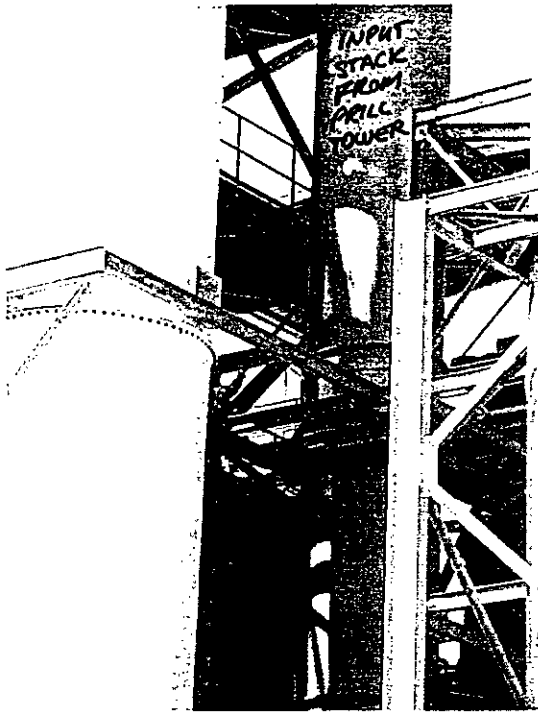
TO: John Reynolds
FROM: Bill Proses *W*
DATE: April 28, 1997
SUBJECT: USAC MAP Plant

Bob Soich and I visited USAC on Friday, April 28, 1997, to look at the new MAP Plant. We looked at the two scrubber inlet ducts.

The larger inlet duct comes from the prill tower and runs vertically for at least eight duct diameters. Setting up a station for stack testing on that inlet should be similar to setting up the station that already exists on the outlet duct.

The smaller inlet duct comes from the cooler cyclones and is approximately five duct diameters long. The five duct diameter run is from a height four or five stories down to a height of two stories. The duct runs at approximately 45 degrees to the horizontal. Setting up a station for stack testing for this duct is possible, but will be complicated and expensive due to the location and awkward geometry involved.

All size estimates are based on looking at the ducts and measuring diameters and length from pictures taken of the ducts. We do not have diagrams of the plant that show the actual dimensions. USAC was unable to provide us diagrams and has promised to provide the actual dimensions as soon as they locate them.





KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

KA 173-94-04

March 10, 1997

RECEIVED
MAR 12 1997
BUREAU OF
AIR REGULATION

VIA FAX AND MAIL

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Motion for Extension of Time to
File an Appeal
U.S. Agri-Chemicals Corporation
Polk County, Florida

Dear Mr. Congden:

Attached is a request for an extension of time to file an Appeal in accordance with Rule 62-103.070, FAC.

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:wa
Enc.

c: Mr. Clair Fancy, FDEP, Tallahassee
✓ Mr. A. A. Linero, FDEP, Tallahassee
Mr. Steven Susick, USAC
Mr. Ron Brunk, USAC
Mr. Viet Ta, USAC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Air Permit for

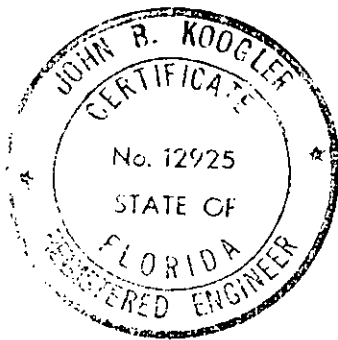
U.S. Agri-Chemicals Corporation
3225 S.R. 630, West
Ft. Meade, Florida 33841-9799

FDEP File No. AC53-260190 (PSD-FL-222)
Polk County - AP

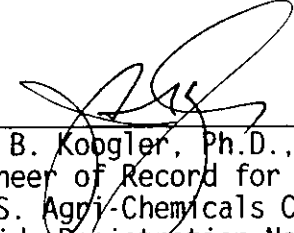
MOTION FOR EXTENSION OF TIME

The Applicant, U.S. Agri-Chemicals Corporation by and through its undersigned Engineer of Record and pursuant to Rule 62-103.070, FAC, requests the Secretary of FDEP to grant a 90-day extension of time in which to file an Appeal. The additional time will allow U.S. Agri-Chemicals adequate time to review the permit and to request minor modifications, if necessary.

Dated the 10th day of March 1997 in Gainesville, Alachua County, Florida.



Koogler & Associates
Environmental Services

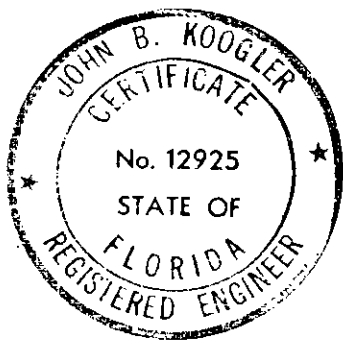


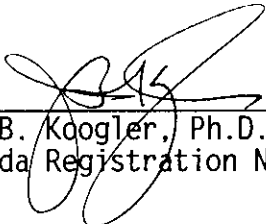
John B. Koogler, Ph.D., P.E.
Engineer of Record for
U.S. Agri-Chemicals Corporation
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822



CERTIFICATE OF SERVICE

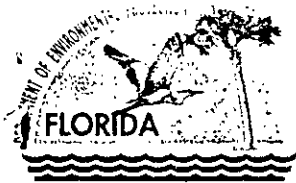
I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, Office of the General Counsel, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Mr. Clair Fancy and Mr. A. A. Linero, FDEP, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Steven Susick, Mr. Ron Brunk and Mr. Viet Ta, U.S. Agri-Chemicals, 3225 S.R. 630 West, Ft. Meade, Florida 33841-9799 by FAX and by U.S. Mail, this 10th day of March 1997.





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





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 5, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Steven J. Susick
General Manager
U.S. Agri-Chemicals, Inc.
3225 State Road 630 West
Fort Meade, Florida 33841-9799

Re: Draft Amended Air Construction Permit No. AC53-260190 (PSD-FL-222)
Final BACT Determination for Ft. Meade Prilled MAP Plant/Proof of Publication

Dear Mr. Susick:

Enclosed is a copy of the Proof of Publication of the Public Notice of Intent to Issue Permit. The public comment period will end on March 26, 1997.

We will address all comments received by that date in our Final Determination, including those already submitted by Mr. John Koogler on behalf of U.S. Agri-Chemicals, Inc.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/kt

cc: J. Koogler, P.E.
B. Beals, EPA
J. Bunyak, NPS
R. Harwood, Polk Co.
B. Thomas, SWD

P 265 659 180

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to	
Steven Susick	
Street & Number	
US Agri Chemicals	
Post Office, State, ZIP Code	
Fort Meade, RI	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	3-5-97
AC 53-260190	
PSD-FI-222	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Steven G. Susick, Agr. Mgr.
 US Agri Chemicals
 3225 State Rd 630W
 Fort Meade, RI
 33841-9799

4a. Article Number
P 265 659 180

4b. Service Type

<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Certified
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured
<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> COD

7. Date of Delivery
3-10-97

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X *[Signature]*

PS Form 3871, December 1994

Thank you for using Return Receipt Service.

Receipt

The Ledger

RECEIVED

MAR 5 1997

BUREAU OF
AIR REGULATION

401 South Missouri Avenue (33801)
P.O. Box 408
Lakeland, FL 33802

941-687-7000

Lakeland, Florida **FAX NO. (941) 687-7090**

Please deliver the following pages to:

Name: KIM TOBER

Telecopier No: 1-904-922-6979

Company/Firm: FLORIDA DEPT OF ENVIRONMENTAL PROTECTION

From: DON JENKINS 941-687-7921 Extension: _____

We are transmitting a total of 3 pages including this cover letter.

Date: 3-4-97

Time: 3:36

Notes: _____

THE LEDGER

Lakeland, Polk County, Florida

Case No

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Nelson Kirkland, who on oath says that he is Classified Advertising Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Public Notice Of Intent

in the matter of

Draft Permit No.: AC53-260190 (PSD-FL-222)

in the

Court, was published in said newspaper in the issues of

February 24;

1997.

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, 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 the said newspaper.

Signed 
Nelson Kirkland
Classified Advertising Manager

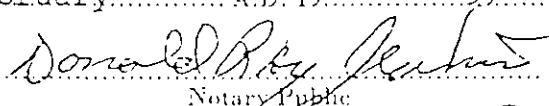
By Nelson Kirkland who is personally known to me

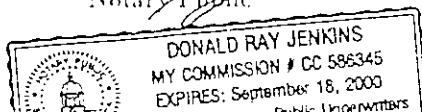
24th

Sworn to and subscribed before me this

day of February A.D. 19..... 97.....

(Seal)


Notary Public



PUBLIC NOTICE OF INTENT TO ISSUE AMENDED AIR QUALITY CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT Permit No.: AC53-260190 (PSD-FL-222)
US Agr. Chemicals, Inc.
Polk County, Florida

The Department of Environmental Protection (Department) gives notice of its intent to issue an amended air construction permit to US Agr. Chemicals, Inc. for a drilled MAP plant located at 3225 State Road 430 West, Fort Meade, Polk County. A Best Achievable Control Technology (BACT) determination was required. The applicant's name and address are: US Agr. Chemicals, Inc., 3225 State Road 430 West, Fort Meade, Florida 33841.

This company applied on April 4, 1995, to construct a drilled MAP plant at its existing facility. The original construction permit was issued on September 29, 1995. Particulate and fluoride emissions from the pill tower and cooler are controlled by a scrubber while the product loadout area is controlled by a baghouse. This amendment was necessitated by a change in the bag for setting final emission limits. The final emission limit for fluoride is more stringent than that contemplated in the original permit while there is no change in the particulate matter emissions originally contemplated.

The Department will issue the FINAL Permit in accordance with the proposed amended conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Amended Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments and requests for public meetings should be provided to the Department, Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #55051, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Amended Permit, the Department shall issue a Revised DRAFT Amended Permit and require, if applicable, another Public Notice.

The Department will issue the FINAL Permit with the proposed amended conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000; Telephone: 904/488-9370; fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 26-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioners, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation, and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in section 120.573, F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.573 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

A complete project file 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:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the Draft Amended Permit, the revised BACT Determination, the original permit, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

PUBLIC NOTICE OF INTENT TO ISSUE AMENDED AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit No.: AC53-260190 (PSD-R-272)
US Agr-Chemicals, Inc.,
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an amended air construction permit to US Agr-Chemicals, Inc. for a prefed MAP plant located at 3226 State Road 630 West, Fort Meade, Polk County. A Best Achievable Control Technology (BACT) determination was required. The applicant's name and address are: US Agr-Chemicals, Inc., 3226 State Road 630 West, Fort Meade, Florida 33841.

This company applied on April 4, 1995, to construct a prefed MAP plant at its existing facility. The original construction permit was issued on September 29, 1995. Particulate and fluoride emissions from the drill tower and cooler are controlled by a scrubber, while the product loadout area is controlled by a baghouse. This amendment was necessitated by a change in the basis for setting final emission limits. The final emission limit for gaseous fluoride is more stringent than that contemplated in the original permit, while there is no change in the particulate matter emissions originally contemplated.

The Department will issue the FINAL Permit, in accordance with the proposed amended conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Amended Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments and request for public meetings should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5500, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the DRAFT Amended Permit, the Department shall issue a Revised DRAFT Amended Permit and require, if applicable, another Public Notice.

The Department will issue the FINAL Permit with the proposed amended conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3000 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9370, fax: 904/487-4098. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-6.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner; the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position

notification of the proposed action, and (b) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in his notice of intent.

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

A person whose substantial interests are affected by the Department's proposed permitting decision may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3000 Commonwealth Boulevard, Mail Station 436, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signature of all parties or their authorized representatives.

As provided in section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such mediated final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

A complete project file 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:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the Draft Amended Permit, the revised BACT Determination, the original permit, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

NOIA

Florida Department of
Environmental Protection

Memorandum

TO: Legal Advertising
Attention Mr. Jenkins

FROM: Al Linero, P.E., Administrator
Division of Air Resources
Department of Environmental Regulation


2/20

DATE: February 20, 1997

SUBJ: Public Notice for U.S. Agri-Chemicals, Inc.

Please publish the following public notice in The Ledger on Monday, February 24, 1997. (one day only)

Also, Kim Tober needs a total cost of publication so she can complete the purchase order for the publication. Her number is (904)488-1344. If she is not there, please leave a message with the total amount.

Please mail the affidavit/invoice to:

Sharolyn Wood
Department of Environmental Protection
Division of Air Resources Management - MS 5500
2600 Blair Stone Road, Twin Towers
Tallahassee, Fl 32399-2400

Thank You.

/kt

Date: 2/19/97 11:24:48 AM
From: Alvaro Linero TAL
Subject: U.S. Agrichem - MAP Plant Public Notice
To: Kim Tober TAL
CC: John Reynolds TAL
CC: Clair Fancy TAL

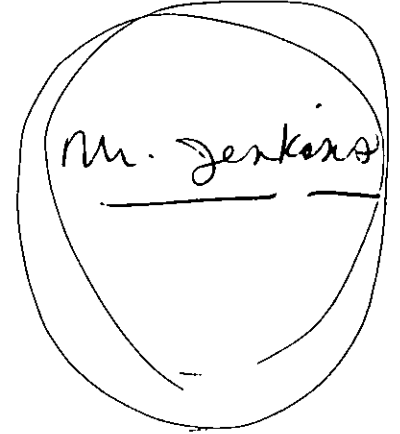
Fed ID

59-138-1032

Kim. Please look through files for recent permits issued in Polk County. Find a newspaper of general circulation.

Get the Public Notice published that we issued to U.S. Agrichem sometime in in late December/early January.

Unless you already know what to do, please consult with Sharolyn and/or Jeanne Carver as to the process for authorizing payment, providing the PN to the newspaper, etc. Thanks.



Senders as
an affidavit
Att: Sharolyn Wood
2600 Blair Stone Road
Tallahassee, FL 32309-2100
MS 5:500

cover letter authorizing
how many days
what dates
cost \$

2 1/2 pages

941
FAX - 687 7976

Bill to DEP

he will send back an ad

The

earliest - Monday 24th

ledger address :
PO Box 408
Lake land, FL 33802

attent
Legal ad

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

PURCHASE ORDER REQUISITION

PAGE 1 OF 1

(THIS IS NOT A PURCHASE ORDER)

REF. NO. DARM 97-318

VENDOR NAME: <u>The Ledger - US Agri Chem</u>		FEID/SSN: <u>59-138-1032</u>	
ADDRESS: <u>P.O. Box 408 AC 53-260190 - PSD-FI-222 (ge)</u>			
CITY: <u>Lakeland</u>		STATE: <u>FL</u>	ZIP: <u>33802</u>
PHONE: <u>941-687-7820</u>			
SHIP: <u>DEP</u>		INVOICE:	
ATTN: <u>Sharolyn Wood</u>		CODE: <u>176</u>	
PHONE: <u>941-488-0114</u>		SC: <u>278-0114</u>	
<u>111 S Magdalena Drive</u>		M/S: <u>PO# 53700 731879</u>	
ROOM: <u>241</u>		ROOM:	
CITY: <u>Tallahassee</u>		STATE: <u>FL</u>	ZIP: <u>32301</u>
CITY: STATE: ZIP:			

PURCHASING USE ONLY	P/C:	MESSAGES:	B/C
---------------------	------	-----------	-----

QUANTITY	UNIT	CLASS / GROUP	DESCRIPTION / DEP PROPERTY # FOR EACH ITEM	UNIT COST	TOTAL
1		973040	Legal notice to run on February 24, 1997		567.85
<p>Need P.O. # today.</p> <p>* Please call with P.O. # so ad can be ran on 2-24-97.</p> <p>Thanks</p>					
GRAND TOTAL \$					567.85

DELIVERY: _____ DAYS ARO OR WPU	F. O. B. : DEST / SP / VENDOR	DEP / DMS CONTRACT NO. :
---------------------------------	-------------------------------	--------------------------

FOR FCO USE ONLY	PROJECT NO. :	CATEGORY NO. :	/9 _____	FUND NO. :
------------------	---------------	----------------	----------	------------

JUSTIFICATION:					FISCAL YEAR FOR ENCUMBRANCE: <u>96-197</u>	
					APPROVALS	
					REQUESTOR:	DATE
					COST CENTER:	2/19
					SECTION:	2/19
					BUREAU:	2/19
					DIV. / SEC. :	2/19
					PURCHASING:	

LINE	ORGANIZATION CODE	EO	OBJECT	AMOUNT
0001	37 55 02 24 000 31		133100	567.85
0002	37			

LINE	FUND	CATEGORY	MODULE	GRANT NO.
0001	1135001	040000	3557	
0002				

1. Page 2 of 2. Attach second page of requisition if purchasing more commodities than can be entered on the original requisition.
2. **REFERENCE NUMBER:** Enter requisition number.
3. **VENDOR INFORMATION:** Enter vendor name, FEID/SSN number, street address and P.O. Box No. (if both available), city, state, zip code, phone number and contact person (if available).
4. **SHIP:** Enter division, bureau (use mail station number and room number for areas within Tallahassee), district, region, park or section name where commodities are to be shipped. Use a specific street address or delivery location. Include the ship to code and name of a contact person. Enter both the regular telephone number and suncom number (if suncom is applicable).
5. **INVOICE:** Use this space only if invoice is being sent to an address different than that of the shipping address.
6. **QUANTITY:** Number of items to be purchased.
7. **UNIT:** Enter "each", "lot", "box", "gallon", "job", "pack", "case" or any other descriptive term applicable.
8. **DMS CLASS/GROUP CODE OR FULL COMMODITY NUMBER FOR EACH ITEM:**
EXAMPLE-Class Code: 595-580 Plants, Bedding (Landscaping) or 991-820 Trash, Garbage and Paper Removal Services.
EXAMPLE-COMMODITY NUMBER (STATE CONTRACT): 618-720-200-0200 Pens, Highlighters or 618-720-260-0100 Pens, Highlighters Dry Fluorescent.
9. **DESCRIPTION FOR EACH ITEM:** DEP Property Number (if applicable), Page Number of State Contract (if applicable), Brand Name, Model Number, Color (if applicable), Dimensions (if applicable), period of service (if applicable), payment terms (if applicable), hourly rate (if applicable), Account Number (if applicable).
10. **UNIT COST:** Enter the per unit cost.
11. **TOTAL:** Enter extended cost of each item.
12. **GRAND TOTAL:** Enter total cost of all requisitioned items.
13. **DELIVERY:** Enter the agreed upon number of days established with the vendor in calendar days. NOTE: DO NOT USE "ASAP". Or circle "WPU" which means "Will Pick Up".
14. **F.O.B. (Freight on Board): DEST/SP/VENDOR** Circle the appropriate terminology to identify who is responsible for paying shipping charges.
DESTINATION (DEST) - The items are delivered to the "Ship Materials To" address, include shipping charges. Note: It is always the best policy for the DEP requisitioner to obtain prices which include the shipping charges (F.O.B. Destination).
SHIPPING POINT (SP) - Vendor adds shipping charges separately to the cost of the item.
VENDOR - Requisitioner picks up the item at the vendor's location and there are no shipping charges.
15. **DMS CONTRACT NO.:** Enter the current D.M.S. state contract number (if applicable).
16. **FOR FCO USE ONLY:** Enter Fixed Capital Outlay Project number (if applicable), category number with year end indicator and fund number.
17. **PURPOSE OR NEED:** Describe in detail why the commodities or contractual services requested are needed and/or benefit to the State.
18. **FISCAL YEAR FOR ENCUMBRANCE:** Enter the fiscal year from which the purchase is to be made (Example: 92/93 or 93/94).
19. **REQUESTOR / DATE:** Signature of person making request and date of signature.
20. **COST CENTER / DATE:** Signature of cost center administrator and date of signature.
21. **SECTION / DATE:** Signature of department personnel having authority to authorize the procurement of commodities or contractual services and date of signature.
22. **BUREAU / DATE:** Signature of bureau chief, if required by their respective Division, and date of signature.
23. **DIVISION / SECRETARY / DATE:** Signature of division director, if required, and date of signature; or signature of Agency Secretary/Deputy Secretary, if required, and date of signature.
24. **PURCHASING** For Purchasing Section use only.
25. **ORGANIZATIONAL CODE** (EXAMPLE: 3705-9999-999)
26. **EXPANSION OPTION** (EXAMPLE: 06 or A6)
27. **OBJECT CODE** (EXAMPLE: 240010) **MUST USE ALL SIX DIGITS.**
28. **AMOUNT OF PURCHASE ORDER.**
29. **FUND** (EXAMPLE: 675002, 510013)
30. **CATEGORY** (EXAMPLE: 04, 06, 03)
31. **MODULE** (EXAMPLE: 9414, 9434, 1304, 0160)
32. **GRANT NO.** (EXAMPLE: AIR 10694, HWO 94)



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 173-94-04

February 7, 1997

RECEIVED
FEB 10 1997
BUREAU OF
AIR REGULATION

Mr. Clair Fancy
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: U.S. Agri-Chemicals, Inc.
Polk County, Florida
Air Construction Permit AC53-260190
(PSD-FL-222)

Dear Mr. Fancy:

U.S. Agri-Chemicals, Inc. (USAC) has reviewed the draft of amended construction permit AC53-260190 (PSD-FL-222) dated December 23, 1996. After a thorough review of the draft permit and my telephone conversations in December 1996 with Al Linero regarding the permit, USAC offers the following comments on the draft permit and the attached documents.

First, however, a general statement is in order to put several of our comments in perspective. As you will recall, the original construction permit was issued to USAC on September 29, 1995, setting forth technology based Best Available Control Technology (BACT) for fluoride emissions from a prilled MAP plant. The technology based BACT was determined by the Department with no consideration given to cost. The original permit further required Department approval of the control technology selected by USAC.

The control technology selected by the USAC design engineer did not meet Department approval and very divided professional opinions developed. The USAC design engineer claimed, based on reputable references and design experience, that the proposed control technology was comparable to the technology based BACT established by the Department taking into consideration all factors required in a BACT determination. The Department's review engineer, citing comparable references, stated the control technology selected by USAC was not equivalent to the technology based BACT established by the Department.

At this point in time, there is a strong professional disagreement regarding the control technology that represents BACT with no evidence to demonstrate which opinion is correct or most nearly correct. To maintain

Mr. Clair Fancy
Florida Department of
Environmental Protection

February 7, 1997
Page 2

the professional integrity of the Department, it is my professional opinion that the referenced permit and the associated documents should be written in a manner that recognizes a difference of professional opinion without taking the judgmental position that one opinion is correct and the other is not.

With this as a basis, we offer the following comments on the draft permit and the associated documents:

INTENT TO ISSUE AMENDED AIR CONSTRUCTION PERMIT

Page 1, paragraph 2.

It should be noted that USAC originally applied for the referenced air construction permit on October 28, 1994. The application was deemed complete on April 4, 1995.

It is suggested that the last sentence in this paragraph be reworded as follows:

However, because the applicant and the Department cannot agree that the control technology proposed by USAC complied with the Department's technology based BACT determination, the Department is issuing a revised BACT determination and this amended air construction permit with final emission limits.

The rationale for this change is addressed in the introductory paragraphs of this letter.

Page 1, paragraph 5.

This paragraph requires the publication of a Public Notice of the Intent to Issue an Amended Air Construction Permit and cites the requirement of Chapter 403.815 F.S. and Rule 62-103.150, F.A.C. It is our interpretation of Rule 62-103.150, F.A.C. that a Public Notice is not required. Rule 62-103.150(2)(a)1, F.A.C. states,

The Department shall require publication of notice of the Department's proposed action on an application in the following circumstances:

All applicants for construction permits for ... air pollution sources shall publish ... a Notice of Intent to Issue a Permit.



Rule 62-103.150(2)(a)5, F.A.C. further states:

After publication of a Notice of Intent to Issue ... the application shall publish an additional notice if the subject activity or project is substantially modified by the applicant and the Department proposes to issue the permit with the modification. ... For purposes of this subparagraph, the term "substantial modification" means a major relocation or modification of the activity or project that is reasonably expected to cause new or greater adverse environmental impacts on the substantial interests of a person other than the applicant. [Emphasis added]

In the case of the referenced project, no relocation is involved and the only change between this draft permit and the original permit issued on September 29, 1995, is the establishment of numeric fluoride emission limits that are more stringent than limits anticipated at the time the original construction permit was issued.

Based on these facts, it is our interpretation of the referenced rules that no Public Notice should be required for this amended construction permit.

PUBLIC NOTICE OF INTENT TO ISSUE

As stated in our previous comment, it is our interpretation that a Public Notice is not required for the amended air construction permit.

Page 1, paragraph 2.

Again, it should be noted that USAC applied for the permit on October 28, 1994. The permit application was determined to be complete on April 4, 1995.

DRAFT AIR CONSTRUCTION PERMIT

Page 5 of 7, Specific Condition 4

It is suggested that this specific condition be reworded:

The opacity of emissions from the prilled MAP plant loadout baghouse shall not exceed five percent. [Rule _____, F.A.C.]



Rationale:

Although particulate matter would be the cause of any opacity of emissions, it is the opacity and not the PM/PM10 that is being limited by this condition.

The rule that was cited, 62-296.403, F.A.C., addresses only fluoride emissions. It would be more appropriate to cite a rule related to PM/PM10 and/or visible emissions. The cite could be to Rule 62-297.620(4), F.A.C. which allows alternative test procedures or to one of the general BACT rules (such as Rule 62-296.330, F.A.C. before its repeal).

Page 5 of 7, Specific Condition 5

It is suggested that this condition be reworded as follows:

Emissions from the prill tower scrubber stack shall not exceed the following limits: [Rule 62-296.403 and _____, F.A.C.]

PM/PM10:	24.00 lb/hr and 105.12 tons/yr
Total Fluorides:	0.58 lb/hr and 2.54 tons/yr
Visible Emissions:	<u>20%</u> opacity

The permittee shall have one year from the time of plant startup to demonstrate compliance with these limits.

Rationale:

The rule citation should be expanded to include particulate matter and visible emissions. See comments on Specific Condition 4.

It is requested that the opacity of emissions from the prill tower scrubber stack be limited to 20 percent. The BACT determination accompanying the original permit issued on September 29, 1995, contained no opacity limit for the prill tower. The 15 percent opacity limit appeared for the first time in the draft BACT determination accompanying this draft permit without discussion. Considering the particulate matter emission limit of 24.00 pounds per hour and the opacity of emissions typically allowed for sources with particulate matter emissions in this range, USAC requests an opacity limit of 20 percent for the prill tower scrubber stack.

The time period of one year to comply with the emission limits established by this specific condition is consistent with the proposed BACT



determination. It is suggested that this condition be placed in the permit for purposes of clarity.

Page 5 of 7, Specific Condition 6

This condition, in part, requires simultaneous testing of fluoride levels at the inlet and outlet of the prill tower scrubber. There is no basis for this requirement as the draft permit establishes only an emission limit for fluoride and PM/PM10 from the stack following the scrubber. Nowhere in the permit is a scrubber efficiency specified nor are there any other requirements that would require measuring the fluoride (or PM/PM10) levels at the inlet of the prill tower scrubber. USAC therefore requests that the requirement for scrubber inlet testing be removed from Specific Condition 6.

Specific Condition 6 also implies that PM/PM10 emission measurements by EPA Method 5 are required for the product loadout baghouse. As there is no mass PM/PM10 emission limit established for the product loadout baghouse, the compliance testing requirements should be clarified to specify only visible emissions testing in accordance with EPA Method 9.

In view of these comments, it is suggested that Specific Condition 6 be reworded as follows:

The initial performance test for total fluorides and annual compliance testing thereafter shall be conducted on the stack of the prill tower scrubber. The initial performance test shall be conducted with the Department option of on-site monitoring by Department staff. PM/PM10 tests and visible emission observations shall be conducted on the prill tower scrubber stack and visible emissions observations shall be conducted on the product loadout baghouse stack

Page 6 of 7, Specific Condition 8

The second sentence of this condition should be expanded to include visible emissions observations as well as the PM/PM10 tests.

BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION

Page 1, BACT Determination Proposed by Applicant

The fluoride emission limit from the prill tower of 0.0417 pounds per ton of P₂O₅ was not proposed by USAC. USAC proposed a limit 0.046 pounds of



Mr. Clair Fancy
Florida Department of
Environmental Protection

February 7, 1997
Page 6

fluoride per ton of P_2O_5 input. The limit of 0.0417 pounds per ton was first put forth in a Department letter to USAC dated November 23, 1994.

Regarding the proposed control technology, USAC did not propose a scrubber using recycled slurry. The slurry terminology originated with the Department following the submittal of a Jacobs Engineering document dated September 26, 1996.

Page 3, Revised BACT Determined by DEP

As stated previously, the opacity limit of 15 percent for the prill tower is not consistent with a particulate matter emission rate of 24.0 pounds per hour considering opacity limits established for similar sources with particulate matter emission rates of the same order of magnitude. USAC requests an opacity limit of 20 percent for the prill tower scrubber stack.

The Control Technology section is not necessary. It is recognized that BACT can be emission limiting or technology based. In this particular case, the Department has established a numeric emission limit for fluoride emissions and is further mandating a technology based standard if this limit cannot be met. Both are not necessary. The control technology used by USAC in achieving the numeric BACT limit is the choice of USAC; not of the Department. By specifying control technology in addition to a numeric emission limit, the Department is placing itself in the role of the plant engineer. The Department's role should be to establish an emission limit which it has done.

Page 3, Revised BACT Determination Rationale

In my professional opinion, this section as it is presented is unnecessary. Furthermore, it is judgmental and fails to take into consideration an honest difference of professional opinion. Statements such as:

... USAC did not follow the Department's BACT requirement for the venturi-only option listed in the original determination

and the statement:

USAC's proposal is to use a high-solids environmentally inferior, recirculated scrubbing slurry

imply failure by USAC to comply with conditions in the original permit. USAC's position is that it complied with the third control technology option presented by the Department in the original BACT determination:



namely, the use of "other system of equivalent removal efficiencies" USAC demonstrated equivalent removal efficiencies taking into consideration all factors that must be included in a BACT determination. The fact that there is a honest difference in professional opinion regarding the performance of the system proposed by USAC should not deteriorate into insinuations regarding USAC's compliance with the conditions in the original permit.

The remainder of the rationale presented by the Department rehashes arguments that are already in the record and serves no purpose in the final BACT determination. The rationale is argumentative and presents one side of a technical argument that is totally unnecessary given that the Department has established a numeric emission limit for fluorides. If the BACT determination was a technology based determination (as was the original determination), a technical discussion of control technology might be warranted. In this case, it is not.

Page 5, Conclusion

The Department's opinion of whether or not USAC will be able to achieve the BACT emission limit for fluorides is irrelevant and unnecessary. The statement that "... the permittee will need to install technology described by the Department" should be deleted as previously discussed. The Department has established a numeric BACT emission limit and the technology that USAC uses to meet this limit should be left to the company. The Department should not place itself in the engineering business.

I appreciate your consideration of these comments and would be more than happy to provide additional information should it be required. Please feel free to contact me if you have any questions or comments.

Very truly yours,

KOGLER & ASSOCIATES


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

JBK:wa

c: Mr. A. Linero, FDEP
Mr. S. Susick, USAC
Mr. R. Brunk, USAC
Mr. L. Curtin

cc: J. Reynolds, BAR
B. Thomas, SWD
R. Harwood, Peck Co.
EPA
NPS





KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 173-94-04

January 2, 1997

RECEIVED

JAN 03 1997

BUREAU OF
AIR REGULATION

VIA FAX AND MAIL

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Motion for Extension of Time to
File an Appeal
U.S. Agri-Chemicals Corporation
Polk County, Florida

Dear Mr. Congden:

Attached is a request for an extension of time to file an Appeal in accordance with Rule 62-103.070, FAC.

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:wa
Enc.

c: Mr. Clair Fancy, FDEP, Tallahassee
Mr. A. A. Linero, FDEP, Tallahassee
Mr. Steven Susick, USAC
Mr. Ron Brunk, USAC
Mr. Viet Ta, USAC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Air Permit for

U.S. Agri-Chemicals Corporation
3225 S.R. 630, West
Ft. Meade, Florida 33841-9799

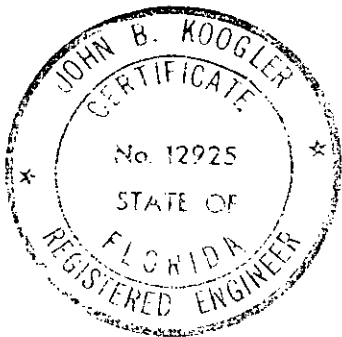
FDEP File No. AC53-260190 (PSD-FL-222)
Polk County - AP

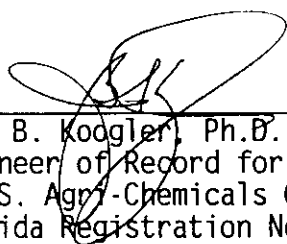
MOTION FOR EXTENSION OF TIME

The Applicant, U.S. Agri-Chemicals Corporation by and through its undersigned Engineer of Record and pursuant to Rule 62-103.070, FAC, requests the Secretary of FDEP to grant a 60-day extension of time in which to file an Appeal. The additional time will allow U.S. Agri-Chemicals adequate time to review the permit and to request minor modifications, if necessary.

Dated the 2nd day of January 1997 in Gainesville, Alachua County, Florida.

Koogler & Associates
Environmental Services



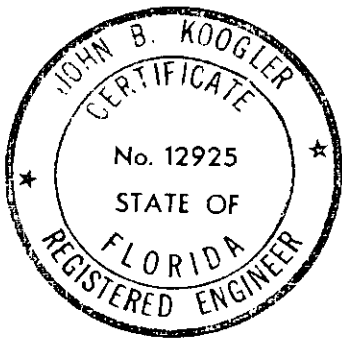


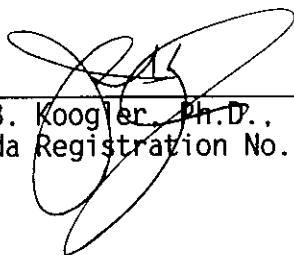
John B. Koogler, Ph.D., P.E.
Engineer of Record for
U.S. Agri-Chemicals Corporation
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, Office of the General Counsel, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Mr. Clair Fancy and Mr. A. A. Linero, FDEP, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Steven Susick, Mr. Ron Brunk and Mr. Viet Ta, U.S. Agri-Chemicals, 3225 S.R. 630 West, Ft. Meade, Florida 33841-9799 by FAX and by U.S. Mail, this 2nd day of January 1997.





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

