

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

FEB 18 2002

BUREAU OF AIR REGULATION

February 15, 2002

Ms. Teresa Heron
FDEP
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: DEP File No. 1050051-015-AC, PSD-FL-321

Dear Ms. Heron;

Enclosed please find the original Affidavit of Publication for the above referenced DEP File. Please note that a copy of the original was faxed to your office on February 15, 2002 by Pradeep Raval of Koogler and Associates.

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

Sincerely,



Ronald L. Brunk, Manager
Environmental Engineering

xc: J. Girardin

cc: C. Halladay
B. Thomas, SWD
Q. Bunnah, NPS
D. Worley, EPA
T. Heron



AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No

STATE OF FLORIDA)
COUNTY OF POLK)

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

Notice of Intent

in the matter of... DEP File No. 1050051-015-AC

in the

Court, was published in said newspaper in the issues of.....

2-8; 2002

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

Ken Holtzinger
Ken Holtzinger
Classified Manager
Who is personally known to me.

Sworn to and subscribed before me this 11TH

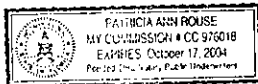
day of FEBRUARY A.D. 20 02

Patricia Ann Rouse
Notary Public

PATRICIA ANN ROUSE

(Seal)

My Commission Expires.....



25740100

G337 US Agri-Chemicals

Attach Notice Here

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1050051-015-AC PSD FL 321
11 Moxie Facility
US Agri-Chemicals Corporation
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to U.S. Agri-Chemicals Corporation to allow an increase in the production rate of the existing Granular MAP/DAP Plant of its phosphate fertilizer manufacturing facility located at 11 Moxie Facility (PM) and particulate matter (PM) determination was required for the plant. The plant is located at 11 Moxie Facility (PM) and particulate matter (PM) determination was required for the plant. The plant is located at 11 Moxie Facility (PM) and particulate matter (PM) determination was required for the plant.

The proposed changes will include burning and piping, as necessary. No major equipment changes are proposed as part of this project to increase the production rate.

The Department proposes the continued use of the existing scrubbing system with limitations of 0.037 lb/day P₂O₅ input and 0.17 lb/day product for the burner and particulate matter, respectively, as BACT for the Granular MAP/DAP Plant.

An air quality impact analysis was conducted. Emissions from the facility will not significantly contribute to any state or federal ambient air quality standards. The maximum predicted PM₁₀ impacts are below de minimis and significant levels, as follows:

Averaging Time	Maximum Impact (µg/m ³)	Significant Impact Level (µg/m ³)	De-minimis Level
24 hour	2.5	5	10
Annual	0.3	1	NA
24 hour	0.07	NA	0.25

PSD Class 1 significant impact levels were not exceeded in the PSD Class 1. The plant is located 110 km to the northwest of Lakeland, Florida. Therefore, a multi-source Class 1 PSD increment analysis for particulate matter was not required. Based on the analysis, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any of PSD increments in the Class 1 area.

The Department will issue the Final Air Construction Permit in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The permitting authority has determined that an Air Construction Permit is required.

The Department will accept written comments and requests for a public meeting concerning the proposed permit action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT". Written comments should be provided to the Department's Bureau of Air Regulation at 2603 Blue Stone Road, Tallahassee, Florida 32309. Tallahassee, Florida 32309-3023. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedure for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permit action may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of 3600 Commonwealth Boulevard, Tallahassee, Florida 32309-3023. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of the notice of intent. Petitions filed by any person other than those listed below must be filed within fourteen days of receipt of the notice of intent. Petitions filed by any person other than those listed below must be filed within fourteen days of receipt of the notice of intent. Petitions filed by any person other than those listed below must be filed within fourteen days of receipt of the notice of intent.

A petition that does not dispute the material facts upon which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; (c) The name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency's determination; (d) A statement of how the petitioner's substantial interests will be affected by the agency's determination; (e) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (f) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (g) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (h) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (i) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (j) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (k) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (l) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (m) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (n) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (o) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (p) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (q) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (r) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (s) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (t) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (u) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (v) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (w) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (x) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (y) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination; (z) A statement of how and why the petitioner's substantial interests will be affected by the agency's determination.

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 the Department on the application has the right to petition to become a party to the proceeding in accordance with the requirements set forth above.

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:

Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 1115 Magnolia Drive Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6275	Dept. of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, Florida 33610-8218 Telephone: 813/744-6100 Fax: 813/744-6068
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The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, inclusive of confidential records under Section 303.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 1115 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

G337-7-8-2002

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to

Mr. Phong T. Vo
 General Manager of Engineering
 & Technical Services
 US Agri-Chemicals
 3225 State Road 630 West
 Ft. Meade, FL 33841-9799

2. Article Number (Copy from service label)
 7000 2870 0000 7028 3154

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature *W. Wash* 1-30
 Agent
 Addressee

D. Is delivery address different from item 1?
 If YES enter delivery address below.

 Yes
 No

3. Service Type

 Certified Mail
 Registered
 Insured Mail
 Express Mail
 Return Receipt for Merchandise
 C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

PS Form 3841, July 1999

Domestic Return Receipt

102545 99 M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 2870 0000 7028 3154

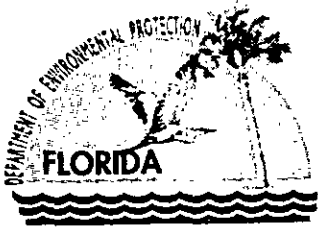
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
 Phong T. Vo
 Street, Apt. No., or PO Box No.
 3225 State Road 630 West
 City, State, ZIP+4
 Ft. Meade, FL 33841-9799

PS Form 3800, May 2000

See Reverse for Instructions



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 25, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Phong T. Vo, General Manager of
Engineering and Technical Services
US Agri-Chemicals
3225 State Road 630 West
Ft. Meade, Florida 33841-9799

Re: DRAFT Permit No. 1050051-015-AC (PSD-FL-321)
Granular MAP/DAP Production Increase
Ft. Meade Chemical Plant


Dear Mr. Vo:

Enclosed is one copy of the Draft Air Construction Permit for modification of the Ft. Meade Chemical Plant, located at 3225 State Road 630 West, Ft. Meade, Polk County. The Technical Evaluation and Preliminary Determination, Best Available Control Technology, the Department's Intent to Issue Air Construction Permit and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" are also included.

The "PUBLIC NOTICE" must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Syed Arif, P.E., at 850/921-9528 or Mr. Linero at 850/921-9523.

Sincerely,



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

CHF/sa

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

Mr. Phong T. Vo, G.M. of Engineering & Technical Services
US Agri-Chemicals
3225 State Road 630 West
Ft. Meade, Florida 33841-9799

DEP File No. 1050051-015-AC
Draft Permit No. PSD-FL-321
Ft. Meade Chemical Plant
Polk County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, US Agri-Chemicals, submitted a complete application on November 15, 2001 to the Department for an air construction permit to increase the production rate of the granular MAP/DAP plant at its phosphate fertilizer manufacturing facility located in Ft. Meade. The plant is located at 3225 State Road 630 West, Ft. Meade, Polk County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that a review for the Prevention of Significant Deterioration (PSD), a determination of Best Available Control Technology (BACT) and an air construction permit are required for the proposed work.

The Department intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT." The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the Final Air Construction Permit in accordance with the conditions of the attached Draft Air Construction permit 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 and requests for a public meeting concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 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 Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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

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

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

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.


The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would

justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.


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

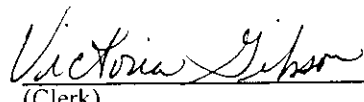
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE, Technical Evaluation and Preliminary Determination, Draft BACT Determination, and the DRAFT permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/28/02 to the person(s) listed:

Phong T. Vo, US Agri-Chemicals*
Gregg Worley, EPA
John Bunyak, NPS
Bill Thomas, DEP-SWD
John Koogler, Ph.D., P.E., Koogler & Associates

Clerk Stamp

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


(Clerk) January 28, 2002
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1050051-015-AC, PSD-FL-321
Ft. Meade Facility
U.S. Agri-Chemicals Corporation
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to U.S. Agri-Chemicals Corporation to allow an increase in the production rate of the existing Granular MAP/DAP Plant at its phosphate fertilizer manufacturing facility located in Ft. Meade, Florida. A Best Available Control Technology (BACT) determination was required for fluorides (F), particulate matter (PM) and particulate matter less than or equal to 10 micrometers (PM₁₀) pursuant to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD). The applicant's name and address (also facility address) are U.S. Agri-Chemicals Corporation, 3225 State Road 630 West, Ft. Meade, Florida 33841.

The proposed changes will include pumps and piping, as necessary. No major equipment changes are proposed as part of this project to increase the production rate.

The Department proposes the continued use of the existing scrubbing system with limitations of 0.037 lb/ton P₂O₅ input and 0.17 lb/ton product for fluorides and particulate matter, respectively, as BACT for the Granular MAP/DAP Plant.

An air quality impact analysis was conducted. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The maximum predicted F impacts are below de-minimis levels. The maximum predicted PM₁₀ impacts are below de-minimis and significant levels, as follows:

Averaging Time	Maximum Impact ($\mu\text{g}/\text{m}^3$)	Significant Impact Level ($\mu\text{g}/\text{m}^3$)	De-minimis Level ($\mu\text{g}/\text{m}^3$)
PM₁₀			
24-hour	2.5	5	10
Annual	0.3	1	NA
F			
24-hour	0.07	NA	0.25

PSD Class I significant impact levels were not exceeded in the PSD Class I Chassahowitzka National Wilderness Area located 110 km to the northwest, therefore a multi-source Class I PSD increment analysis for particulate matter was not required. Based on the analyses, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any or PSD increment in the Class I area.

The Department will issue the Final Air Construction Permit in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The permitting authority has determined that an Air Construction Permit is required.

The Department will accept written comments and requests for a public meeting concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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

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

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

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

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:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

U.S.AGRI-CHEMICALS CORPORATION

Granular Monoammonium and Diammonium Plant
Fertilizer Loadout
Ft. Meade, Polk County

DEP File No. 1050051-015-AC
PSD-FL-321

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

January 25, 2002

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. APPLICATION INFORMATION

- 1.1 Applicant Name and Address
U.S. Agri-Chemicals Corporation
3225 State Road 630 West
Ft. Meade, Florida 33841

Authorized Representative: Phong T. Vo, General Manager, Engineering and Technical Services

1.2 Reviewing and Process Schedule

05-07-01: Date of Receipt of Application
06-05-01: DEP Completeness Request
08-28-01: USAC response to DEP's Completeness Request
09-26-01: USAC waiver of 30-day review period
10-29-01: DEP Completeness Request
11-15-01: USAC response completing DEP's Review
01-25-02: Intent to Issue Date

2. FACILITY INFORMATION

2.1 Facility Location

The U.S. Agri-Chemicals Corporation (USAC) fertilizer facility is located off State Road 630, near Ft. Meade, Polk County. This site is approximately 110 kilometers from the Chassahowitzka National Wilderness Area, a Class I PSD Area. The UTM coordinates of this facility are Zone 17; 416.2 km E; 3068.7 km N.

2.2 Standard Industrial Classification Codes (SIC)

Major Group No.	28	Chemicals and Allied Products
Industry Group No.	2874	Phosphate Fertilizers

2.3 Facility Category

This phosphate fertilizer facility makes sulfuric acid, phosphoric acid, monoammonium phosphate (MAP) and diammonium phosphate (DAP). Phosphoric acid is made by acidulation of phosphate rock with sulfuric acid. Waste gypsum is produced and stacked. The phosphoric acid is reacted with ammonia to make MAP and DAP. The sulfuric acid is produced on-site by burning elemental sulfur, catalytically converting the resulting sulfur dioxide to sulfur trioxide, and absorbing it into a recirculating sulfuric acid solution.

The facility is classified as a major or Title V source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceed 100 TPY.

This industry is included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a major facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Per Table 62-212.400-2, modifications at the facility resulting in emissions increases greater than 40 TPY of NO_x or SO₂ or 7 TPY of sulfuric acid mist (SAM), require review per the

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

PSD rules and a determination of Best Available Control Technology (BACT) per Rule 62-212, F.A.C. The facility includes sulfur storage and handling for which certain analyses are required per Rule 62-212.600, F.A.C.

3. PROCESS DESCRIPTION

In the basic ammoniated phosphate process, anhydrous ammonia is reacted with phosphoric acid. The slurry produced by the ammoniation is then sprayed onto a bed of solids in the granulator and additional ammonia (if required) is added to complete the acid neutralization and produced the final product grade. The resulting slurry/solids mixture contains excess water which is removed by drying in a fossil fuel fired direct contact rotary dryer. The dried solids are then screened to remove on size product. The product size material is passed through a product cooler and then to storage. The over-sized and under-sized materials are crushed and recirculated through the granulator. Air emissions of fluorides, particulate matter, and ammonia are controlled by the process reactions and add-on wet scrubbers.

4. PROJECT DESCRIPTION

This permit addresses the following emissions units:

EMISSION UNIT NO.	SYSTEM	EMISSION UNIT DESCRIPTION
037	Product	DAP/MAP Loadout
038	Process	Granular MAP/DAP Plant

The applicant proposes to increase the granular MAP and DAP production rate of the existing plant from 50 to 60 tons per hour product. The project may involve minor plant process equipment changes (e.g., pumps, piping, ducting, etc.) to achieve the production rate increase. No major physical modifications are required to increase the production rate. The maximum loadout rate will be 150 tons per hour, on a daily basis.

The proposed project will result in actual increases in fluorides (F1) and particulate matter (PM/PM₁₀). There will also be minimal emissions increases of nitrogen oxides (NO_x). Projected emissions increases of NO_x are below the significant emission level per Table 62-212.400-2, F.A.C., and do not require PSD or non-attainment new source review. However, PSD review is required for F1 and PM/PM₁₀ since projected emissions will increase by more than PSD significant levels.

5. RULE APPLICABILITY

The project is subject to the federal new source performance standards (NSPS) for DAP plants (40 CFR 60, Subpart V), incorporated by reference in Rule 62-204.800, F.A.C.

The proposed project is also subject to permitting, preconstruction review, emissions limits and compliance requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

This facility is located in Polk County, an area designated as attainment for all criteria pollutants

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in accordance with Rule 62-204.360, F.A.C. The proposed project is subject to review under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), because the potential emission increases for F1 and PM/PM₁₀ exceed the significant emission rates given in Chapter 62-212, Table 62-212.400-2, F.A.C. PSD review requires an assessment of air quality impacts and a determination of Best Available Control Technology (BACT).

The emission units affected by this permit modification shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules:

Chapter 62-4	Permits.
Rule 62-204.220	Ambient Air Quality Protection
Rule 62-204.240	Ambient Air Quality Standards
Rule 62-204.260	Prevention of Significant Deterioration Increments
Rule 62-204.360	Designation of Prevention of Significant Deterioration Areas
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-212.400	Prevention of Significant Deterioration
Rule 62-213	Operation Permits for Major Sources of Air Pollution
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-297.310	General Test Requirements
Rule 62-297.401	Compliance Test Methods
Rule 62-297.520	EPA Continuous Monitor Performance Specifications

6. SOURCE IMPACT ANALYSIS

6.1 Air Quality Analysis

6.1.1 Introduction

According to the application, the proposed project will increase emissions of two pollutants in excess of PSD significant amounts: PM₁₀ and F. PM₁₀ is a criteria pollutant and has national and state ambient air quality standards (AAQS) and PSD increments defined for it. F is a non-criteria pollutant and has no AAQS or PSD increments defined for it; therefore, no air quality impact analysis was required for F. Instead, the NSPS requirements will establish the F emission limit for this project. The PSD regulations require the following air quality analyses for this project:

- A significant impact analysis for PM₁₀;
- An analysis of existing air quality for PM₁₀ and F
- An analysis of impacts on soils, vegetation, and visibility and growth-related impacts.

Based on the required analyses, the Department has reasonable assurance that the proposed

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

project, as described in this report and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any AAQS or PSD increment. However, the following EPA-directed stack height language is included: "In approving this permit, the Department has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators." A discussion of the required analyses follows.

6.1.2 Analysis of Existing Air Quality and Determination of Background Concentrations

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD review unless otherwise exempted or satisfied. The monitoring requirement may be satisfied by using existing representative monitoring data, if available. An exemption to the monitoring requirement may be obtained if the maximum air quality impact resulting from the projected emissions increase, as determined by air quality modeling, is less than a pollutant-specific de minimus concentration. In addition, if EPA has not established an acceptable monitoring method for the specific pollutant, monitoring may not be required.

If preconstruction ambient monitoring is exempted, determination of background concentrations for PSD significant pollutants with established AAQS may still be necessary for use in any required AAQS analysis. These concentrations may be established from the required preconstruction ambient air quality monitoring analysis or from existing representative monitoring data. These background ambient air quality concentrations are added to pollutant impacts predicted by modeling and represent the air quality impacts of sources not included in the modeling.

The table below shows that predicted F and PM₁₀ impacts from the project are predicted to be less than the de minimus level; therefore, preconstruction ambient air quality monitoring is not required.

Maximum Project Air Quality Impacts for Comparison to the De Minimus Ambient Levels.

Pollutant	Avg. Time	Max Predicted Impact (ug/m ³)	De Minimus Level(ug/m ³)	Impact Greater Than De Minimus?
PM ₁₀	24-hour	2.5	10	NO
F	24-hour	0.07	0.25	NO

6.1.3 Models and Meteorological Data Used in the Air Quality Impact Analysis

The applicant and the Department used the EPA-approved Industrial Source Complex Short-Term (ISCST3) dispersion model to evaluate the pollutant emissions from the proposed project. The model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, area, and volume sources. The model incorporates elements for plume rise,

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

transport by the mean wind, Gaussian dispersion, and pollutant removal mechanisms such as deposition. The ISCST3 model allows for the separation of sources, building wake downwash, and various other input and output features. A series of specific model features, recommended by the EPA, are referred to as the regulatory options. The applicant used the EPA recommended regulatory options. Direction-specific downwash parameters were used for all sources for which downwash was considered. The stacks associated with this project all satisfy the good engineering practice (GEP) stack height criteria.

Meteorological data used in the ISCST3 model consisted of a consecutive 5-year period of hourly surface weather observations and twice-daily upper air soundings from the National Weather Service (NWS) stations at Tampa International Airport, Florida (surface data) and Ruskin, Florida (upper air data). The 5-year period of meteorological data was from 1987 through 1991. These NWS stations were selected for use in the study because they are the closest primary weather stations to the study area and are most representative of the project site. The surface observations included wind direction, wind speed, temperature, cloud cover, and cloud ceiling.

Since five years of data were used in ISCST3, the highest-second-high (HSH) short-term predicted concentrations were compared with the appropriate AAQS or PSD increments. For the annual averages, the highest predicted yearly average was compared with the standards. For determining the project's significant impact area in the vicinity of the facility and if there are significant impacts from the project on any PSD Class I area, both the highest short-term predicted concentrations and the highest predicted yearly averages were compared to their respective significant impact levels.

6.1.4 Significant Impact Analysis

Initially, the applicant conducts modeling using only the proposed project's emissions changes. If this modeling shows significant impacts, further modeling is required to determine the project's impacts on the AAQS or PSD increments. Fourteen receptor rings with 10 degree intervals (10-360 degrees) were placed at distances ranging from 0.5 to 10 km from the facility, which is located in a PSD Class II area. In addition receptors were located along the facility's property boundary. Discrete receptors were set in the Chassahowitzka National Wilderness Area (CNWA) which is a PSD Class I area located approximately 110 km to the northwest of the project at its closest point. The results of this modeling, presented below, indicate that no significant impacts are predicted from emissions from this project; therefore, no further modeling was required.

**Maximum Project Air Quality Impacts for Comparison to the
PSD Class I and II Significant Impact Levels**

Pollutant	Averaging Time	Maximum Predicted Impact (ug/m ³)	Significant Impact Level (ug/m ³)	Significant Impact?
PM ₁₀ Class I	24-hour	0.04	0.3	NO
	Annual	0.002	0.2	NO
PM ₁₀ Class II	24-hour	2.5	5	NO
	Annual	0.3	1	NO

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6.2 Additional Impacts Analysis

6.2.1 Impact Analysis Impacts On Soils, Vegetation, And Wildlife

The maximum ground-level concentrations predicted to occur from PM₁₀ emissions as a result of the proposed project, including background concentrations and all other nearby sources, will be below the associated AAQS. The AAQS are designed to protect both the public health and welfare. As such, this project is not expected to have a harmful impact on soils and vegetation in the PSD Class II area. An air quality related values (AQRV) analysis was done by the applicant for the Class I area. No significant impacts on this area are expected.

6.2.2 Impact On Visibility

A regional haze analysis was used to assess the potential for a significant increase in regional haze in the Class I CNWA due to this source's projected increase in emissions. A regional haze analysis to determine visibility impacts in the Class I area was required by the National Park Service. The results indicate that the impact of this project on visibility in the Class I area is insignificant.

6.2.3 Growth-Related Air Quality Impacts

The proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

7. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations, provided the Department's BACT determination is implemented.

Syed Arif, P.E.
Cleve Holladay, Meteorologist

PERMITTEE:

US Agri-Chemicals Corporation
3225 State Rd. 630 West
Ft. Meade, Florida 33841

Authorized Representative:

Phong T. Vo
General Manager of Eng. And Tech. Services

File No.	1050051-015-AC
Permit No.	PSD-FL-321
SIC No.	2874
Project:	Ft. Meade Chemical Plant
Expires:	May 1, 2004

PROJECT AND LOCATION:

Permit for the construction /modification of the Ft. Meade Chemical Plant to increase production and the fertilizer storage and shipping rates at US Agri-Chemicals Corporation's Ft. Meade facility, 3225 State Road 630 West, Ft. Meade, Polk County. UTM coordinates are Zone 17; 416.2 km E; 3068.7 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

ATTACHED APPENDICES ARE MADE A PART OF THIS PERMIT:

Appendix BD BACT Determination
Appendix GC Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

SECTION I. FACILITY INFORMATION

DRAFT

Facility Description

The U.S. Agri-Chemicals Corporation's Ft. Meade facility manufactures phosphate fertilizer. Phosphate rock is reacted with sulfuric acid (purchased or produced on-site) to make phosphoric acid. The phosphoric acid is reacted with ammonia to make monoammonium phosphate (MAP), or diammonium phosphate (DAP).

This permit allows an increase in the permitted production rate of granular MAP/DAP from 50 to 60 tons product per hour. This corresponds to 31.8 tons of P_2O_5 input per hour for MAP and 28.2 tons of P_2O_5 input per hour for DAP. The maximum loadout rate will be 150 tons per hour, on a daily basis.

REGULATORY CLASSIFICATION

The Ft. Meade facility is classified as a major source of air pollution or Title V source because it has the potential to emit at least 100 tons per year of nitrogen oxides and sulfur dioxide.

PERMIT SCHEDULE:

- 05-07-01: Date of Receipt of Application
- 11-15-01: Application deemed complete
- 01-xx-02: Intent issued
- 02-xx-00: Notice of Intent published in _____

RELEVANT DOCUMENTS:

The documents listed form the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received 05-07-01
- Department's incompleteness letters dated 06-05-01, 10-29-01
- Applicant's letters dated 08-24-01, 09-26-01, 11-13-01
- Technical Evaluation and Preliminary Determination dated 01-25-02
- Best Available Control Technology determination (issued concurrently with permit)

AIR CONSTRUCTION PERMIT 1050051-015-AC AND PSD-FL-321

SECTION II. ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department's Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-8218 and phone number (813)744-6100. All applications for permits to construct or modify an emissions unit(s) *subject to the Prevention of Significant Deterioration or Nonattainment (NA) review requirements* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. Expiration: This air construction permit shall expire on **May 1, 2004** [Rule 62-210.300(1), F.A.C.]. The permittee may, for good cause, 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. However, the permittee shall promptly notify the Department's Southwest District Office of any delays in completion of the project which would affect the startup day by more than 90 days. [Rule 62-4.090, F.A.C.]
6. Application for Title V Permit: An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the Department's Southwest District Office. [Chapter 62-213, F.A.C.]
7. Permit Approval: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)].

AIR CONSTRUCTION PERMIT 1050051-015-AC AND PSD-FL-321

SECTION II. ADMINISTRATIVE REQUIREMENTS

8. BACT Determination: In conjunction with extension of the 18 month periods to commence or continue construction, or extension of the permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of best available control technology for the source. [40 CFR 52.21(j)(4)]
9. Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports using DEP Form 62-210.900(4) shall be sent to the DEP's Southwest District office by March 1st of each year.
10. Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.
11. Quarterly Reports: Quarterly excess emission reports, in accordance with 40 CFR 60.7 (a)(7) (c) (1997 version), shall be submitted to the DEP's Southwest District office.
12. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION A. COMMON CONDITIONS:

40 CFR 60 - NEW SOURCE PERFORMANCE STANDARDS

This permit addresses the following emission units.

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
037	MAP/DAP Loadout
038	Granular MAP/DAP Plant

These emission units shall comply with all applicable requirements of 40 CFR 60, General provisions, Subpart A, adopted by reference in Rule 62-204.800(7), F.A.C.

- 40 CFR 60.7, Notification and record keeping
- 40 CFR 60.8, Performance tests
- 40 CFR 60.11, Compliance with standards and maintenance requirements
- 40 CFR 60.12, Circumvention
- 40 CFR 60.13, Monitoring requirements
- 40 CFR 60.19, General notification and reporting requirements

The Granular MAP/DAP Plant is subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart V, Standards of Performance for Diammonium Phosphate Plants (DAP).

SUBSECTION B. SPECIFIC CONDITIONS :

The Specific Conditions listed in this subsection apply to the following emission units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
037	MAP/DAP Loadout
038	Granular MAP/DAP Plant

1. Unless otherwise indicated, the construction and operation of the subject Granular MAP/DAP production facility shall be in accordance with the capacities and specifications stated in the application. **[Rule 62-210.300, F.A.C.]**
2. The subject emissions units shall comply with all applicable provisions of the 40 CFR 60 New Source Performance Standards for Diammonium Phosphate Plants, Subpart V. **[Rule 62-204.800 F.A.C.]**
3. The production rate shall not exceed 60 tons of MAP (31.8 tons of P₂O₅ feed per hour) or 60 tons of DAP (28.2 tons of P₂O₅ feed per hour). **[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**
4. The maximum permitted loadout rate is 150 tons product per hour, on a daily basis. **[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**

U.S. Agri-Chemicals Corporation
Granular MAP/DAP Plant

DEP File No. 1050051-015-AC
Permit No. PSD-FL-321

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

5. The subject emission units are allowed to operate continuously (8760 hours/year). **[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**
6. Total fluoride emissions during MAP production shall not exceed 1.18 lb/hr and 5.2 TPY. Total fluoride emissions during DAP production shall not exceed 1.04 lb/hr and 4.6 TPY. **[Rule 62-212.400, F.A.C.]**
7. Particulate matter emissions during MAP/DAP production shall not exceed 10.2 lb/hr and 44.7 TPY. **[Rule 62-212.400, F.A.C.]**
8. Visible emissions from all scrubber stacks shall not exceed 20% opacity. Visible emissions from the Loadout stack shall not exceed 5% opacity. **[Rule 62-212.400, F.A.C.]**
9. The natural gas firing rate in the dryer shall not exceed 30 million BTU per hour. **[Rule 62-210.200, F.A.C.]**
10. The permittee shall install, calibrate, operate and maintain monitoring devices that continuously measure and record the total pressure drop across each scrubbing system. Accuracy of the monitoring devices shall be $\pm 5\%$ over the operating range. **[Rules 62-297.310, 62-204.800, F.A.C.; 40 CFR 60.223]**
11. Before this construction permit expires, the subject emission units shall be tested for compliance with the above emission limits. 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 permitted capacity (i.e., 90% of the 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.]**
12. The Department's Southwest District office in Tampa shall be notified in writing at least 15 days prior to the compliance tests. Written reports of the test results shall be submitted to that office within 45 days of test completion. **[Rule 62-297.310, F.A.C.]**
13. The compliance test procedures shall be in accordance with EPA Reference Methods 1, 2, 3, 4, 5, 9 and 13A or 13B, as appropriate, as published in 40 CFR 60, Appendix A. 60, Appendix A. **[Rules 62-204.800 and 62-297.310, F.A.C.]**
14. All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. **[Rule 62-213, F.A.C.]**
15. The permittee shall install, calibrate, maintain, and operate a monitoring device which can be used to determine the mass flow of phosphorus-bearing feed material to the process. The monitoring device shall have an accuracy of ± 5 percent over its operating range. The

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

permittee shall maintain a daily record of equivalent P₂O₅ feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using the flow monitoring device meeting the requirements of 40 CFR 60.223(a) and then by proceeding according to 40 CFR 60.223(b). **[Rule 62-204.800, F.A.C.; 40 CFR 60.223(b)]**

16. 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.]**
17. 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.]**
18. The subject emissions units shall be subject to the following:
 - 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.]**
 - 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.]**
 - 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.]**
 - 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.]**
19. The permittee shall submit an Annual Operating Report using the appropriate DEP form 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.]**
20. The permittee shall submit an application for the revision of the Title V permit upon completion of construction using the appropriate DEP form to the Department's Southwest District office at least 90 days prior to the expiration date of this permit. **[Rule 62-213, F.A.C.]**

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

Granular Monoammonium and Diammonium Phosphate Plant
U.S. Agri-Chemicals Corporation
PSD-FL-321 / 1050051-015-AC
Ft. Meade, Polk County

DRAFT

The U.S. Agri-Chemicals Corporation proposes to increase the production rate of granular monoammonium phosphate (MAP) and diammonium phosphate (DAP) from 50 to 60 TPH at its existing Granular MAP/DAP Plant in Ft. Meade, Polk County. This will result in a corresponding increase in the fertilizer loadout operation. The proposed modification will result in a significant increase in emissions of particulate matter (PM/PM₁₀) and fluorides (F). 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.). A Best Available Control Technology (BACT) determination is part of the review required by Rules 62-212.400 and 62-296, F.A.C.

The Granular MAP/DAP Plant reacts phosphoric acid with ammonia to make granular MAP/DAP. The product goes to storage and loadout. The air emissions are indicated below:

Pollutant	PSD Level ¹	Actual Emissions ²	Current Allowables	Proposed Emissions ³	Net Change ⁴	Subject to PSD Review?
F	3	1.86	2.94	5.2	3.34	Yes
PM	25/15 ⁵	28.7	29.6	49.2	20.5	Yes
NO _x	40	7.2	N/A	18.4	11.2	No

¹ Tons per year (Rule 212.400, F.A.C.)

² Based on projected 2001 operations and compliance data for F and PM/PM₁₀. NO_x emissions based on AP-42 factors for boilers.

³ Proposed by applicant as allowable emissions at the new production rate.

⁴ Applicant's proposed emissions minus actuals.

⁵ PM/PM₁₀.

DATE OF RECEIPT OF COMPLETE BACT APPLICATION:

November 15, 2001

BACT DETERMINATION PROCEDURE:

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic

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impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT 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.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- 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 unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, 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.

The air pollutant emissions from a facility can typically be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can generally be classified as indicated below:

- **Fluorides** (HF, F, SiF₄). Controlled generally by scrubbing with pond water.
- **Particulate Matter** (PM, PM₁₀). Controlled generally by wet scrubbing or filtration.
- **Combustion Products** (SO₂, NO_x, PM). Controlled generally by good combustion of clean fuels.
- **Products of Incomplete Combustion** (CO, VOC). Controlled generally by proper combustion.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis. Although all

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of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM, SO₂, H₂SO₄, fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

BACT LIMITS PROPOSED BY APPLICANT:

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
F (MAP)	1.18 lb/hr	0.037 lb/ton P ₂ O ₅ input	Two-stage scrubbers using acid/pond water
F (DAP)	1.04 lb/hr	0.037 lb/ton P ₂ O ₅ input	Two-stage scrubbers using acid/pond water
PM (Plant)	10.2 lb/hr	0.17 lb/ton product	Cyclones and scrubbers using acid/pond water
PM(Loadout)	5% opacity	Use Baghouse or Oiling	Baghouse or Product Oiling

BACT POLLUTANT ANALYSIS

GASEOUS FLUORIDES (F)

Fluoride-containing gases including hydrogen fluoride (HF) and silicon tetrafluoride (SiF₄) are evolved during the exothermic reaction between ammonia and phosphoric acid that occurs in the reactor and to a lesser extent in the granulator. Since the vent gases from the reactor and granulator contain ammonia in high concentrations, the first scrubbing stage uses a phosphoric acid stream as the scrubbing medium for recovery of ammonia so that it is recycled back to the process. A final stage of pond water scrubbing removes most of the fluoride evolved from the process as well as that which is stripped out of the phosphoric acid in the first stage scrubber.

Additional fluoride and ammonia emissions are generated in the dryer and are controlled by a separate scrubbing system from the reactor and granulator. Gaseous fluoride and ammonia emissions from the cooler are relatively low and therefore do not require special controls. The applicant has proposed that the existing emission control equipment be considered as BACT.

PARTICULATE MATTER (PM/PM₁₀) AND VISIBLE EMISSIONS (VE)

The sources of PM and VE, consisting primarily of MAP/DAP dust along with relatively small amounts of ammonium fluoride and other related compounds, are the granulator, dryer, cooler, screens and mills. These emissions are controlled by cyclones which remove most of the larger particles with the remainder controlled by wet scrubbers. The applicant has proposed that the existing control equipment be considered as BACT.

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BACT DETERMINATION BY THE DEPARTMENT:

Based on the information provided by the applicant and other information available to the Department, the following emission limits are established employing the top-down BACT approach.

POLLUTANT	EMISSION LIMIT	LIMIT BASIS
F (MAP)	1.18 lb/hr	0.037 lb/ton P ₂ O ₅ input
F (DAP)	1.04 lb/hr	0.037 lb/ton P ₂ O ₅ input
PM (Plant)	10.2 lb/hr	0.17 lb/ton product
PM(Loadout)	5% opacity	Use Baghouse or Oiling

FLUORIDES

The top-down BACT determination for fluorides identified the control technologies listed below starting with the most stringent:

1. Packed scrubber using once-through fresh water.
2. Packed scrubber using neutralized water from a dedicated pond (fresh water makeup).
3. Packed scrubber using process cooling pond water.
4. Existing venturi scrubber using pond water.

Use of once-through fresh water would achieve the highest level of fluoride removal but this option is not practical for operations where water conservation is required and plant water balance problems would be created.

Option 2 is possible, however, the cost would be expected to exceed even that for a packed scrubber, as discussed below for Option 3.

Option 3 is possible, however, the costs need to be considered. The following cost estimate is based on information submitted by the applicant.

<u>ITEM</u>	<u>COST</u>
Packed Scrubber (TIC)	\$ 493,240
Annual Costs:	
Indirect (TIC x 0.1715)	\$ 84,600
Operation & Maintenance (@ 12% of TIC)	\$ 60,000
Total Annual Cost	\$ 144,600

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By conservatively assuming that all the potential fluoride emissions from the plant can be controlled, the emission reduction would be 5.2 tpy.

The cost of additional control:

$$\begin{aligned} \text{Total Cost} &= \$144,600 / 5.2 \text{ tpy} \\ &= \$ 27,800/\text{ton F removed} \end{aligned}$$

This figure is sufficiently high to rule out Option 3, and similarly Option 2. Therefore, Option 4 is determined by the top-down approach as the basis for the fluoride BACT emission limit.

The BACT limit for MAP/DAP, at 0.037 lb/ton P₂O₅ input, is the most stringent fluoride emission limit established by FDEP for such a plant. The recent operation data provide reassurance to FDEP that this stringent emission limit will continue to be met by the plant.

PARTICULATE MATTER (PM/PM₁₀) AND VISIBLE EMISSIONS (VE)

The top-down approach for control of PM/PM₁₀ and VE identified the following BACT options:

1. High-energy (>30 in.w.c.) venturi scrubber or ionizing wet scrubber.
2. Medium-energy (12-30 in.w.c.) venturi scrubber.

Characteristic of this process is that the first stage of scrubbing (acid scrubber) is primarily for ammonia recovery while the primary function of the second stage scrubber is fluoride removal, leaving PM/PM₁₀ control with a secondary priority from a design standpoint. Since recovery of ammonia takes place by chemical reaction with the acid scrubbing medium, the required removal can be effected using a medium energy scrubber which also removes up to 85% of the product dust escaping the cyclones. In this case the tail gas venturi scrubber is a medium energy device that efficiently controls particulate matter.

If maximum PM/PM₁₀ removal is considered to be a design parameter, the cost effectiveness of adding high energy scrubbing to the existing system (Option 1), assuming replacement of the existing venturi scrubbers with high pressure drop units, the costs are expected to be in the range of \$20,000 per ton, due to the high cost of installing new ducts, pumps, fans, and instrumentation for retrofitting an existing system, and the high energy costs. Consequently, Option 1 is not feasible for this project.

Option 2, which reflects the existing venturi scrubber arrangement, is determined to be BACT. The corresponding particulate matter emission limit of 0.17 lb/ton of product is the most stringent limit established by FDEP for such a plant. The recent operation data provide reassurance to FDEP that this stringent emission limit will continue to be met by the plant.

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The BACT for the product loadout is determined to be the continued use of a baghouse or product oiling, resulting in visible emissions of 5% opacity or less. This emission limitation is in line with limits established by FDEP for similar operations.

COMPLIANCE

Compliance with the fluoride limit shall be in accordance with the EPA Reference Method 13A or 13B as contained in 40 CFR 60, Appendix A.

Compliance with the PM/PM₁₀ limit shall be in accordance with the EPA Reference Method 5 as contained in 40 CFR 60, Appendix A.

Compliance with the visible emission limit shall be in accordance with the EPA Reference Method 9 as contained in 40 CFR 60, Appendix A.

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

Syed Arif, P.E., Permit Engineer, New Source Review Section
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
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

Date:

Date:

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.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, Florida Statutes. 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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 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.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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.
- G.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.
- G.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.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and 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.

- G.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.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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.

- G.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, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (*X*)
 - (b) Determination of Prevention of Significant Deterioration (*X*); and
 - (c) Compliance with New Source Performance Standards (*X*).
- G.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 or 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:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.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.

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy *copy for CHF*
THRU: Al Linero *copy*
FROM: Syed Arif *Syed Arif*
DATE: January 25, 2002
SUBJECT: US Agri-Chemicals Corporation
1050051-015-AC (PSD-FL-321)

Attached is the Public Notice package to increase the production rate of the granular MAP/DAP Plant from 50 tons per hour (TPH) to 60 tph at its existing chemical complex at Ft. Meade, Polk County.

The project is subject to Prevention of Significant Deterioration (PSD) review for F, PM, and PM_{10} in accordance with 62-212.400, F.A.C. A Best Available Control Technology (BACT) determination is part of the review required by Rules 62-212.400 and 62-296, F.A.C.

The facility proposes to use the existing scrubbers as BACT for the MAP/DAP Plant with a fluoride emissions limit of 0.037 lb/ton P_2O_5 input; and, a particulate matter emissions limit of 0.17 lb/ton product. These emission limits represent some of the most stringent limitations imposed on MAP/DAP Plants in the US.

January 25 is Day 71 for the project.

I recommend your approval and signature.

AAL/sa

Attachments