

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

US
Agri-Chemicals

A Sinochem Company

November 29, 1995

RECEIVED

DEC 13 1995

BUREAU OF
AIR REGULATION

Mr. John Reynolds
New Source Review Section
DEP - Bureau of Air Regulation
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

Dear Mr. Reynolds:

RE: PSD-FL-223 (AC53-260192) Granular DAP/MAP

This is to notify the Department that U.S. Agri-Chemicals (USAC) wishes to withdraw the permit application for the referenced Granular DAP/MAP plant.

USAC would like to take this opportunity to thank you and other Department staffs for the cooperation during the processing of the Prill MAP permit application.

Please feel free to contact me at (813)285-7123, ext. 279 if you have any questions.

Sincerely,



Ronald L. Brunk
Environmental Manager

CC: EPA
NPS
SWD
Polk Co.

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

US
Agri-Chemicals

A Sinochem Company

February 24, 1995

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FEB 27 1995

Bureau of
Air Regulation

Mr. John Reynolds
FDEP-Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

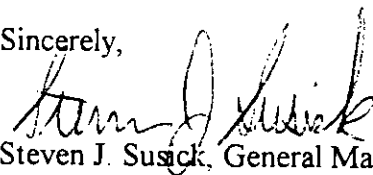
RE: PSD-FL-222(AC53-260190) Prill MAP
PSD-FL-223(AC53-260192) Granular DAP/MAP

Dear Mr. Reynolds,

U. S. Agri-Chemicals Corporation has retained Dr. John Koogler as a consultant on the Prill MAP application. Dr. Koogler is authorized to act on behalf of the company.

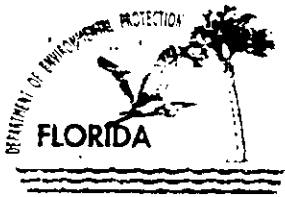
If you have any questions, please give me a call at (813) 285-8121 extension 344.

Sincerely,



Steven J. Susick, General Manager
Engineering & Technical Services

SJS/dgs
h:\files\sjs\reynolds.doc



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 17, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Steven J. Susick, P.E.
General Manager
US Agri-Chemicals Corporation
3225 State Road 630 West
Fort Meade, Florida 33841-9799

RE: PSD-FL-222 (AC53-260190)/Prilled MAP Plant ← Cert. Receipt in phone. No
PSD-FL-223 (AC53-260192)/Granular MAP/DAP Plant green
card
rec'd

Dear Mr. Susick:

This is a request for additional information concerning the construction applications listed above. As stated in the Department's November 23 letter, as a result of the shortened review time due to these applications being filed with the district office, additional questions may be required by the National Park Service. Accordingly, please respond to each of the issues addressed in the attached letter submitted by their Atlanta regional office.

If there are any questions about this additional requirement, please contact John Reynolds or Cleve Holladay at 904-488-1344 or write to me at the above address.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section
Bureau of Air Regulation

AAL/JR/kt

cc: W. Thomas, SWD
L. Novak, Polk County
J. Harper, EPA
E. Porter, NPS

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

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JAN 06 1995

Bureau of
Air Regulation

US

Agri-Chemicals

A Sinochem Company

January 4, 1994

John Reynolds
Dept. Of Env. Protection
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

Dear Mr. Reynolds:

RE: PSD-FL-222 (AC53-260190) Prill MAP
PSD-FL-223 (AC53-260192) Granular DAP/MAP

This is to inform you that, due to the comments by the U.S. Dept. of Interior's letter dated December 15, 1994, we are working on a reply which will satisfy their letter as well as your letter dated November 23, 1994.

Please contact me at (813)285-7123, ext. 279, if you have any questions.

Sincerely,



Ronald L. Brunk, Manager
Environmental Engineering

cc: S. Susick
J. Koogler



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

IN REPLY REFER TO:

December 15, 1994

RECEIVED

DEC 21 1994

Bureau of
Air Regulation

Mr. Clair H. Fancy
Chief, Bureau of Air Regulation
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration (PSD) applications for the Monoammonium Phosphate plant and the Diammonium Phosphate plant proposed by U.S. Agrichemicals Corporation (USAC). The new plants would be located at USAC's Ft. Meade Chemical facility, approximately 130 km southeast of Chassahowitzka Wilderness Area (WA), a Class I air quality area, administered by the Fish and Wildlife Service. We understand that USAC plans to build only one of the new plants, but wants to start the permit process for both. Our comments are as follows:

PSD Applicability

The application provides net emission increase calculations to determine which pollutants are subject to PSD review. The calculations use allowable permitted emissions to offset the proposed emission increases. As you know, net emission increase calculations must be based on actual, not allowable emissions. It is not clear if, in this case, allowable emissions are equal to actual. If actual emissions are less, the applicant should reevaluate PSD applicability based on actual emissions, and perform or revise impact and control analyses accordingly.

Best Available Control Technology (BACT)

The applicant proposes to meet a fluoride emission rate of .06 pounds per ton of P_2O_5 input at their DAP plant. A recent BACT determination for an IMC Agrico Diammonium Phosphate plant requires a BACT limit of .0417 pounds per ton of P_2O_5 input. BACT should be set at the lower level unless the applicant provides information demonstrating that .0417 is not an appropriate level for this particular plant.

Air Quality Modeling Analysis

The applicant incorrectly concludes that because the proposed facilities are more than 100 km from a Class I area, analyses of impacts at the Class I area are not necessary. The determination of whether a Class I area impact analysis is required is made on a case-by-case basis. The Environmental Protection Agency has stated that "large sources located at distances greater than 100 kilometers need to be considered when such impacts reasonably could affect the outcome of the Class I analysis." The need for a Class I impact analysis cannot be decided until the amounts of the proposed emissions increases are clarified.


No increment analysis or visibility impact analysis was performed for the Class I area. If the proposed project is PSD significant for particulate matter, these analyses must be done. In addition, fluoride concentrations at the Class I area should be modeled.

Air Quality Related Values (AQRV) Analysis

As noted above, USAC did not analyze impacts, including AQRV impacts, on the Class I area. We are particularly concerned with cumulative fluoride impacts to vegetation and wildlife at Chassahowitzka WA. We would like the applicant to discuss these impacts in an AQRV analysis.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you should require further information, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at 303/969-2071.

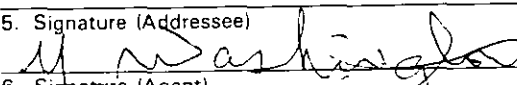
Sincerely yours,



John T. Brown
Acting Regional Director

cc: J. Reynolds
R. Zhang
G. Kissel, SW Dist
L. Noval, Park Co.
G. Harper, EPA
V. Ja, US Agri-Chem -

Is your RETURN ADDRESS completed on the reverse side?

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • 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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. Steven J. Susick, P.E. General Manager US Agri-Chemicals Corporation 3225 State Road 630 West Fort Meade, Florida 33841-9799		4a. Article Number Z 751 860 003	
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
		7. Date of Delivery 11-30-94	
5. Signature (Addressee) 		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent)			

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Z 751 860 003



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Sent to Mr. Steven J. Susick, P.E.	
Street and No. 3225 State Road 630 West	
P.O. State and ZIP Code Fort Meade, FL 33841-9799	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 11/28/94 PSD-FL-222 (AC53-260190) PSD-FL-223 (AC53-260192)	



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 23, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Steven J. Susick, P.E.
General Manager
US Agri-Chemicals Corporation
3225 State Road 630 West
Fort Meade, Florida 33841-9799

Re: PSD-FL-222 (AC53-260190)/Prilled MAP Plant
PSD-FL-223 (AC53-260192)/Granular MAP/DAP Plant

Dear Mr. Susick:

On October 28, 1994, the Department's Southwest District Office received your two PSD construction permit applications. One is for a 40 tons per hour Prilled Monoammonium Phosphate (MAP) Plant; the other for a 150 tons per hour Granular MAP/Diammonium Phosphate (DAP) Plant on your existing site at Fort Meade. The applications were forwarded the Department's Bureau of Air Regulation in Tallahassee since the districts do not process PSD permits. The following additional information for these applications will be required, including all calculations, assumptions and reference material, before the applications can be considered as complete:

1. Since the MAP product is about 51% P₂O₅, the proposed Best Available Control Technology (BACT) fluoride emission limit of 0.046 pound of fluorides (F) per ton of Prilled MAP product is less stringent than the most recent (July 1992) Pipe Reactor/Granular MAP BACT limit of 0.060 pound F per ton of P₂O₅ input (Farmland's AC53-210886). Farmland's MAP BACT limit is equivalent to the DAP federal NSPS and pre-1994 DAP BACT limit. However, the typical BACT limit for DAP plants has been reduced from 0.060 to 0.0417 pound F per ton of P₂O₅ input with the issuance of IMC-Agrico's AC53-232681 in April of this year.

Therefore, assuming equivalency of fluoride emissions from the MAP and DAP processes, and from the Prilled vs. Granular processes, the fluoride emissions from the new Prilled MAP plant would be limited to 0.85 pound F per hour instead of the 1.84 figure proposed. Likewise, the fluoride emissions from the new Granular MAP/DAP plant would be limited to 2.88 pounds per hour instead of the 4.14 figure proposed. The Cargill (AC53-194504 & -08) limit of 0.046 pound F per ton of P₂O₅ that the Prilled MAP proposal is based on was not derived from a BACT determination for a new facility. It was a production increase with no increase in

Mr. Steven J. Susick
Letter: Completeness Review
November 23, 1994
Page 2

allowable emissions based on Cargill's fluoride allocation of 1.0 pound F per hour under the "0.4 existing plant emissions" rule [Rule 62-296.403(2), Florida Administrative Code (F.A.C.)]. Please address these issues and revise the applications accordingly.

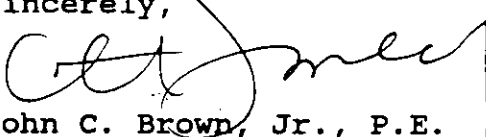
2. The Prilled MAP application should describe the type of pond water makeup to be employed (i.e., fresh water or gypsum pond water).

3. The use of allowable particulate matter emissions instead of the representative two-year average actual emissions cannot be used for netting out of PSD review (see 40 CFR 52.21 and Rule 62-212.400(2)(e)3., F.A.C.). The only exception would be a situation in which no actual emission data exist and the limits for the emission units shut down were federally enforceable. The net emission increase will have to be recalculated using the most recent or representative two-year average actual emissions from the rock drying operation and the results are to be compared to the proposed potential/allowables. If the increase is significant, then the requirements (i.e., modeling analysis, BACT determination, etc.) of Rule 62-212.400(5), F.A.C., must be satisfied and provided to the Department.

4. The National Park Service may have additional questions about the impacts of fluoride emissions on the Chassahowitzka PSD Class I area. They may need more time to review the proposal since the applications were delayed getting to the Bureau because they were filed with the district office.

If there are any questions, please contact John Reynolds or Cleve Holladay of our staff at 904-488-1344 or write to me at the above address.

Sincerely,


for John C. Brown, Jr., P.E.
Administrator
Permitting and Standards

JCB/JR/bjb

cc: W. Thomas, SWD
J. Harper, EPA

L. Novak, Polk County
J. Bunyak, NPS



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 18, 1994

Mr. John Bunyak, Chief
Policy, Planning and Permit Review Branch
National Park Service-Air Quality Division
P. O. Box 25287
Denver, CO 80225

Dear Mr. Bunyak:

RE: US Agrichemicals Corporation
Polk County
PSD-FL-222, MAP Plant
PSD-FL-223, DAP Plant

Enclosed for your review and comment are the above referenced PSD applications. Please forward your comments to the Department's Bureau of Air Regulation as soon as possible. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact John Reynolds or Katherine Zhang at (904)488-1344 or write to me at the above address.

Sincerely,

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

CHF/pa

Enclosures



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 18, 1994

Ms. Linda Novak
Polk County Air Quality Program
P. O. Box 39
Bartow, FL 33830

Dear Ms. Novak:

RE US Agri-Chemicals Corporation
Polk County
PSD-FL-222, MAP Plant
PSD-FL-223, DAP Plant

Enclosed for your review and comment are the above referenced PSD applications. Please forward your comments to the Department's Bureau of Air Regulation as soon as possible. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact John Reynolds or Katherine Zhang at (904)488-1344 or write to me at the above address.

Sincerely,

Patricia G. Adams
John H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

Enclosures