

Florida Department of
Environmental Protection

Memorandum

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RECEIVED

SEP 28 1995

Bureau of
Air Regulation

TO: Howard L. Rhodes
THRU: C. H. Fancy *CH*
FROM: A. A. Linero *AA Linero* 9/26
DATE: September 26, 1995
SUBJ: Approval of Permit PSD-FL-222
U. S. Agrico, Prilled MAP Plant - Polk County

Attached for your review and approval is a PSD permit and a Best Available Control Technology Determination for a new 60 TPH prilled monoammonium phosphate (MAP) plant at the Agrico facility in Fort Meade, Polk County.

Sources of emissions are from the absorption tower and product loadout area. Controls include 99+ percent absorption by venturi scrubbing, use of natural gas for process heating, and a baghouse for product loadout.

No comments were received during the public notice period. I recommend your approval.

AAL/aal/l

Attachments

1050051-002-AC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DEP File No. AC 53-260190
PSD-FL-222
Polk Co.


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

Enclosed is Permit Number AC 53-260190 (PSD-FL-222) for the construction of a 60 TPH prilled monoammonium phosphate plant at the existing US Agri-Chemicals facility located in Fort Meade, Polk County, Florida, issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 9-29-95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


(Clerk)

9/29/95
(Date)

Copies furnished to:
W. Thomas, SWD
R. Harwood, Polk County
J. Harper, EPA
J. Bunyak, NPS
J. Koogler, P.E.

Final Determination

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

**Permit Number
PSD-FL-222
AC 53-260190**

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

September 26, 1995

Final Determination
US Agri-Chemicals Corp.
PSD-FL-222
AC 53-260190

The Technical Evaluation and Preliminary Determination for a permit to construct a 60 tons per hour prilled monoammonium phosphate (MAP) plant at the US Agri-Chemicals facility in Fort Meade, Polk County, Florida, was distributed on June 29, 1995. The Notice of Intent to Issue was published in the Ledger on August 1, 1995. Copies of the evaluation were available for public inspection at the Department's offices in Tallahassee and Tampa.

During the 30-day period following public notice, the Department received comments from the applicant and the US Environmental Protection Agency (USEPA). The USEPA requested no changes, while the applicant requested that the fluoride emission limit be based on another Best Available Control Technology (BACT) determination for a granular MAP plant. Since there are significant differences in the granular and prilled MAP processes, the Department does not agree that a BACT fluoride emission limit for the granular process can be applied to the prilled process. The applicant also requested that the permit expiration date be extended to December 30, 1997. The final action of the Department will be to issue the permit with the extended expiration date.

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

The applicant proposes to construct a 60 tons per hour (TPH) prilled monoammonium phosphate (MAP) plant at their agricultural chemical facility in Fort Meade. The proposed project will result in a significant increase in emissions of particulate matter (PM-PM10) and gaseous fluorides (SiF₄ and HF). The project is, therefore, subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). The BACT determination is part of the review required by Rule 62-212.410, F.A.C.

Date of Receipt of Complete Application: April 4, 1995

BACT Determination Proposed by Applicant:

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

Control Technology: - Medium-energy venturi scrubber using recycled pond water (for tower and cooler)
- Baghouse (for product loadout)
- Natural Gas (for process heater)

BACT Determination Procedure:

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

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

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

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

BACT Determined by DEP:

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

Control Technology:

Options for Tower & Cooler:

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

Product Loadout: Baghouse as proposed

Process Heater: Natural gas as proposed

BACT Determination Rationale:

The applicant based their proposed fluoride BACT emission limit of 0.0417 lb F per ton P2O5 on the Department's 1994 BACT determination for IMC-Agrico's granular Diammonium Phosphate plant in Polk County (PSD-FL-204). However, due to the substantial differences in air flow and other process variables that exist between the granulation and prill tower processes, the Department

- (d) The social and economic impact of the application of such technology.

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BACT
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cannot rely on the granulation emissions to accurately predict emissions from the prill process.

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

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

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

Air Quality Analysis:

The proposed project will result in PSD-significant emissions of PM/PM10 and gaseous fluorides (HF and SiF₄). The maximum 24-hour and annual average PM/PM10 concentrations are 20.43 and 2.02 ug/m³, respectively. The maximum PM/PM10 impacts are above the respective Class II PM10 significant impact levels of 5.0 and 1.0 ug/m³. The maximum predicted 24-hour and annual PM/PM10 concentrations in the Class I Chassahowitzka National Wilderness Area are 0.075 and 0.0046 ug/m³, respectively. They are below the National Park Service-recommended Class I PM10 24-hour and annual significance levels of 0.27 and 0.08 ug/m³. Therefore, a full Class II impact assessment was done while a Class I modeling analysis was not required.

The modeling results indicate that the maximum PM/PM10 increment consumption will not exceed the allowable PSD increments. Also, as shown in the Technical Evaluation, the maximum impacts of toxic air pollutants (ammonia and fluorides), compared to the Department's draft Ambient Reference Concentrations (ARC), are less than their respective ARC values. Results of the Level I visibility impairment analysis demonstrate that all parameters

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US Agri-Chemicals Corp.
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have values less than the threshold values indicating that emissions from the proposed project will not have a significant impact on area visibility.

Conclusion:

The controlled air pollutant emissions resulting from the proposed project are not expected to have any adverse environmental impact. It is concluded that the control equipment options proposed by the Department represent the best available control technology.

BACT Analysis Details Available From:

A. A. Linero, P.E. or John Reynolds
New Source Review Section
Bureau of Air Regulation
111 South Magnolia Drive
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

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

Virginia B. Wetherell, Secretary
Dept. of Environmental

_____, 1995
Date

_____, 1995
Date

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US Agri-Chemicals Corp.
Page Three

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

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Conclusion:

The controlled air pollutant emissions resulting from the proposed project are not expected to have any adverse environmental impact. It is concluded that the control equipment options proposed by the Department represent the best available control technology.

BACT Analysis Details Available From:


John Reynolds, Permit Engineer
Bureau of Air Regulation
Department of Environmental Protection
111 South Magnolia Drive
Tallahassee, Florida 32399-2400

Recommended by:


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

9/27, 1995
Date

Approved by:


Howard L. Rhodes, P.E., Director
Division of Air Resources Management

9/27, 1995
Date



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

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

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1997
County: Polk
Latitude/Longitude: 27°44'25"N
81°51'05"W
Project: 60 TPH Prilled MAP
Plant

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

For the construction of a 60 TPH Prilled MAP Plant with state-of-the-art air pollution control equipment to be approved by the Department prior to construction and emission limits set after construction and testing. The facility is located at 3225 State Road 630 West, Fort Meade, Polk County, Florida. The UTM coordinates are Zone 17: 416 km East and 3,069 km North.

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

Attachments are listed below:

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

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1997

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1997

GENERAL CONDITIONS:

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

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

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

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

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

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1997

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

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

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222
Expiration Date: Dec. 30, 1997

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

1. Unless otherwise indicated, the construction and operation of the subject Prilled MAP production facility shall be in accordance with the capacities and specifications stated in the application.

2. Pursuant to Rule 62-212.200(56), F.A.C., the production rate of the Prilled MAP plant shall not exceed 60 tons MAP product per hour.

3. Pursuant to Rule 62-212.200(56), F.A.C., the Prilled MAP plant may operate up to 8760 hours per year.

4. Pursuant to Rule 62-212.410, F.A.C., PM/PM10 emissions from the Prilled MAP plant loadout baghouse shall not exceed 5% opacity.

5. Pursuant to Rule 62-212.410, F.A.C., emissions of fluorides and PM/PM10 from the prill tower shall meet the requirements for Best Available Control Technology. Limits for these pollutants shall be determined by the Department's Bureau of Air Regulation (BAR) in Tallahassee, Florida, within 45 days following receipt by BAR of the performance test results required in Specific Condition No. 6. As soon as the design of the air pollution control system is finalized, the permittee shall submit all efficiency calculations and drawings of the system to the BAR in Tallahassee for approval.

6. Pursuant to Rule 62-297.340(1)(a), F.A.C., and before this construction permit expires, performance testing for fluorides and PM/PM10 shall be conducted on the prill tower scrubber stack and for opacity from the product loadout baghouse with the emission unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than capacity (i.e., less than 90 percent of maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
PSD-FL-222

Expiration Date: Dec. 30, 1997

7. Pursuant to Rule 62-297.340(1)(i), the Department's Southwest District office shall be notified in writing at least 15 days prior to the performance test. Pursuant to Rule 17-297.570(1) and (2), written reports of the test results shall be submitted to that office and the BAR office in Tallahassee within 45 days of test completion.

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

9. Pursuant to Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited, no person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

10. Pursuant to Rule 62-210.650, F.A.C., Circumvention, 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.

11. Pursuant to Rule 62-210.700, Excess Emissions, the Prilled MAP plant is subject to the following:

a. Rule 62-210.700(1): 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.

b. Rule 62-210.700(4): 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.

c. Rule 62-210.700(5): 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.

d. Rule 62-210.700(6): 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.

PERMITTEE:
US Agri-Chemicals Corp.

Permit Number: AC 53-260190
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12. Pursuant to Rules 62-210.370(2)(a) and (b), F.A.C., Reports, the permittee shall submit an Annual Operating Report using DEP Form 62-210.900(4) to the Department's Southwest District office by March 1 of the following year for the previous year's operation.

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

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

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Howard L. Rhodes, P.E., Director
Division of Air Resources Management

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Stephen G. Susick, PE
 US Agri-Chemicals Corp
 3225 State Rd 630, West
 Ft. Meade, FL 33841-9799
 Ft. Washington

4a. Article Number
 Z 127 632 528

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 6-2-95

5. Signature (Addressee)
 [Signature]

6. Signature (Agent)

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

PS Form 3811, December 1991 *U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 127 632 528



PS Form 3800, March 1993

Rec'd	Stephen Susick
Street and No.	US Agri Chem
P.O. Box, State and Zip Code	Ft. Meade, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	AC53-260190 PSD-FI-222 9-29-95