



USS
Agri-Chemicals

Division of United States Steel Corporation

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December 8, 1980

Mr. Willard Hanks
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Hanks:

Re: Fort Meade Chemical Plant
Construction Permits

AC 53-33818	Sulfuric Acid No. 1
33819	Sulfuric Acid No. 2
33820	Phosphoric Acid Train A
33821	Phosphoric Acid Train B
33822	Auxiliary Boiler
33868	Phos. Acid Storage Area

Attached are USS Agri-Chemicals' comments on the proposed conditions for construction permits for the above-referenced plants. We are primarily concerned about the time limitation placed on operation of the Auxiliary Boiler and BACT determination of particulate emissions from the phosphoric acid plant scrubbers, which appears to have been set with inadequate foundations.

I appreciate the opportunity given USSAC's representatives on December 2 for discussions prior to written comments, and believe this may have given DER a fuller understanding of our concerns.

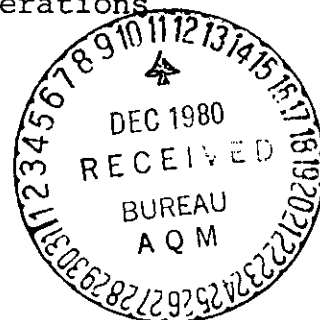
Very truly yours,

USS AGRI-CHEMICALS

G. W. Beck, General Manager,
Florida Phosphate Operations

GWB:cbr

Attachments



USS AGRI-CHEMICALS
FORT MEADE CHEMICAL PLANT

COMMENTS ON PROPOSED CONDITIONS FOR CONSTRUCTION PERMITS

SULFURIC ACID PLANT, AC53-33818 & 19

1. Stack Locations

Please recheck the stack locations coordinates for conformity to the permit application.

2. Conversion Factor, item 6 of Specific Conditions

The formula contains a typographical error.
The number should be 1.000 not 1,000.

3. Shutdown of Existing Plants

USSAC believes that as written item 9 of the Special Conditions is not sufficiently definitive, and requests that the item be modified as follows:

".....within 3 months after written notification from DER that the compliance tests on the new sulfuric acid plants are acceptable."

4. Typographical Error

See item 15. of Special Conditions.

PHOSPHORIC ACID PLANTS, AC53-33820 & 21

1. Stack Location Coordinates

Same comment as for sulfuric acid plants.

2. Shutdown of Existing Plants

Same comment as for Sulfuric Acid plants.

3. Limitation of Particulates

Since particulate emissions from existing phosphoric acid plant stacks are not regulated, USSAC nor the phosphate

industry does not have a background history of performance and proven design information. According to our investigations the limit of 5.9 pounds per hour per train appears to be achievable. However, it is well known and often experienced that actual performance from unproven designs fails to meet the expectancy. For this reason the permit application requested that the final emission limit be deferred pending actual performance testing, at which time a more sound foundation for the BACT limit would be established.

AUXILIARY BOILER, AC53-33822

1. Stack Location Coordinates

Same comment as for Sulfuric Acid plants.

2. Limitation on Operating Time

As stated in the permit application USSAC estimates that operation of the auxiliary boiler will normally not be required more than five weeks a year. Emergencies may arise which require operation for longer periods of time. When operating on natural gas, which contains only a trace amount of sulfur if any, atmospheric contamination from the boiler stack is negligible. USSAC, therefore, requests that operation of the auxiliary boiler on natural gas should not be time limited, since such a limitation would not give further protection to the environment but could cause hardship to plant operation.

PHOSPHORIC ACID STORAGE AREA, AC53-33868

1. Typographical error.

See item 7. of Special Conditions.