



EXHIBIT - B

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

500 EAST CENTRAL AVENUE P.O. BOX 9205
WINTER HAVEN, FLORIDA 33881

PETER P. BALJET
EXECUTIVE DIRECTOR

POLK COUNTY AP
USS AGRI-CHEMICALS (FT. MEADE)

W. D. FREDERICK, JR.
CHAIRMAN

Mr. George W. Beck
General Manager
USS Agri-Chemicals
P.O. Box 150
Bartow, Florida 33830

RECEIVED

OCT 25 1974

Dear Mr. Beck:

Pursuant to your recent application, please find enclosed a permit (No. AC53-2582) dated Oct. 21, 1974 to construct/~~operate~~ the subject pollution source.

This permit will expire on August 21, 1975 and will be subject to the conditions, requirements and restrictions checked or indicated otherwise in the attached sheet "Construction/~~Operation~~ Permit Conditions".

This permit is issued under the authority of Florida Statute 403.061(16). The time limits imposed herein are a condition to this permit and are enforceable under Florida Statute 403.161. You are hereby placed on Notice that the Department will review this permit before the scheduled date of expiry and will seek court action for violation of the conditions and requirements of this permit.

You have ten days from the date of receipt hereof within which to seek a review of the conditions and requirements contained in this permit. Failure to file a written request to review or modify the conditions or requirements contained in this permit shall be deemed a waiver of any objections thereto.

Your continued cooperation in this matter is appreciated and in future communication please refer to your permit number.

Yours very truly,

J. H. Kerns
for J. H. Kerns, P.E.
Regional Engineer
West Central Region

JHK/FW/pm
cc: Nickonovitz

John R. Middlemas
BOARD MEMBER

Alice C. Wainwright
BOARD MEMBER

Mark D. Hollis
BOARD MEMBER

Y. E. Hall
BOARD MEMBER

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR USS Agri-Chemicals
P.O. Box 1150 STATE
Bartow, Florida 33830

PERMIT NO. AC53-2582 DATE October 21, 1974

PURSUANT TO THE PROVISION OF SECTION 403.061 (16) OF CHAPTER 403, FLORIDA STATUTES, AND CHAPTER 17-4, FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
Mr. George W. Beck, General Manager

FOR THE CONSTRUCTION OF:
A limestone scrubbing process to serve existing sulfuric acid plants

LOCATED AT: 8 Ft. Meade chemical plant, S.R. 630, 3 miles West of Ft. Meade, Polk County UTM 17-416000 East, 3069000 North

IN ACCORDANCE WITH THE APPLICATION DATED September 5, 1974 AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN, ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL Aug. 21, 1975 AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

CHIEF, BUREAU OF PERMITTING J. H. KERNS, P.E. EXECUTIVE DIRECTOR
WEST CENTRAL REGION

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC53-2582

Date: October 21, 1974

- (X) 1. Construction of this installation shall be completed by June 30, 1975. Application for Permit to Operate to be submitted by _____.
- (X) 2. This construction permit expires on August 21, 1975 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
- (X) 3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction.
- (X) 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit.
- (X) 5. This scrubber stack shall be tested* for sulfur dioxide and sulfuric acid mist within 10 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC West Central Florida Regional Office P.O. Box 9205, Winter Haven, Florida 33880
- *FUEL ANALYSIS MAY BE SUBMITTED FOR REQUIRED SULFUR DIOXIDE EMISSION TEST.
- () 6. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (36FR24895; Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC _____ Florida Regional Office, _____.
- (X) 7. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.
- () 8. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- () 9. All fugitive dust generated at this site shall be adequately controlled.

(X) 10. Recognition of the foregoing estimated date of completion shall not be construed as the granting of a variance or the waiver of permittee's responsibility to conduct operations in timely compliance with applicable law.

(X) 11. The compliance schedule for this plant established by permit A053-2144 remains in effect.



53-493
D.P.C.

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

SEP 10 1966
Pd

APPLICATION TO ~~OPERATE~~/CONSTRUCT POLLUTION SOURCE(S) CONTROL REGION

SECTION I - GENERAL INFORMATION FOR ALL POLLUTION SOURCES
I TO BE FILLED IN BY APPLICANT

Source Type: Air Pollution
Type application: [] Operation [] Temporary Operation [x] Construction
Status Source: [x] New [] Existing [] Modification

Source Name: Ft. Meade Phosphate Chemical Plant County: Polk

Source Location: Street: 3 miles west of City: Ft. Meade
(Water Source Only) Lat: _____° _____' _____" Long: _____° _____' _____"
(Air Source Only) UTM: East 166.2 17-416000 North 377.9 3069000

Appl. Name and Title: G. W. Beck, Manager Florida Phosphate Operations
Appl. Address: c/o USS Agri-Chemicals, P.O. Box 150, Bartow, Florida 33830

II TO BE FILLED IN BY REGION (*BY BUREAU OF PERMITTING)

Control No: Region _____ County _____ Type _____ *Project _____

Type Permit	Date Rec'd	*Permit No.	*Issue Date	*Compl. Date	*Exp. Date
_____	_____	_____	_____	_____	_____

Source Description: _____
Control Equipment: _____

Water Permits

Receiving Body Code: _____ Surface Water Code: _____
Station No.: Influent: _____ Effluent: _____

Effluent:	Average	Design	% Reduction
Flow rate, MGD	_____	_____	_____
BOD, lbs/day	_____	_____	_____
Susp. Sol., lbs/day	_____	_____	_____
Other: _____	_____	_____	_____

Air Permits

Operating Time: [] Continuous [] Intermittent
Fuel: Type _____ M-BTU/hr. In Put _____
Incinerator: Capacity, tons/day _____ Type Waste _____
Mfg. & Model _____

Pollutant Emissions, lbs/day	Actual	Design	Allowable
Particulate	_____	_____	_____
Sulfur Oxides	_____	_____	_____
Other: _____	_____	_____	_____

Implementation: Estimated Appl. Filing Date _____
Estimated Start of Const. _____ Estimated Compliance Date _____

DESCRIPTION OF PROPOSED PROJECT

A. Describe the nature and extent of the proposed project. Refer to existing pollution control facilities, DPC permits, conditions, orders and notices, expected improvement in performance of the facilities and state whether the proposed project will result in full compliance of the source. Attach additional sheet if necessary.

The existing sulfuric acid plant is operating under permit no. A053-2144 which expires July 1, 1975. A compliance schedule was submitted to DPC on February 25, 1974. Work is on schedule and, subject to the prior issue of a construction permit, construction is expected to begin on the dates shown below. The Peabody Limestone Scrubbing Process will be used to achieve emissions at the levels required for a compliance with Chapter 17-2 rules. Refer to flow diagram E-65011-0100/A for a further description of the process.

B. Schedule of Project Covered in this Application (Construction Permit Application Only).

Federally or State Financed Projects only:

Planning Complete NA

Financing Program Complete NA

Indicate other local, state and/or federal agency approvals and dates NA

NA-Not applicable

All projects:

Start of Construction On or before 10/31/74

Completion of Construction 6/1/75 to 6/31/75 (Start-up by 6/15/75)

C. Costs of Construction (Show a breakdown of costs for individual components/units of the proposed project serving pollution control purpose only). Information on actual costs shall be furnished with the application for operation permit.

SO2 Abatement Process Unit	\$2,514,000
Disposal Pond	156,000
Supernate Pumping	63,000
Utility Tie-ins	63,000
Total	\$2,796,000

D. Indicate any previous DPC permits, issuance dates, and expiration dates.

This construction permit application is for a new facility. No previous permits have been issued.

AIR POLLUTION SOURCES & CONTROL DEVICES

A. Identification of Air Contaminants

- 1) Particulates
 - a) Dust
 - b) Fly Ash
 - c) Smoke
 - d) Other (Identify)
- 2) Sulfur Compounds
 - a) SO_x as SO₂
 - b) Reduced Sulfur as H₂S
 - c) Other (Identify)
- 3) Nitrogen Compounds
 - a) NO_x as NO₂
 - b) NH₃
 - c) Other (Identify)
- 4) Fluorides
- 5) Acid Mist
- 6) Odor
- 7) Hydrocarbons
- 8) Volatile Organic Compounds
- 9) Other (Specify): _____

B. Raw Materials and Chemicals Used (Be Specific)

Description	Utilization xxxxxx xxxxxx lbs./hr.	Approximate Contaminant Content		Relate to Flow Diagram
		Type	% Wt.	
Tail gas from an existing 1500 ton/day sulfuric acid plant	609,190	SO _x +	0.786	E-65011-0100/A (Stream #1)
		acid		
		mist		

C. Process Weight:

- 1) Total Process Weight Rate NA lbs./hr. [See Sec. 17-2.04(2)]
- 2) Product Weight NA lb./hr. expressed as NA
- 3) Normal Operating Time 24 hrs. per day, if seasonal describe: Not seasonal
NA-Not applicable

D. Airborne Contaminants Discharged:

Name of Contaminant	Design		Allowable Discharge*	Relate Location to Flow Diagram
	Actual Discharge	Discharge Criteria*		
SO ₂	10 max.	#/ton H ₂ SO ₄	10	E-65011-0100/A
Acid mist	0.15 max.	#/ton H ₂ SO ₄	0.15	(Stream #4)

* Refer to Chapter 17-2 Florida Administrative Code
(Discharge Criteria: Process Weight Rate, #/ton P₂O₅, #/M BTU/hr etc.)

E. Control Devices:

Name	% Eff.	Conditions of Operation, Particle Size Range, etc.	Relate to Flow Diagram
<u>Limestone Scrubbing</u>			
<u>Unit</u>	86.9	Continuous	E-65011-0100/A

F. Fuels:

Type (Be specific)	Daily Consumption	Heat Input BTU/hr.	Relate to Flow Diagram
<u>None</u>	<u>None</u>	<u>None</u>	<u>----</u>

G. Describe briefly, without revealing trade secrets, the unit processes/operations generating the airborne emissions identified in this application:

The control devices of this construction permit application are to reduce the airborne emissions generated in an existing sulfuric acid plant.

H. Indicate liquid or solid wastes generated and method of disposal.

Slurry discharges to the disposal pond where solids settle to the bottom. The supernate is recycled to the existing rock beneficiation plant. Alternatively the recycle may be recycled to the chemical plant. Disposal pond and recycle system totally contained on company property.

STATEMENTS BY APPLICANT AND ENGINEER

A. Applicant

The undersigned owner or authorized representative of * USS Agri-Chemicals is fully aware that the statements made in this application for a construction permit are true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provisions of Chapter 403 Florida Statutes and all the rules and regulations of the Department or revisions thereof. He also understands that a permit, if granted by the Department, will be non-transferable and he will promptly notify the Department upon sale or legal transfer of the permitted establishment.

George W. Beck
Signature of the Owner or Authorized Representative

G. W. Beck, Manager Florida Phosphate Operations
Name and Title (Please Type)

Date: 9-5-74 Telephone No.: (813) 533-1495

* Attach a letter of authorization

B. Professional Engineer Registered in Florida:

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the control and discharge of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution source(s) with appropriate control facilities, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and the rules and regulations of the Department. It is also agreed that the undersigned will furnish the applicant a set of instructions for the proper maintenance and operation of the installation covered in this application.

Signature *Arthur O. Hansen* Mailing Address: P. O. Box 150
Bartow, Florida 33830

Name: Arthur O. Hansen Telephone No.: (813) 533-1495
(please type)

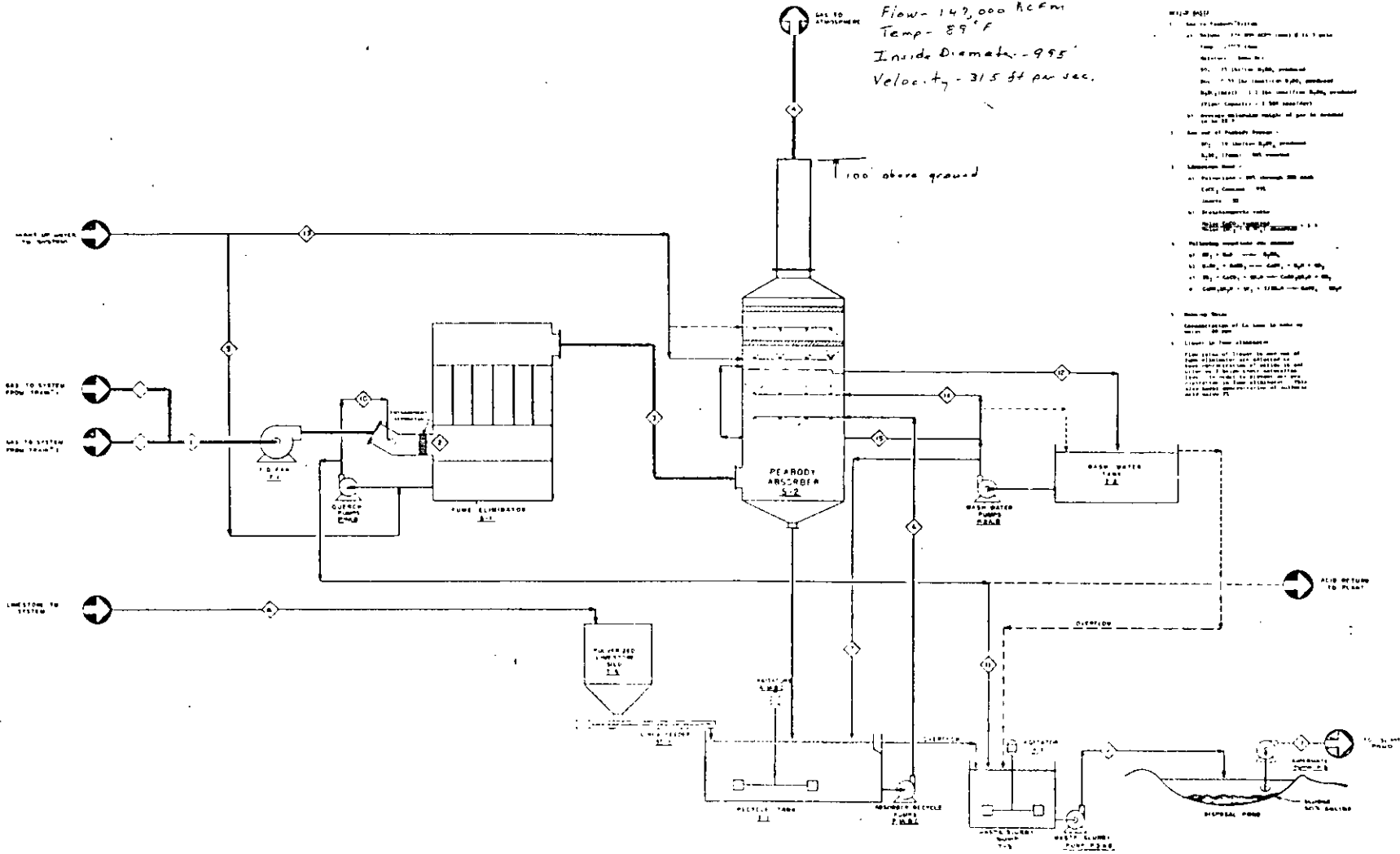
Florida Registration Number 12237 Date: 9/6/74
(Please affix seal)

RECEIVED
PERMIT NO. AC53-2542
DATE October 21, 1974

STACK CONDITIONS

Flow - 147,000 ACFM
Temp - 89° F
Inside Diameter - 99.5"
Velocity - 31.5 ft per sec.

- 1. Air to Treatment System
- 2. Air to Fuel System
- 3. Air to Quench System
- 4. Air to Wash Water System
- 5. Air to Recycle System
- 6. Air to Ammonia System



ITEM	DESCRIPTION	UNIT	QTY	REMARKS
1	PEARODY ABSORBER	S-2	1	
2	FUME ELIMINATOR	A-1	1	
3	QUENCH TANK	C-3	1	
4	WASH WATER TANK	I-2	1	
5	WASH WATER PUMP	F-2A	1	
6	AMMONIA CYCLE TANK	F-1A	1	
7	CYCLE TANK	I-1	2	
8	WATER TANK	I-1	1	
9	WATER PUMP	F-1A	1	
10	SHORELINE POND			

ITEM	DESCRIPTION	UNIT	QTY	REMARKS
11
12
13
14
15
16
17
18
19
20

ITEM	DESCRIPTION	UNIT	QTY	REMARKS
21
22
23
24
25

65011-010
E-65011-010
E-65011-010

EXHIBIT - C

REFERENCES

STUDY OF SO₂ SCRUBBERS
NATIONAL AIR POLLUTION CONTROL ADMINISTRATION

1. Aerojet-General Corp., "Applicability of Aqueous Solutions to the Removal of SO₂ from Flue Gases" (Report S-4850-01-2), Contract PI186-68-77
2. Backstrom, H. L. J., "The Chain-Reaction Theory of Negative Catalysis," *Journal of the American Chemical Society*, 49, 1460, 1927
3. Barron, C. H., and O'Hern, H. A., "Reaction Kinetics of Sodium Sulfite Oxidation by the Rapid-Mixing Method," *Chemical Engineering Science*, 21, 397, 1966
4. Bartholomew, W. H., Karow, E. O., Sfat M. R., and Whilhelm, R. H., "Oxygen Transfer and Agitation in Submerged Fermentations," *Industrial and Engineering Chemistry*, 42, 1801, 1950
5. Betz, W. H., and Betz, L. D., "Oxygen Removal with Na₂SO₃," Technical Paper No. 114
6. Cooper, C. M., Fernstrom, G. A., and Miller, S. A., "Performance of Agitated Gas-Liquid Contactors," *Industrial and Engineering Chemistry*, 36, 504, 1944
7. Frankenberg, T. T., "Removal of Sulfur from Products of Combustion," *API Preprint* No. 53-65, May 12, 1965
8. Fuller, E. C., and Crist, R. H., "The Rate of Oxidation of Sulfite Ions by Oxygen," *Journal of the American Chemical Society*, 63, 1644, 1941
9. Hixson, A. W., and Gaden, E. L., Jr., "Oxygen Transfer in Submerged Fermentation," *Industrial and Engineering Chemistry*, 42, 1792, 1950
10. Johnstone, H. F., and Singh, A. D., "Recovery of Sulfur Dioxide from Waste Gases," *Industrial and Engineering Chemistry*, 32, 1037, 1940
11. Johnstone, H. F., and Kleinschmidt, R. V., "The Absorption of Gases in Wet Cyclone Scrubbers," *Transactions of the American Institute of Chemical Engineers*, 34, 181, 1938
12. Johnstone, H. F., Read, H. J., and Blankmeyer, H. C., "Recovery of Sulfur Dioxide from Waste Gases," *Industrial and Engineering Chemistry*, 30, 101, 1938
13. Mallette, F. S., *Problems and Control of Air Pollution*, Chapter 15, Reinhold Publishing Corp., New York, 1955

14. Manvelyan, M. G., Grigoryan, G. O., et al, "Effect of Inhibitors on Oxidation of Magnesium Sulfite to Sulfate by Atmospheric Oxygen in Presence of Traces of Nitrogen Oxides," translated from *Zhurnal Prikladnoi Khimii*, 34, 896, 1961
15. Maxon, W. D., and Johnson, M. J., "Aeration Studies on Propagation of Baker's Yeast," *Industrial and Engineering Chemistry*, 45, 2554, 1953
16. Phillips, D. H., and Johnson, M. J., "Oxygen Transfer in Agitated Vessels," *Industrial and Engineering Chemistry*, 51, 83, 1959
17. Srivastana, R. D., McMillan, A. F., and Harris, I. J., "The Kinetics of Oxidation of Sodium Sulphite," *Canadian Journal of Chemical Engineering*, 46, 181, 1968
18. Wartman, F. S., "Oxidation of Ammonium Sulphite Solution," United States Bureau of Mines, Progress Reports -- R.I. 3339 Metallurgical Division, No. 17, May 1937
19. Yagi, S., and Inoue, H., "The Absorption of Oxygen into Sodium Sulphite Solution," *Chemical Engineering Science*, 17, 411, 1962
20. Johnstone, H. F., "Recovery of Sulfur Dioxide from Waste Gases," *Industrial and Engineering Chemistry*, 27, 587, 1935
21. Johnstone, H. F., and Keyes, D. B., "Recovery of Sulfur Dioxide from Waste Gases," *Industrial and Engineering Chemistry*, 27, 659, 1935
22. Johnstone, H. F., and Singh, A. D., "Recovery of Sulfur Dioxide from Waste Gases," *Industrial and Engineering Chemistry*, 29, 286, 1937
23. Johnstone, H. F., "Recovery of Sulfur Dioxide from Waste Gases," *Industrial and Engineering Chemistry*, 29, 1396, 1937
24. Johnstone, H. F., and Williams, G. C., "Absorption of Gases by Liquid Droplets," *Industrial and Engineering Chemistry*, 31, 993, 1939
25. Johnstone, H. F., and Silcox, H. E., "Gas Absorption and Humidification in Cyclone Spray Towers," *Industrial and Engineering Chemistry*, 39, 808, 1947
26. Pigford, R. L. and Pyle, C., "Performance Characteristics of Spray Type Absorption Equipment," *Industrial and Engineering Chemistry*, 43, 1649, 1951
27. Whitney, R. P., et al, "On the Mechanism of Sulfur Dioxide Absorption in Aqueous Media," *TAPPI*, 36, 172, 1953
28. Parkinson, R. V., "The Absorption of Sulfur Dioxide from Gases of Low Concentration," *TAPPI*, 39, 522, 1956
29. Pollock, W. A., et al, "Removal of Sulfur Dioxide and Fly Ash from Coal Burning Power Plant Flue Gases," *ASME Preprint*, August 5, 1966

30. Katell, S., "Removal of Sulfur Dioxide from Flue Gas," *Chemical Engineering Progress*, 62, 67, 1966
31. Reiss, L. P., "Cocurrent Contacting in Packed Towers," *Industrial and Engineering Chemistry, Process Design and Development*, Vol. 6, 486, 1967
32. Kopita, R., and Gleason, T. G., "Wet Scrubbing of Boiler Flue Gas," *Chemical Engineering Progress*, 64, 74, 1968
33. Blosser, R. O., and Cooper, H. B. H., "Trends in Atmospheric Particulate Matter Reduction in the Kraft Industry," *TAPPI*, 51, 73A, 1968
34. Danckwerts, P. V., "Gas Absorption with Instantaneous Reaction," *Chemical Engineering Science*, 23, 1045, 1968

ADDITIONAL REFERENCES

1. Various authors, "SO₂ Processing", *Chemical Engineering Progress*, Vol. 71, no. 5, 1975.
2. Karan S. Gaus, "Pollution Control with SO₂ Recovery", *Pollution Engineering*, Vol. 10, no. 5, 1978.
3. J. B. Rinckhoff and J. J. Friedman, "Design Options for Sulfuric Acid Plants", *Chemical Engineering Progress*, March, 1977.
4. C.I.L., "Improving H₂SO₄ Plant Efficiency without Interpass Absorption", *Sulfur*, Nov./Dec., 1978.

EXHIBIT-D

AVERAGE AND MAXIMUM PRODUCTION/EMISSION RATES

The material balance on the contractors drawing, Attachment-E of the permit application, represents nominal design rates under average conditions.

USSAC expects maximum sustainable production rates to be 10% in excess of the nominal design. The application form section III C, first column, specifies emissions to be recorded as "maximum, lbs./hr.", and the numbers entered comply with this specification. For consistency, maxima were also used in section III B.

For further clarification tables have been prepared to summarize average and maximum rates, and are included as part of EXHIBIT-D. See tables IA, IB, IIA, and IIB. Numbers are given in lbs./hr. to be more easily identified with permit application numbers which are also in lbs./hr.

There are no fluoride emissions in streams 22 and 23 on Attachment-E of the permit application. This is verified by the designer/contractor letter which is included with this EXHIBIT-D.

EXHIBIT D

TABLE IA-AVERAGE RAW MATERIAL & PRODUCTION RATES
(Refer Attachment E)

	Pounds Per Hour		Pounds Per Hour (Tons/Day)	
	Train A	Train B	Total	
Rock Feed, P ₂ O ₅	61,085	61,085	122,170	(1466)
Production, P ₂ O ₅	58,335	58,335	116,670	(1400)

TABLE IB-FLUORIDE EMISSIONS AT AVERAGE PRODUCTION RATE
(Refer Attachment E)

	Pounds Per Hour		Pounds Per Hour (Lbs./Day)	
	Train A	Train B	Total	
Reaction Area, Stream 20	0.45	0.45	0.90	(21.6)
Storage Area, Stream 21	0.16	0.16	0.32*	(7.6)
Other	0	0	0	0
Total	0.61	0.61	1.22	(29.2)

*The storage area scrubber is common to both trains.

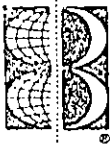
TABLE IIA-MAXIMUM RAW MATERIAL & PRODUCTION RATES

	Pounds Per Hour		Pounds Per Hour (Tons/Day)	
	Train A	Train B	Total	
Rock Feed, P ₂ O ₅	70,510	70,510	141,020	(1692)
Production, P ₂ O ₅	64,165	64,165	128,330	(1540)

TABLE IIB-FLUORIDE EMISSIONS AT MAXIMUM PRODUCTION RATE

	Pounds Per Hour		Pounds Per Hour (Lbs./Day)	
	Train A	Train B	Total	
Reaction Area, Stream 20	0.53	0.53	1.06	(25.4)
Storage Area, Stream 21	0.18	0.18	0.36*	(8.6)
Other	0	0	0	0
Total	0.71	0.71	1.42	(34.0)

*The storage area scrubber is common to both trains.



Badger

EXHIBIT - D

RECEIVED

SEP 18 1980

USS ENG. - FT. MEADE

GULF DESIGN DIVISION

1401 NORTH WESTSHORE BOULEVARD □ P.O. BOX 22317 □ TAMPA, FLORIDA 33622 □ TELEPHONE: 813/879-0715

September 19, 1980
Letter No. GD/USSAC-030L

USS Agri-Chemicals
P.O. Box 150
Bartow, Florida 33830

Attention: Mr. R. T. Lindsay
Project Manager


Subject: Exhaust Gases from Vacuum Pump Silencer
Phosphoric Acid Plant
Fort Meade, Florida
Badger Study No. E-7541

Dear Bob:

In recent discussions, your technical team questioned the nature of gases exhausting from the Reactor and Filter Vacuum Pumps in our phosphoric acid plant. Please be advised that these gases are primarily air, carbon dioxide, and water vapor. We have not detected fluorine compounds in gases leaving these silencers.

Very truly yours,

BADGER AMERICA, INC.


J. W. Salter
Project Manager

JWS:mey

EXHIBIT-E

ERRATA

A numerical error has been found in Attachment-B, paragraph 3, of the permit application.

Attachment-B revised for correction is included as EXHIBIT-E. The error was not reflected elsewhere in the application.

TRAIN - A

ATTACHMENT B

(For Section V of Application)

1. Total Process Input Rate and Product Weight

P ₂ O ₅ Input	=	70510	lb/h
P ₂ O ₅ in Product	=	64165	lb/h
P ₂ O ₅ Loss to Gypsum Storage	=	6345	lb/h

2. Emission Estimate and Test Methods

- (a) Basis of Emission Estimate - performance guarantee from Badger America Inc. (Attachment A) which equates to meeting Federal NSPS and Florida Emission Limiting Standards.
- (b) Compliance Test Methods - in accordance with 40 CFR 60, or DER/EPA approved alternate methods.

3. Basis of Potential Discharge

(Refer to Flow Diagram, Attachment E)

Based on guarantees from Bader America, fluoride emissions from the reactor area fume scrubber will be 10.8 pounds per day (lb/d) at a scrubber efficiency of 99%. Fluoride emissions from the storage tank area fume scrubber will be 3.8 lb/d at a scrubber efficiency of 95%. Total potential (uncontrolled) emission rates will be as follows:

Reactor Area	=	10.8 lb/d	=	¹⁰⁸⁰ 2090 lb/d *
		<u>0.01 (effic. factor)</u>		
Storage Tank Area	=	^{3.8} 7.8 lb/d	=	⁷⁶ 156 lb/d *
		<u>0.05 (effic. factor)</u>		
<hr/>				
TOTAL			=	¹⁷³⁶ 2246 lb/d *
			=	⁴⁸ 94 lb/h *

4. Design Details of Pollution Control Equipment

Design details are not yet available. Refer to flow diagram in Attachment E for additional information.

* Revised to correct error - 9/15/80

TRAIN-B

ATTACHMENT B
(For Section V of Application)1. Total Process Input Rate and Product Weight

P ₂ O ₅ Input	=	70510	lb/h
P ₂ O ₅ in Product	=	64165	lb/h
P ₂ O ₅ Loss to Gypsum Storage	=	6345	lb/h

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3. Basis of Potential Discharge

(Refer to Flow Diagram, Attachment E)

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Reactor Area	=	10.8 lb/d	=	$\frac{1080}{0.01 \text{ (effic. factor)}}$	=	2090 lb/d *
Storage Tank Area	=	$\frac{3.8}{0.05 \text{ (effic. factor)}}$ lb/d	=	$\frac{76}{0.05 \text{ (effic. factor)}}$	=	156 lb/d *
<hr/>						
TOTAL				$\frac{1156}{0.05 \text{ (effic. factor)}}$	=	2246 lb/d *
				$\frac{48}{0.05 \text{ (effic. factor)}}$	=	94 lb/h *

4. Design Details of Pollution Control Equipment

Design details are not yet available. Refer to flow diagram in Attachment E for additional information.

* Revised to correct error - 9/15/80

	After	Before	metric units
emission rate (g/sec)	0.88 lb/hr	0.71 lb/hr	0.111
stack ht (meters)	85 ft		25.9
stack exit temp (°K)	100°F		311
stack exit velocity (m/s)	22 FT/sec		6.7
stack dia (m)	3.4 FT		1.04

@@PRNT

@XQT TSOURCE.TEST-STACK

ENTER OPTIONS 1,2,3,TEMP K,MIX HT,AND RECEPTOR ELE

0 0 0 293 1500 0

ENTER ANEMOMETER HEIGHT,AND SIX WIND EXPONENTS

.10 .15 .20 .25 .30 .30

USS AGRI CHEM PHOS ACID PLT MODIF

FTN ERR ON UNIT-5

INPUT DATA DOES NOT CORRESPOND TO TYPE

ENTER UP TO 80 COLUMNS OF HEADER INFORMATION

USS AGRI CHEM PHOS ACID PLTS MODIF

ENTER SRC STRENGTH,HT,GAS TEMP,GAS VELOCITY,& DIAM

0.111 25.9 311 6.7 1.04

PTPLU VERSION 80021, TOM PIERCE AND BRUCE TURNER : ENVIRONMENTAL OPERATIONS BRANCH

USS AGRI CHEM PHOS ACID PLTS MODIF

OPTIONS 1=YES USE THE OPTION 0=NO DO NOT USE THE OPTION

IOPT(1) = 0 (COMPUTE GRADUAL PLUME RISE) AMBIENT AIR TEMP = 293.00(DEG.K)
 IOPT(2) = 0 (COMPUTE STACK DOWNWASH) WIND EXPONENTS = .15 .20 .25 .30 .30 .00
 IOPT(3) = 0 (COMPUTE INITIAL PLUME SIZE) ANEMOMETER HT = .10 (METERS)
 IF = 1 USE PASQUILLS RECOMMENDATION

SOURCE PARAMETERS

EMISSION RATE = .11(G/SEC) PHYSICAL STACK HEIGHT = 25.90(METERS)
 STACK TEMP = 311.00(DEG.K) STACK EXIT VELOCITY = 6.70(M/SEC)
 STACK DIAM = 1.04(METERS) VOLUME FLOW = 5.69(CU M/SEC)
 MIXING HT = 1500.0(METERS) RECEPTOR HT = .00(METERS)

Max Impact
 after modif { 7.3 ug/m³ - 1 stack
 14.6 ug/m³ - 2 stacks

Max Impact before Modif = $(14.6) \left(\frac{0.71}{0.78} \right) = 11.8 \frac{ug}{m^3}$
 (1 hr)

Increased Impact = $\frac{14.6 \times 4 = 58.4 (24hr)}{11.8 \times 4 = 47.2 (24hr)}$
 2.8 ug/m³ increase
 (1 hr)

X 0.4
 11.2 ug/m³ max
 24 hr
 1 impact

ANALYSIS OF CONCENTRATION AS A FUNCTION OF STABILITY AND WIND SPEED

****EXTRAPOLATED WINDS****

STABILITY	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)
1	.50	7.3136-006	.331	69.7	1.15	6.7149-006	.225	44.9
1	.80	7.1592-006	.266	53.2	1.84	5.7276-006	.192	37.8
1	1.00	6.9160-006	.238	47.8	2.30	5.1565-006	.181	35.4
1	1.50	6.2050-006	.206	40.5	3.45	4.0767-006	.166	32.2
1	2.00	5.5207-006	.188	36.8	4.60	3.3510-006	.159	30.7
1	2.50	4.9366-006	.177	34.7	5.75	2.8389-006	.154	29.7
1	3.00	4.4484-006	.171	33.2	6.90	2.4605-006	.151	29.1

****EXTRAPOLATED WINDS****

STABILITY	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)
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2	.50	6.6004-006	.505	69.7	1.52	6.0614-006	.289	40.3
2	.80	6.7456-006	.384	53.2	2.43	4.9935-006	.250	34.9
2	1.00	6.6432-006	.344	47.8	3.04	4.4224-006	.237	33.1
2	1.50	6.0855-006	.291	40.5	4.56	3.4069-006	.219	30.7
2	2.00	5.4707-006	.264	36.8	6.08	2.7586-006	.211	29.5
2	2.50	4.9225-006	.248	34.7	7.60	2.3142-006	.205	28.8
2	3.00	4.4552-006	.237	33.2	9.12	1.9919-006	.202	28.3
2	4.00	3.7244-006	.224	31.4	12.15	1.5582-006	.195	27.7
2	5.00	3.1898-006	.216	30.3	15.19	1.2792-006	.192	27.3

****EXTRAPOLATED WINDS****

STABILITY	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)
3	2.00	5.6734-006	.393	36.8	8.02	2.3438-006	.298	28.6
3	2.50	5.1306-006	.368	34.7	10.03	1.9487-006	.292	28.1
3	3.00	4.6601-006	.351	33.2	12.04	1.6669-006	.288	27.7
3	4.00	3.9138-006	.330	31.4	16.05	1.2923-006	.283	27.3
3	5.00	3.3618-006	.317	30.3	20.06	1.0549-006	.280	27.0
3	7.00	2.6130-006	.303	29.0	28.08	7.7122-007	.276	26.7
3	10.00	1.9535-006	.292	28.1	40.12	5.4946-007	.273	26.4
3	12.00	1.6711-006	.288	27.7	48.14	4.6105-007	.272	26.4
3	15.00	1.3728-006	.284	27.4	60.18	3.7140-007	.271	26.3

****EXTRAPOLATED WINDS****

STABILITY	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)
4	.50	4.3152-006	1.683	69.7	2.65	4.1157-006	.678	34.2
4	.80	5.1556-006	1.107	53.2	4.24	3.1493-006	.603	31.1
4	1.00	5.3355-006	1.000	47.8	5.30	2.7075-006	.578	30.0
4	1.50	5.0628-006	.836	40.5	7.94	1.9948-006	.545	28.7
4	2.00	4.6413-006	.744	36.8	10.59	1.5756-006	.529	28.0
4	2.50	4.2296-006	.690	34.7	13.24	1.3011-006	.520	27.6
4	3.00	3.8625-006	.654	33.2	15.89	1.1077-006	.513	27.3
4	4.00	3.2671-006	.610	31.4	21.19	8.5357-007	.505	26.9

4	5.00	2.8189-006	.584	30.3	26.48	6.9414-007	.500	26.7
4	7.00	2.2027-006	.554	29.0	37.08	5.0528-007	.495	26.5
4	10.00	1.6536-006	.532	28.1	52.97	3.5879-007	.491	26.3
4	12.00	1.4169-006	.524	27.7	63.56	3.0066-007	.489	26.2
4	15.00	1.1659-006	.515	27.4	79.45	2.4188-007	.488	26.2
4	20.00	8.9982-007	.507	27.0	105.93	1.8243-007	.486	26.1

****EXTRAPOLATED WINDS****

STABILITY	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)
5	2.00	1.8429-006	1.845	49.7	10.59	6.0767-007	1.283	39.6
5	2.50	1.6055-006	1.746	48.0	13.24	5.1684-007	1.233	38.6
5	3.00	1.4308-006	1.671	46.7	15.89	4.5180-007	1.195	37.8
5	4.00	1.1877-006	1.564	44.8	21.19	3.6398-007	1.140	36.7
5	5.00	1.0242-006	1.489	43.4	26.48	3.0681-007	1.102	36.0

****EXTRAPOLATED WINDS****

STABILITY	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)	WIND SPEED (M/SEC)	MAX CONC (G/CU M)	DIST OF MAX (KM)	PLUME RISE (M)
6	2.00	1.7009-006	3.000	45.7	2.00	1.7009-006	3.000	45.7
6	2.50	1.4851-006	3.000	44.2	2.50	1.4851-006	3.000	44.2
6	3.00	1.3219-006	2.898	43.2	3.00	1.3219-006	2.898	43.2
6	4.00	1.0947-006	2.705	41.6	4.00	1.0947-006	2.705	41.6
6	5.00	9.4195-007	2.572	40.5	5.00	9.4195-007	2.572	40.5

(1) NO COMPUTATION WAS ATTEMPTED AS THE DISTANCE TO THE POINT OF MAXIMUM CONCENTRATION IS SO GREAT THAT THE SAME STABILITY IS NOT LIKELY TO PERSIST LONG ENOUGH FOR THE PLUME TO TRAVEL THIS FAR.

(2) THE PLUME IS OF SUFFICIENT HEIGHT THAT EXTREME CAUTION SHOULD BE USED IN INTERPRETING THIS COMPUTATION AS THIS STABILITY TYPE MAY NOT EXIST TO THIS HEIGHT. ALSO WIND SPEED VARIATIONS WITH HEIGHT MAY EXERT A DOMINATING INFLUENCE.

(3) NO COMPUTATION WAS ATTEMPTED FOR THIS HEIGHT AS THE POINT OF MAXIMUM CONCENTRATION IS GREATER THAN 100 KILOMETERS FROM THE SOURCE.