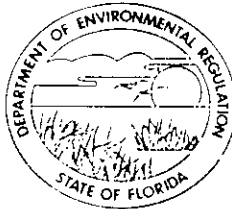


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. J. C. Daniel, Manager
USS Agri-Chemicals
P. O. Box 867
Ft. Meade, Florida 33841

August 23, 1985

Enclosed are Permit Numbers AC 53-103831, 103830, 103829, and 081664 to USS Agri-Chemicals which authorizes increased production in two phosphoric acid and two sulfur acid plants. These permits are issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, 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 32301; 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 permit is filed with the clerk of the Department.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Enclosure

cc: John Koogler
Bill Thomas
Bruce Miller, FPA

CERTIFICATION

This is to certify that the foregoing Notice of Permit and all copies requested were mailed before the close of business on August 27, 1985.

C. H. Fancy

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to §120.52(9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Patricia G. Adams
Clerk

8/27/85
Date

P 085 152 641

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982
* U.S. P.O. 1984-46-014

Sent to Mr. J. C. Daniel	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 8/27/85	

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.

2. Restricted Delivery.

3. Article Addressed to:
Mr. J. C. Daniel
USS Agri-Chemicals
P. O. Box 867
Ft. Meade, FL 33841

4. Type of Service: Registered Insured Certified COD Express Mail

Article Number: P 085 152 641

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X *Pat Daniel*

6. Signature - Agent
X

7. Date of Delivery
8-29-85

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

DOMESTIC RETURN RECEIPT

Final Determination

USS Agri-Chemicals
Ft. Meade, Florida
Polk County

Phosphoric Acid Plant Modifications

Plants	Permit Numbers
A	AC 53-103831
B	AC 53-103830

Sulfur Acid Plant Modifications

Plants	Permit Numbers
A	AC 53-103829
B	AC 53-081664

Florida Department Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

August 21, 1985

Final Determination
USS Agri-Chemicals

The Technical Evaluation and Preliminary Determinations for the proposed increases in production of two phosphoric acid and two sulfuric acid plants at USS Agri-Chemical's Ft. Meade, Polk County, Florida phosphate fertilizer facility were distributed on June 27, 1985. Copies of the evaluations were available for public inspection at the Bartow Public Library and the department's Tampa and Tallahassee offices. The Notice of Proposed Agency Action on the permit applications was published in The Polk County Democrat on July 18, 1985.

The only comment received on the department's intent to issue the permits was a request from the company to remove the limits on the annual hours of operation of the sulfuric acid plants because the company may need the additional production in the future and the modeling results submitted with the original applications showed no violation of PSD increments or ambient air quality standards with continuous operation of the plants.

The bureau has reviewed this matter and confirmed that the applicant's statements are correct. Specific Condition No. 9 in construction permit Nos. AC 53-103829 and AC 53-081664 have been changed to allow continuous operation of the sulfuric acid plants.

No comments were received on proposed permits AC 53-103831 and AC 53-103830 for the phosphoric acid plants.

The final action of the department will be to issue the permits to construct that authorize an increase in production of two sulfuric acid plants as proposed in the Technical Evaluation and Preliminary Determination, with the change in the hours of operation as discussed above, and to issue the permits to construct the phosphoric acid plants as proposed in the determination.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
USS Agri-Chemicals
P. O. Box 867
Ft. Meade, Florida 33841

Permit Number: AC 53-103830
Expiration Date: April 1, 1987
County: Polk
Latitude/Longitude: 27° 44' 32"N/
81° 51' 6"W
Project: Phosphoric Acid Plant B
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Modification of an existing phosphoric acid plant to increase production from 800 to 1,000 TPD P₂O₅. Fluoride emissions from the plant are controlled by a 12,000 ACFM venturi scrubber that discharges through a 3.4 foot diameter, 85 foot high stack. Fluoride emissions from the clarification and storage areas are controlled by a 6,000 ACFM venturi scrubber that discharges through a 2 foot diameter, 60 foot high stack. The plant is located in Polk County, 3.5 miles west of Ft. Meade on State Road 630. The UTM coordinates of this site are zone 17, 416.07 km E and 3068.70 km N.

This construction permit replaces permit No. AO 53-69839.

The modification shall be in accordance with the plans and schedule submitted by the permittee and attached to the permit except for the changes listed in the Specific Conditions.

attachments: Application received May 6, 1985.
USS Agri-Chemicals letter dated April 24, 1985.
Application for PSD Approval dated January, 1984.
USS Agri-Chemicals letter dated August 20, 1984.
Sholtes & Koogler letter dated May 18, 1984.
USS Agri-Chemicals letter dated January 19, 1984.

PERMITTEE:
USS Agri-Chemicals

Permit Number:AC 53-103830
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103830
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times 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 credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:

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

PERMITTEE:
USS Agri-Chemicals

Permit Number:AC 53-103830
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103830
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The phosphoric acid plant shall comply with all requirements of 40 CFR 60, Subpart T - Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid plants, prior to, during, and after the modifications.

2. Phosphorus bearing feed material to the modified plant shall not exceed 1,056 ton per day P₂O₅ input (1,000 TPD P₂O₅ product) and 45.8 TPH P₂O₅ production. Raw material input shall be monitored as required by 40 CFR 60.203. All records shall be kept for a minimum of 2 years.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103830
Expiration Date: April 1, 1987

SPECIFIC CONDITIONS:

3. Total fluoride (F) emissions from this plant's manufacturing, clarification, and storage equipment shall not exceed 0.02 lb F/T P₂O₅ input and 21.1 lb/day. The plant's emissions shall be the sum of the fluoride emissions from the manufacturing facilities and one half of the fluoride emissions from the clarification/storage area. Compliance with this condition shall be determined by the test methods and procedures specified in 40 CFR 60.204 while the plant is operating at the permitted capacity of 44 TPH P₂O₅ input (+ 10%). The acid plant venturi scrubber and storage/clarification venturi scrubber shall be tested within 24 hours of each other. Scrubber water pressure, scrubber water flow, and gas pressure drop shall be monitored during any compliance test and a summary of this data included in any emissions test report. The Southwest District shall be notified at least 15 days in advance of any compliance test.

4. The acid storage and clarification areas of this plant may operate continuously, 8760 hour per year. The manufacturing equipment shall not operate more than 7,968 hour per year unless prior approval has been obtained from the Southwest District.

5. All manhole openings, seal tanks, etc. shall be covered during plant operations to minimize fugitive fluoride emission.

6. The wetted area in the gypsum disposal area and the process cooling pond shall not be increased without prior approval from the Southwest District.

7. The Company shall submit semi-annual status reports on the plant modifications to the Southwest District that describe what modifications were done during the preceding 6 months, what modifications are planned for the next 6 months, and the maximum hourly and daily production rates achieved during the preceding 6 months.

8. The Company shall submit a complete application for permit to operate this phosphoric acid plant, which will include an emission tests report of the plant (manufacturing, clarification, and storage scrubbers), to the Southwest District at least 90 days prior to the expiration date of this construction permit or no later than 45 days after reaching the permitted production capacity, whichever date occurs first. If the compliance tests are conducted at an operating rate of less than 90 percent of the permitted capacity, then any permit to operate issued for the plant shall restrict its maximum production to not more than 10 percent

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103830
Expiration Date: April 1, 1987

SPECIFIC CONDITIONS:

above the production rate that existed during the compliance tests. The Company may prorate the allowable fluoride emissions among the manufacturing, clarification and storage scrubbers.

9. Upon obtaining a permit to operate, the Company will be required to make periodic compliance tests and to submit annual operation reports to the Southwest District which shall include as a minimum: The amount of material processed during the preceding year, a recent fluoride emission tests report, the annual emissions from the plant (note calculation basis), and any change to the plant described in the information contained in the permit application.

Issued this 22 day of August, 1985

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

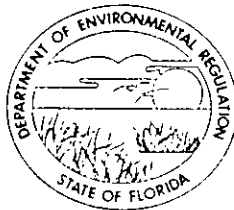


VICTORIA J. TSCHINKEL, Secretary

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
USS Agri-Chemicals
P. O. Box 867
Ft. Meade, Florida 33841

Permit Number: AC 53-103831
Expiration Date: April 1, 1987
County: Polk
Latitude/Longitude: 27° 44' 32"N/
81° 51' 6"W
Project: Phosphoric Acid Plant A
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Modification of an existing phosphoric acid plant to increase production from 800 to 1,000 TPD P₂O₅. Fluoride emissions from the plant are controlled by a 12,000 ACFM venturi scrubber that discharges through a 3.4 foot diameter, 85 foot high stack. Fluoride emissions from the clarification and storage areas are controlled by a 6,000 ACFM venturi scrubber that discharges through a 2 foot diameter, 60 foot high stack. The plant is located in Polk County, 3.5 miles west of Ft. Meade on State Road 630. The UTM coordinates of this site are zone 17, 416.07 km E and 3068.78 km N.

This construction permit replaces permit No. AO 53-69840.

The modification shall be in accordance with the plans and schedule submitted by the permittee and attached to the permit except for the changes listed in the Specific Conditions.

attachments: Application received May 6, 1985.
USS Agri-Chemicals letter dated April 24, 1985.
Application for PSD Approval dated January, 1984.
USS Agri-Chemicals letter dated August 20, 1984.
Sholtes & Koogler letter dated May 18, 1984.
USS Agri-Chemicals letter dated January 19, 1984.

PERMITTEE:
USS Agri-Chemicals

Permit Number:AC 53-103831
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103831
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times 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 credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:

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

PERMITTEE:
USS Agri-Chemicals

Permit Number:AC 53-103831
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103831
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The phosphoric acid plant shall comply with all requirements of 40 CFR 60, Subpart T - Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid plants, prior to, during, and after the modifications.

2. Phosphorus bearing feed material to the modified plant shall not exceed 1,056 ton per day P_2O_5 input (1,000 TPD P_2O_5 product) and 45.8 TPH P_2O_5 production. Raw material input shall be monitored as required by 40 CFR 60.203. All records shall be kept for a minimum of 2 years.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103831
Expiration Date: April 1, 1987

SPECIFIC CONDITIONS:

3. Total fluoride (F) emissions from this plant's manufacturing, clarification, and storage equipment shall not exceed 0.02 lb F/T P₂O₅ input and 21.1 lb/day. The plant's emissions shall be the sum of the fluoride emissions from the manufacturing facilities and one half of the fluoride emissions from the clarification/storage area. Compliance with this condition shall be determined by the test methods and procedures specified in 40 CFR 60.204 while the plant is operating at the permitted capacity of 44 TPH P₂O₅ input (+ 10%). The acid plant venturi scrubber and storage/clarification venturi scrubber shall be tested within 24 hours of each other. Scrubber water pressure, scrubber water flow, and gas pressure drop shall be monitored during any compliance test and a summary of this data included in any emissions test report. The Southwest District shall be notified at least 15 days in advance of any compliance test.

4. The acid storage and clarification areas of this plant may operate continuously, 8760 hour per year. The manufacturing equipment shall not operate more than 7,968 hour per year unless prior approval has been obtained from the Southwest District.

5. All manhole openings, seal tanks, etc. shall be covered during plant operations to minimize fugitive fluoride emission.

6. The wetted area in the gypsum disposal area and the process cooling pond shall not be increased without prior approval from the Southwest District.

7. The Company shall submit semi-annual status reports on the plant modifications to the Southwest District that describe what modifications were done during the preceding 6 months, what modifications are planned for the next 6 months, and the maximum hourly and daily production rates achieved during the preceding 6 months.

8. The Company shall submit a complete application for permit to operate this phosphoric acid plant, which will include an emission tests report of the plant (manufacturing, clarification, and storage scrubbers), to the Southwest District at least 90 days prior to the expiration date of this construction permit or no later than 45 days after reaching the permitted production capacity, whichever date occurs first. If the compliance tests are conducted at an operating rate of less than 90 percent of the permitted capacity, then any permit to operate issued for the plant shall restrict its maximum production to not more than 10 percent

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103831
Expiration Date: April 1, 1987

SPECIFIC CONDITIONS:

above the production rate that existed during the compliance tests. The Company may prorate the allowable fluoride emissions among the manufacturing, clarification and storage scrubbers.

9. Upon obtaining a permit to operate, the Company will be required to make periodic compliance tests and to submit annual operation reports to the Southwest District which shall include as a minimum: The amount of material processed during the preceding year, a recent fluoride emission tests report, the annual emissions from the plant (note calculation basis), and any change to the plant described in the information contained in the permit application.

Issued this 22 day of August, 1985

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
USS Agri-Chemicals
P. O. Box 867
Ft. Meade, Florida 33841

Permit Number: AC 53-081664
Expiration Date: April 1, 1987
County: Polk
Latitude/Longitude: 24° 44' 29"N/
81° 51' 4"W
Project: No. 2 Sulfuric Acid
Plant Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Modifications to an existing No. 2 Sulfuric Acid Plant to increase production from 2,200 to 3,000 TPD 100 percent sulfuric acid. Sulfur dioxide emissions are controlled by the double contact/double absorption process. Acid mist emissions are controlled by a demister. The plant is located in Polk County, 3.5 miles west of Ft. Meade on State Road 630. The UTM coordinates of this site are zone 17, 416.12 km E and 3068.62 km N.

This construction permit replaces permit No. AO 53-69838.

The modifications shall be in accordance with the plans and schedule submitted by the permittee and attached to the permit except for the changes listed in the Specific Conditions.

attachments: Application received May 6, 1985.
USS Agri-Chemicals letter dated April 24, 1985.
Application for PSD Approval dated January, 1984.
USS Agri-Chemicals letter dated August 20, 1984.
Sholtes & Koogler letter dated May 18, 1984.
USS Agri-Chemicals letter dated January 19, 1984.

PERMITTEE:
USS Agri-Chemicals

Permit Number:AC 53-081664
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-081664
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times 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 credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:

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

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-081664
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-081664
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The sulfuric acid plant shall comply with all requirements of 40 CFR 60, Subpart H - Standards of Performance for Sulfuric Acid Plants.
2. Sulfuric acid production shall not exceed 3,000 TPD (100% acid).
3. Sulfur dioxide emissions shall not exceed 4 lb/ton acid produced and 500 lb/hr.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-081664
Expiration Date: April 1, 1987

SPECIFIC CONDITIONS:

4. Acid mist emissions shall not exceed 0.15 lb/ton acid and 18.8 lb/hr.
5. Visible emissions shall not exceed 10 percent opacity, average for any consecutive 6 minute period.
6. Nitric oxide emissions shall not exceed 18 ppm or 73.6 TPY.
7. The test methods and procedures described in 40 CFR 60.85 shall be used to determine the compliance status of the source with the sulfur dioxide and acid mist standards and Method 9, as described in 40 CFR 60, Appendix A, shall be used to determine the compliance status of the source with the visible emissions standard. Method 7 as described in 40 CFR 60, Appendix A, shall be used to determine the nitrogen oxides emissions. Compliance tests shall be conducted while the plant is operating at its maximum permitted capacity (\pm 10%).
8. A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained, and operated on this plant as specified in 40 CFR 60.84. Excess emissions shall be reported to the Southwest District and the Bureau of Air Quality Management.
9. This plant may operate continuously, 8,760 hours per year.
10. This construction permit replaces the current operation permit for this sulfuric acid plant. While the plant is being modified, the emissions shall not exceed 4 lb SO₂ and 0.15 lb acid mist per ton of acid produced and 10 percent opacity when the plant is being operated commercially.
11. Construction shall reasonably conform to the plan and schedule in the application. Any changes in the plan or schedule shall be reported to the Southwest District. The company shall submit semi-annual status reports on the plant modifications to the Southwest District that describe what modifications were done during the preceding 6 months, what modifications are planned for the next 6 months, and the maximum hourly and daily production rates achieved during the preceding six months.
12. USS Agri-Chemicals shall take precautionary measures to prevent gas leaks and promptly repair any gas leaks that occur at this

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-081664
Expiration Date: April 1, 1987

SPECIFIC CONDITIONS:

plant. A portable industrial vacuum unit equipped with classification and air filtering equipment shall be used to rejuvenate the existing catalyst. Spent catalyst shall be disposed of in an environmentally sound manner.

13. USS Agri-Chemicals shall submit a complete application for permit to operate the sulfuric acid plant, which must include an emissions test report, to the Southwest District at least 90 days prior to the expiration date of this construction permit or no later than 45 days after reaching the permitted production capacity, whichever date occurs first. If the compliance tests are conducted at a plant operating rate of less than 90 percent of the permitted capacity (3,000 TPD), then any permit to operate issued for the plant shall restrict maximum production to not more than 10 percent above the production rate that existed during the compliance tests. USS Agri-Chemicals may continue to operate this sulfuric acid plant, if it is in compliance with all conditions of this construction permit, until its expiration date or until the expiration date of any permit to operate that is issued for this source.

13. Upon obtaining a permit to operate, USS-Agri Chemicals will be required to submit quarterly excess emissions reports (40 CFR 60.7) and annual operation reports which shall include, as a minimum, the annual production and a recent emissions test report, to the Southwest District. A copy of the excess emissions report shall be sent to the Bureau of Air Quality Management.

Issued this 22 day of August, 1985

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
USS Agri-Chemicals
P. O. Box 867
Ft. Meade, Florida 33841

Permit Number: AC 53-103829
Expiration Date: April 1, 1987
County: Polk
Latitude/Longitude: 24° 44' 27"N/
81° 51' 4"W
Project: No. 1 Sulfuric Acid
Plant Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Modifications to an existing No. 1 Sulfuric Acid Plant to increase production from 2,200 to 3,000 TPD 100 percent sulfuric acid. Sulfur dioxide emissions are controlled by the double contact/double absorption process. Acid mist emissions are controlled by a demister. The plant is located in Polk County, 3.5 miles west of Ft. Meade on State Road 630. The UTM coordinates of this site are zone 17, 416.12 km E and 3068.62 km N.

This construction permit replaces permit No. AO 53-69837.

The modifications shall be in accordance with the plans and schedule submitted by the permittee and attached to the permit except for the changes listed in the Specific Conditions.

attachments: Application received May 6, 1985.
USS Agri-Chemicals letter dated April 24, 1985.
Application for PSD Approval dated January, 1984.
USS Agri-Chemicals letter dated August 20, 1984.
Sholtes & Koogler letter dated May 18, 1984.
USS Agri-Chemicals letter dated January 19, 1984.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103829
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103829
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times 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 credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the department with the following information:

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

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103829
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103829
Expiration Date: April 1, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The sulfuric acid plant shall comply with all requirements of 40 CFR 60, Subpart H - Standards of Performance for Sulfuric Acid Plants.
2. Sulfuric acid production shall not exceed 3,000 TPD (100% acid).
3. Sulfur dioxide emissions shall not exceed 4 lb/ton acid produced and 500 lb/hr.

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103829
Expiration Date: April 1, 1987

SPECIFIC CONDITIONS:

4. Acid mist emissions shall not exceed 0.15 lb/ton acid and 18.8 lb/hr.
5. Visible emissions shall not exceed 10 percent opacity, average for any consecutive 6 minute period.
6. Nitric oxide emissions shall not exceed 18 ppm or 73.6 TPY.
7. The test methods and procedures described in 40 CFR 60.85 shall be used to determine the compliance status of the source with the sulfur dioxide and acid mist standards and Method 9, as described in 40 CFR 60, Appendix A, shall be used to determine the compliance status of the source with the visible emissions standard. Method 7, as described in 40 CFR 60, Appendix A, shall be used to determine the nitrogen oxide emissions. Compliance tests shall be conducted while the plant is operating at its maximum permitted capacity ($\pm 10\%$).
8. A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained, and operated on this plant as specified in 40 CFR 60.84. Excess emissions shall be reported to the Southwest District and the Bureau of Air Quality Management.
9. This plant may operate continuously, 8,760 hours per year.
10. This construction permit replaces the current operation permit for this sulfuric acid plant. While the plant is being modified, the emissions shall not exceed 4 lb SO₂ and 0.15 lb acid mist per ton of acid produced and 10 percent opacity when the plant is being operated commercially.
11. Construction shall reasonably conform to the plan and schedule in the application. Any changes in the plan or schedule shall be reported to the Southwest District. The company shall submit semi-annual status reports on the plant modifications to the Southwest District that describe what modifications were done during the preceding 6 months, what modifications are planned for the next 6 months, and the maximum hourly and daily production rates achieved during the proceeding six months.
12. USS Agri-Chemicals shall take precautionary measures to prevent gas leaks and promptly repair any gas leaks that occur at this

PERMITTEE:
USS Agri-Chemicals

Permit Number: AC 53-103829
Expiration Date: April 1, 1987

SPECIFIC CONDITIONS:

plant. A portable industrial vacuum unit equipped with classification and air filtering equipment shall be used to rejuvenate the existing catalyst. Spent catalyst shall be disposed of in an environmentally sound manner.

13. USS Agri-Chemicals shall submit a complete application for permit to operate the sulfuric acid plant, which must include an emissions test report, to the Southwest District at least 90 days prior to the expiration date of this construction permit or no later than 45 days after reaching the permitted production capacity, whichever date occurs first. If the compliance tests are conducted at a plant operating rate of less than 90 percent of the permitted capacity (3,000 TPD), then any permit to operate issued for the plant shall restrict maximum production to not more than 10 percent above the production rate that existed during the compliance tests. USS Agri-Chemicals may continue to operate this sulfuric acid plant, if it is in compliance with all conditions of this construction permit, until its expiration date or until the expiration date of any permit to operate that is issued for this source.

14. Upon obtaining a permit to operate, USS Agri-Chemicals will be required to submit quarterly excess emissions reports (40 CFR 60.7) and annual operation reports which shall include, as a minimum, the annual production and a recent emissions test report, to the Southwest District. A copy of the excess emissions report shall be sent to the Bureau of Air Quality Management.

Issued this 22 day of August, 1985

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

Best Available Control Technology (BACT) Determination
USS Agri-Chemicals
Polk County

The applicant plans the following modifications at its Ft. Meade chemical complex.

- 1) the total productive output from the two existing sulfuric acid plants will be increased from 4400 to 6000 tons per day of 100 percent acid,
- 2) the total output from the two phosphoric acid plants will be increased from 1600 to 2000 tons per day of P₂O₅.

The planned increase in production capacities will increase the amount of the following air pollutants released to the atmosphere.

Sulfur dioxide	1064	ton/yr
Sulfuric acid mist	39.8	ton/yr
Nitrogen oxides	59.2	ton/yr

The net emissions increase of sulfur dioxide, sulfuric acid mist and nitrogen oxides, exceed the significant emission rates listed in Table 500-2, Regulated Air Pollutants - Significant Emission Rates, and are subject to a Best Available Control Technology (BACT) determination as set forth in Florida Administrative Code Rule 17-2.630.

BACT Determination Requested by the Applicant:

Sulfur dioxide emissions not to exceed 4.0 pounds per ton of 100% acid produced using double absorption control technology. High efficiency mist eliminators will be used to control sulfuric acid mist emissions below 0.15 pound per ton of 100% acid produced. Nitrogen oxides emissions not to exceed 18 ppm or 73.6 TPY. There is no feasible method of further reducing the emissions of NO_x from a sulfuric acid plant.

Date of Receipt of a BACT application:

January 23, 1984

Date of Publication in the Florida Administrative Weekly:

February 10, 1984

Review Group Members:

The determination was based upon comments received from the New Source Review Section and the Southwest District Office.

BACT Determined by DER:

Pollutant	Emission Limit per plant
Sulfur dioxide	4 lb/ton expressed as 100% sulfuric acid produced
Sulfuric Acid Mist	0.15 lb/ton expressed as 100% sulfuric acid produced
Nitrogen Oxides	18 ppm or 73.6 TPY
Visible Emissions	Not to exceed 10% opacity

Test methods and procedures as set forth in 40 CFR 60.85 shall be used to determine compliance with the sulfur dioxide and acid mist emission limits. Compliance with the nitrogen oxides emission limit shall be in accordance with 40 CFR 60, Appendix A, Method 7.

Compliance with the visible emissions limit will be in accordance with 40 CFR 60, Appendix A, Method 9.

A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained and operated as required in 40 CFR 60, Subpart H.

BACT Determination Rationale

Double absorption technology will be used to control SO₂ emissions from the sulfuric acid plant. This method of SO₂ emission control is currently considered the best demonstrated technology. No justification could be found to require a more stringent SO₂ emission limit than the NSPS requirements (40 CFR 60, Subpart H) and DER concurs that the applicant's proposal is BACT for the control of SO₂ emissions.

Use of high efficiency mist eliminators to control sulfuric acid mist as proposed by the applicant is considered BACT. The department could not find a reason to justify for a more stringent sulfuric acid mist emission limit than the NSPS standard.

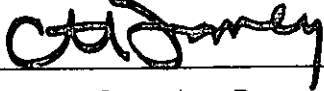
No demonstrated commercial process is currently available to control NO_x emissions from contact sulfuric acid plants.

Air quality modeling predicts no violation of any PSD increment or ambient air quality standard resulting from the emissions determined as BACT.

Details of the Analysis may be Obtained by Contacting:

Edward Palagyi, BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Recommended by:



C. H. Fancy, Deputy Bureau Chief

Date: 8-22-85

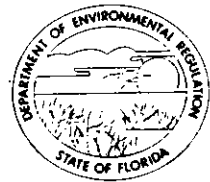
Approved by:



Victoria J. Tschinkel, Secretary

Date: 8-23-85

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

TO: Victoria J. Tschinkel
FROM: Clair Fancy *Clair Fancy*
DATE: August 21, 1985
SUBJ: Permits to Construct

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
To: _____	LOCTN: _____
To: _____	LOCTN: _____
To: _____	LOCTN: _____
FROM: _____	DATE: _____

AUG 22 1985

Office of the Secretary

Attached for your approval and signature are four permits to construct and a BACT determination that authorizes higher production rates at two sulfuric acid and two phosphoric acid plants operated by USS Agri-Chemicals at their Ft. Meade, Polk County, facility.

Public Notice of the department's intent to issue the permits was published in The Polk County Democrat on July 18, 1985.

The only comment received was from the company. They requested that the restriction in the proposed permits on the annual hours of operation of the sulfuric acid plants be removed. The bureau reviewed their request and agreed that continuous operation of the plants would not violate any air pollution control regulation.

The bureau recommends that the construction permits be issued as proposed in the Technical Evaluation and Preliminary Determination except for the change in the hours operation of the sulfuric acid plants mentioned above.

Day 90, after which the permits would be issued by default, is September 13, 1985.

CHF/WH/s

DER

AUG 23 1985

BAQM
DER

AUG 26 1985

BAQM

USS FORT MEADE CHEMICAL PRODUCTS USS 9208 USS 63-122 5631
 P.O. BOX 867
 FORT MEADE, FLA. 33841
 Phone (813) 285-8121 (813) 533-8184
 DATE 03/06/85
 PAY \$ 1200.00
 TO THE ORDER OF
 FLORIDA DEPT. OF ENVIRONMENTAL REG.
 FORT MEADE CHEMICAL PRODUCTS
 (Check of \$25,000.00 and over must be countersigned)
 AUTHORIZED SIGNATURE
 COUNTERSIGNED
 FLAGSHIP STATE BANK OF POLK COUNTY FORT MEADE, FLORIDA

⑈009208⑈ ⑆063101221⑆ ⑆220659697⑈

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 76071

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from St. Meade Chemical Products Date Mar. 4, 1985
 Address P. O. Box 867, St. Meade, FL 33841 Dollars \$ 1200.00
 Applicant Name & Address USS Apptchem, Inc. 1117 St. Meade, FL 33841
 Source of Revenue _____
 Revenue Code 601031 Application Number AC 53-103827-143530-100051
 By Patricia D. Adams



SHOLTÈS & KOOGLER, ENVIRONMENTAL CONSULTANTS
1213 N.W. 6th Street Gainesville, Florida 32601 (904) 377-5822

SKEC 173-82-08

August 6, 1985

Mr. C. H. Fancy
Deputy Chief,
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Subject: Polk County - AP
USS Agri-Chemicals
Sulfuric Acid Plant Modifications
Permit Nos. AC53-103829 and AC53-081664

Dear Mr. Fancy:

On July 22, 1985, I spoke with both you and Bill Thomas regarding a request to modify air pollution source Construction Permits AC53-103829 and AC53-081664 which have been issued in Draft form to USS Agri-Chemicals (USSAC) allowing increases in the production rates of two sulfuric acid plants located at the USSAC Ft. Meade Chemical Complex. The modification to these permits that I spoke with you and Bill about involve increasing the permitted annual hours of operation for each plant from 7967 hours per year to 8760 hours per year.

The annual operating time of 7967 hours per year appearing in the Draft Construction Permits is the operating time originally requested by USSAC. This operating time represents an annual operating factor of 91 percent. In reviewing the Draft Permits, it became apparent to USSAC that the actual operating time of a new sulfuric acid plant can approach 8760 hours per year, or a 100 percent operating factor. As a result of this, USSAC is requesting that the annual operating times for the two sulfuric acid plants (covered by Permits AC53-103829 and AC53-081664) be increased to 8760 hours per year.

The increased operating time requested for each plant will be 793 hours per year. At the permitted operating rates of 3000 tons per day, each plant, the permitted annual sulfur dioxide emission rate increase will be 396.5 tons per year and the permitted annual sulfuric

DER

6 09 1985

AQM

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Willard

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

please prepare response after consulting with Larry

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

Clan

DATE

8/9

PHONE

730

730

acid mist emission rate increase will be 14.9 tons per year; total for both plants. The maximum hourly sulfur dioxide and sulfuric acid mist emission rates will not be effected by the requested modification.

The annual increase in both sulfur dioxide and sulfuric acid mist emissions resulting from the requested modification exceeds the significant emission rate increases for these pollutants defined in Chapter 17-2.500(2)(e)2, FAC. These increases should not trigger a new PSD review, however, since the PSD review proposed in conjunction with the issuance of Construction Permits AC53-103829 and AC53-081664 and submitted to the Department in January, 1984, addresses all issues that would need to be addressed in granting this requested increase in annual operating hours.

The PSD application submitted in January 1984 included a description of the sulfuric acid plants and an evaluation of Best Available Control Technology; neither of which will change as a result of the requested modification. Furthermore, the short-term air quality impacts will remain unchanged since maximum hourly emission rates of air pollutants from the two sulfuric acid plants will not change and hence, the short-term air quality review will remain unchanged. The long-term air quality review included in the January 1984 PSD application assumed a 100 percent annual operating factor even though the permit applications requested operating times of 7967 hours per year for each plant. Hence, the long-term air quality review will likewise remain unchanged. The increase in annual operating hours is also not expected to have any effect on the impact of emissions on soils, vegetation and visibility.

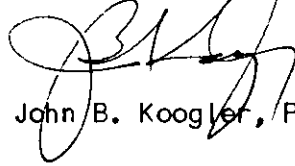
We would appreciate your review of the information contained herein and a response identifying any additional information that will be required in order to grant the requested increase in annual operating times. Two specific questions that USSAC can presently identify are:

1. Will it be necessary to republish the Public Notice describing the Department's intended action to issue the permits, and
2. Will a Waiver of the 90-day time limit be required in order for the Department to consider this request for modifications?

We would appreciate your response to these two questions and the identification of any further information that may be required.

Very truly yours,
Sincerely,

SHOLTES & KOOGLER,
ENVIRONMENTAL CONSULTANTS



John B. Koogler, Ph.D., P.E.1

JBK:ssc

cc: Mr. Bill Thomas, Tallahassee
Mr. Willard Hanks, Tallahassee
Mr. Bill Thomas, Tampa
Mr. Jim Daniels, USSAC
Mr. James H. Carroll, USSAC