



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

May 6, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Phong Vo
General Manager
Engineering and Technical Services
US Agri-Chemicals Corporation
3225 SR 630 West
Fort Meade, FL 33841-9778

Re: Ft. Meade Plant Title V Renewal DEP File No.1050051-019-AV

Dear Mr. Vo,

On April 7, 2004 the Department received your additional information for the renewal of the Title V permit for the US Agri-Chemicals Ft. Meade Plant. The application is still incomplete. Specifically, the following information remains outstanding:

1. Please try to quantify the annual amount of HF emissions coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pondwater. If applicable, please also provide information concerning the closure of these ponds.

2. Please explain the following differences between the submitted CAM Plan and the Title V Permit for this facility:

a. The CAM submittal states that the production rate for EU 005 and 020 is 50 tons per hour (each). The permit (1050051-018-AV) limit is 44 tons per hour (each).

b. The CAM submittal states that the limit for F is 0.012 lb/ton P₂O₅, the permit limit is 0.02 lb/ton P₂O₅.

c. The CAM submittal states that the limits for EU 032 and 038 are 10.2 lb/hr for PM, and 1.8 (MAP)/1.04 (DAP) lb/hr for fluoride. The permit (1050051-018-AV) limit is 16.4 lb/hr for PM, and 0.39 lb/hr for fluoride.

3. Phosphoric Acid A-Train (EU 005) & Phosphoric Acid B-Train (EU 020)

CAM is applicable for fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits with a margin of safety that allows for corrective action to be taken before a permit limit is exceeded. If the indicator ranges are different for the A-train and B-train, please submit two separate monitoring approach tables.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Phong Vo
May 6, 2004
Page 2 of 2

4. Prilled MAP/DAP Plant (EU 032) & Granular MAP/DAP Plant (EU 038)

CAM is applicable for PM and fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits with a margin of safety that allows for corrective action to be taken before a permit limit is exceeded. If the indicator ranges are different for PM and fluoride, the most restrictive will need to be used. Also, if the indicator ranges are different for the Prilled Plant and the Granular Plant, please submit two separate monitoring approach tables.

As a reminder, rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

Please submit all requested information as soon as possible to me at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If you have any questions regarding this request for additional information, please contact me at Cindy.Phillips@dep.state.fl.us or (850) 921-9534. To discuss the specific CAM requirements, please contact Mr. Jonathan Holtom at (850)921-9531 or Jonathan.Holtom@dep.state.fl.us.

Sincerely,



Cindy L. Phillips, P.E.
Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD
Jonathan Holtom, FDEP - DARM
Pradeep Raval, Consultant, Koogler and Associates
John B. Koogler, PhD., P.E., Koogler and Associates

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<input type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, on the front if space permits.		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) _____ C. Date of Delivery 3/10/04	
1. Addressee to: Mr. Phong Vo General Manager Engineering and Technical Services US Agri-Chemicals Corporation 3225 SR 630 West Fort Meade, FL 33841-9778		D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
		Service Type: <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Transfer from service label)		7000 1670 0013 3109 9625	
PS Form 3811, August 2001		102595-02-M-1540	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 1670 0013 3109 9625

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Mr. Phong Vo
 3225 SR 630 West
 Fort Meade, Florida 33841-9778