



# 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 P<sub>2</sub>O<sub>5</sub>, the permit limit is 0.02 lb/ton P<sub>2</sub>O<sub>5</sub>.
  - 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"*

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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](mailto: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](mailto:Jonathan.Holtom@dep.state.fl.us).

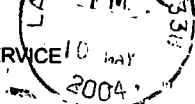
Sincerely,



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

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

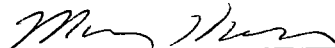
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Fort Meade, Florida 33841-9778