KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

KA 173-02-03

May 17, 2005

Mr. Errin Pichard
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal
US Agri-Chemicals Corporation – Ft. Meade Facility
DEP File No. 1050051-019-AV

Dear Mr. Pichard:

This is in response to your request for providing justification for the request for Alternate Sampling Procedure for the above referenced facility.

It is our understanding from your correspondence that the only component missing in our request for the ASP was the justification for alternate parameter monitoring. The requested information is, therefore, attached.

If you have any additional questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par
Encl.

C: Ron Brunk, USAC
Syed Arif, FDEP
Jonathan Holtom, FDEP

ADDITIONAL INFORMATION FOR
REQUEST FOR ALTERNATE SAMPLING PROCEDURE

USAC – FT. MEADE PLANT

The supporting justification requested by FDEP regarding the previously submitted alternate sampling procedures, for emissions units subject to NESHAPS, is presented below.

Justification For Request

USAC believes that fan amperage is an equivalent indicator of scrubber performance to maximum pressure drop. Fan amps provide a good indication of proper operation and maintenance of the pollution control equipment. Fan amps provide an accurate indication of air movement through the evacuation system and can be a reliable indicator of system upsets. Air flow outside normal ranges could indicate short-circuiting of air through the scrubbers, excess tramp air being drawn into the system, scrubber fouling, or inadequate evacuation of process equipment. Therefore, use of fan amps as an alternative parameter meets the intent of the monitoring requirement to assure proper operation of the pollution control system.

In addition to fan amperage being as good as or a better indicator of emissions than pressure drop, another factor in proposing fan amperage as a surrogate is that the pressure drop across the scrubbers may be relatively small. The result is that for a maximum pressure drop limit, small deviations in the pressure drop can cause a plant monitoring excursion. Requiring a maximum pressure drop as a limit may result in frequent and unnecessary plant monitoring excursions, while scrubbing efficiency was still maintained.

A similar justification is presented for the use of pump amps as an alternative to liquid flow in gpm.

The previous request addressed the following emissions units and their respective parameters:

A. Emission Unit 005 - Phosphoric Acid Plant A-Train and
Emission Unit 020 - Phosphoric Acid Plant B-Train

1. For scrubber pressure drop (surrogate for air flow):

Parameter limits:
To provide reasonable assurance of compliant operation, allow monitoring of dP (min/max); or dP (min) and fan amps (min/max); or fan amps (min/max) as a backup for no more than 1 week.

Instruments:
For dP use pressure sensors; or manometer as a backup for no more than 1 week.
For measuring fan amps, use ammeter.

Data recording:
For dP or fan amps use a continuous recorder; or computer files; or manually log 1/shift as a backup for no more than 1 week.

2. For scrubber liquid flow:

Parameter limits:
To provide reasonable assurance of compliant operation, allow monitoring of gpm (min/max); or pump amps (min/max).

Instruments:
For flow, use flow meter or pump amps as a backup for no more than 1 week.

Data recording:
Log 1/shift; or continuous recorder; or computer files

3. For P_2O_5 input:

Parameter limits:
Use totalized rock input (x gravity x % P_2O_5); or production totalizer (x %P_2O_5 x recovery) as backup for no more than 1 week; or totalized sulfuric acid (x Production factor) as a backup for no more than 1 week.

Instruments:
Feed: Use slurry flow meter and a density gauge; or a micro-motion mass flow meter; or a production totalizer as a backup for no more than 1 week; or a sulfuric acid totalizer as a backup for no more than 1 week.

Data recording:
Use acid totalizer; or production totalizer.

B. Emission Unit 038 – Granular MAP/DAP Plant

For Venturi Scrubbers:

1. For scrubber pressure drop (surrogate for air flow)

Parameter limits:
a) dP (min) OR b) Fan amps (min/max) (backup- no more than 1 week)

Instruments:
dP- pressure sensors OR manometer (backup- no more than 1 week)
Fan amps- ammeter

Data recording:
dP or Fan amps: continuous recorder OR computer files OR manually log 1/shift (backup- no more than 1 week)

2. For scrubber liquid flow

Parameter limits:
a) gpm (min/max) OR b) pump amps (min/max)

Instruments:
Flow: flow meter or pump amps (backup- no more than 1 week)

Data recording:
a) Log 1/shift OR b) continuous recorder OR c) computer files

3. For P_2O_5 input

Parameter limits:
Totalized acid input (x density x % P_2O_5) OR Production totalizer (x %P_2O_5) (backup- no more than 1 week)

Instruments:
Flow: Flow meter or Production totalizer (backup- no more than 1 week)

Data recording:
a) Acid totalizer OR b) Production totalizer

For the R/G Ammonia Absorber:

1. For pressure drop (surrogate for air flow)

Parameter limits:
a) dP (min) OR b) Fan amps (min/max)

Instruments:
dP- pressure sensors OR manometer (backup- no more than 1 week)
fan amps- ammeter

Data recording:
dP or fan amps: manually log 1/shift OR continuous recorder OR computer files

2. For liquid flow

Parameter limits:
a) gpm (min/max) OR b) Pump amps (min/max)

Instruments:
Flow: Flow meter OR Pump amps (backup- no more than 1 week)

Data recording:
dP or Fan amps: manually log 1/shift OR continuous recorder OR computer files

For Tailgas Scrubbers:

1. For pressure drop (surrogate for air flow)

Parameter limits:
a) dP (min/max) OR b) dP (min) AND fan amps (min/max) OR c) Fan amps (min/max) (backup- no more than 1 week)

Instruments:
dP- pressure sensors OR manometer (backup- no more than 1 week)
fan amps- ammeter

Data recording:
dP or Fan amps: Continuous recorder OR Computer files OR manually log 1/shift (backup- no more than 1 wk)

2. For liquid flow

Parameter limits:
a) gpm (min/max) OR b) pump amps (min/max)

Instruments:
Flow: flow meter or pump amps (backup- no more than 1 week)

Data recording:
a) Log 1/shift OR b) continuous recorder OR c) computer files

3. For P_2O_5 input

Parameter limits:
Totalized acid input (x density x % P_2O_5) OR Production totalizer (x %P_2O_5) (backup- no more than 1 week)

Instruments:
Flow: Flow meter or Production totalizer (backup- no more than 1 week)

Data recording:
a) Acid totalizer OR b) Production totalizer

Professional Engineer Certification

1. Professional Engineer Name: **John B. Koogler, Ph.D, P.E.**
   Registration Number: **12925**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Koogler and Associates**
   Street Address: **4014 NW 13th Street**
   City: **Gainesville** State: **FL** Zip Code: **32609**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 377-5822** ext. Fax: **(352) 377-7158**
4. Professional Engineer Email Address: **jkoogler@kooglerassociates.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein*, that:

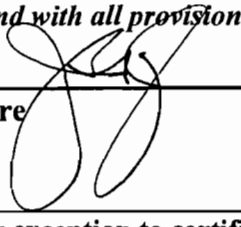
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☒, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



Signature (seal)

5/17/05
Date

*** Attach any exception to certification statement.**

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

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

Department of Environmental Protection

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

Jeb Bush
Governor

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.

Department of
Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

August 11, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Phong Vo
General Manager
Engineering and Technical Services
U.S. Agri-Chemicals Corporation
3225 SR 630 West
Fort Meade, FL 33841-9799

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

Dear Mr. Vo:

On July 16, 2004 the Department received your letter dated July 13 transmitting answers to our request for additional information dated May 6.

We requested an estimate of the annual hydrogen fluoride (HF) emissions coming from the gypsum and cooling ponds located on the property along with the fluoride concentrations, pH, and acreage. The response transmitted by U.S. Agri-Chemicals (USAC) was:

"The average pond fluoride concentration is about 7000 ppm; the pond area is about 230 acres; and, average pond pH is about 1.5 standard units. Based on past studies conducted by EPA and others, an HF emission factor of 0.1 lb/acre-day has been applied to gypsum pond and cooling ponds located at phosphate fertilizer facilities. This factor has been used for pond systems with fluoride concentrations around 10,000 ppm fluoride and a pH around 1 standard units. The estimated HF emission rate using the above emission factor is 4.2 tpy".

The Department notes that based on the past EPA studies, the estimated emission factors are in the range of 0.1 to 10 lb/acre-day. Using that range, instead of the value ascribed by USAC to EPA, the emissions for ponds in general are between 4 and 420 tpy. Based on the given pond parameters, the Department believes that emissions from the USAC pond system are not at the low end of the spectrum and are actually in excess of 10 tpy. This is sufficient to conclude that the Ft. Meade facility is a major source of hazardous air pollutants without considering HF emissions from fugitive sources, phosphoric acid manufacturing, or fertilizer production.

The compliance date for the NESHAP 40 CFR 63, Subparts AA and BB was June 10, 2002. We intend to include the applicable requirements of these standards in the Title V operation permit renewal that we are currently processing. We invite your submittal of a compliance plan for incorporation into the draft permit being prepared by the Department.

Several other companies relied on a report that yielded low HF emission estimates because of a systematic error that, after correction, would yield estimates one to two orders of magnitude greater. They have since agreed to comply with the mentioned subparts. In certain cases we have approved control equipment pressure drop parameters or requests for alternative monitoring procedures in accordance with the procedures given in 40 CFR 63. We would be pleased to discuss these matters with you in greater detail. Please note that the processing of such requests will not stop the processing of the renewal application for your Title V operation permit.

If additional testing and modeling demonstrates that the facility is not and has never been a major source of hazardous air pollutants since at least June 10, 2002, you shall have the right to request that the Department revise your Title V operation permit to remove those requirements and conditions that are applicable because the facility is a major source of hazardous air pollutants as determined by the Department.

If you have any questions regarding this matter, please contact me at (850)921-9534 or Cindy.Phillips@dep.state.fl.us . For details regarding alternative monitoring procedures or additional testing, please contact Mr. Errin Pichard at Errin.Pichard@dep.state.fl.us or (850)921-9509.

Sincerely,

Cindy L. Phillips

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

Cc: Mr. Pradeep Raval, Consultant, Koogler and Associates
Mr. Ronald L. Brunk, US Agri-Chemicals
Mr. Errin Pichard, FDEP

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

RECEIVED
JUL 15 2004
BUREAU OF AIR REGULATION

KA 173-02-03

July 13, 2004

Ms. Cindy Phillips, P.E.
Florida Department of
Environmental Protection
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal
US Agri-Chemicals Corporation – Ft. Meade Facility
DEP File No. 1050051-019-AV

Dear Ms. Phillips:

This is a follow up to your letter dated May 6, 2004, requesting additional information on the above referenced Title V renewal project.

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 pond water. If applicable, please also provide information concerning the closure of these ponds.

RESPONSE

The average pond fluoride concentration is about 7000 ppm; the pond area is about 230 acres; and, average pond pH is about 1.5 standard units. Based on past studies conducted by EPA and others, an HF emission factor of 0.1 lb/acre-day has been applied to gypsum pond and cooling ponds located at phosphate fertilizer facilities. This factor has been used for pond systems with fluoride concentrations around 10,000 ppm fluoride and a pH around 1 standard units. The estimated HF emission rate using the above emission factor is 4.2 tpy.

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.

RESPONSE

The production rates for the Phosphoric Acid A Train (EU 005) and Phosphoric Acid B Train (EU 020) have been revised in permit 1050051-009-AC and PSD-FL-278 to 50 tph P2O5 input, 30-day rolling average and 55 tph maximum for each train. The fluoride emission limits have also been revised to 0.012 lb/ton P2O5 and 2.63 tpy, for each train.

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 fluoride. The permit (1050051-018-AV) limit is 16.4 lb/hr for PM, and 0.39 lb/hr for fluoride.

RESPONSE

The permit limitations in 1050051-018-AV apply to the Prilled MAP/DAP Plant (EU 032). Limitations in the more recent permit 1050051-015-AC and PSD-FL-321, reflected in the CAM plan, address Granular MAP/DAP production (EU 038). This permit also allowed the increase in production of MAP/DAP to 60 tph. This clarification was not provided in the CAM plan due to an oversight.

296. 403.(1)(a)

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 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.

NO

RESPONSE

The requested test data are presented in Attachment 1.

Ms. Cindy Phillips
Florida Department of
Environmental Protection

July 13, 2004

.06 F MeSHAP
.037 PSD do CAM

296.403(1)(B)

MACT F

CAM PM

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 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.

RESPONSE

The requested test data are presented in Attachment 2.

The P.E. and R.O. certification forms are presented in Attachment 3.

Also, please incorporate the terms of the GMAP construction permit 1050051-015-AC and PSD-FL-321 into the Title V permit, as construction has been completed.

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par
Encl.

C: Ron Brunk, USAC

ATTACHMENT 1

TEST DATA FOR PHOSPHORIC ACID A and B TRAINS

PHOSPHORIC ACID TRAINS TEST DATA

0.88 .02

A-train Date	P2O5 tpd	Pdrop "H2O	Water gpm	F Emissions lb/hr	F Emissions lb/tP2O5
20-Jan-99	1042	15.4	255	0.033	0.0008
8-Nov-99	1006	12.9	77	0.045	0.0011
2-Feb-00	974	15.9	270	0.019	0.0005
6-Dec-00	998	17.8	70	0.028	0.0007
9-Aug-01	1190	12.7	94	0.107	0.0022
7-Dec-01	1159	15.6	129	0.05	0.0010
11-Dec-02	1205	11.2	54	0.036	0.0007
11-Dec-03	1103	10.2	38	0.020	0.0004
Max		17.8	270		
Min		10.2	38		

B-train Date	P2O5 tpd	Pdrop "H2O	Water gpm	F Emissions lb/hr	F Emissions lb/tP2O5
22-Jan-99	996	17.6	257	0.022	0.0005
9-Nov-99	1032	12.8	71	0.069	0.0016
1-Feb-00	996	14.3	251	0.022	0.0005
5-Dec-00	1051	12.4	73	0.036	0.0008
12-Jun-01	1046	10.5	50	0.121	0.0028
4-Dec-01	1157	15.4	136	0.033	0.0007
12-Dec-02	1248	9.8	48	0.027	0.0005
9-Dec-03	1125	10.4	56	0.056	0.0012
		17.6	257		
		9.8	48		

NOTE: The source operations are compliant at the above min/max indicator levels.

ATTACHMENT 2

TEST DATA FOR PRILLED AND GRANULAR MAP/DAP PLANT

PRILLED MAP PLANT TEST DATA

10.9 TPH

Date	P2O5	Emissions Fluorides		PM	Tower venturi Flow	dP	Cooler venturi Flow	dP
Unit	tph	lbs /hr	#F/tP2O5	lbs /hr	GPM	"H2O	GPM	"H2O
PMAP		0.31 ~~0.58~~	**0.019** ✓	~~24~~ 16.36				
12/12/1996	23.3	0.49 0.21	0.009	9.32 1.8	1173	23	214	18
1/7/1997	20.5	0.39 0.39 Lbs	0.019	8.2 3.0	1244	26	349	20
1/14/1997	24.0	0.46 0.12	0.005	9.6 2.4	1200	18	340	12
1/14/1997	24.0	0.46 0.12	0.005	9.6 2.3	1192	18	337	12
1/15/1997	25.0	0.48 0.10	0.004	10 3.1	1191	18	341	6
1/15/1997	23.8	0.45 0.19	0.008	9.52 4.3	1225	19	351	9
2/25/1997	20.0	0.38 0.18	0.009	8 4.0	1183	22	341	18
7/16/1997	18.6	.35 0.13	0.007	7.44 2.0	1228	16	363	13
7/23/1997	20.0	.38 0.12	0.006	8 14.1	1208	21	346	14
7/30/1997	20.8	.40 0.25	0.012	8.32 7.0	1180	15	345	14
12/29/1997	17.5	.33 0.14	0.008	7 2.2	1145	18	332	14
2/24/1998	18.7	.36 0.14	0.008	7.46 1.2	1221	14	350	13
				max	1244	26	363	20
				min	1145	14	214	6

Granular 8.38

MAP/DAP PLANT TEST DATA

	Product	Emissions		Tower venturi		Cooler venturi		Absorber	
Date	MAP	Fluorides	PM	Flow	dP	Flow	dP	Flow	dP
Unit	tph	lbs /hr	lbs /hr	GPM	"H2O	GPM	"H2O	GPM	"H2O
Limit	**60**	**0.98**	**10.2**						
2/27/2001	49.7	0.27	5.96	953	18.6	284	25.6	393	5.15
4/10/2001	47.1	0.52	6.98	568	8.5	257	12.1	258	3.8
1/15/2002	31.5	0.41	5.23	375	6.8	214	8.8	156	3.6
2/6/2002	33.0	0.28	7.60	808	14.6	197	13.2	543	6.1
2/19/2002	40.7	0.13	4.64	1369	24.4	531	18	196	5.8
3/7/2002	38.3	0.11	3.05	1382	18.2	175	13.9	591	5.9
9/23/2003	47.5	0.45	3.10	894	22.4	531	13.1	658	7.83
Max	49.7	0.5	7.6	1382.0	24.4	531.0	25.6	658.0	7.8
Average	41.1	0.3	5.2	907.0	16.2	312.7	15.0	399.3	5.5
Min	31.5	0.1	3.1	375.0	6.8	175.0	8.8	156.0	3.6

NOTE: The source operations are compliant at the above min/max indicator levels.

0.168 lb PM / Ton Product

ATTACHMENT 3

P.E. AND R.O. CERTIFICATION

Professional Engineer Certification

1. Professional Engineer Name: **John B. Koogler, Ph.D, P.E.**
   Registration Number: **12925**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Koogler and Associates**
   Street Address: **4014 NW 13th Street**
   City: **Gainesville** State: **FL** Zip Code: **32609**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 377-5822** ext. Fax: **(352) 377-7158**
4. Professional Engineer Email Address: **jkoogler@kooglerassociates.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein*, that:

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☒, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature 7/12/04 **Date**

(seal)

*** Attach any exception to certification statement.**

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
   Phong T. Vo, General Manager of Engineering and Technical Services

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   ☒ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   ☐ The designated representative at an Acid Rain source.

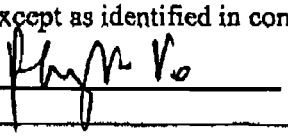
3. Application Responsible Official Mailing Address...
   Organization/Firm: **US Agri-Chemicals Corporation**
   Street Address: **3225 State Road 630 West**
   City: **Ft. Meade** State: **FL** Zip Code: **33841-9799**

4. Application Responsible Official Telephone Numbers...
   Telephone: **(863) 285-8121** ext. Fax: **(863) 285-7088**

5. Application Responsible Official Email Address: **PVO@USAGRICHEM.COM**

6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Signature  Date 7/13/04

JONATHAN

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 173-02-03

April 2, 2004

Ms. Cindy Phillips, P.E.
Florida Department of
Environmental Protection
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal
US Agri-Chemicals Corporation – Ft. Meade Facility
DEP File No. 1050051-019-AV

Dear Ms. Phillips:

This is a follow up to your letter dated January 15, 2004, requesting additional information on the above referenced Title V renewal project.

The responses provided herein are in the format discussed with you and Bobby Bull in order to provide only the pertinent information.

1. **Please provide reasonable assurance that the facility is not a Major Source of Hazardous Air Pollutants (HAPs).**

RESPONSE

The fluoride emissions limits in the current permit are as follows:

UNIT	DESCRIPTION		FLUORIDES (tpy)
005	Phosphoric Acid Plant A-Train		3.5
020	Phosphoric Acid Plant B-Train		3.5
021	Phosphoric Acid Plant Tank Farm		included above
032	Prilled MAP/DAP Plant		1.7
038	Granular MAP/DAP Plant		2.94
		TOTAL	11.64

As the total permitted fluoride emissions are about 12 tpy, even using conservative EPA factors, the estimated maximum potential hydrogen fluoride (HF) emissions are 4 tpy (HF at 30 percent of total fluorides). Please note that the actual emissions of total fluorides reported in the 2003 annual operating report were 1.7 tpy. The corresponding estimated actual HF emissions would be around 0.51 tpy (30 percent of F), or about 5 percent of the major source threshold for a HAP.

The fugitive HF emissions from the cooling pond water system, however, have not yet been conclusively determined to be above the major source threshold. Other HAP emissions at the site are not expected in any significant quantities based on the materials handled and/or processed.

2. **Please provide reasonable assurance that the facility is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP), in particular 40 CFR63 Subparts AA and BB.**

RESPONSE

See the response presented above.

3. **Please provide a Compliance Assurance Monitoring (CAM) Plan for all applicable emission units for the facility.**

RESPONSE

The CAM applicability and plan information is presented in Attachment 1.

4. **Please provide a facility plot plan for the facility. The previous application did not have the applicable attachment.**

RESPONSE

The requested facility plot plan is presented in Attachment 2.

5. **Please provide the process flow diagram(s) for the facility.**

RESPONSE

The requested process flow diagrams are presented in Attachment 3.

6. Please provide the precautions to prevent emissions of unconfined particulate matter for the facility.

RESPONSE

The list of precautions to prevent emissions of unconfined particulate matter is presented in Attachment 4.

7. Please provide a list of insignificant activities for the facility. The previous application did not have the applicable attachment.

RESPONSE

The list of insignificant activities is presented in Attachment 5.

8. Please provide a compliance report and plan for the facility. The previous application did not have the applicable attachment.

RESPONSE

The compliance reports summary is presented in Attachment 6.

9. Please provide any applicable supplementary items for each emission unit in the facility.

RESPONSE

The supplementary pertinent information is presented in the attachments herein.

10. Please provide a list of any fugitive emissions from the facility.

RESPONSE

The list of fugitive emissions summary is presented in Attachment 7.

11. Please provide the area map showing the facility location.

RESPONSE

The facility location map is presented in Attachment 8.

12. 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.

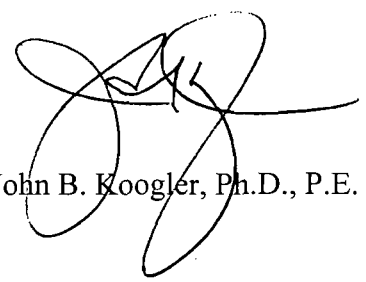
RESPONSE

The P.E. and R.O. certification forms are presented in Attachment 9.

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:par
Encl.

C: Ron Brunk, USAC

ATTACHMENT 1

CAM APPLICABILITY ANALYSIS AND PLAN

CAM APPLICABILITY DETERMINATION

UNIT	DESCRIPTION	CAM APPLIES?	RATIONALE
005	Phosphoric Acid Plant A-Train	YES	Uncontrolled emissions > 100 tpy

Uncontrolled F emissions = 50 tph P2O5 x 0.463 lb F/ton P2O5 (AP-42, Table 8.9-2)
= 23.2 lbs/hr
x 8760 hrs/yr x ton/2000 lbs
= 101.4 tpy

006	Auxiliary Boiler	NO	No control device
016	Sulfuric Acid Plant No. 1	NO	No control device, product recovery
017	Sulfuric Acid Plant No. 2	NO	No control device, product recovery
020	Phosphoric Acid Plant B-Train	YES	Uncontrolled emissions > 100 tpy

Uncontrolled F emissions = 50 tph P2O5 x 0.463 lb F/ton P2O5 (AP-42, Table 8.9-2)
= 23.2 lbs/hr
x 8760 hrs/yr x ton/2000 lbs
= 101.4 tpy

021	Phosphoric Acid Plant Tank Farm	NO	Scrubber emissions < 100 tpy (included in Phosphoric Acid Plant emissions)
028-031	Molten Sulfur System	NO	No control device
032	Prilled MAP/DAP Plant	YES	Uncontrolled emissions > 100 tpy

Uncontrolled F emissions = 60 tph x 0.04 lb/ton (AP-42,Table 8.5.3-1)
x. 1/(1-0.9) AP-42 venturi F scrubber efficiency ~ 90%
= 24 lbs/hr
x 8760 hrs/yr x ton/2000 lbs
= 105.1 tpy

Uncontrolled PM emissions= 60 tph x 0.68 lb/ton (AP-42,Table 8.5.3-1)
x. 1/(1-0.8) AP-42 venturi PM scrubber efficiency ~ 80%
= 204 lbs/hr
x 8760 hrs/yr x ton/2000 lbs
= 893.5 tpy

033	Lime Silo	NO	No control device, product recovery

035	Phosphogypsum Stack	NO	No control device
036	Facility-wide fugitive emissions	NO	No control device
038	Granular MAP/DAP Plant	YES	Uncontrolled emissions > 100 tpy

Uncontrolled F emissions = 60 tph x 0.04 lb/ton (AP-42,Table 8.5.3-1)
x. 1/(1-0.9) AP-42 venturi F scrubber efficiency ~ 90%
= 24 lbs/hr
x 8760 hrs/yr x ton/2000 lbs
= 105.1 tpy

Uncontrolled PM emissions= 60 tph x 0.68 lb/ton (AP-42,Table 8.5.3-1)
x. 1/(1-0.8) AP-42 venturi PM scrubber efficiency ~ 80%
= 204 lbs/hr
x 8760 hrs/yr x ton/2000 lbs
= 893.5 tpy

039	MAP/DAP Storage & Loadout	NO	No control device, oiled product

Accordingly, a CAM plan is presented below for the following emission units:

005 Phosphoric Acid Plant A-Train
020 Phosphoric Acid Plant B-Train
032 Prilled MAP/DAP Plant
038 Granular MAP/DAP Plant

CAM PLAN

1. FOR PHOSPHORIC ACID PLANT A-TRAIN & B-TRAIN

The two phosphoric acid trains are similar in equipment, permit limits, etc. and so the CAM plan described herein applies equally to both units.

Each train (EU 005 and 020) has a maximum production rate of 50 tons per hour (TPH) of P2O5 input and has emissions limits for fluorides. The emissions from each train are controlled by venturi scrubbers using pond water.

The above analysis indicates potential uncontrolled F emissions greater than the major source threshold. A CAM plan is therefore required for this source.

1.1. Emissions Unit Description: Phosphoric Acid Plant A Train & B Train EU 005 and 020.

Applicable Regulations, Emission Limits, and Monitoring Requirements

Regulations: Permit No. 1050051-009 AC, PSD-FL-278, 62-212.400, FAC.

Emissions Limits (each train):

Fluoride:	0.012 lb/ton P2O5
Opacity:	20 %

Monitoring Requirements: The permit requires monitoring of raw material input and pressure drop across the scrubbing systems.

Control Technology: The fluorides are controlled by venturi scrubbers.

Need test Data

2.2. Monitoring Approach

	Indicator No. 1	Indicator No. 2
Indicator	Pressure drop across each scrubber.	Scrubber liquid flow rate to each scrubber.
Measurement Approach	Differential pressure meter.	mag flow meter.
Indicator Range	An excursion is defined as operation outside of the indicator range in the permit. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as operation outside of the indicator range in the permit. Excursions trigger an inspection, corrective action, and a reporting requirement.
Data Representativeness	The minimum accuracy of the device is 5 percent.	The minimum accuracy of the device is 5 percent.
Verification of Operational Status	Operator check and computer alarm.	Operator check and computer alarm.
QA/QC Practices and Criteria	The differential pressure meter is calibrated periodically.	The flow meter is calibrated periodically.
Monitoring Frequency	The pressure drop is monitored continuously.	The scrubber liquid flow is monitored continuously.
Data Collection Procedures	Daily averages are computed.	Daily averages are computed.
Averaging Period	Daily average	Daily average

ok < 100% DFTer Carbon

2.3. Justification

Rationale for Selection of Performance Indicators

Based on EPA regulations and industry practice, the performance indicators selected are the scrubber liquid flow rate and pressure drop. These parameters have been widely accepted by the Department to provide reasonable assurance of proper scrubber operation and the resulting emission control.

Rationale for Selection of Performance Indicator Ranges

The monitoring approach is based on EPA regulations for phosphate fertilizer plants. The indicator ranges are based on historical tests which establish acceptable values. An excursion is defined as operation outside of the established indicator range. If an excursion occurs, the corrective action plan will include an evaluation of the occurrence to determine cause and then determine the best course of action required to correct the situation. All excursions will be documented and reported.

40.9

2. FOR MAP/DAP PLANT

As the two MAP/DAP prilled and granular products are made using mostly shared process and emissions control equipment, a single CAM plan applies.

The MAP/DAP Plant at USAC's Ft. Meade Facility (EU 032 and 038) has a maximum production rate of 60 tons per hour (TPH) of product and has emissions limits for particulate matter and fluorides. These two products are made using mostly shared process and emissions control equipment, and only one product can be manufactured by the plant at a time. The plant emissions are controlled by a venturi scrubber for the reactor/granulator and dryer gas streams and another venturi scrubber in parallel for the cooler gas stream. The two venturis exhaust to a shared cyclonic separator.

The above analysis indicates potential uncontrolled F and PM emissions greater than the major source threshold. A CAM plan is therefore required for this source.

2.1. Emissions Unit Description: MAP/DAP Plant, EU 032 and 038

Applicable Regulations, Emission Limits, and Monitoring Requirements

Regulations: Permit No. 1050051-008 AC, 62-212.400, FAC.

Emissions Limits:

Particulate Matter:	10.2 lb/hr	16.4
Fluoride:	~~1.18~~ 0.39 lb/hr (MAP); 1.04 lb/hr (DAP)	0.39
Opacity:	20 %	

Monitoring Requirements: Permit requires monitoring of raw material input, liquid flow rate and pressure drop across the scrubbing systems.

Control Technology: The plant emissions are controlled by a venturi scrubber for the reactor/granulator and dryer gas streams and another venturi scrubber in parallel for the cooler gas stream. The two venturis exhaust to a shared cyclonic separator.

Same for PM + F?

1.2. Monitoring Approach

	Indicator No. 1	Indicator No. 2
Indicator	Pressure drop across each scrubber.	Scrubber liquid flow rate to each scrubber.
Measurement Approach	Differential pressure meter.	mag flow meter.
Indicator Range	An excursion is defined as operation outside of the indicator range in the permit. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as operation outside of the indicator range in the permit. Excursions trigger an inspection, corrective action, and a reporting requirement.
Data Representativeness	The minimum accuracy of the device is 5 percent.	The minimum accuracy of the device is 5 percent.
Verification of Operational Status	Operator check and computer alarm.	Operator check and computer alarm.
QA/QC Practices and Criteria	The differential pressure meter is calibrated periodically.	The flow meter is calibrated periodically.
Monitoring Frequency	The pressure drop is monitored continuously.	The scrubber liquid flow is monitored continuously.
Data Collection Procedures	Daily averages are computed.	Daily averages are computed.
Averaging Period	Daily average	Daily average

1.3. Justification

Rationale for Selection of Performance Indicators

Based on EPA regulations and industry practice, the performance indicators selected are the scrubber liquid flow rate and pressure drop. These parameters have been widely accepted by the Department to provide reasonable assurance of proper scrubber operation and the resulting emission control.

Rationale for Selection of Performance Indicator Ranges

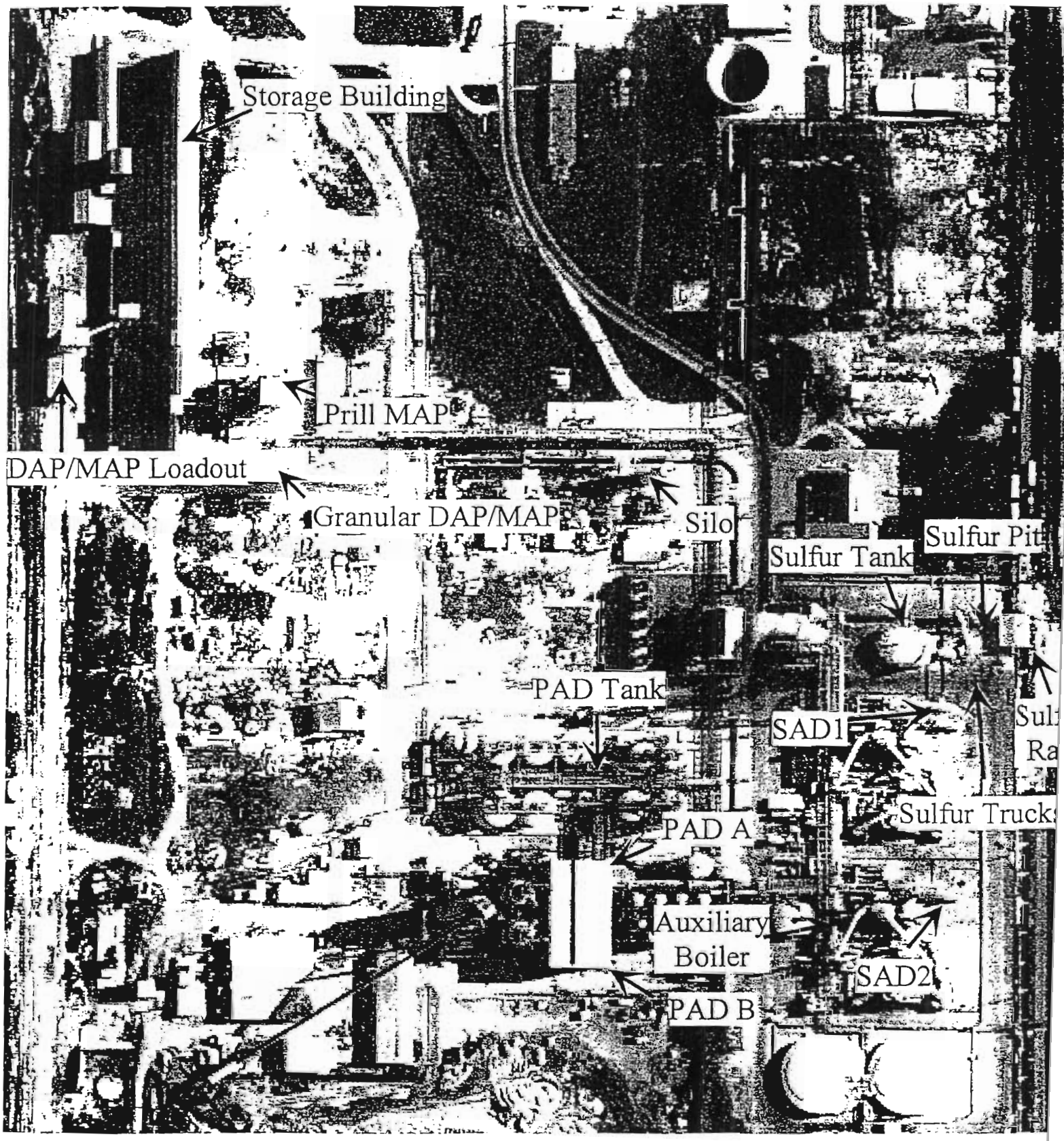
The monitoring approach is based on EPA regulations for phosphate fertilizer plants. The indicator ranges are based on historical tests which establish acceptable values. An excursion is defined as operation outside of the established indicator range. If an excursion occurs, the corrective action plan will include an evaluation of the occurrence to determine cause and then determine the best course of action required to correct the situation. All excursions will be documented and reported.

ATTACHMENT 2

FACILITY PLOT PLAN

FPP

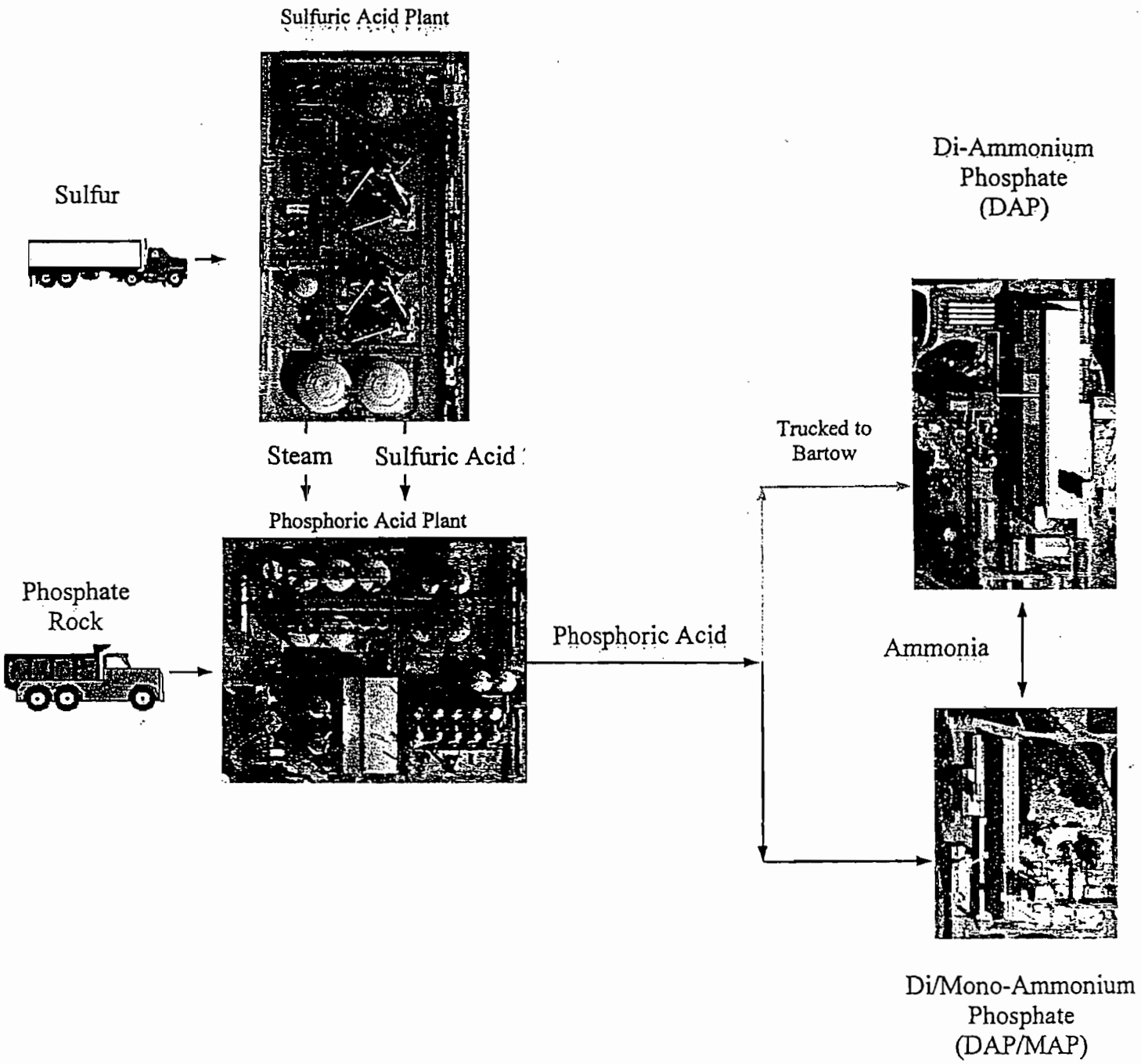
U.S. Agri-Chemicals
Title V Facility Plot Plan

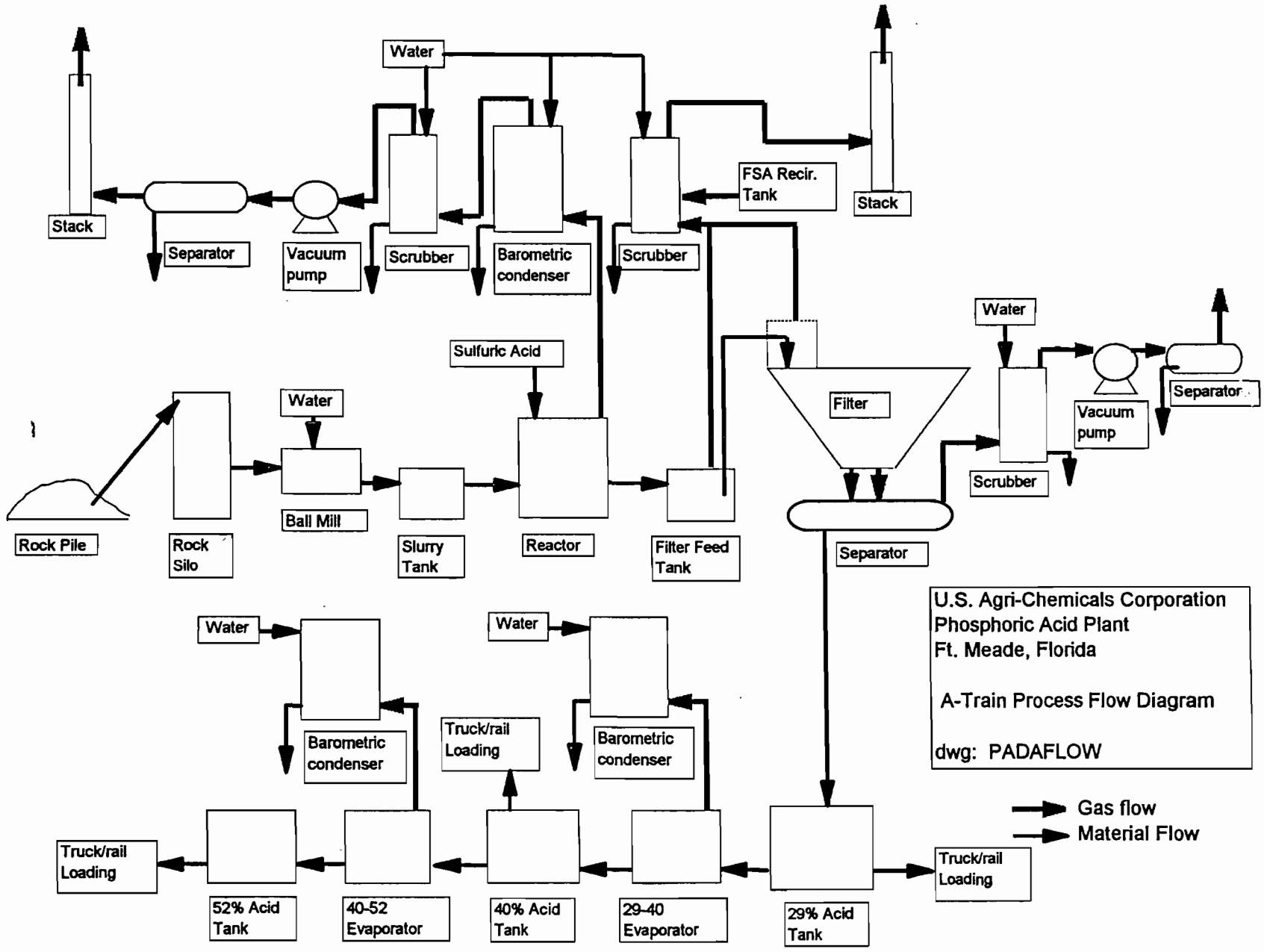


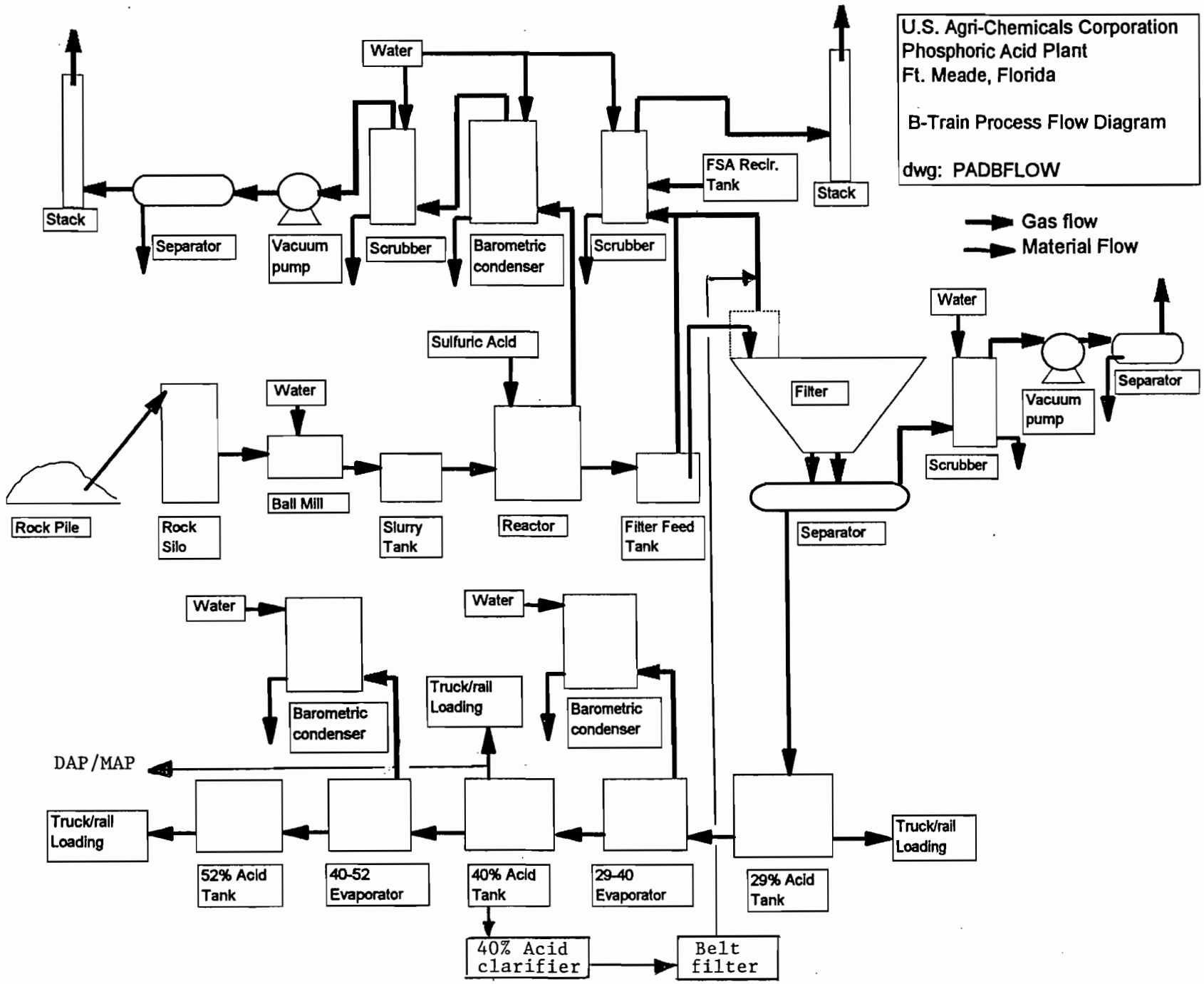
ATTACHMENT 3

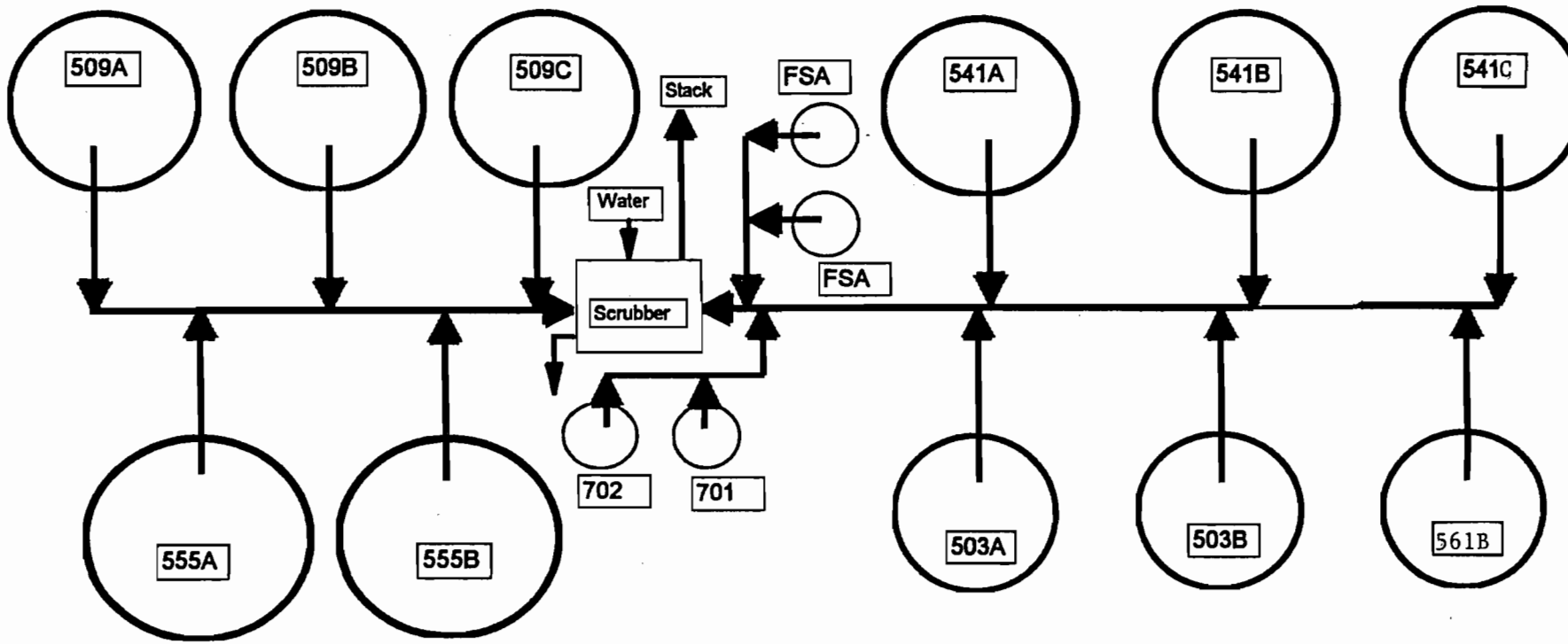
PROCESS FLOW DIAGRAMS

U.S. Agri-Chemicals
Ft. Meade Product Flow Diagram




Water
Stack
Separator
Vacuum pump
Scrubber
Barometric condenser
Scrubber
FSA Recir. Tank
Stack
Water
Separator
Vacuum pump
Sulfuric Acid
Filter
Water
Rock Pile
Rock Silo
Ball Mill
Slurry Tank
Reactor
Filter Feed Tank
Scrubber
Separator
U.S. Agri-Chemicals Corporation
Phosphoric Acid Plant
Ft. Meade, Florida
A-Train Process Flow Diagram
dwg: PADAFLOW
Water
Water
Barometric condenser
Truck/rail Loading
Barometric condenser
Gas flow
Material Flow
Truck/rail Loading
Truck/rail Loading
52% Acid Tank
40-52 Evaporator
40% Acid Tank
29-40 Evaporator
29% Acid Tank


U.S. Agri-Chemicals Corporation
Phosphoric Acid Plant
Ft. Meade, Florida
B-Train Process Flow Diagram
dwg: PADBFLOW
Gas flow
Material Flow
Water
Stack
Separator
Vacuum pump
Scrubber
Barometric condenser
Scrubber
FSA Recir. Tank
Stack
Water
Vacuum pump
Separator
Sulfuric Acid
Filter
Water
Scrubber
Rock Pile
Rock Silo
Ball Mill
Slurry Tank
Reactor
Filter Feed Tank
Separator
Water
Water
Barometric condenser
Truck/rail Loading
Barometric condenser
DAP/MAP
Truck/rail Loading
52% Acid Tank
40-52 Evaporator
40% Acid Tank
29-40 Evaporator
29% Acid Tank
Truck/rail Loading
40% Acid clarifier
Belt filter



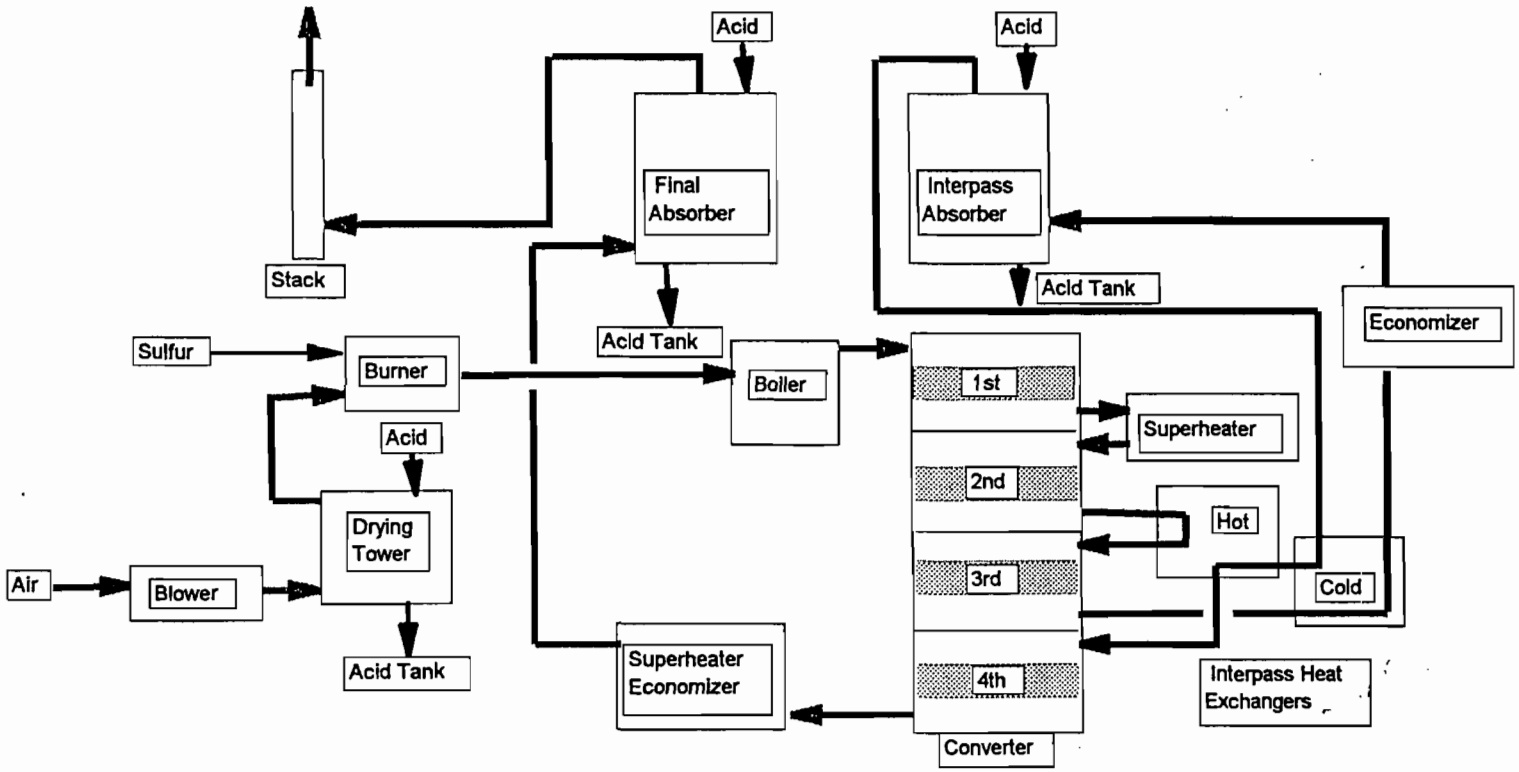
509A	29% Storage
509B	29 or 40% Storage
509C	40% Storage
555A	54% Storage
555B	54% Storage
701	Acid mix tanks
702	Acid mix tanks
503A	29% Clarifier
503B	29% Clarifier
541A	40% Clarifier
541B	40% Clarifier
541C	54% Clarifier
561B	54% Clarifier

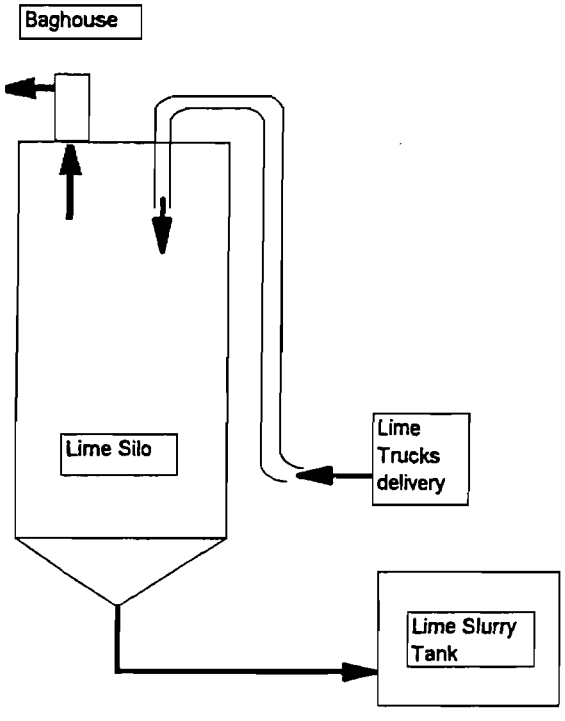
→ Gas flow
→ Material Flow

U.S. Agri-Chemicals Corporation
Phosphoric Acid Plant
Ft. Meade, Florida

Tank Farm Process Flow Diagram

dwg: PADTFFLOW


Acid
Acid
Final Absorber
Interpass Absorber
Stack
Acid Tank
Economizer
Sulfur
Burner
Acid Tank
Boiler
1st
Superheater
Acid
2nd
Hot
Drying Tower
Air
Blower
3rd
Cold
Acid Tank
Superheater Economizer
4th
Interpass Heat Exchangers
Converter
Gas Flow
Liquid Flow
U.S. Agri-Chemicals Corporation
Sulfuric Acid Plant
Ft. Meade, Florida
Process Flow Diagram
dwg: SADFLOW



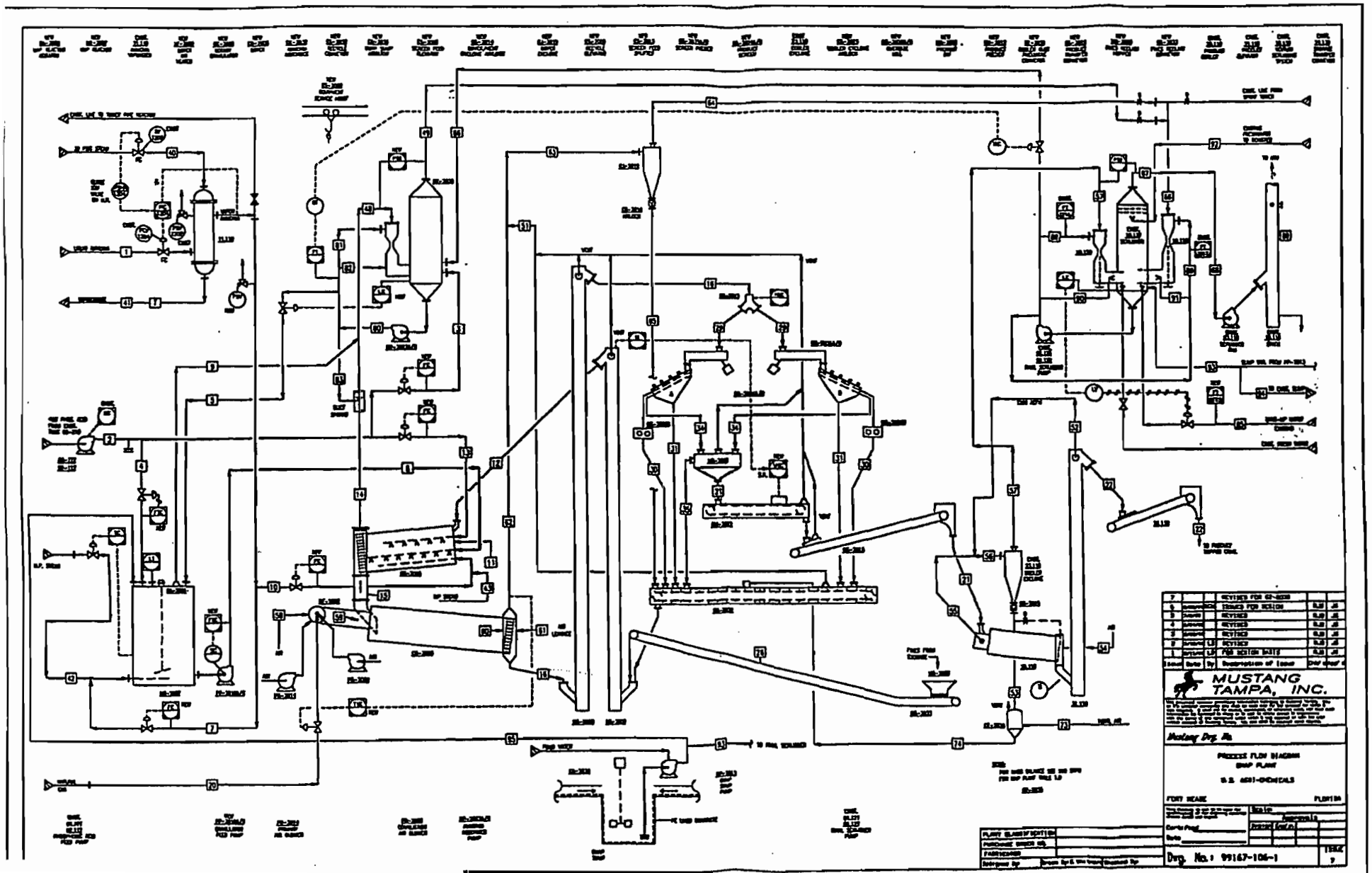
Air Flow

Lime Flow

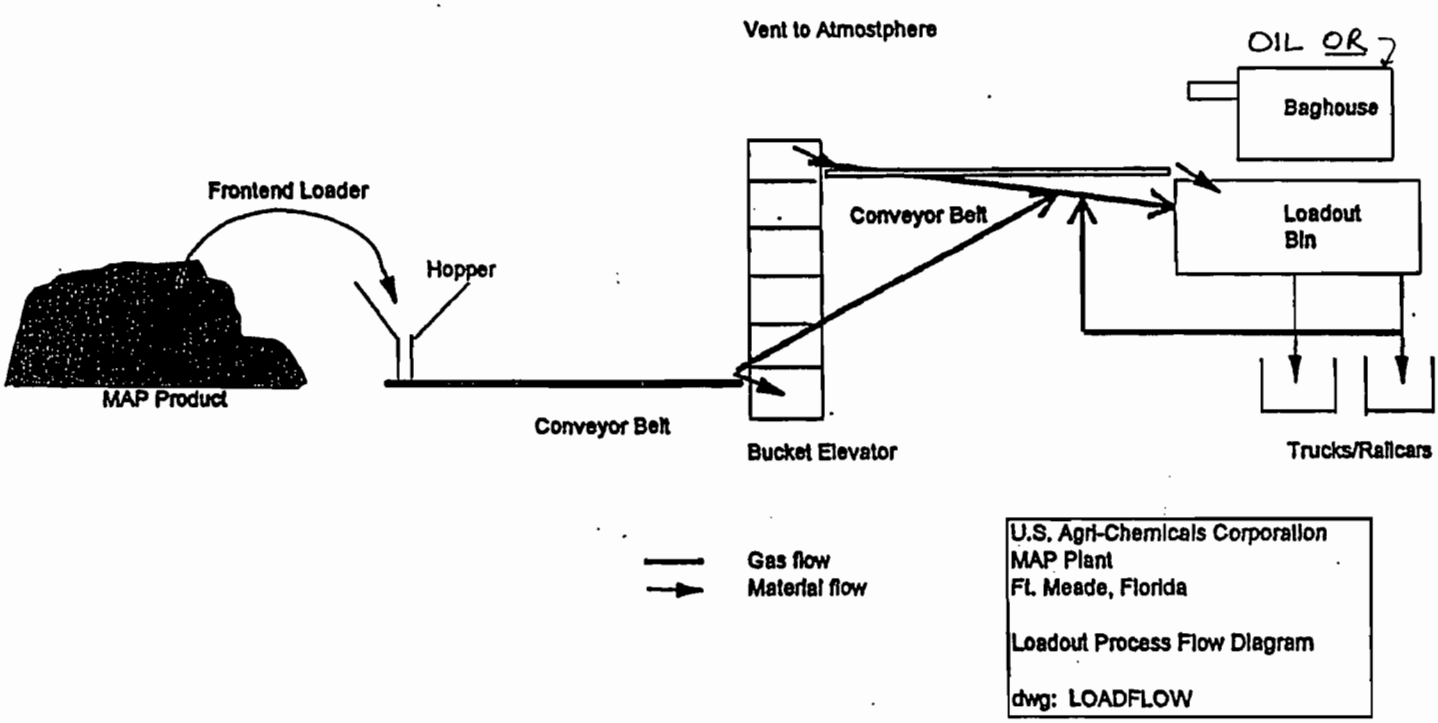
U.S. Agri-Chemicals Corporation

Ft. Meade, Florida
Lime Silo Process Flow Diagram
dwg: LIMEFLOW

PROCESS FLOW DIAGRAM - GRANULAR MAP/DAP PLANT

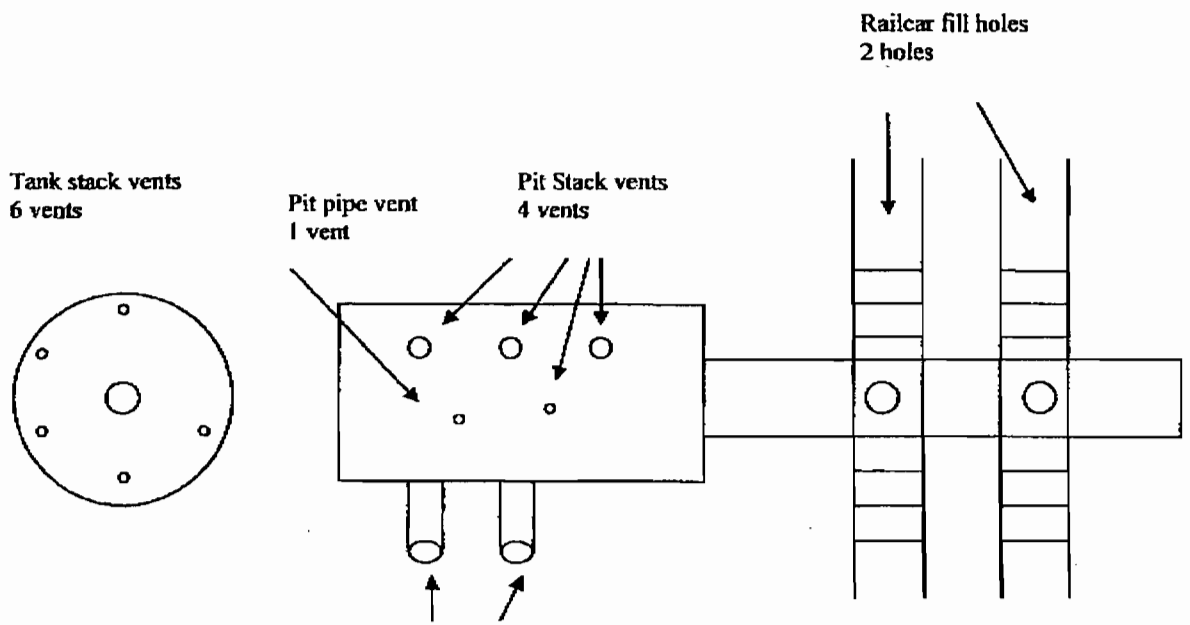


MAP/DAP LOADOUT PROCESS FLOW DIAGRAM



U. S. Agri-Chemicals Corporation
Sulfuric Acid Plant
Ft. Meade, Florida

Sulfur Storage & Handling Diagram
Dwg: SULFUR



ATTACHMENT 4

PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

Reasonable precautions to minimize emissions of unconfined particulate matter may include, as necessary:

- Paved roadways; application of water to unpaved roads.

- Landscaping or planting of vegetation.

- Use of enclosures and windbreaks, where practical.

- Oiling of fertilizer products to reduce dust generation.

ATTACHMENT 5

LIST OF INSIGNIFICANT ACTIVITIES

LIST OF INSIGNIFICANT AND/OR UNREGULATED EMISSIONS UNITS FOR TITLE V PERMIT

GENERAL FACILITY WIDE

E	abrasive cleaning - indoors
E	agricultural related activities
E	air compressors
E	air conditioners
E	air vents in compressed air systems
E	ammonia bullets, pipeline, pop off valves, flanges, truck/rail unloading, flares and chillers
CD	asbestos, waste and haz-waste removal
CD	automatic oil/lube systems for mechanical equipment and fueling operations
E	automotive, tractor, locomotives and their repair shops
E	blueprint copiers
E	building ventilation systems
E	caustic tanks/vents
E	closed containers of maintenance chemicals
CD	cold cleaning degreasers (containing heavier than air solvents)
E	construction/repair of office, storage and residential units
E	containers, reservoirs, wax and grease
GD	containers and tanks for oils
CD	cooling ponds and process water storage ponds, gypsum stacks
GD	cooling towers (no heavy metals used as antiscalants or algaecides)
E	degassifiers/dearators
CD	diesel pump motors
E	drain vents
E	drinking water treatment area and wastewater treatment plant
E	ducts, chutes, equipment maintenance
E	dumpsters, other miscellaneous waste collection and handling
GD	electric substation/electric yard
E	electric-powered vehicles
E	electrical charging systems
E	electrically heated equipment for heat treating, drying, annealing, etc.
E	equipment cleaning, including steam cleaning
E	equipment for bonding brake shoes
E	equipment of hydraulic or hydrostatic testing
E	fire training exercises
E	food preparation, handling, consumption
E	fresh water tanks/vents
E	fuel tanks and dispensors
CD	gypsum stack process water re-circulation system (ditches, ponds, spillways)
E	hand held equipment
GD	handling of baghouse materials
E	hydroblasting
E	instrument air systems/vents
CD	laboratories (quality control, analytical, metallurgical)
E	landscaping and farm equipment
GD	lime silo with baghouse
E	lime tanks/vents
E	liming station
E	liquid sampling systems
E	maintenance of facilities
E	maintenance of grounds
E	maintenance shops
E	mechanical drives/gearboxes
CD	metal shops

GD	minor fugitive leaks from process equipment
E	mobile equipment fueling operations (diesel/gasoline)
E	mobile sources, including internal combustion engines, pumps, compressors, generators, welding , etc.
E	neutralization tanks/vents
E	non process mineral spirits use
E	open containers in use
E	painting /coating of equipment, tanks and structures (less than 6 gallons per day)
CD	portable kerosene space heaters
E	pressure/steam relief valves
GD	process water treatment and management systems
GD	pump seals
E	purchased non-listed chemical tanks/vents (no HAP or VOC content)
GD	railcar/truck/tanker unloading
E	railroad flares
GD	raw material, reclaim/recycle material and product transfer and storage tanks
GD	reclaimed mined areas
E	reclaimed water tank vents
CD	refrigeration systems
GD	rock pile, rock hoppers, rock grinding mills
CD	safety devices
CD	safety kleen solvent cleaners
E	sandlbasters, welding equipment, compressors, wood shop, metal shop
E	service of air pollution control devices
CD	space heaters
E	steam vents/leaks
E	storage facilities for packaged materials
E	storage tanks and dispensers
GD	sulfuric acid tanks/vents
E	sweeping and general cleanup
E	temporary use of compressors, generators, water pumps with internal combustion engines
GD	transfer of materials on covered belt systems
GD	transformer vault/building
E	vacuum cleaning systems
GD	valves and flanges (no HAP or VOC content)
E	washing and cleaning equipment
E	waste preparation for disposal (in closed drums or other containers, spill cleanup)
GD	wastewater plants, water treatment area
CD	water pumps
E	water treatment aeration
E	water treatment chemical tanks/totes/drums
GD	wet limestone transfer, handling, storage
E	woodworking shops
E	fugitive emissions of PM/PM10, SO2, NOx, CO, VOCs, NH3 and HAPs

GRANULATION

GD	choke feeder, covered conveyors, screening tower
GD	chutes, conveyor and hopper
E	coating oil tanks
GD	cooling tower, slurry pump, scrubber sump
GD	covered conveyor, surge bin, product screens, chute to truck/railcar
GD	material conveyors, elevators and screens
E	oil coating application systems
E	pond water sumps
GD	product recovery units
GD	raw material, reclaim material and product storage tanks, bins and buildings
GD	scrubber seal tanks
E	seal oil tanks

MOLTEN SULFUR HANDLING

GD	molten sulfur storage tank fires
GD	tanker truck/rail unloading
GD	sulfur spill cleanup

PHOSPHATE ROCK HANDLING

GD	railcar unloading and unloading pit
GD	rock and feed hoppers, conveyors
GD	train/truck unloading, hoppers, conveyors, wet rock stacking on pile
GD	wet rock grinding
GD	wet rock pile, stacking and transfer

SULFURIC ACID PRODUCTION

E	auxiliary power diesel generators
E	auxiliary power generator diesel tank
GD	cooling towers
E	economizers
GD	hot water reuse tank
GD	process and product storage tanks
GD	sulfuric acid tanker truck/rail loading/unloading
E	water reuse, uncontaminated water storage, condensate tanks for evaporators

NOTES:

1. E reflects items to be exempted under EPA "trivial list" criteria
2. CD reflects items to be exempted under DEP's categorical exemption criteria
3. GD reflects items to be exempted under DEP's generic exemption criteria or criteria in 62-4.040 FAC

ATTACHMENT 6

COMPLIANCE REPORT

COMPLIANCE REPORT & PLAN

The compliance reports have been submitted for the listed emission units as follows:

	EMISSION UNIT	COMPLIANCE TEST REPORT SUBMITTED
005	Phosphoric Acid Plant A-Train	12-11-03
006	Auxiliary Boiler	Not required
016	Sulfuric Acid Plant No. 1	11-11-03
017	Sulfuric Acid Plant No. 2	11-13-03
020	Phosphoric Acid Plant B-Train	12-09-03
021	Phosphoric Acid Plant Tank Farm	12-10-03
028	Molten Sulfur System – Sulfur Tank	05-20-03
029	Molten Sulfur System – Sulfur Pit	05-20-03
030	Molten Sulfur System – Sulfur Rail Unloading	05-20-03
031	Molten Sulfur System – Sulfur Truck Unloading	05-20-03
032	Prilled MAP/DAP Plant including Storage and Loadout	See granular
033	Lime Silo	05-20-03
035	Phosphogypsum Stack	Not required
036	Facility-wide fugitive emissions	Not required
038	Granular MAP/DAP Plant	09-23-03
039	MAP/DAP Storage & Loadout	08-15-03

As there are no emission units out of compliance, a compliance plan is not necessary for this facility.

ATTACHMENT 7

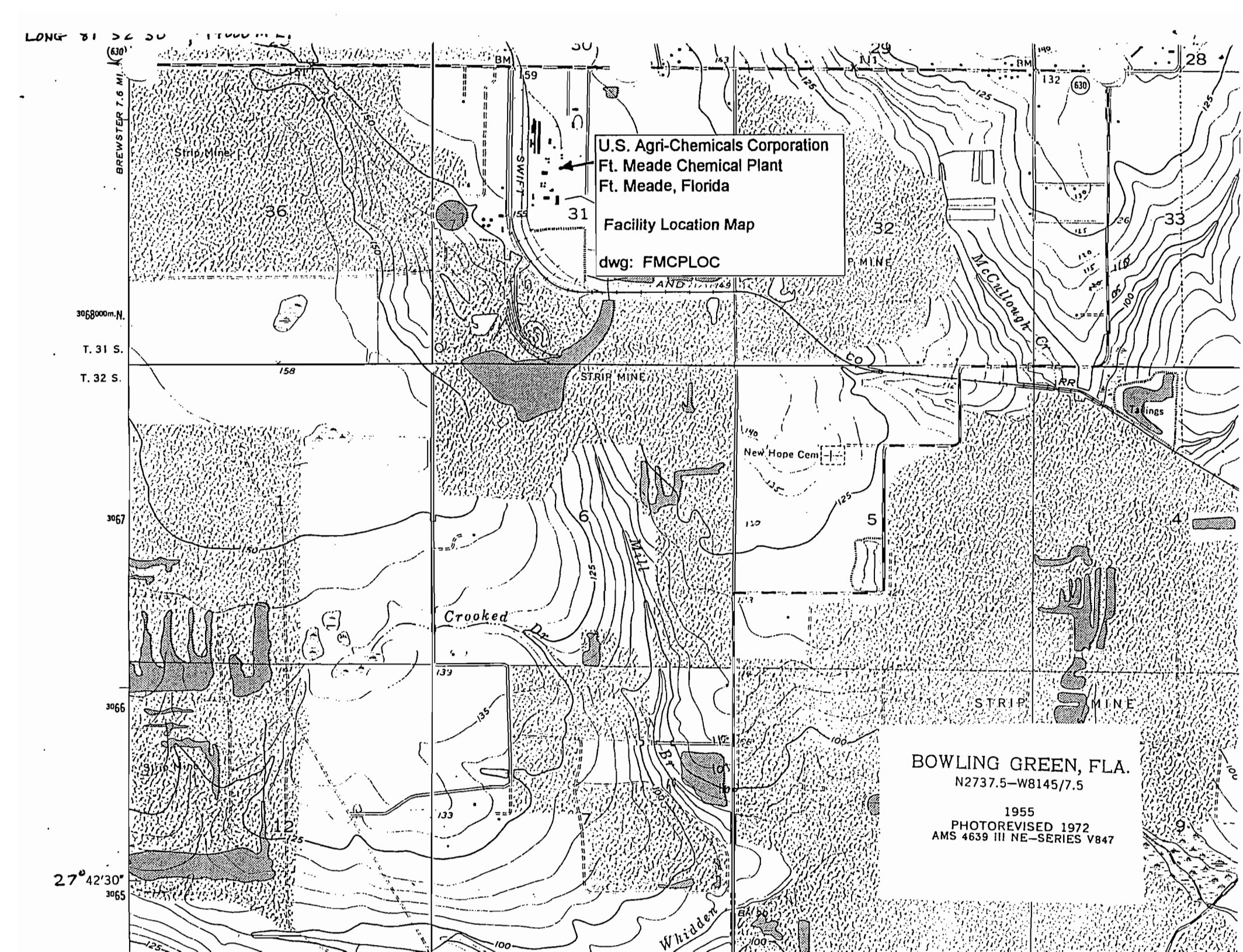
SUMMARY OF FUGITIVE EMISSIONS

FUGITIVE EMISSIONS

The phosphate fertilizer manufacturing process and associated activities result in fugitive emissions of PM/PM10, SO2, NOx, CO, VOCs, NH3 and HAPs from the receiving, storage, handling, transfer and use of process, product and maintenance related materials. These fugitive emissions may occur both inside the manufacturing buildings and outside within the plant site.

ATTACHMENT 8

FACILITY LOCATION MAP


U.S. Agri-Chemicals Corporation
Ft. Meade Chemical Plant
Ft. Meade, Florida
Facility Location Map
dwg: FMCPLOC
BREWSTER 7.6 MI.
Strip Mine
STRIP MINE
McCullough Cr.
Tailings
New Hope Cem
Crooked
Mill
Whidden
3068000m.N.
T. 31 S.
T. 32 S.
3067
3066
3065
27°42'30"
BOWLING GREEN, FLA.
N2737.5—W8145/7.5
1955
PHOTOREVISED 1972
AMS 4639 III NE—SERIES V847

ATTACHMENT 9

P.E. AND R.O. CERTIFICATION

Professional Engineer Certification

1. Professional Engineer Name: **John B. Koogler, Ph.D, P.E.**
   Registration Number: **12925**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Koogler and Associates**
   Street Address: **4014 NW 13th Street**
   City: **Gainesville** State: **FL** Zip Code: **32609**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 377-5822** ext. Fax: **(352) 377-7158**
4. Professional Engineer Email Address: **jkoogler@kooglerassociates.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein*, that:

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☒, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature (seal) **Date** 4/1/04

*** Attach any exception to certification statement.**

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
   Phong T. Vo, General Manager of Engineering and Technical Services

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   ☒ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   ☐ The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm: **US Agri-Chemicals Corporation**
   Street Address: **3225 State Road 630 West**
   City: **Ft. Meade** State: **FL** Zip Code: **33841-9799**

4. Application Responsible Official Telephone Numbers...
   Telephone: **(863) 285-8121** ext. Fax: **(863) 285-7088**

5. Application Responsible Official Email Address: **PVO@USAGRICHEM.COM**

6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Signature Phong T. Vo Date 4/2/04

Subsection E. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-032	Prilled MAP Plant (includes MAP/*DAP* Storage & Loadout)

The 60 TPH prilled MAP plant is based on the Swift prill tower process. In this process, diluted wet process phosphoric acid is reacted with ammonia vapor in a pipe reactor and sprayed into the top of the tower to produce MAP. Ambient air entering the bottom of the tower removes moisture in the MAP as they fall by gravity to the bottom of the tower. The gas in the tower is evacuated to a venturi scrubber. Product MAP is cooled in a cooler. The gas in the cooler is evacuated to a smaller venturi scrubber. The gas and liquid from both venturi scrubbers enter a cyclonic separator prior to being discharged to the atmosphere via a stack. A portion of the scrubber liquid is used to adjust the concentration of phosphoric acid in the day tank. Fresh water and/or cooling pond water is used to maintain scrubber water balance. The cooler discharges to a transfer system that carries the MAP to the *MAP/DAP* storage building.

From the storage building, *MAP/DAP* is loaded into railcars by a loadout system. Dust from the loadout system is controlled by a baghouse. *The storage and loadout system baghouse may be shut down only while handling granular MAP/DAP to which dust-suppressing oil has been applied in sufficient quantity.*

{Permitting note: These emissions units are regulated under Rule 62-212.300, F.A.C., General Preconstruction Review Requirements; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards and Rule 62-296.403, F.A.C., Phosphate Processing.}

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

E.1. Capacity.

a. The production rate of the Prilled MAP Plant shall not exceed 40.9 tons of MAP product per hour, except as allowed by Condition E.1.b below.

b. To regain the original plant capacity of 60 tons of MAP product per hour, the permittee may conduct a performance test at a rate higher than 40.9 tons of MAP product per hour and up to 60 tons of MAP product per hour by notifying the Department at least 15 days prior to the special test. The plant may be operated at the higher rate for only seven consecutive days and then must resume operation at no higher than 40.9 tons of MAP product per hour. Upon written approval of the performance test by the Department, including a determination that the plant will be able to meet the limits of conditions E.2 through E.6, the plant will be authorized to operate at a rate up to and including the rate that was experienced during the performance test. In the process of regaining the originally intended capacity of 60

tons of MAP product per hour, the permittee shall not be required to undergo another PSD review and BACT determination for PM/PM10 under Rule 62-212.400, F.A.C. or another BACT review for fluorides under Rule 62-296.403, F.A.C., unless the permittee submits an application to increase the plant's maximum operating capacity above 60 tons of MAP product per hour.

[Rules 62-4.160(2) & 62-210.200, F.A.C., Definitions - (PTE); Construction permit AC53-260190/PSD-FL-222]

Emission Limitations and Standards

E.2. Particulate matter (PM)/PM_{10} emissions from the Prilled MAP Plant scrubber stack shall not exceed any of the following:

a. 0.4 pounds per ton of MAP product;
b. 16.4 pounds per hour;
c. 71.7 tons per year.

{Permitting Note: Emission limits based on 40.9 tons per hour of MAP product.} [Construction permit AC53-260190/PSD-FL-222]

E.3. Fluoride emissions from the Prilled MAP Plant scrubber stack shall not exceed any of the following:

a. 0.019 pounds per ton of P_2O_5 input;
b. 0.39 pounds per hour;
c. 1.7 tons per year.

{Permitting Note: Emission limits based on 20.5 tons per hour P_2O_5 input.} [Construction permit AC53-260190/PSD-FL-222]

E.4. Total fluoride emissions from the Prilled MAP and Granular MAP/DAP Plants shall not exceed 2.94 tons per consecutive 12-month period. (Effective as of the revision date for Permit No. 1050051-017-AV, as shown on page 2 of 3.)
[Construction permit 1050051-008-AC]

E.5. Visible emissions from the Prilled MAP Plant scrubber stack shall not exceed 15% opacity. [Construction permit AC53-260190/PSD-FL-222]

E.6. Visible emissions from the ~~Prilled~~ MAP*/DAP* ~~Plant~~ Loadout baghouse shall not exceed 5% opacity. [Construction permit AC53-260190/PSD-FL-222]

E.7. *There shall be less than 5% visible emissions to the ambient atmosphere from any point on the MAP/DAP storage building and load-out system when a dust-suppressing oil has been applied to granular product to control particulate emissions in lieu of operation of the baghouse emission-control device. (Effective as of the revision date for Permit No. 1050051-018-AV, as shown on page 2 of 3.)*
[Rules 62-4.070(3) & 62-296.320(4)(c), F.A.C.; Construction permit 1050051-014-AC]

Test Methods and Procedures

E.8. The Prilled MAP Plant scrubber stack shall be tested for the following pollutants ~~annually, on or during the 60-day period prior to December 30~~ *in each federal fiscal year (October 1-September 30).*

a. total fluorides;
b. PM/PM_{10};
c. visible emissions.

[Rule 62-297.310(7)(a)4, F.A.C.; Construction Permit AC53-260190/PSD-FL-222]

E.9. The ~~Prilled~~ MAP*/DAP* ~~Plant~~ Loadout baghouse shall be tested for visible emissions ~~*annually on or during the 60 day period prior to December 30*~~ *in each federal fiscal year. (The Department shall waive this test in each year that the permittee submits a statement that—since the last compliance test—(1) dust-suppressing oil has been applied at no less than the minimum rate established by Condition E.12, and (2) the baghouse system has not been used.) (Effective as of the revision date for Permit No. 1050051-018-AV, as shown on page 2 of 3.)*

[Rules 62-297.310(7)(a)4 & (7)(c), F.A.C.; Construction Permits AC53-260190/PSD-FL-222 *and 1050051-014-AC*]

E.10. Compliance with the emission limitations of Conditions E.2 through E.6 shall be determined using EPA Methods 1, 2, 4, 5, 9 and 13A or 13B contained in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-297, F.A.C. The actual production rate shall be specified in each test report. Failure to include the actual production rate in the report may invalidate the test.

[Rule 62-297, F.A.C.; Construction Permit AC53-260190/PSD-FL-222]

E.11. The Department's Bureau of Air Regulation Office in Tallahassee and the Southwest District Office shall be notified in writing at least 15 days prior to any emission test.

[Rule 62-297.310, F.A.C.; Construction Permit AC53-260190/PSD-FL-222]

E.12. *To insure that the MAP/DAP storage and loadout facility does not produce visible emissions while handling granular product when the baghouse is shutdown, product shall have been oiled at no less than the minimum rate identified in Table 2-1. The permittee shall conduct performance tests on all types of dust-suppressing oils that will be used to control generation of dust in the MAP/DAP storage and loadout system. A report of the results of these performance tests shall be submitted to the Department. For each oil tested, the report shall include at least the following information:*

1. *The specific type of dust-suppressing oil (include a MSDS sheet on this material, if available);*
2. *The point of application of the dust-suppressing oil, the minimum rate (gallons of oil per ton of product) at which it was applied, and a description of how the rate of application was controlled and measured;*

3. *A statement of the results of observation of visible emissions from the transfer and load-out building when handling product to which dust-suppressing oil had been applied at the minimum rate.*

Should the permittee decide at some future time to use a dust-suppressing oil (1) for which no performance test has been submitted to the Department or (2) for which any of the conditions of application in Condition E.12, item no. 2, above, has been altered, then additional performance testing shall be conducted within 15 days of the change for the new oil and/or conditions. A report that contains Condition E.12., item nos. 1, 2, & 3, above, shall be submitted to the Department within 30 days of the testing. Table 2-1 may be revised upon request from the permittee and written approval from the Department. (Effective as of revision date for Permit No. 1050051-018-AV, as shown on page 2 of 3.)
[Rule 62-297.310(7)(c), F.A.C.; Construction Permit 1050051-014-AC]

E.13. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]

E.14. The Prilled MAP Plant shall be subject to the following:

a. Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hour in any 24 hour period unless specifically authorized by the Department for longer duration.
b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
c. Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.
d. In case of excess emissions resulting form malfunctions, each source shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700, F.A.C.; Construction Permit AC53-260190/PSD-FL-222]

Monitoring of Operations

E.15. In order to provide reasonable assurance that the pollution control system is operating properly, the permittee shall comply with Facility-wide Condition No. 10 when the prilled MAP plant and MAP/*DAP* loadout system *baghouse* are operating.
[Rule 62-4.070(3), F.A.C.].

E.16. In order to provide reasonable assurance that the pollution control system is operating properly, the permittee shall create and keep a record log of the scrubber operating parameters. The record log shall contain, at a minimum:

a. the volumetric liquid flow rate (gallons per minute),
b. the scrubber pressure drop (inches of water),
c. the date and time of the measurements, and
d. the name of the person responsible for performing the measurements.

A log entry shall be made at least once for every day that the MAP Plant operates.

{Permitting Note: The permittee may substitute continuous monitoring and strip chart recordings for the manual recordkeeping required by this Condition.}
[Rules 62-4.070(3), 62-4.160(14)(b), 62-4.160(14)(c), and 62-213.440(b)2.b., F.A.C.]

E.17. In order to provide reasonable assurance that the pollution control system is operating properly, the permittee shall create and keep a record log of the baghouse operating parameters. The record log shall contain, at a minimum:

b. the pressure drop (inches of water),
c. the date and time of the measurements, and
d. the name of the person responsible for performing the measurements.

A log entry shall be made at least once for every day of operation of the MAP/*DAP* Loadout System. *If dust-suppressing oil was applied to product, then the lowest rate at which oil was applied shall be entered into the daily record log. (Effective as of the revision date for Permit No. 1050051-018-AV, as shown on page 2 of 3.)*

{Permitting Note: Daily baghouse recordkeeping is required only on days that the load-out system conveys un-oiled or inadequately oiled product; and daily oiling recordkeeping is required only on days that dust-suppressing oil is applied to product.}

{Permitting Note: The permittee may substitute continuous monitoring and strip chart recordings for the manual recordkeeping required by this Condition.}
[Rules 62-210.650, 62-4.160(14)(b)&(c), and 62-213.440(b)2.b., F.A.C.; *Construction Permit 1050051-014-AC*]

Recordkeeping and Reporting Requirements

E.18. In order to comply with Condition E.1, the permittee shall maintain hourly records of the MAP production rate. [Rule 62-213.440(1), F.A.C.]

Table 2-1, Summary of Compliance Requirements

U.S. Agri-Chemicals Corporation
Ft. Meade Chemical Plant

FDEP Project No.: 1050051-020-AV (Administrative Correction)
(Initial Title V Permit No. 1050051-003-AV)
Facility ID No.: 1050051

This table summarizes information for convenience only. It does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

-005 Phosphoric Acid Plant A-Train
-006 Auxiliary Boiler
-020 Phosphoric Acid Plant B-Train
-016 Sulfuric Acid Plant #1
-021 Phosphoric Acid Plant Tank Farm
-017 Sulfuric Acid Plant #2

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-005, -020, 021	F (Fluoride)		13A or 13B	annual	29-November	1 hour		III. A.5. & A.6.
	VE		9	annual	29-November	30 minutes		III. A.5. & A.6.
	Pressure drop						Yes	III. A.8, A.10 & A.13.
	Water flow rate							III. A.8 & A.13.
	Mass flow							III. A.9, A.11 & A.13.
-006	VE	oil	DEP 9	annual	18-May	1 hour		III. B.6. & B.7.
	VE	gas	DEP 9	five years	6 months prior	1 hour		III. B.6, B.7 & B.9.
					to exp. date	1 hour		
	SO_2	No. 2 Fuel Oil	fuel analysis, and sampling	annual	18-May			III. B.6. & B.8.
-016, 017	VE		9	annual	12-November	1 hour		III. C.6. & C.8.
	SO_2		8	annual	12-November	1 hour	Yes	III. C.6., C.7., & C.12.
	H_2SO_4 acid mist		8	annual	12-November	1 hour		III. C.6. & C.8.
	NO_x		7 or 7E	five years	120 days prior	1 hour		III. C.7. & C.8.
					to exp. date			

Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

Condition A.7:

Pollution Control Equipment	Parameters	Minimum Limitations	Maximum Limitations
A-Train Venturi Scrubber	Liquid Flow-rate / Gas Pressure-Drop	64 GPM / 11.5 "H_2O	283 GPM / 19.4 "H_2O
B-Train Venturi Scrubber	Liquid Flow-rate / Gas Pressure-Drop	50 GPM / 10.5 "H_2O	283 GPM / 19.4 "H_2O

Table 2-1 was updated on March 24, 2003 by administrative correction

Tank Farm Venturi Scrubber	Liquid Flow-rate / Gas Pressure-Drop	91.8 GPM / 8.4 "H_2O	329 GPM / 18.3 " H_2O

Table 2-1 was updated on March 24, 2003 by administrative correction
Bookmark not defined.

Table 2-1, Summary of Compliance Requirements

U.S. Agri-Chemicals Corporation
Ft. Meade Chemical Plant

FDEP Project No.: 1050051-020-AV (Administrative Correction)
(Initial Title V Permit No. 1050051-003-AV)
Facility ID No.: 1050051

This table summarizes information for convenience only. It does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

-028 Molten Sulfur System -- Sulfur Tank
-029 Molten Sulfur System -- Sulfur Pit
-030 Molten Sulfur System -- Sulfur Rail Unloading
-031 Molten Sulfur System -- Sulfur Truck Unloading
-032 Prilled MAP Plant (includes MAP/*DAP* Storage & Loadout)

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-028, 029, 030, 031	VE		DEP Method 9	five years	120 days prior to exp. date	30 minutes		III. D.4., D.5., & D.6.
-032	PM		5	annual	30-December	1 hour		III. E.8. & E.10.
	F (Fluoride)		13A or 13B	annual	30-December	1 hour		III. E.8. & E.10.
	VE		9	annual	30-December	30 minutes		III. E.8., E.9, & E.10.
	Pressure drop							III. E.16. & E.17.
	Water flow rate							III. E.16.

Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310(7)(a)4, F.A.C.
**CMS [=] continuous monitoring system

Condition E.12:

Pollution Control Equipment	Dust-Suppressing Oil	Minimum Application Rate	Point of Application	Method of Measurement
MAP/DAP Storage & Loadout Unit—Product Oiling	Dustrol 3650	~~0.37~~ 0.64 gallons per ton of product	Cooler's discharge end	Ratio controller/ automatic valve

Table 2-1 was updated on March 24, 2003 by administrative correction
Bookmark not defined.

Table 2-1, Summary of Compliance Requirements

U.S. Agri-Chemicals Corporation
Ft. Meade Chemical Plant

FDEP Project No.: 1050051-020-AV (Administrative Correction)
(Initial Title V Permit No. 1050051-003-AV)
Facility ID No.: 1050051

This table summarizes information for convenience only. It does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

-033 Lime Silo
-038 Granular MAP/DAP Plant

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-033	VE		9	annual	08-September	30 minutes		III. F.5, F.8 & F.9.
	PM		5	five years	120 days prior to exp. date	1 hour		III. F.6, F.8 & F.9. (waived per Condition F.7.)
	Pressure drop							III. F.10. & F.11.
-038	PM		5	annual	27-February	1 hour		III. H.8. & H.20.
	F (Fluoride)		13A or 13B	annual	27-February	1 hour		III. H.6., H.7., & H.20.
	VE		9	annual	27-February	30 minutes		III. H.9 & H.20.
	Pressure drop							III. H.13, H.14. & H.18.
	Water flow rate							III. H.15. & H.18.
	N:P ratio							III. H.16. & H.18.

Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT

In the Matter of a Request for Administrative Correction:

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

Project No.: 1050051-020-AV
Administrative Correction to Permit No.: 1050051-003-AV
Polk County

Enclosed are ADMINISTRATIVELY CORRECTED pages to the Title V Air Operation Permit, No. 1050051-003-AV, for the operation of the facility located at 2020 US Highway 17, Bartow, Polk County. This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request dated 1/24/2003, to change the product oiling rate. This corrective action does not alter the effective dates of the existing permit.

The Department of Environmental Protection (Department) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9314, Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply to the Department for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;
(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
(c) Each rule or portion of a rule from which a variance or waiver is requested;
(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
(e) The type of action requested;
(f) The specific facts that would justify a variance or waiver for the petitioner;
(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any party to this order (permit) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; 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 thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tampa, Florida.

_____
Gerald J. Kissel, P.E.
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF ADMINISTRATIVELY CORRECTED PERMIT (including the corrected page(s)) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the person(s) listed or as otherwise noted:

Ms. Susanne Allen, Supervisor
Environmental Engineering
US Agri-Chemicals Corporation

U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)

Please find attached updated Table 2-1, Summary of Compliance Requirements.