

**Friday, Barbara**

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**To:** Pradeep Raval; Waters, Jason; Kissel, Gerald; jkoogler@kooglerassociates.com

**Cc:** Bull, Robert

**Subject:** PROPOSED Title V Permit Renewal No.: 1050052-008-AV - CF Industries, Inc. - Bartow Phosphate Complex

Attached for your records is a zip file which contains the PROPOSED Title V Permit Renewal and associated documents.

If I may be of further assistance, please feel free to contact me.

Barbara J. Friday  
Planner II  
Bureau of Air Regulation  
(850)921-9524  
[Barbara.Friday@dep.state.fl.us](mailto:Barbara.Friday@dep.state.fl.us)



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

December 27, 2004

Mr. John M. Doran  
CF Industries, Inc.  
P.O. Box 1480  
Bartow, FL 33831

Re: Title V Air Operation Permit Renewal  
PROPOSED Title V Air Operation Permit Renewal Project No.: 1050052-008-AV  
Bartow Phosphate Complex

Dear Mr. Doran:

One copy of the "PROPOSED Determination" for the renewal of a Title V Air Operation Permit for the Bartow Phosphate Complex located at 2501 Bonnie Mine Road, Bartow, Polk County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"[http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch\\_ltd.asp](http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch_ltd.asp)"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Bobby Bull at 850/921-9585.

Sincerely,

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TV/jkp/rlb

Enclosures

copy furnished to:  
John B. Koogler, PhD., P.E., Koogler and Associates  
Pradeep Raval, Consultant, Koogler and Associates  
Gerald Kissel, FDEP- SWD  
Jason Waters, FDEP- SWD  
USEPA, Region 4 (INTERNET E-mail Memorandum)

*"More Protection, Less Process"*

*Printed on recycled paper.*

## PROPOSED Determination

Title V Air Operation Permit Renewal  
PROPOSED Permit Project No.: 1050052-008-AV  
Page 1 of 5

### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to CF Industries, Inc. for the Bartow Phosphate Complex located at 2501 Bonnie Mine Road, Bartow, Polk County was clerked on November 8, 2004. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published in the The Ledger on November 20, 2004. The DRAFT Permit was available for public inspection at the Southwest District Office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on December 2, 2004.

### **II. Public Comment(s).**

Comments were received and the DRAFT Permit was changed. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. Letter from Mr. John M. Doran dated December 2, 2004, and received on December 9, 2004.

1. **Comment:** CFI recommends that the following condition be deleted as we believe there is no applicable standard for the emission limitation:

**C.4.** Particulate Matter Emissions from Boiler No. 1 shall not exceed 0.5lb/hr and 2.1 tpy. [Rule 62-296.406]

**Response:** The condition will not be removed based upon Facility Wide Condition 27.

2. **Comment:** Please note the proposed truck unloading and transfer operation will occur inside the product storage warehouse. Product will be directly unloaded from (or directly loaded to) trucks while inside the warehouse building and with all entrances and exits closed or curtailed. Accordingly, there are no exterior transfer points. Therefore, no fugitive emissions will be generated and visible emissions testing should not be required for the enclosed truck transfer operation. Note also that, although the description of the emissions unit states "unloading and transfer" and not specifically "loading", truck loading is presumed to be included in the term transfer as clearly discussed in all information previously submitted to the Department. With these points in mind, CFI recommends the following changes to Section III, Subsection D.

**Response:** As a result of this comment, **Section III, Subsection D** is hereby changed:

**From:**

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

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b>                             |
|-------------------|---|
| -031              | DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation |

The Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar/Truck Unloading and Transfer Operation has an unloading and transfer rate of 80.0 tons per hour of DAP/MAP/GTSP. The operation consists of receiving by railcar or truck DAP/MAP/GTSP which has been treated with a dust suppressant. DAP/MAP/GTSP is transferred to a hopper located below the railcar/truck, from the railcar/truck hopper the DAP/MAP/GTSP is transferred to a conveyor system which conveys the material to a warehouse for storage.

{**Permitting note(s):** This emissions unit is regulated under Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. **If this operation commences construction or modification after October 22, 1974, it is subject to NSPS Subpart X (40 CFR 60.240) for GTSP Storage Facilities if GTSP is manufactured on-site or if the facility receives fresh GTSP (i.e., GTSP produced within the preceding 72 hours).**}

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

**Essential Potential to Emit (PTE) Parameters**

**D.1. Capacity.** The unloading and transfer rate for the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation shall not exceed 130.0 tons per hour and 700,800 tons total operations and 300,000 tons for the trucking operation per 12 consecutive month period.

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C., Air Construction Permit No. AC53-246837, 1050052-006-AC, and 1050052-009-AC]

**Emission Limitations and Standards**

**D.2.** All material transferred from the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation (i.e., DAP, MAP, GTSP) shall be coated with a dust suppressant material. As an indicator of the effectiveness of this control measure, visible emissions from each material transfer point shall not exceed an opacity of 5%.

[Rule 62-296.320(4)(a), F.A.C. and 1050052-009-AC]

**Test Methods and Procedures**

**D.3.** Each material transfer point associated with the DAP/MAP/GTSP railcar/truck unloading and transfer operation shall be tested for visible emissions annually on or during the 60 day period prior to July 7.

[Rules 62-297.310(7)(a), 62-4.070(4), F.A.C., and 1050052-009-AC]

**D.4.** Compliance with the visible emission limitation of Condition D.2 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The

minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A.  
[Chapter 62-297, F.A.C.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.  
[Rule 62-4.070(3), F.A.C.]

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.  
[Rules 62-213.440(1)(b)2.b, and 62-4.070(3), F.A.C.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.  
[Rule 62-4.070(3), F.A.C.]

**To:**  
**Subsection D. This section addresses the following emissions unit(s).**

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b>                             |
|-------------------|---|
| -031              | DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation |

The Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar/Truck Unloading and Transfer Operation has an unloading and transfer rate of ~~80.0~~ 130.0 tons per hour of DAP/MAP/GTSP. The operation consists of receiving by railcar or truck DAP/MAP/GTSP which has been treated with a dust suppressant. DAP/MAP/GTSP is transferred by rail to a hopper located below the railcar/~~truck~~, and from the railcar/~~truck~~ hopper the DAP/MAP/GTSP is transferred to a conveyor system which conveys the material to a warehouse for storage. For truck transfer, DAP/MAP/GTSP is unloaded directly from or loaded directly into the truck while inside the enclosed storage warehouse.

**{Permitting note(s):** This emissions unit is regulated under Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. **If this operation commences construction or modification after October 22, 1974, it is subject to NSPS Subpart X (40**

**CFR 60.240) for GTSP Storage Facilities if GTSP is manufactured on-site or if the facility receives fresh GTSP (i.e., GTSP produced within the preceding 72 hours).}**

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

**Essential Potential to Emit (PTE) Parameters**

**D.1. Capacity.** The unloading and transfer rate for the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation shall not exceed 130.0 tons per hour and 700,800 tons total operations and 300,000 tons for the trucking operation per 12 consecutive month period.

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C., Air Construction Permit No. AC53-246837, 1050052-006-AC, and 1050052-009-AC]

**Emission Limitations and Standards**

**D.2.** All material transferred from the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation (i.e., DAP, MAP, GTSP) shall be coated with a dust suppressant material. As an indicator of the effectiveness of this control measure, visible emissions from each material transfer point shall not exceed an opacity of 5% for the railcar operation. To ensure that no fugitive emissions occur from the storage building during truck loading/unloading, all doors to the warehouse building shall remain closed or curtailed during any truck transfer operations.

[Rule 62-296.320(4)(a), F.A.C. and 1050052-009-AC]

**Test Methods and Procedures**

**D.3.** Each material transfer point associated with the DAP/MAP/GTSP railcar/truck unloading and transfer operation shall be tested for visible emissions annually on or during the 60 day period prior to July 7.

[Rules 62-297.310(7)(a), 62-4.070(4), F.A.C., and 1050052-009-AC]

**D.4.** Compliance with the visible emission limitation of Condition D.2 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A.

[Chapter 62-297, F.A.C.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

[Rule 62-4.070(3), F.A.C.]

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rules 62-213.440(1)(b)2.b, and 62-4.070(3), F.A.C.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.

- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 62-4.070(3), F.A.C.]

**III. Document on file with the permitting authority:**

-Letter received December 9, 2004, from Mr. John M. Doran.

**IV. Conclusion.**

The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.

## STATEMENT OF BASIS

CF Industries, Inc.  
Bartow Phosphate Complex  
**Facility ID No.:** 1050052  
Polk County

**PROPOSED Permit No. 1050052-008-AV**  
(Initial Title V Permit No.: 1050052-004-AV)

The initial Title V Air Operation Permit No. 1050052-004-AV, was issued/effective on September 9, 1998 for the CF Industries, Bartow Phosphate Complex. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of one active Sulfuric Acid Plant, two Monoammonium/Diamonium Phosphate (MAP)/DAP Shipping Plants including DAP/MAP Railcar/Truck Unloading and Transfer Operation, one Auxiliary Boiler, and a Molten Sulfur Storage and Handling System. The CAM Rule does not apply to these units. Additionally the facility consists of several process units which were excluded from the renewal by the permittee in accordance with Rule 62-210-300(2)(a)(3)(c), F.A.C., and are not permitted to operate. The units are one Sulfuric Acid Plant (unit 005), one Phosphoric Acid Plant No. 1 (unit 007), one Rock Surge Bin for Phosphoric Acid Plant No. 2 (unit 017), one Phosphoric Acid Clarification Plant (unit 022), one Phosphoric Acid Aging Tank (023), one Phosphoric Acid Storage Tank (unit 024) and one Rock Unloading facility (unit 026).

This renewal application will include changes to the Initial Title V Permit 1050052-004-AV. The renewal incorporates Air Construction Projects 1050052-006-AC and 1050052-009-AC. Project 1050052-006-AC increases the unloading and transfer rate for the DAP/MAP/GTSP Railcar Unloading and Transfer Operation from 80.0 tons per hour to 130.0 tons per hour. Project 1050052-009-AC incorporates truck operations at the DAP/MAP/GTSP Railcar Unloading and Transfer Operation. With the incorporation of Air Construction Permits 1050052-006-AC and 1050052-009-AC, the following changes have been made as follow:

### **a. Table of Contents**

**FROM:** 031 DAP/MAP/GTSP Railcar Unloading and Transfer Operation

**TO:** 031 DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation

### **b. Section I, Subsection A, Facility Description**

**FROM:** This facility consists of one sulfuric acid plant, two monoammonium phosphate (MAP)/diammonium phosphate (DAP) shipping plants including DAP/MAP railcar unloading and transfer operation, one auxiliary boiler, and a molten sulfur storage and handling system.



**TO:** This facility consists of one sulfuric acid plant, two monoammonium phosphate (MAP)/diammonium phosphate (DAP) shipping plants including DAP/MAP railcar/truck unloading and transfer operation, one auxiliary boiler, and a molten sulfur storage and handling system.

**c. Section I, Subsection B**

**FROM:** DAP/MAP/GTSP Railcar Unloading and Transfer Operation

**TO:** DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation

**d. Section II. Facility Wide Conditions**

**FROM: 6.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: only DAP/MAP/GTSP which has been treated with a dust suppressant shall be unloaded and transferred at the DAP/MAP/GTSP Railcar Unloading and Transfer Operation, and watering of plant areas on an as needed basis.

[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit AC53-246837]

**TO: 6.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: only DAP/MAP/GTSP which has been treated with a dust suppressant shall be unloaded and transferred at the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation, and watering of plant areas on an as needed basis.

[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit AC53-246837, Air Construction Permit 1050052-009-AC]

**e. Section III, Subsection D**

**FROM:**

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

**E.U. ID**

**No.**

**Brief Description**

-031 DAP/MAP/GTSP Railcar Unloading and Transfer Operation

The Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar Unloading and Transfer Operation has an unloading and transfer rate of 80.0 tons per hour of DAP/MAP/GTSP. The operation consists of receiving by railcar DAP/MAP/GTSP which has been treated with a dust suppressant. DAP/MAP/GTSP is transferred to a hopper located below the railcar, from the railcar hopper the DAP/MAP/GTSP is transferred to a conveyor system which conveys the material to a warehouse for storage.

{**Permitting note(s):** This emissions unit is regulated under Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. **If this operation commences construction or modification after October 22, 1974, it is subject to NSPS Subpart X (40 CFR 60.240) for GTSP Storage Facilities if GTSP is manufactured on-site or if the facility receives fresh GTSP (i.e., GTSP produced within the preceding 72 hours).**}

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

**Essential Potential to Emit (PTE) Parameters**

**D.1. Capacity.** The unloading and transfer rate for the DAP/MAP/GTSP Railcar Unloading and Transfer Operation shall not exceed 80.0 tons per hour.

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C., Air Construction Permit No. AC53-246837 and 1050052-006-AC]

**Emission Limitations and Standards**

**D.2.** All material transferred from the DAP/MAP/GTSP Railcar Unloading and Transfer Operation (i.e., DAP, MAP, GTSP) shall be coated with a dust suppressant material. As an indicator of the effectiveness of this control measure, visible emissions from each material transfer point shall not exceed an opacity of 5%.

[Rule 62-296.320(4)(a), F.A.C.]

**Test Methods and Procedures**

**D.3.** Each material transfer point associated with the DAP/MAP/GTSP railcar unloading and transfer operation shall be tested for visible emissions annually on or during the 60 day period prior to July 7.

[Rules 62-297.310(7)(a)4 and 62-4.070(4), F.A.C.]

**D.4.** Compliance with the visible emission limitation of Condition D.2 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A.

[Chapter 62-297, F.A.C.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

[Rule 62-4.070(3), F.A.C.]

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rules 62-213.440(1)(b)2.b, and 62-4.070(3), F.A.C.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 62-4.070(3), F.A.C.]

**TO:**

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

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b>                             |
|-------------------|---|
| -031              | DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation |

The Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar/Truck Unloading and Transfer Operation has an unloading and transfer rate of 130.0 tons per hour of DAP/MAP/GTSP. The operation consists of receiving by railcar or truck DAP/MAP/GTSP which has been treated with a dust suppressant. DAP/MAP/GTSP is transferred by rail to a hopper located below the railcar and from the railcar hopper the DAP/MAP/GTSP is transferred to a conveyor system which conveys the material to a warehouse for storage. For truck transfer, DAP/MAP/GTSP is unloaded directly from or loaded directly into the truck while inside the enclosed storage warehouse.

{**Permitting note(s):** This emissions unit is regulated under Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. **If this operation commences construction or modification after October 22, 1974, it is subject to NSPS Subpart X (40 CFR 60.240) for GTSP Storage Facilities if GTSP is manufactured on-site or if the facility receives fresh GTSP (i.e., GTSP produced within the preceding 72 hours).**}

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

**Essential Potential to Emit (PTE) Parameters**

**D.1. Capacity.** The unloading and transfer rate for the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation shall not exceed 130.0 tons per hour and 700,800 tons total operations and 300,000 tons for the trucking operation per 12 consecutive month period. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C., Air Construction Permit No. AC53-246837, 1050052-006-AC, and 1050052-009-AC]

**Emission Limitations and Standards**

**D.2.** All material transferred from the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation (i.e., DAP, MAP, GTSP) shall be coated with a dust suppressant material. As an indicator of the effectiveness of this control measure, visible emissions from each material transfer point shall not exceed an opacity of 5% for the railcar operation. To ensure that no fugitive emissions occur from the storage building during truck loading/unloading, all doors to the warehouse building shall remain closed or curtailed during any truck transfer operations. [Rule 62-296.320(4)(a), F.A.C. and 1050052-009-AC]

**Test Methods and Procedures**

**D.3.** Each material transfer point associated with the DAP/MAP/GTSP railcar unloading and transfer operation shall be tested for visible emissions annually. [Rules 62-297.310(7)(a), 62-4.070(4), F.A.C.]

**D.4.** Compliance with the visible emission limitation of Condition D.2 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A. [Chapter 62-297, F.A.C.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

[Rule 62-4.070(3), F.A.C.]

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rules 62-213.440(1)(b)2.b, and 62-4.070(3), F.A.C.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 62-4.070(3), F.A.C.]

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Renewal application received February 28, 2003 and additional information provided by the applicant, this facility is not a major source of hazardous air pollutants (HAPs).

CF Industries, Inc.  
Bartow Phosphate Complex  
**Facility ID No.: 1050052**  
Polk County

Title V Air Operation Permit Renewal  
**PROPOSED Permit No. 1050052-008-AV**

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Telephone: 850/488-0114  
Fax: 850/922-6979

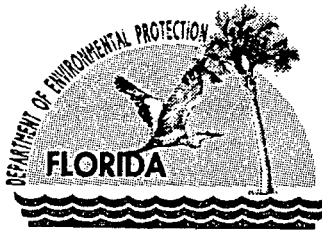
Compliance Authority:

Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619  
Telephone: 813/744-6100  
Fax: 813/744-6458

Title V Air Operation Permit Renewal  
**PROPOSED Permit No. 1050052-008-AV**

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| E. 032 Rail/Truck Unloading Pit -- Molten Sulfur System   |                    |
| 033 North Storage Tank -- Molten Sulfur System  |                    |
| 034 South Storage Tank -- Molten Sulfur System  | E1 – E3            |
| F. 035 Phosphogypsum Stack  | F1 – F7            |
| <br>  |                    |
| IV. Appendices and Attachments (listed in sequence as attached)   |                    |
| Attachment A, Memorandum of Understanding Regarding Best Operational Start-up<br>Practices for Sulfuric Acid Plants |                    |
| Appendix U-1 List of Unregulated Emission Units and/or Activities.  |                    |
| Appendix TV-4, Title V Conditions   |                    |
| Appendix SS-1, Stack Sampling Facilities  |                    |
| Appendix A-1, Abbreviations, Definitions, Citations, and ID Numbers   |                    |
| Appendix H-1, Permit History/ID Number Transfers  |                    |
| Figure 1 - Summary Report - Excess Emissions and Monitoring Sys. Performance  |                    |
| Table 297.310-1 Calibration Schedule  |                    |
| Table 1-1, Summary of Air Pollutant Standards and Terms   |                    |
| Table 2-1, Summary of Compliance Requirements   |                    |
| Statement of Basis  |                    |



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

**Permittee:**  
CF Industries, Inc.  
P.O. Box 1480  
Bartow, Florida 33831

**PROPOSED Permit No.** 1050052-008-AV  
**Facility ID No.:** 1050052  
**SIC Nos.:** 28, 2874  
**Project:** Title V Air Operation Permit Renewal

The purpose of this permit is for the operation of CF Industries, Inc. Bartow Phosphate Complex, and to renew Title V Air Operation Permit No. 1050052-008-AV, and to incorporate the terms of construction permits 1050052-006-AC and 1050052-009-AC. The facility located at 2501 Bonnie Mine Road, Bartow, Polk County; UTM Coordinates: Zone 17, 408.3 km East and 3082.5 km North; Latitude: 27° 51' 59" North and Longitude: 81° 55' 46" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Attachment A, Memorandum of Understanding Regarding Best Operational Start-up Practices for Sulfuric Acid Plants

Appendix U-1, List of Unregulated Emissions Units and/or Activities

APPENDIX TV-4, TITLE V CONDITIONS (version dated 2/12/02)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/7/96)

TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/7/96)

FIGURE 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)

**Effective Date:** ARMS day 55

**Renewal Application Due Date:** 6 months from Expiration

**Expiration Date:** 5 years from Effective date

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

\_\_\_\_\_  
Michael G. Cooke, Director  
Division of Air Resource Management

MGC/jkp/rlb

"More Protection, Less Process"

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**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of one sulfuric acid plant, two monoammonium phosphate (MAP)/diammonium phosphate (DAP) shipping plants including DAP/MAP railcar/truck unloading and transfer operation, one auxiliary boiler, and a molten sulfur storage and handling system.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the Title V Renewal permit application received February 28, 2003 and additional information provided by the applicant, this facility is not a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b>                                   |
|-------------------|---|
| -002              | No. 1 MAP/DAP/Granular Triple Superphosphate (GTSP) Shipping Unit |
| -006              | Sulfuric Acid Plant No. 6   |
| -021              | Boiler No. 1  |
| -025              | No. 2 MAP/DAP/GTSP Shipping Unit                                  |
| -031              | DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation       |
| -032              | Molten Sulfur System -- Rail/Truck Unloading Pit                  |
| -033              | Molten Sulfur System -- North Storage Tank                        |
| -034              | Molten Sulfur System -- South Storage Tank                        |
| -035              | Phosphogypsum Stack   |

The following shutdown process units are located at the facility. They are to remain shutdown at all times, in accordance with Rule 62-210-300(2)(a)(3)(c), F.A.C., unless a new construction permit allows a specified emission unit to operate under this permit.

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b>             |
|-------------------|---|
| -005              | Sulfuric Acid Plant No. 5                   |
| -007              | Phosphoric Acid Plant No. 1                 |
| -017              | Rock Surge Bin for Phosphoric Acid Plant #2 |
| -022              | Phosphoric Acid Clarification Tank          |
| -023              | Phosphoric Acid Aging Tank                  |
| -024              | Phosphoric Acid Storage Tank                |
| -026              | West Rock Unloading                         |

**Unregulated Emissions Units and/or Activities**

|      |                                  |
|------|----------------------------------|
| -036 | Facility Wide Fugitive Emissions |
|------|----------------------------------|

***Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.***



**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History / ID Number Transfers

Statement of Basis

These documents are on file with permitting authority:

Initial Title V Permit Application received June 13, 1996

Additional Title V Application Information dated June 23, 1997

Additional Information Request dated December 5, 1997

Additional Information Response received February 27, 1998

Additional Information Response received April 13, 1998

Title V Permit Revision Request received December 20, 2001

Additional Information Request dated February 14, 2002

Additional Information Response received April 18, 2002

Title V Permit Renewal Application received February 28, 2003

Additional Information Request dated April 17, 2003

Additional Information Response received September 25, 2003

Additional Information Request dated October 13, 2003

Additional Information Response received March 4, 2004

Additional Information Request dated April 2, 2004

Additional Information Response received May 13, 2004

Draft Renewal Permit issued July 7, 2004

Revised Draft Renewal Permit Issued November 8, 2004

**Section II. Facility-wide Conditions.**

**The following conditions apply facility-wide:**

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.  
{Permitting note: APPENDIX TV-4, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
  2. **Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.** The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
  3. **General Particulate Emission Limiting Standards. General Visible Emissions Standard.** Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).  
[Rule 62-296.320(4)(b)1., F.A.C.]
  4. **Prevention of Accidental Releases (Section 11i2(r) of CAA).** If required by 40 CFR 68, the permittee shall submit:
    - a. a risk management plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:  
RMP Reporting Center  
Post Office Box 1515  
Lanham-Seabrook, Maryland 20703-1515  
Telephone: 301/429-5018
- and,
- b. to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.  
[40 CFR 68]
5. **Unregulated Emissions Units and/or Activities.** Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]
6. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: only DAP/MAP/GTSP which has been treated with a dust suppressant shall be unloaded and transferred at the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation, and watering of plant areas on an as needed basis.  
[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit AC53-246837, Air Construction Permit 1050052-009-AC]
7. 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 (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-296.700(1), F.A.C.]

8. 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.

[Rule 62-296.700(4), F.A.C.]

Test Methods and Procedures

9. The requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C., *Stationary Sources - Emission Monitoring* and 40 CFR 60, Appendix A.

[Rule 62-297.401, F.A.C.]

10. The visible emissions test shall be conducted by a certified observer and be a minimum of thirty minutes in duration, unless otherwise specified within. The test observation period shall include the period during which the highest opacity can reasonably be expected to occur.

[Rule 62-297.310(4)(a)2, F.A.C.]

11. Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. In no case shall the process or production rate exceed the maximum permitted process or production rate. The actual process or production rate during the test shall be included in each test report. Failure to include the actual process or production rate in the results may invalidate the test. In addition, the test results shall include any operating parameters limited or specified to be recorded in this permit.

[Rule 62-4.070(3) and 62-297.310(2), F.A.C.]

12. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.

[Rule 62-297.310(7)(b), F.A.C.]

13. Compliance Testing. The permittee shall conduct an initial compliance test on the following emission units within 45 days after reaching 90 percent of the maximum permitted capacity or within 90 days of reactivation (initial startup), whichever occurs first: Sulfuric Acid Plant No. 6 (EU No. 006), Boiler No. 1 (EU No. 021), and the Molten Sulfur System (EU Nos. 032, 033, and 034).

[Rules 62-297.310(7) and 62-297.310(8), F.A.C.]

{Permitting Note: Compliance Test Dates. Compliance test dates for emissions units in this permit are for planning purposes only. Rule 62-297.310(7)(a)4, F.A.C., allows the permittee to conduct a formal compliance test any time during the federal fiscal year (October 1 -- September 30).}

Recordkeeping and Reporting Requirements

14. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted.

[Rules 62-297.310(7)(a)9 and 62-209.500(5), F.A.C.]

15. The permittee shall submit to the Air Compliance Section of Southwest District Office of the Department each calendar year, on or before March 1, a completed DEP Form 62-210.900(5), an "Annual

Operating Report for Air Pollutant Emitting Facility”, for the preceding calendar year containing the following information pursuant to Subsection 403.061(13), F.S.:

- a. Annual amount of materials and/or fuels utilized;
- b. Annual emissions (note calculation basis);
- c. Hours of operation;
- d. Any changes in the information contained in the permit.

[Rule 62-210.370(3), F.A.C.]

**16.** The “Statement of Compliance” required to be submitted to this office and U.S.EPA shall be submitted at the same time as the Annual Operating Report. **Note to Permittee:** see Appendix TV-4 Nos. 24 and 51.

[Rules 62-213.420(4), 62-213.440(3), and 62-4.070(3), F.A.C.]

**17. Test Reports**

a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Air Compliance Section of Southwest District Office of the Department, and the applicable local program(s) on the results of each such test.

b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed or with the operating permit application, whichever is earlier.

c. The report shall provide sufficient detail on the emissions unit tested (at a minimum, the "Project", "Facility ID" and "Emission Unit ID"), the test procedures used to allow the Department to determine if the test report was properly conducted and the test results properly computed. Testing procedures shall be consistent with the requirements of Rule 62-297.310(7), F.A.C.

d. The test report, other than for an EPA or DEP Method 9 test, as a minimum, shall provide the following information:

1. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
2. The normal operating parameters of air pollution control devices installed on each emission unit (e.g., pressure drop, scrubber liquid flow rate, scrubber liquid pressure, total current, etc.), and the operating parameters of air pollution control devices during each test run.

Failure to submit the rates and actual operating conditions in the test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 62-297.310(8), F.A.C., and 62-4.070(3), F.A.C.]

**18. Hours of Operation** - Unless otherwise noted, all emission units are allowed to operate continuously, i.e., 8760 hours per year.

[Rule 62-4.070(3), F.A.C.]

**19.** At a minimum, all records and logs required by this permit shall be updated monthly. (Also reference appendix TV-4, items 12.(14)(b), 12.(14)(c) and 42.)

[Rule 62-4.070(3), F.A.C.]

**20. Better Grade Fuel Oil**

A better grade fuel oil is defined as a fuel oil with a higher ranking than the subject fuel oil as provided on the following list:

**Better Grade (Top of List) Rankings**

new, No. 2 fuel oil, or No. 2 on-specification fuel oil  
new, No. 3 fuel oil, or No. 3 on-specification fuel oil  
new, No. 4 fuel oil, or No. 4 on-specification fuel oil  
new, No. 5 fuel oil, or No. 5 on-specification fuel oil  
new, No. 6 fuel oil, or No. 6 on-specification fuel oil

**21.** When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

**22.** The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District office:

Department of Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8218  
Telephone: 813/744-6100  
Fax: 813/744-6458

**23.** Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Air & EPCRA Enforcement Branch  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9155  
Fax: 404/562-9163

**24.** This facility is subject to the provisions of 40 CFR 60 Subpart A - General Provisions. A copy of 40 CFR 60 Subpart A - General Provisions is available from the Department upon request.

**25.** This facility shall not emit more than 9 tons per year of Hydrogen Fluoride or any other Hazardous Air Pollutants regulated under MACT Standards. Any emissions units emitting Hazardous Air Pollutants will be subject to the provisions in Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, 62-296, and 62-297. Any emissions units, currently not operating at the facility and resumes operation through a construction permit, will be subject to the same provisions. (Per applicant request to avoid MACT Standards.)

**26.** This facility shall not emit more than 24 tons per year of any combinations of Hazardous Air Pollutants regulated under MACT Standards. Any emissions units emitting Hazardous Air Pollutants will be subject to the provisions in Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, 62-296, and 62-297. Any emissions units, currently not operating at the facility and resumes operation through a construction permit, will be subject to the same provisions. (Per applicant request to avoid MACT Standards.)

27. This facility may be subject to 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

**NOTES to PERMITTEE:**

Based on a modeling study approved by the Department, it was determined that emissions from this facility will not have a significant impact on the Hillsborough County Air Quality Maintenance Area and it is therefore exempt from the PM RACT requirements in accordance with Rule 62-296.700(2)(b), F.A.C. The following emission units have permitted particulate emission limits and are subject to modeling in order to demonstrate to the department that this facility will not have a significant impact on the Air Quality Maintenance Area.

| Subsection | E.U. I.D. No. | Description                      | Particulate Matter (PM) Limit |                  |
|------------|---------------|----------------------------------|-------------------------------|------------------|
|            |               |                                  | lbs/hr                        | Tons per year    |
| A          | 002           | No. 1 MAP/DAP/GTSP Shipping Unit | ** <sup>3</sup>               |                  |
| A          | 025           | No. 2 MAP/DAP/GTSP Shipping Unit | ** <sup>3</sup>               |                  |
| C          | 021           | Boiler No. 1                     | 0.5 <sup>1</sup>              | 2.1 <sup>1</sup> |
| E          | 032 -<br>034  | Molten Sulfur System             |                               | 1.6 <sup>2</sup> |
| Total      |               |                                  | 0.5** <sup>3</sup>            |                  |

<sup>1</sup>Emission limit based on BACT determination. [DEP Guidance Memo DARM-PER-02]

<sup>2</sup>Emission estimate for emission inventory and PSD purposes. [Specific Condition E.3.]

<sup>3</sup>The Title V Permit Revision No. 1050052-007-AV replaced the PM allowables of 40.4 lbs per hour for each Nos. 1 and 2 MAP/DAP/GTSP Shipping Units with a 5% opacity limit for the handling of only product which has been treated with a dust suppressant (see Section III, Subsection A of this permit).

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Permit Renewal - Reference Appendix TV-4, item 5

**Section III. Emissions Unit(s) and Conditions.**

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

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b>  |
|-------------------|----------------------------------|
| -002              | No. 1 MAP/DAP/GTSP Shipping Unit |
| -025              | No. 2 MAP/DAP/GTSP Shipping Unit |

The Nos. 1 and 2 MAP/DAP/GTSP Shipping Units each have a maximum design process rate of 325 TPH of product. Product is loaded into railcars on an intermittent basis. The product loaded has been previously treated with a dust suppressant, which minimizes particulate matter emissions.

{Permitting note(s): These emissions units are regulated under Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

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

**Essential Potential to Emit (PTE) Parameters**

**A.1. Capacity.** The process/operation rate for each of the Nos. 1 and 2 Shipping Units shall not exceed 325 tons of product per hour (1 hour average).

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C.]

**Emission Limitations and Standards**

**A.2. At all times, only product which has been treated with a dust suppressant material** may be loaded at the Nos. 1 and 2 MAP/DAP/GTSP Shipping Units. As an indicator that the dust suppressant is adequately controlling the particulate matter emissions, visible emissions from each emission unit shall not exceed an opacity of 5%.

[Rule 62-4.070, F.A.C.]

{Permitting Note: The permittee indicated a potential-to-emit of 0.5 TPY PM for each emissions unit at the loading rate of 325 TPH each. This is significantly less than the previous PM allowable of 40.4 pounds per hour, therefore, the previous determination that the facility is qualified for the PM RACT exemption per Rule 62-296.700(2)(b), F.A.C. per Initial Title V Permit No. 1050052-0004-AV, still applies}

**Test Methods and Procedures**

**A.3.** Test the Nos. 1 and 2 MAP/DAP/GTSP Shipping Units for visible emissions (VE) annually, on or during the 60 day period prior to the test due dates shown below:

| <b>Emission Unit</b> | <b>Description</b>               | <b>Test Due Date</b> |
|----------------------|----------------------------------|----------------------|
| 002                  | No. 1 MAP/DAP/GTSP Shipping Unit | December 7           |
| 025                  | No. 2 MAP/DAP/GTSP Shipping Unit | January 25           |

Each test report shall include the operation information that is required per Condition A.8 of this permit that was recorded for each test. Failure to include this information in the results may invalidate the test.

[Rules 62-297.310(7)(a)4, F.A.C. and 62-4.070(4), F.A.C.]

A.4. Compliance with the emission limitations of Conditions A.2., and A.3. shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A.  
[Rule Chapter 62-297, F.A.C.]

**Monitoring of Operations**

A.5. Reserved.

**Recordkeeping and Reporting Requirements**

A.6. In order to document compliance with Conditions A.1, A.2, and A.3, the permittee shall create and keep a daily record log to record the following during operation of either the No. 1 or No. 2 MAP/DAP/GTSP Shipping Unit:

- a. The date, time started and time ended of each railcar loading operation;
- b. Amount and type (identification) of dust suppressant used on the product during each railcar loading operation. Vendor supplied information may be used;
- c. Amount loaded during each railcar loading operation (tons) and the corresponding 1-hour average loading rate (tons per hour) during each railcar loading operation;
- d. Name of person responsible for recording the information.

These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rules 62-213.440(1)(b)2.b and 62-4.070, F.A.C.]



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

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b> |
|-------------------|---------------------------------|
| -006              | Sulfuric Acid Plant No. 6       |

Sulfuric Acid Plant No. 6 is a double contact/double absorption plant with a production capacity of 60.0 tons/hour of 100% H<sub>2</sub>SO<sub>4</sub>. Emissions from this plant exhaust through a York demister.

{Permitting note(s): These emissions units are regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards; Rule 296.402, F.A.C., Sulfuric Acid Plants. Sulfuric Acid Plant No. 5 has not operated since June 30, 1989.}

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

**Essential Potential to Emit (PTE) Parameters**

**B.1. Capacity.**

The sulfuric acid production at Sulfuric Acid Plant No. 6 shall not exceed 60.0 tons per hour of 100% H<sub>2</sub>SO<sub>4</sub>.

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C.; As requested by permittee in amendment request letter dated November 22, 1995]

**Emission Limitations and Standards**

**B.3.** In accordance with Rule 62-296.402(1)(b), F.A.C., the maximum allowable emission rates from Sulfuric Acid Plant No. 6 shall not exceed the following:

- a. Sulfur dioxide emissions shall not exceed 6.7 pounds/ton of 100% H<sub>2</sub>SO<sub>4</sub> produced or 400.0 pounds/hour, whichever is less.
- b. Acid mist emissions shall not exceed 0.20 pounds/ton of 100% H<sub>2</sub>SO<sub>4</sub> produced or 12.0 pounds/hour, whichever is less.
- c. Visible emissions shall not exceed 10% opacity.

[Rule 62-296.402(1)(b), F.A.C.]

**Test Methods and Procedures**

**B.4.** The permittee shall test the emissions from Sulfuric Acid Plant No. 6 for the following pollutants on, or during the 60 day period prior to the test due dates and test intervals shown below:

| <b>Pollutant</b> | <b>Test Interval</b> | <b>Test Due Date</b>                         |
|------------------|----------------------|--|
|                  |                      | <b>Sulfuric Acid Plant No. 6<sup>1</sup></b> |
| Opacity          | Annual               | Reactivation Date                            |
| Sulfur Dioxide   | Annual               | Reactivation Date                            |
| Acid Mist        | Annual               | Reactivation Date                            |

<sup>1</sup>The permittee shall test the emissions from Sulfuric Acid Plant No. 6 within 45 days after reaching 90 percent of the maximum permitted capacity or within 90 days of reactivation (initial startup), whichever occurs first ; and annually thereafter on or during the 60 day period prior to that date. (See Facility Wide Condition No. 13, page 6)

[Rules 62-297.310(7)(a)4, F.A.C. and 62-4.070(4), F.A.C.]

**B.5.** Compliance with the emission limitations of Conditions B.2. and B.3 shall be determined using EPA Methods 1, 2, 3, 8 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A.  
[Chapter 62-297, F.A.C.]

**Excess Emissions**

**B.6.** 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 2 hours in any 24 hour period unless specifically authorized by the Department for longer duration. In case of a conflict between this condition and the Memorandum of Understanding Regarding Best Operational Start-Up Practices for Sulfuric Acid Plants (ref. Condition B.17), the Memorandum of Understanding Regarding Best Operational Start-Up Practices for Sulfuric Acid Plants shall govern.  
[Rule 62-210.700(1), F.A.C.]

**B.7.** 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.  
[Rule 62-210.700(4), F.A.C.]

**B.8.** This permit acknowledges that leaks of sulfur dioxide and sulfur trioxide or other fugitive process emissions that do not pass through a stack may occur as a part of routine operations. Best operational practices to minimize these emissions shall be adhered to and shall include regular inspections and prompt repair or correction of any leaks or other fugitive emissions.  
[Rule 62-296.320(4)(c), F.A.C.]

**Monitoring of Operations**

**B.9.** The permittee shall establish a conversion factor for the purpose of converting sulfur dioxide monitoring data into units of the applicable standard (pounds per ton). A record of all conversion factors and values from which they were calculated shall be maintained.  
[Rule 62-4.070(3), F.A.C.]

**Continuous Monitoring Requirements**

**B.10.** For each plant, a continuous emission monitoring system for the measurement of sulfur dioxide shall be calibrated, maintained, and operated by the permittee. The span value of the continuous monitor shall be set at 1000 ppm.  
[Rule 62-296.402(4), F.A.C.]

**Recordkeeping and Reporting Requirements**

**B.11.** In order to document compliance with Condition B.1., the permittee shall maintain a daily record of sulfuric acid production in tons/day of 100% H<sub>2</sub>SO<sub>4</sub>. These records shall be recorded in a permanent form suitable for inspection by the Department on request.  
[Rule 62-4.070(3), F.A.C.]

**B.12.** For each plant, the permittee shall submit a written report of excess sulfur dioxide emissions each calendar quarter in accordance with Rule 62-296.402(5), F.A.C. Periods of excess emissions shall be all three-hour periods (or the arithmetic average of three consecutive one-hour periods) during which the integrated average sulfur dioxide emissions exceed the applicable standard under Rule 62-296.402(1)(b), F.A.C. The excess emission report shall also include a statement of all periods during the quarter when the

sulfur dioxide monitoring system was inoperative. The quarterly sulfur dioxide excess emission report shall be submitted to the Southwest District Office of the Department. All reports shall be postmarked by the 30th day following the end of each calendar quarter.

[Rules 62-213.440(1)(b)2.b, F.A.C. and 62-4.070(3), F.A.C.]

**B.13.** For each plant, the permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system (sulfur dioxide) or monitoring device is inoperative. Records on monitoring system performance evaluations, calibrations and maintenance shall be maintained and be made available for inspection upon request

[Rules 62-213.440(1)(b)2.b, F.A.C. and 62-4.070(3), F.A.C.]

**B.14.** The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection.

[Rules 62-204.800(7)(b)10 and 62-213.440(b)2.b, F.A.C. and 40 CFR 60.7(d)]

**B.15.** The expiration date of the permit for Sulfuric Acid Plant No. 6 established, in accordance with the requirements of Rule 62-210.300(2)(a)3.c., F.A.C., is November 24, 2009, which is ten years from the last day of operation of this emissions unit (November 24, 1999). Applications to renew the operating permit shall be submitted to the Southwest District Office of the Department no later than September 24, 2009 (60 days prior to the expiration date of the permit). If this source still has not operated at the time of the expiration date of this permit, then a renewal operation permit cannot be issued.

[Rules 62-210.300(2)(a)3.c., and 62-4.090(1), F.A.C.]

{Permitting Note: If the Renewal permit (1050052-008-AV) is issued prior to September 24, 2009, the renewal operating permit for Emission Unit No. 006, Sulfuric Acid Plant No. 6, shall be submitted along with the Permit Renewal Application for permit 1050052-008-AV 180 days prior to the expiration date of permit 1050052-008-AV.}

**B.16.** In accordance with Rule 62-210.300(2)(a)4., F.A.C., the permittee shall notify the Air Section of the Department's Southwest District in writing of the date of reactivation of this source no later than 30 days prior to such date. The permittee shall demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to Rule 62-204.800(7), F.A.C.

[Rule 62-210.300(2)(a)4., F.A.C.]

#### **Operational Procedures**

**B.17. Not federally enforceable.** The permittee shall comply with the *MEMORANDUM OF UNDERSTANDING REGARDING BEST OPERATIONAL START-UP PRACTICES FOR SULFURIC ACID PLANTS*; see Attachment A.

[Signed and Executed on November 1, 1989, Rules 62-4.070(3), F.A.C., and 62-210.700(1), F.A.C.]

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

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b> |
|-------------------|---------------------------------|
| -021              | Boiler No. 1                    |

The No. 1 Package Boiler is used for process heat during cold start-up of the sulfuric acid plants. The boiler produces 25,000 pounds per hour of steam. The boiler is fired with natural gas or new No. 2 fuel oil. The sulfur content of the new No. 2 fuel oil shall not exceed 0.5% by weight. The maximum heat input to the boiler is 32.87 MMBtu per hour when being fired with natural gas.

{Permitting note(s): This emissions unit is regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Emissions Units.}

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

**Essential Potential to Emit (PTE) Parameters**

**C.1. Capacity.** The maximum heat input rate is 32.87 MMBtu per hour.  
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C.]

**C.2 Methods of Operation - (i.e., Fuels).** Boiler No. 1 shall be fired with natural gas or new No. 2 fuel oil. The fuel oil shall contain no more than 0.5% sulfur, by weight. The firing of waste oil or recycled oil is not allowed. New oil means an oil that has been refined for crude oil and has not been used and which may or may not contain additives.  
[Rules 62-4.160(2), F.A.C. and 62-213.440(1), F.A.C.]

**Emission Limitations and Standards**

**C.3.** Visible emissions from Boiler No. 1 shall not exceed 20% opacity except for one six-minute period per hour during which opacity shall not exceed 27 percent.  
[Rule 62-296.406(1), F.A.C., and requested by Permittee]

**C.4.** Particulate Matter Emissions from boiler No. 1 shall not exceed 0.5 lb/hr and 2.1 tpy.  
[Rule 62.296.406, F.A.C.]

**Test Methods and Procedures**

**C.5.** The boiler stack shall be tested for visible emissions annually on or during the 60 day period prior to February 24.  
[Rules 62-297.310(7)(a)4, F.A.C. and 62-4.070(4), F.A.C.]

**C.6.** Compliance with the visible emission (VE) limitation of Condition C.3 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The visible emissions test shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The visible emissions test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A.  
[Chapter 62-297, F.A.C.]

**C.7.** The visible emissions compliance test could be waived, on a year by year basis, if fuel oil has not been fired in this boiler for more than 400 hours for the previous 12 months and if it is not expected to be fired in this boiler for more than 400 hours during the next 12 months. In order to qualify for the annual visible emissions test waiver, a letter shall be sent to the Air Compliance Section of the Department of Environmental Protection, at least 15 days prior to the scheduled test date, requesting a visible emissions test waiver and stating that the 400 hour fuel oil limitation has been satisfied for the year prior to the date of the waiver request. Submit with the waiver request a copy of the fuel oil analysis or certification required by Condition C.8. If no fuel oil was utilized, a copy of the fuel oil analysis or certification is not required. Regardless of fuel usage, a visible emissions test shall be conducted during the six month period prior to the expiration date of this permit.  
[Rules 62-297.310, and 62-4.070(3), F.A.C.]

**C.8.** If testing is conducted while firing fuel oil in the boiler, compliance with the sulfur content requirement of Condition C.2 shall be demonstrated during the test by submitting either of the following with the test report:

- a. A Certificate of Fuel Oil Analysis from your fuel oil vendor for the fuel used during the compliance test; or
- b. A Certificate of Fuel Oil Analysis for a fuel oil sample taken during the compliance test.

[Rule 62-4.070(3), F.A.C.]

#### **Recordkeeping and Reporting Requirements**

**C.9.** In order to document continuing compliance with the maximum sulfur content requirement of - Condition C.2, the permittee shall maintain a record of the sulfur content of the fuel oil received for use in the boiler. These records may be based on vendor supplied information or analysis of samples taken by the permittee in accordance with Rule 62-297.440, F.A.C.

[Rule 62-4.070(3), F.A.C.]

**C.10.** A daily record log(s) shall be established and maintained to document, at a minimum, the following:

- a. the quantity of natural gas and the quantity of No. 2 fuel oil utilized in Boiler No. 1.
- b. the sulfur content (percent, by weight) of No. 2 fuel oil utilized in Boiler No. 1. The sulfur content may be based upon vendor supplied as-delivered oil sulfur content information, or an oil analysis.
- c. the total hours of Boiler No. 1 operation using oil of any type.
- d. the total hours of Boiler No. 1 operation using oil of any type for each rolling 12 consecutive month period (hours per 12 months).

[Rule 62-4.070(3), F.A.C.]

**C.11.** All test reports submitted to the Department shall include, at a minimum, the following information for the test period:

- a. Type of fuel being fired.
- b. Heat input rate (MMBtu per hour) and firing rate (MCF per hour or gallons per hour).
- c. If the test was conducted while firing natural gas, then include a statement of the total hours of boiler operation while firing fuel oil, of any type, during the 12 consecutive month period prior to the test.

Failure to submit the above information, or operating at conditions which do not reflect normal operating conditions may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 62-4.070(3), F.A.C.]

**C.12.** The expiration date of the permit for Boiler No. 1 established, in accordance with the requirements of Rule 62-210.300(2)(a)3.c., F.A.C., is November 15, 2009, which is ten years from the last day of operation of this emissions unit (November 15, 1999). Applications to renew the operating permit shall be submitted to the Southwest District Office of the Department no later than September 15, 1999 (60 days prior to the expiration date of the permit). If this source still has not operated at the time of the expiration date of this permit, then a renewal operation permit cannot be issued.  
[Rules 62-210.300(2)(a)3.c., and 62-4.090(1), F.A.C.]

{Permitting Note: If the Renewal permit (1050052-008-AV) is issued prior to September 15, 2009, the renewal operating permit for Emission Unit No. 021, Boiler No. 1, shall be submitted along with the Permit Renewal Application for permit 1050052-008-AV 180 days prior to the expiration date of permit 1050052-008-AV.}

**C.13.** In accordance with Rule 62-210.300(2)(a)4., F.A.C., the permittee shall notify the Air Section of the Department's Southwest District in writing of the date of reactivation of this source no later than 30 days prior to such date. The permittee shall demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to Rule 62-204.800(7), F.A.C.  
[Rule 62-210.300(2)(a)4., F.A.C.]

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

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b>                             |
|-------------------|---|
| -031              | DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation |

The Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar/Truck Unloading and Transfer Operation has an unloading and transfer rate of 130.0 tons per hour of DAP/MAP/GTSP. The operation consists of receiving by railcar or truck DAP/MAP/GTSP which has been treated with a dust suppressant. DAP/MAP/GTSP is transferred by rail to a hopper located below the railcar and from the railcar hopper the DAP/MAP/GTSP is transferred to a conveyor system which conveys the material to a warehouse for storage. For truck transfer, DAP/MAP/GTSP is unloaded directly from or loaded directly into the truck while inside the enclosed storage warehouse.

{**Permitting note(s):** This emissions unit is regulated under Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. **If this operation commences construction or modification after October 22, 1974, it is subject to NSPS Subpart X (40 CFR 60.240) for GTSP Storage Facilities if GTSP is manufactured on-site or if the facility receives fresh GTSP (i.e., GTSP produced within the preceding 72 hours).**}

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

**Essential Potential to Emit (PTE) Parameters**

**D.1. Capacity.** The unloading and transfer rate for the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation shall not exceed 130.0 tons per hour and 700,800 tons total operations and 300,000 tons for the trucking operation per 12 consecutive month period.

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C., Air Construction Permit No. AC53-246837, 1050052-006-AC, and 1050052-009-AC]

**Emission Limitations and Standards**

**D.2.** All material transferred from the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation (i.e., DAP, MAP, GTSP) shall be coated with a dust suppressant material. As an indicator of the effectiveness of this control measure, visible emissions from each material transfer point shall not exceed an opacity of 5% for the railcar operation. To ensure that no fugitive emissions occur from the storage building during truck loading/unloading, all doors to the warehouse building shall remain closed or curtailed during any truck transfer operations.

[Rule 62-296.320(4)(a), F.A.C. and 1050052-009-AC]

**Test Methods and Procedures**

**D.3.** Each material transfer point associated with the DAP/MAP/GTSP railcar unloading and transfer operation shall be tested for visible emissions annually.

[Rules 62-297.310(7)(a), 62-4.070(4), F.A.C.]

**D.4.** Compliance with the visible emission limitation of Condition D.2 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A.

[Chapter 62-297, F.A.C.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.  
[Rule 62-4.070(3), F.A.C.]

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.  
[Rules 62-213.440(1)(b)2.b, and 62-4.070(3), F.A.C.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rule 62-4.070(3), F.A.C.]



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

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b>                  |
|-------------------|--|
| -032              | Rail/Truck Unloading Pit -- Molten Sulfur System |
| -033              | North Storage Tank -- Molten Sulfur System       |
| -034              | South Storage Tank -- Molten Sulfur System       |

The molten sulfur storage and handling system consists of a rail/truck unloading pit with a 150 ton capacity; a north storage tank with a 500 ton capacity; a south storage tank with a 1500 ton capacity; and all of the associated transfer pumps and piping.

Molten sulfur is unloaded from trucks and railcars into the below-grade Rail/Truck Unloading Pit. Up to three trucks can unload at a time. The railcar unloading station can unload five railcars at a time. The sulfur is pumped from the pit to the storage tanks. The molten sulfur is then pumped from the storage tanks to the sulfuric acid plants. Steam is used to keep the sulfur in the liquid state.

{Permitting note(s): These emissions units are regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards; Rule 62-296.411, F.A.C., Sulfur Storage and Handling Facilities.}

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

**Essential Potential to Emit (PTE) Parameters**

**E.1. Capacity.** The molten sulfur throughput rate to the sulfuric acid plants shall not exceed 840 tons per day and 306,000 tons per year.  
 [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C.]

**Emission Limitations and Standards**

**E.2.** Visible emissions from any emission point in the molten sulfur facility shall not exceed 20 percent opacity (six minute average).  
 [Rule 62-296.411(1)(g), F.A.C.]

**E.3.** For emission inventory and PSD purposes, the estimated maximum emissions from the sources in the molten sulfur storage and handling systems are:

| <b>E.U. ID No.</b> | <b>Source</b>            | <b>PM/PM<sub>10</sub> TPY</b> | <b>SO<sub>2</sub> TPY</b> | <b>TRS/H<sub>2</sub>S TPY</b> | <b>VOC TPY</b> |
|--------------------|--------------------------|-------------------------------|---------------------------|-------------------------------|----------------|
| 032                | Rail/Truck Unloading Pit | 0.5                           | 0.5                       | 0.3                           | 0.4            |
| 033                | North Storage Tank       | 0.5                           | 0.5                       | 0.3                           | 0.4            |
| 034                | South Storage Tank       | 0.6                           | 0.6                       | 0.4                           | 0.4            |

[Rule 62-296.320 and 62-296.411, F.A.C., and Letter from Applicant dated April 9, 1998]

**Test Methods and Procedures**

**E.4.** The permittee shall test the Rail/Truck Unloading Pit, the North Storage Tank and the South Storage Tank for visible emissions (VE) on or during the 180 day period prior to the expiration date of this permit.  
 [Rule 62-297.310(7)(a)3, F.A.C.]

**E.5.** Compliance with the visible emission limitation of Condition E.2 shall be determined using DEP Method 9 and shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration or shall be equal to the duration of the batch, cyclic processes, or other operations completion time. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C.

[Rules 62-297.310(4)(a)2, and 62-296.411(1)(j)1., F.A.C.]

**E.6.** Testing of emissions must be conducted when the emission unit being tested is in operation and the test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. All test reports shall include a statement of the rate. Failure to submit this information, or operating at conditions which do not reflect normal operating conditions may invalidate the test and fail to provide reasonable assurance of compliance.

[Rules 62-4.070(3), F.A.C., and 62-297.310(4)(a)2, F.A.C.]

### **Operating Practices**

**E.7.** The permittee shall employ at a minimum the following practices to minimize emissions of sulfur particulate matter:

a. All molten sulfur transfer shall be through enclosed piping systems where feasible and practical. In user facilities, molten sulfur may be transferred by covered trench or a movable spout which is positioned over a receiving pit. Contact surfaces between movable unloading arms and stationary pipes shall seat effectively around the entire circumference to minimize spillage.

[Rule 62-296.411(1)(a), F.A.C.]

b. All areas surrounding points where molten sulfur pipes are routinely disconnected and areas where molten sulfur is transferred to trucks or railcars shall be paved and curbed within 20 feet of the point of disconnection or transfer to contain any spilled molten sulfur, or shall be provided with noncorrosible drip pans or other secondary containment, positioned to collect spills, that are adequate to contain amounts of sulfur that may escape during routine disconnection, reconnection or operation of the piping system.

[Rule 62-296.411(1)(b), F.A.C.]

c. All spilled molten sulfur shall be collected and properly disposed of whenever the containment area is filled to one-half its containment capacity, or monthly, whichever is more frequent. Spills of molten sulfur outside of a containment area, or where subject to vehicular traffic, shall be collected and disposed of as soon as possible, but no later than 24 hours after the spill occurs. Drip pans or other secondary containment shall be cleaned as needed to prevent exceedance of capacity, but at least weekly.

[Rule 62-296.411(1)(d), F.A.C.]

d. All vent surfaces shall be cleaned monthly to remove captured particles.

[Rule 62-296.411(1)(e), F.A.C.]

**E.8.** Any change in the method of operation or equipment which will cause an increase in the actual emissions may be considered a modification and must be reported to the Southwest District Office of the Department for proper processing prior to implementing the change.

[Rules 62-210.300 and 62-210.200(185), F.A.C.]

**Recordkeeping and Reporting Requirements**

**E.9.** In order to document compliance with the requirements of Condition E.1, the permittee shall maintain the following records at the facility and make them available to the Department upon request:

- a. Daily molten sulfur throughput rate (in tons per day).
- b. Monthly total molten sulfur throughput rate (tons per month) and cumulative total for the most recent 12 consecutive month period (tons per year) (including sulfur loaded out to trucks).

[Rules 62-4.070(3) and 62-213.440(1)(b)2.b., F.A.C.]

**E.10.** The permittee shall maintain records of spills outside of containment areas and of collection and disposal of spilled sulfur. Such records shall be retained and shall be available for inspection by the Department upon request.

[Rule 62-296.411(1)(f), F.A.C.]

**E.11.** The expiration date of the permit for the Molten Sulfur System established, in accordance with the requirements of Rule 62-210.300(2)(a)3.c., F.A.C., is November 15, 2009, which is ten years from the last day of operation of this emissions unit (November 15, 1999). Applications to renew the operating permit shall be submitted to the Southwest District Office of the Department no later than September 15, 1999 (60 days prior to the expiration date of the permit). If this source still has not operated at the time of the expiration date of this permit, then a renewal operation permit cannot be issued.

[Rules 62-210.300(2)(a)3.c., and 62-4.090(1), F.A.C.]

{Permitting Note: If the Renewal permit (1050052-008-AV) is issued prior to September 15, 2009, the renewal operating permit for Emission Unit Nos. 032, 33, and 34, Molten Sulfur System, shall be submitted along with the Permit Renewal Application for permit 1050052-008-AV 180 days prior to the expiration date of permit 1050052-008-AV.}

**E.12.** In accordance with Rule 62-210.300(2)(a)4., F.A.C., the permittee shall notify the Air Section of the Department's Southwest District in writing of the date of reactivation of this source no later than 30 days prior to such date. The permittee shall demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to Rule 62-204.800(7), F.A.C.

[Rule 62-210.300(2)(a)4., F.A.C.]

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

**E.U. ID**

| <b><u>No.</u></b> | <b><u>Brief Description</u></b> |
|-------------------|---------------------------------|
| -036              | Phosphogypsum Stack             |

Phosphogypsum stack.

{Permitting note(s): This emissions unit is regulated under Rule 40 CFR 61 Subpart A and R (National Emission Standards for Hazardous Air Pollutants -- General Provisions; National Emission Standards for Radon Emissions from Phosphogypsum Stacks.)}

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

**F.1.** The permittee shall comply with 40 CFR 61 Subpart A and R (National Emission Standards for Hazardous Air Pollutants -- General Provisions; and National Emission Standards for Radon Emissions from Phosphogypsum Stacks).

**F.2.** The following specific conditions are a verbatim copy of 40 CFR 61 Subpart R- National Emission Standards for Radon Emissions From Phosphogypsum Stacks:

**§61.200 Designation of facilities.**

The provisions of this subpart apply to each owner or operator of a phosphogypsum stack, and to each person who owns, sells, distributes, or otherwise uses any quantity of phosphogypsum which is produced as a result of wet acid phosphorus production or is removed from any existing phosphogypsum stack.

**§ 61.201 Definitions.**

As used in this subpart, all terms not defined here have the meaning given them in the Clean Air Act or subpart A of part 61. The following terms shall have the following specific meanings:

(a) Inactive stack means a stack to which no further routine additions of phosphogypsum will be made and which is no longer used for water management associated with the production of phosphogypsum. If a stack has not been used for either purpose for two years, it is presumed to be inactive.

(b) Phosphogypsum is the solid waste byproduct which results from the process of wet acid phosphorus production.

(c) Phosphogypsum stacks or stacks are piles of waste resulting from wet acid phosphorus production, including phosphate mines or other sites that are used for the disposal of phosphogypsum.

### §61.202 Standard.

Each person who generates phosphogypsum shall place all phosphogypsum in stacks. Phosphogypsum may be removed from a phosphogypsum stack only as expressly provided by this subpart. After a phosphogypsum-gypsum stack has become an inactive stack, the owner or operator shall assure that the stack does not emit more than 20 pCi/m<sup>2</sup>-s of radon-222 into the air.

### §61.203 Radon monitoring and compliance procedures.

(a) Within sixty days following the date on which a stack becomes an inactive stack, or within ninety days after the date on which this subpart first took effect if a stack was already inactive on that date, each owner or operator of an inactive phosphogypsum stack shall test the stack for radon-222 flux in accordance with the procedures described in 40 CFR part 61, appendix B, Method 115. EPA shall be notified at least 30 days prior to each such emissions test so that EPA may, at its option, observe the test. If meteorological conditions are such that a test cannot be properly conducted, then the owner or operator shall notify EPA and test as soon as conditions permit.

(b) (1) Within ninety days after the testing is required, the owner or operator shall provide EPA with a report detailing the actions taken and the results of the radon-222 flux testing. Each report shall also include the following information:

- (i) The name and location of the facility;
- (ii) A list of the stacks at the facility including the size and dimensions of each stack;
- (iii) The name of the person responsible for the operation of the facility and the name of the person preparing the report (if different);
- (iv) A description of the control measures taken to decrease the radon flux from the source and any actions taken to insure the long term effectiveness of the control measures; and
- (v) The results of the testing conducted, including the results of each measurement.

(2) Each report shall be signed and dated by a corporate officer in charge of the facility and contain the following declaration immediately above the signature line: "I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. See, 18 U.S.C. 1001."

(c) If the owner or operator of an inactive stack chooses to conduct measurements over a one year period as permitted by Method 115 in appendix B to part 61, within ninety days after the testing commences the owner or operator shall provide EPA with an initial report, including the results of the first measurement period and a schedule for all subsequent measurements. An additional report containing all the information in §61.203(b) shall be submitted within ninety days after completion of the final measurements.

(d) If at any point an owner or operator of a stack once again uses an inactive stack for the disposal of phosphogypsum or for water management, the stack ceases to be in inactive status and the owner or operator must notify EPA in writing within 45 days. When the owner or operator ceases to use the stack for disposal of phosphogypsum or water management, the stack will once again become inactive and the owner or operator must satisfy again all testing and reporting requirements for inactive stacks.

(e) If an owner or operator removes phosphogypsum from an inactive stack, the owner shall test the stack in accordance with the procedures described in 40 CFR part 61, appendix B, Method 115. The stack shall be tested within ninety days of the date that the owner or operator first removes phosphogypsum from the stack, and the test shall be repeated at least once during each calendar year that the owner or operator removes additional phosphogypsum from the stack. EPA shall be notified at least 30 days prior to an emissions test so that EPA may, at its option, observe the test. If meteorological conditions are such

that a test cannot be properly conducted, then the owner shall notify EPA and test as soon as conditions permit. Within ninety days after completion of a test, the owner or operator shall provide EPA with a report detailing the actions taken and the results of the radon-222 flux testing. Each such report shall include all of the information specified by §61.203(b).

**§61.204 Distribution and use of phosphogypsum for agricultural purposes.**

Phosphogypsum may be lawfully removed from a stack and distributed in commerce for use in agriculture if each of the following requirements is satisfied:

(a) The owner or operator of the stack from which the phosphogypsum is removed shall determine annually the average radium-226 concentration at the location in the stack from which the phosphogypsum will be removed, as provided by 61.207.

(b) The average radium-226 concentration at the location in the stack from which the phosphogypsum will be removed, as determined pursuant to 61.207, shall not exceed 10 picocuries per gram (pCi/g).

(c) All phosphogypsum distributed in commerce for use in agriculture by the owner or operator of a phosphogypsum stack shall be accompanied by a certification document which conforms to the requirements of 61.208(a).

(d) Each distributor, retailer, or reseller who distributes phosphogypsum for use in agriculture shall prepare certification documents which conform to the requirements of §61.208(b).

**§61.205 Distribution and use of phosphogypsum for research and development.**

(a) Phosphogypsum may be lawfully removed from a stack and distributed in commerce for use in research and development activities if each of the following requirements is satisfied:

(1) The owner or operator of the stack from which the phosphogypsum is removed shall determine annually the average radium-226 concentration at the location in the stack from which the phosphogypsum will be removed, as provided by §61.207.

(2) All phosphogypsum distributed in commerce by the owner or operator of a phosphogypsum stack, or by a distributor, retailer, or reseller, or purchased by the end-user, shall be accompanied at all times by certification documents which conform to the requirements of §61.208.

(b) Phosphogypsum may be purchased and used for research and development purposes if the following requirements are satisfied:

(1) Each quantity of phosphogypsum purchased by a facility for a particular research and development activity shall be accompanied by certification documents which conform to the requirements of §61.208.

(2) No facility shall purchase or possess more than 700 pounds of phosphogypsum for a particular research and development activity.

(3) Containers of phosphogypsum used in research and development activities shall be labeled with the following warning:

Caution: Phosphogypsum Contains Elevated Levels of  
Naturally Occurring Radioactivity

(4) For each research and development activity in which phosphogypsum is used, the facility shall maintain records which conform to the requirements of 61.209(c).

(c) Phosphogypsum not intended for distribution in commerce may be lawfully removed from a stack by an owner or operator to perform laboratory analyses required by this subpart or any other quality control or quality assurance analyses associated with wet acid phosphorus production.

**§61.206 Distribution and use of phosphogypsum for other purposes.**

(a) Phosphogypsum may not be lawfully removed from a stack and distributed or used for any purpose not expressly specified in 61.204 or 61.205 without prior EPA approval.

(b) A request that EPA approve distribution and/or use of phosphogypsum for any other purpose must be submitted in writing and must contain the following information:

(1) The name and address of the person(s) making the request.

(2) A description of the proposed use, including any handling and processing that the phosphogypsum will undergo.

(3) The location of each facility, including suite and/or building number, street, city, county, state, and zip code, where any use, handling, or processing of the phosphogypsum will take place.

(4) The mailing address of each facility where any use, handling, or processing of the phosphogypsum will take place, if different from paragraph (b)(3) of this section.

(5) The quantity of phosphogypsum to be used by each facility.

(6) The average concentration of radium-226 in the phosphogypsum to be used.

(7) A description of any measures which will be taken to prevent the uncontrolled release of phosphogypsum into the environment.

(8) An estimate of the maximum individual risk, risk distribution, and incidence associated with the proposed use, including the ultimate disposition of the phosphogypsum or any product in which the phosphogypsum is incorporated.

(9) A description of the intended disposition of any unused phosphogypsum.

(10) Each request shall be signed and dated by a corporate officer or public official in charge of the facility.

(c) The Assistant Administrator for Air and Radiation may decide to grant a request that EPA approve distribution and/or use of phosphogypsum if he determines that the proposed distribution and/or use is at least as protective of public health, in both the short term and the long term, as disposal of phosphogypsum in a stack or a mine.

(d) If the Assistant Administrator for Air and Radiation decides to grant a request that EPA approve distribution and/or use of phosphogypsum for a specified purpose, each of the following requirements shall be satisfied:

(1) The owner or operator of the stack from which the phosphogypsum is removed shall determine annually the average radium-226 concentration at the location in the stack from which the phosphogypsum will be removed, as provided by 61.207.

(2) All phosphogypsum distributed in commerce by the owner or operator of a phosphogypsum stack, or by a distributor, retailer, or reseller, or purchased by the end-user, shall be accompanied at all times by certification documents which conform to the requirements 61.208.

(3) The end-user of the phosphogypsum shall maintain records which conform to the requirements of 61.209(c).

(e) If the Assistant Administrator for Air and Radiation decides to grant a request that EPA approve distribution and/or use of phosphogypsum for a specified purpose, the Assistant Administrator may decide to impose additional terms or conditions governing such distribution or use. In appropriate circumstances, the Assistant Administrator may also decide to waive or modify the recordkeeping requirements established by 61.209(c).

**§61.207 Radium-226 sampling and measurement procedures.**

(a) Before removing phosphogypsum from a stack for distribution to commerce pursuant to §61.204, §61.205, or §61.206, the owner or operator of a phosphogypsum stack shall measure the average radium-226 concentration at the location in the stack from which phosphogypsum will be

removed. Measurements shall be performed for each such location prior to the initial distribution in commerce of phosphogypsum removed from that location and at least once during each calendar year while distribution of phosphogypsum removed from the location continues.

(b) The radium-226 concentration shall be determined in accordance with the analytical procedures described in 40 CFR part 61, appendix B, Method 114.

(c) Phosphogypsum samples shall be taken at regularly spaced intervals across the surface of the location in the phosphogypsum stack from which phosphogypsum will be removed.

(d) The minimum number of samples considered necessary to determine a representative average radium-226 concentration for the location on the stack to be analyzed shall be calculated as follows:

(1) Obtain the measured mean and standard deviation of 30 regularly spaced phosphogypsum samples.

(2) Solve the following equation for the number of samples required to achieve a 95% confidence interval:

$$e \geq \frac{\tau(n)s}{x\sqrt{n}}$$

where:

$\tau$  is the students -  $\tau$  distribution,

s = measured standard deviation of the radium-226 concentration,

x = measured mean of the radium-226 concentration,

e = allowable error (expressed as a fraction), and

n = number of samples.

See Reference 1 of Method 115 in appendix B to part 61 for a detailed discussion of this statistical technique.

(3) If the number of samples required is greater than 30, then obtain and analyze the necessary number of additional samples and recalculate the average radium-226 concentration using the combination of the results of the original 30 samples and additional samples. The additional samples shall also be regularly spaced across the surface of the location in the phosphogypsum stack from which phosphogypsum will be removed.

#### §61.208 Certification requirements.

(a) (1) The owner or operator of a stack from which phosphogypsum will be removed and distributed in commerce pursuant to 61.204, 61.205, or 61.206 shall prepare a certification document for each quantity of phosphogypsum which is distributed in commerce which includes:

(i) The name and address of the owner or operator;

(ii) The name and address of the purchaser or recipient of the phosphogypsum;

(iii) The quantity (in pounds) of phosphogypsum sold or transferred;

(iv) The date of sale or transfer;

(v) A description of the intended end-use for the phosphogypsum;

(vi) The average radium-226 concentration, in pCi/g, of the phosphogypsum, as determined pursuant to §61.207; and

(vii) The signature of the person who prepared the certification.

(2) The owner or operator shall retain the certification document for five years from the date of sale or transfer, and shall produce the document for inspection upon request by the Administrator, or his



authorized representative. The owner or operator shall also provide a copy of the certification document to the purchaser or recipient.

(b) (1) Each distributor, retailer, or reseller who purchases or receives phosphogypsum for subsequent resale or transfer shall prepare a certification document for each quantity of phosphogypsum which is resold or transferred which includes:

- (i) The name and address of the distributor, retailer, or reseller;
- (ii) The name and address of the purchaser or recipient of the phosphogypsum;
- (iii) The quantity (in pounds) of phosphogypsum resold or transferred;
- (iv) The date of resale or transfer;
- (v) A description of the intended end-use for the phosphogypsum;
- (vi) A copy of each certification document which accompanied the phosphogypsum at the time it was purchased or received by the distributor, retailer, or reseller; and
- (vii) The signature of the person who prepared the certification.

(2) The distributor, retailer, or reseller shall retain the certification document for five years from the date of resale or transfer, and shall produce the document for inspection upon request by the Administrator, or his authorized representative. For every resale or transfer of phosphogypsum to a person other than an agricultural end-user, the distributor, retailer, or reseller shall also provide a copy of the certification document to the purchaser or transferee.

#### **§61.209 Required records.**

(a) Each owner or operator of a phosphogypsum stack must maintain records for each stack documenting the procedure used to verify compliance with the flux standard in 61.202, including all measurements, calculations, and analytical methods on which input parameters were based. The required documentation shall be sufficient to allow an independent auditor to verify the correctness of the determination made concerning compliance of the stack with flux standard.

(b) Each owner or operator of a phosphogypsum stack must maintain records documenting the procedure used to determine average radium-226 concentration pursuant to §61.207, including all measurements, calculations, and analytical methods on which input parameters were based. The required documentation shall be sufficient to allow an independent auditor to verify the accuracy of the radium-226 concentration.

(c) Each facility which uses phosphogypsum pursuant to §61.205 or §61.206 shall prepare records which include the following information:

(1) The name and address of the person in charge of the activity involving use of phosphogypsum.

(2) A description of each use of phosphogypsum, including the handling and processing that the phosphogypsum underwent.

(3) The location of each site where each use of phosphogypsum occurred, including the suite and/or building number, street, city, county, state, and zip code.

(4) The mailing address of each facility using phosphogypsum, if different from paragraph (c)(3) of this section.

(5) The date of each use of phosphogypsum.

(6) The quantity of phosphogypsum used.

(7) The certified average concentration of radium-226 for the phosphogypsum which was used.

(8) A description of all measures taken to prevent the uncontrolled release of phosphogypsum into the environment.

(9) A description of the disposition of any unused phosphogypsum.

(d) These records shall be retained by the facility for at least five years from the date of use of the phosphogypsum and shall be produced for inspection upon request by the Administrator, or his authorized representative.

**§61.210 Exemption from the reporting and testing requirements of 40 CFR 61.10.**

All facilities designated under this subpart are exempt from the reporting requirements of 40 CFR 61.10.

Not federally enforceable.

Attachment A

MEMORANDUM OF UNDERSTANDING  
REGARDING BEST OPERATIONAL START-UP PRACTICES  
FOR SULFURIC ACID PLANTS

These Sulfuric Acid Plant Best Operation Start-Up Practices will be made available in the control room at all times.

1. Only one sulfuric acid plant at a facility should be started up and burning sulfur at a time, There are times when it will be acceptable for more than one sulfuric acid plant to be in the start-up mode at the same time, provided the following condition is met. It is not acceptable to initiate sulfur burning at one sulfuric acid plant when another plant at the same facility is emitting SO<sub>2</sub> at a rate in excess of the emission limits imposed by the permit or rule, as determined by the CEMs emission rates for the immediately preceding 20 minutes.

2. A plant start-up must be at the lowest practicable operating rate, not to exceed 70 percent of the designated operating rate, until the SO<sub>2</sub> monitor indicates compliance, Because production rate is difficult to measure during start-up, if a more appropriate indicator (such as blower pressure, furnace temperature, gas strength, blower speed, number of sulfur guns operating, etc.) can be documented, tested and validated, the Department will accept this in lieu of directly documenting the operating rate. Implementation requires the development of a suitable list of surrogate parameters to demonstrate and document the reduced operating rate on a plant-by-plant basis. Documentation that the plant is conducting start-up at the reduced rate is the responsibility of the owner or operator.

3. Sulfuric acid plants are authorized to emit excess emissions from start-up for a period of three consecutive hours provided best operational practices, in accordance with this agreement, to minimize emissions are followed. No plant shall be operated (with sulfur as fuel) out of compliance for more than three consecutive hours, Thereafter, the plant shall be shut down, The plant shall be shut down (cease burning sulfur) if, as indicated by the continuous emission monitoring system, the plant is not in compliance within three hours of start-up, Restart may occur as soon as practicable following any needed repairs or adjustments, provided the corrective action is taken and properly documented.

4. Cold Start-Up Procedures.

a. Converter.

(1) The inlet and outlet temperature at the first two masses of catalyst shall be sufficiently high to provide immediate ignition when SO<sub>2</sub> enters the masses, In no event shall the inlet temperature to the first mass be less than 800°F or the outlet temperature to the first two masses be less than 700°F. These temperatures are the desired temperatures at the time the use of auxiliary fuel is terminated.

(2) The gas stream entering the converter shall contain SO<sub>2</sub> at a level less than normal, and sufficiently low to promote catalytic conversion to SO<sub>3</sub>.

b. Absorbing Towers.

The concentration, temperature and flow of circulating acid shall be as near to normal conditions as reasonably can be achieved. In no event shall the concentration be less than 96 percent H<sub>2</sub>SO<sub>4</sub>.

5. Warm Restart.

a. Converter.

The inlet and outlet temperatures of the first two catalyst masses should be sufficiently high to ensure conversion. one of the following three conditions must be met:

- (1) The first two catalyst masses inlet and outlet temperatures must be at a minimum of 700°F;  
or
- (2) Two of the four inlet and outlet temperatures must be greater than or equal to 800°F; or
- (3) The inlet temperature of the first catalyst must be greater than or equal to 600°F and the outlet temperature greater than or equal to 800°F. Also, the inlet and outlet temperatures of the second catalyst must be greater than or equal to 700°F.

Failure to meet one of the above conditions, requires use of cold start-up procedures.

To allow for technological improvements or individual plant conditions, alternative conditions will be considered by the Department in appropriate cases.

b. Absorbing Towers.

The concentration, temperature and flow of circulating acid shall be as near to normal conditions as reasonably can be achieved, In no event shall the concentration be less than 96 percent H<sub>2</sub>SO<sub>4</sub>.

## Appendix H-1, Permit History/ID Number Changes

CF Industries, Inc.  
Bartow Phosphate Complex

**PROPOSED Permit No. 1050052-008-AV**  
**Facility ID No.: 1050052**

**Permit History (for tracking purposes):**

E.U.

| <u>ID No.</u> | <u>Description</u>             | <u>Permit.No.</u>             | <u>Issue Date</u> | <u>Expiration Date</u> | <u>Extended Date</u> <sup>1,2</sup> | <u>Revised Date(s)</u> |
|---------------|--------------------------------|-------------------------------|-------------------|------------------------|-------------------------------------|------------------------|
| -001          | East Phosphate Rock Unloading† | AC53-2638                     | 05/15/75          | 05/30/76               |                                     |                        |
|               |                                | AO53-177927                   | 08/17/90          | 06/28/95               |                                     |                        |
| -002          | No. 1 MAP/DAP Shipping         | AO53-173656                   | 03/13/90          | 03/07/95               |                                     |                        |
|               |                                | Amendment<br>(1050052-001-AO) | 12/13/95          | 03/07/95               |                                     |                        |
| -005          | Sulfuric Acid Plant No. 5      | AC53-2544                     | 07/24/74          | 02/15/76               |                                     |                        |
|               |                                | AO53-169349                   | 12/08/89          | 12/06/94               |                                     |                        |
| -006          | Sulfuric Acid Plant No. 6      | AC53-2545                     | 07/24/74          | 04/04/76               |                                     |                        |
|               |                                | AO53-171759                   | 02/01/90          | 05/31/94               |                                     |                        |
|               |                                | AO53-246083                   | 08/10/94          | 05/31/99               |                                     |                        |
|               |                                | Amendment                     | 12/28/95          | 12/28/99               |                                     |                        |

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

†Emission unit no longer in operation.

Not included in this table: Operating permits issued prior to 1990, ownership transfers, and construction permit time extensions for expired construction permits.

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CF Industries, Inc.  
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|---------------|------------------------------|-------------------|-------------------|------------------------|-------------------------------------|------------------------|
| -007          | Phosphoric Acid Plant No. 1  | AO53-179210       | 06/15/90          | 05/30/94               |                                     |                        |
|               |                              | AO53-246086       | 08/10/94          | 05/30/99               |                                     |                        |
| -008          | Phosphoric Acid Plant No. 2† | AO53-132416       | 12/16/87          | 11/22/92               |                                     |                        |
|               |                              | Amendment         | 07/17/89          | 11/22/92               |                                     |                        |
| -009          | Phosphoric Acid Plant No. 3† | AO53-132417       | 12/16/87          | 12/06/92               |                                     |                        |
|               |                              | Amendment         | 07/17/89          | 12/06/92               |                                     |                        |
| -011          | DAP Plant No. 1†             | AO53-134972       | 08/26/87          | 08/25/92               |                                     |                        |
|               |                              | AO53-212884       | 09/11/92          | 07/08/95               |                                     |                        |
| -012          | DAP Plant No. 2†             | AO53-134973       | 08/26/87          | 08/25/92               |                                     |                        |
|               |                              | AO53-212883       | 09/11/92          | 12/10/92               |                                     |                        |
| -013          | DAP Plant No. 3†             | AO53-134974       | 08/26/87          | 08/25/92               |                                     |                        |

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

†Emission unit no longer in operation.

Not included in this table: Operating permits issued prior to 1990, ownership transfers, and construction permit time extensions for expired construction permits.

## Appendix H-1, Permit History/ID Number Changes

CF Industries, Inc.  
Bartow Phosphate Complex

**PROPOSED Permit No. 1050052-008-AV**  
**Facility ID No.: 1050052**

**Permit History (for tracking purposes):**

| E.U.          |   |                   |                   |                        |                                     |                        |
|---------------|---|-------------------|-------------------|------------------------|-------------------------------------|------------------------|
| <u>ID No.</u> | <u>Description</u>                              | <u>Permit No.</u> | <u>Issue Date</u> | <u>Expiration Date</u> | <u>Extended Date</u> <sup>1,2</sup> | <u>Revised Date(s)</u> |
| -014          | Sulfuric Acid Plant No. 7†                      | AO53-212881       | 09/11/92          | 07/09/95               |                                     |                        |
|               |   | AC53-2246         | 07/24/74          | 01/01/76               |                                     |                        |
|               |   | AO53-172853       | 03/09/90          | 11/12/92               |                                     |                        |
| -016          | Rock Surge Bin for<br>Phosphoric Acid Plant #1† | AO53-134966       | 08/26/87          | 08/24/92               |                                     |                        |
|               |   | Amendment         | 07/24/89          | 08/24/92               |                                     |                        |
|               |   | AO53-212877       | 06/10/92          | 07/05/95               |                                     |                        |
|               |   | Amendment         | 02/02/95          | 07/05/95               |                                     |                        |
| -017          | Rock Surge Bin at<br>Phosphoric Acid Plant # 2  | AO53-212874       | 06/10/92          | 05/29/94               |                                     |                        |
|               |   | AO53-246090       | 08/10/94          | 05/29/99               |                                     |                        |
|               |   | Amendment         | 02/02/95          | 05/29/99               |                                     |                        |

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

†Emission unit no longer in operation.

Not included in this table: Operating permits issued prior to 1990, ownership transfers, and construction permit time extensions for expired construction permits.

## Appendix H-1, Permit History/ID Number Changes

CF Industries, Inc.  
Bartow Phosphate Complex

**PROPOSED Permit No. 1050052-008-AV**  
**Facility ID No.: 1050052**

**Permit History (for tracking purposes):**

| E.U.<br>ID No. | Description                                     | Permit No.   | Issue Date                                   | Expiration Date                              | Extended Date <sup>1,2</sup> | Revised Date(s) |
|----------------|---|--|--|--|------------------------------|-----------------|
| -018           | Rock Surge Bin at<br>Phosphoric Acid Plant # 3† | AO53-212875  | 06/10/92                                     | 12/06/92                                     |                              |                 |
| -020           | DAP Plant No. 4†                                | AO53-134975<br>Amendment                               | 08/26/87<br>01/21/88                         | 08/25/92<br>10/12/92                         |                              |                 |
| -021           | Boiler No. 1                                    | AC53-19382<br>AO53-170301                              | 08/07/79<br>01/26/90                         | 01/02/80<br>01/24/95                         |                              |                 |
| -022           | 40% Phosphoric Acid<br>Clarification Tank       | AO53-134969<br>Amendment<br>AO53-212880<br>AO53-246092 | 08/26/87<br>07/24/89<br>06/04/92<br>08/10/94 | 08/24/92<br>08/24/92<br>06/09/94<br>06/09/99 |                              |                 |

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
- 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.  
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}
- †Emission unit no longer in operation.

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## Appendix H-1, Permit History/ID Number Changes

CF Industries, Inc.  
Bartow Phosphate Complex

**PROPOSED Permit No. 1050052-008-AV**  
**Facility ID No.: 1050052**

**Permit History (for tracking purposes):**

| E.U.<br>ID No. | Description                         | Permit No.  | Issue Date | Expiration Date | Extended Date <sup>1,2</sup> | Revised Date(s) |
|----------------|-------------------------------------|-------------|------------|-----------------|------------------------------|-----------------|
| -023           | 40% Phosphoric Acid<br>Aging Tank   | AO53-134970 | 08/26/87   | 08/24/92        |                              |                 |
|                |                                     | Amendment   | 07/24/89   | 08/24/92        |                              |                 |
|                |                                     | AO53-212878 | 06/04/92   | 06/02/94        |                              |                 |
|                |                                     | AO53-246091 | 08/10/94   | 06/02/99        |                              |                 |
| -024           | 40% Phosphoric Acid<br>Storage Tank | AO53-134971 | 08/26/87   | 08/24/92        |                              |                 |
|                |                                     | Amendment   | 07/24/89   | 08/24/92        |                              |                 |
|                |                                     | AO53-212873 | 06/04/92   | 06/09/94        |                              |                 |
|                |                                     | AO53-246089 | 08/10/94   | 06/09/99        |                              |                 |
| -025           | No. 2 MAP/DAP Shipping              | AO53-174886 | 03/13/90   | 03/07/95        |                              |                 |
|                |                                     | Amendment   | 11/29/95   | 03/07/95        |                              |                 |
| -026           | West Rock Unloading<br>System       | AO53-177952 | 06/13/90   | 05/26/94        |                              |                 |
|                |                                     | AO53-246087 | 08/10/94   | 05/26/99        |                              |                 |

Notes:

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2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

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| E.U.<br>ID No. | Description   | Permit No.     | Issue Date | Expiration Date | Extended Date <sup>1,2</sup> | Revised Date(s) |
|----------------|---|----------------|------------|-----------------|------------------------------|-----------------|
| -029           | Uranium Recovery Acid<br>Cleanup Area†                  | AC53-14972     | 01/12/79   | 11/30/80        |                              |                 |
|                |   | AO53-185372    | 09/20/90   | 07/06/95        |                              |                 |
| -030           | Clay Storage Silo<br>w/Baghouse†                        | AC53-16540     | 03/23/79   | 01/15/81        |                              |                 |
|                |   | AO53-109843    | 11/27/85   | 11/19/90        |                              |                 |
| -031           | DAP/MAP Railcar<br>Unloading and Transfer<br>Operations | AC53-235706    | 10/04/93   | 07/23/94        |                              |                 |
|                |   | AO53-242634    | 02/02/94   | 01/24/99        |                              |                 |
|                |   | AC53-246837    | 06/20/94   | 06/13/95        |                              |                 |
|                |   | AO53-254733    | 08/30/94   | 08/23/99        |                              |                 |
|                | Rate Increase<br>Truck Loading/Unloading                | 1050052-006-AC | 2/19/02    | 02/01/04        |                              |                 |
|                |   | 1050052-009-AC | TBD        |                 |                              |                 |

Notes:

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2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

†Emission unit no longer in operation.

Not included in this table: Operating permits issued prior to 1990, ownership transfers, and construction permit time extensions for expired construction permits.

## Appendix H-1, Permit History/ID Number Changes

CF Industries, Inc.  
Bartow Phosphate Complex

**PROPOSED Permit No. 1050052-008-AV**  
**Facility ID No.: 1050052**

**Permit History (for tracking purposes):**

E.U.

| <u>ID No.</u> | <u>Description</u> | <u>Permit No.</u> | <u>Issue Date</u> | <u>Expiration Date</u> | <u>Extended Date</u> <sup>1,2</sup> | <u>Revised Date(s)</u> |
|---------------|--------------------|-------------------|-------------------|------------------------|-------------------------------------|------------------------|
| -All          | Facility           | 1050052-004-AV    | 9/9/1998          | 9/7/2003               |                                     |                        |
|               |                    | 1050052-008-AV    | TBD               |                        |                                     |                        |

**ID Number Changes (for tracking purposes):**

From: **Facility ID No.:** 40TPA530052

To: **Facility ID No.:** 1050052

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
- 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.  
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}
- †Emission unit no longer in operation.

Not included in this table: Operating permits issued prior to 1990, ownership transfers, and construction permit time extensions for expired construction permits.

**Appendix U-1, List of Unregulated Emissions Units and/or Activities.**

CF Industries, Inc.  
Bartow Phosphâte Complex

**PROPOSED Permit No. 1050052-008-AV**  
**Facility ID No.: 1050052**

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Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

**E.U.**

| <b><u>ID No.</u></b> | <b><u>Brief Description of Emissions Units and/or Activity</u></b> |
|----------------------|--|
| -035                 | Fugitive PM/PM10 Sources   |
| -035                 | Fugitive SO2 Sources   |
| -035                 | Fugitive NOx Sources   |
| -035                 | Fugitive CO Sources  |
| -035                 | Fugitive VOC Sources   |
| -035                 | Fugitive Fluoride (F) Sources                                      |

**Table 1-1, Summary of Air Pollutant Standards and Terms**

CF Industries, Inc.  
Bartow Phosphate Complex

**PROPOSED Permit No.: 1050052-008-AV**  
**Facility ID No.: 1050052**

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

**E.U. ID No. Brief Description**

- 002 No. 1 MAP/DAP Shipping Unit
- 025 No. 2 MAP/DAP Shipping Plant
- 006 Sulfuric Acid Plant No. 6
- 021 Boiler No. 1
- 031 DAP/MAP Railcar and Truck Unloading and Transfer Operation
- 032 Rail/Truck Unloading Pit -- Molten Sulfur System
- 033 North Storage Tank -- Molten Sulfur System
- 034 South Storage Tank -- Molten Sulfur System

| E.U. ID No.    | Pollutant Name                           | Fuel(s)            | Hours/Yr | Allowable Emissions   |           |     | Equivalent Emissions* |      | Regulatory Citation(s)        | See Permit Condition(s) |
|----------------|--|--------------------|----------|---|-----------|-----|-----------------------|------|-------------------------------|-------------------------|
|                |  |                    |          | Standard(s)   | lbs./hour | TPY | lbs./hour             | TPY  |                               |                         |
| -002, 025      | VE (5%)                                  |                    | 8,760    | 5% opacity  |           |     |                       | 0.5  | 62-4.070 & 62.296.700, F.A.C. | III. A.2.               |
|                | VE                                       |                    | N/A      | 20% opacity   | N/A       | N/A | N/A                   | N/A  | 62-296.320(4)(b), F.A.C.      | III. A.3.               |
| -006           | VE                                       |                    | N/A      | 10% opacity   | N/A       | N/A | N/A                   | N/A  | 62-296.402(1)(b), F.A.C.      | III. B.3.               |
|                | SO <sub>2</sub>                          |                    | 8,760    | Lesser of 6.7 lbs/ton of 100% acid produced or 400.0 lbs/hr | 400.0     |     | 400.0                 | 1752 | 62-296.402(1)(b), F.A.C.      | III. B.3.               |
|                | H <sub>2</sub> SO <sub>4</sub> Acid Mist |                    | 8,760    | Lesser of 0.20 lbs/ton of 100% acid produced or 12.0 lbs/hr | 12.0      |     | 12.0                  | 52.6 | 62-296.402(1)(b), F.A.C.      | III. B.3.               |
| -021           | VE                                       | No. 2 Fuel Oil/Gas | N/A      | 20% opacity except 27% for 6 min/hr                         | N/A       | N/A | N/A                   | N/A  | 62-296.406(1), F.A.C.         | III. C.3.               |
|                | SO <sub>2</sub>                          | Oil                | 8,760    | 0.5% Sulfur by weight                                       |           |     | 16.8                  | 73.4 | 62-296.406(3), F.A.C.         | III. C.2.               |
| -031           | VE                                       |                    | N/A      | 5% opacity (dust suppressant)                               | N/A       | N/A | N/A                   | N/A  | 62-296.320(4)(c), F.A.C.      | III. D.2.               |
| -032, 033, 034 | VE                                       |                    | N/A      | 20% opacity   | N/A       | N/A | N/A                   | N/A  | 62-296.411(1)(g), F.A.C.      | III. E.2.               |

Notes: \*The "Equivalent Emissions" listed are for informational purposes only.  
N/A: Not Applicable EBA: Established by Applicant

**Table 2-1, Summary of Compliance Requirements**

CF Industries, Inc.  
Bartow Phosphate Complex

**PROPOSED Permit No.: 1050052-008-AV**  
**Facility ID No.: 1050052**

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

**E.U. ID No. Brief Description**

- 002 No. 1 MAP/DAP Shipping Unit
- 025 No. 2 MAP/DAP Shipping Unit
- 006 Sulfuric Acid Plant No. 6
- 021 Boiler No. 1
- 031 DAP/MAP Railcar Unloading and Transfer Operation
- 032 Rail/Truck Unloading Pit -- Molten Sulfur System
- 033 North Storage Tank -- Molten Sulfur System
- 034 South Storage Tank -- Molten Sulfur System

| E.U. ID No.    | Pollutant Name<br>or Parameter           | Fuel(s)           | Compliance<br>Method           | Testing<br>Time<br>Frequency | Frequency<br>Base Date *       | Min.<br>Compliance<br>Test Duration | CMS** | See Permit<br>Condition(s)           |
|----------------|--|-------------------|--------------------------------|------------------------------|--------------------------------|-------------------------------------|-------|--------------------------------------|
| -002           | VE                                       |                   | 9                              | annual                       | 07-December                    | 30 minutes                          |       | III. A.4. & A.6.                     |
| -025           | VE                                       |                   | 9                              | annual                       | 25-January                     | 30 minutes                          |       | III. A.4. & A.6.                     |
| -006           | VE                                       |                   | 9                              | annual                       | 4-January                      | 30 minutes                          | Yes   | III. B.4. & B.5.                     |
|                | SO <sub>2</sub>                          |                   | 8                              | annual                       | 4-January                      | 1 hour                              |       | III. B.4. & B.5.                     |
|                | H <sub>2</sub> SO <sub>4</sub> acid mist |                   | 8                              | annual                       | 4-January                      | 1 hour                              |       | III. B.4. & B.5.                     |
| -021           | VE                                       | oil               | 9                              | annual                       | 24-February                    | 1 hour                              |       | III. C.4. & C.5.                     |
|                | VE                                       | gas               | 9                              | five years                   | 6 months prior<br>to exp. date | 1 hour                              |       | III. C.4., C.5, & C.6.               |
|                | SO <sub>2</sub>                          | No. 2<br>Fuel Oil | fuel analysis,<br>and sampling | annual                       | 24-February                    | 1 hour                              |       | III. C.6. & C.7.                     |
| -031           | VE<br>Dust Suppressant<br>Usage          |                   | 9                              | annual                       | 07-July                        | 30 minutes                          |       | III. D.3. & D.4.<br>III. D.5. & D.7. |
| -032, 033, 034 | VE                                       |                   | DEP Method 9                   | five years                   | 120 days prior<br>to exp. date | 30 minutes                          |       | III. E.4. & E.5.                     |

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

CF Industries, Inc.  
 Bartow Phosphate Complex

**FIGURE 1--SUMMARY REPORT-- GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE (version dated 7/96)**

[Note: This form is referenced in 40 CFR 60.7, Subpart A-General Provisions]

Pollutant (*Circle One*):      SO<sub>2</sub>    NO<sub>x</sub>    TRS    H<sub>2</sub>S    CO    Opacity

Reporting period dates: From \_\_\_\_\_ to \_\_\_\_\_

Company: \_\_\_\_\_

Emission Limitation: \_\_\_\_\_

Address: \_\_\_\_\_

Monitor Manufacturer: \_\_\_\_\_

Model No.: \_\_\_\_\_

Date of Latest CMS Certification or Audit: \_\_\_\_\_

Process Unit(s) Description: \_\_\_\_\_

Total source operating time in reporting period <sup>1</sup>: \_\_\_\_\_

| Emission data summary <sup>1</sup>   | CMS performance summary <sup>1</sup>   |
|--|--|
| 1. Duration of excess emissions in reporting period due to:  | 1. CMS downtime in reporting period due to:  |
| a. Startup/shutdown..... _____   | a. Monitor equipment malfunctions ..... _____  |
| b. Control equipment problems ..... _____  | b. Non-Monitor equipment malfunctions _____  |
| c. Process problems ..... _____  | c. Quality assurance calibration ..... _____   |
| d. Other known causes..... _____   | d. Other known causes ..... _____  |
| e. Unknown causes ..... _____  | e. Unknown causes..... _____   |
| 2. Total duration of excess emissions ..... _____  | 2. Total CMS Downtime ..... _____  |
| 3. Total duration of excess emissions x (100) / [Total source operating time] _____ % <sup>2</sup> | 3. [Total CMS Downtime] x (100) / [Total source operating time] ..... % <sup>2</sup> |

(footnotes on next page)

- <sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.
- <sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 60.7(c) shall be submitted.

*Note: On a separate page, describe any changes since last quarter in CMS, process or controls.*

I certify that the information contained in this report is true, accurate, and complete.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_