



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

April 21, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. M. Farris
Vice President of Operations
Farmland Hydro, L.P.
Post Office Box 960
Bartow, Florida 33831

Re: Extension of Expiration Date of Permit No. 1050053-020-AC, PSD-FL-246
North MAP/DAP Green Bay Facility

The applicant, Farmland Hydro, L.P., applied on April 17, 2000, to the Department for an extension of the expiration date of air construction permit number 1050053-020-AC (PSD-FL-246) for its North MAP/DAP plant located at 4390 County Road 640 West, Bartow, Polk County. The Department has reviewed the request. The expiration date is hereby extended from May 1, 2000 to July 1, 2000 to allow review of special testing required in Specific Condition 23 of the permit.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

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

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

Mediation is not available in this proceeding.

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

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

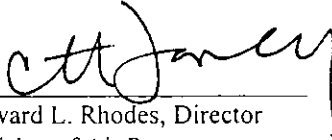
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will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

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

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

for 
Howard L. Rhodes, Director
Division of Air Resources
Management

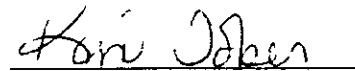
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4-24-00 to the person(s) listed:

C. M. Farris, Farmland Hydro, L.P.*
C. W. Jenkins, Farmland Hydro, L.P.
B. Thomas, DEP-SWD
Gregg Worley, EPA
John Bunyak, NPS

Clerk Stamp

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


(Clerk)

4-24-00
(Date)

Z 031 391 957

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to	
C.M. Farris	
Street & Number	
Fairland Hdw	
Post Office, State, & ZIP Code	
Baton Rouge LA	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
105053-020-AC 4-24-00	
P00-F1-246	

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

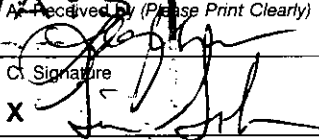
1. Article Addressed to:

Mr. C.M. Farris
Fairland Hdw, LP
PO Box 960
Baton Rouge, LA
33831

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) _____

B. Date of Delivery 4-28-00

C. Signature 

Agent
 Addressee

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Copy from service label) 2031 391 957

Farmland Hydro, L.P.

Charles W. Jenkins
Manager of Environmental and Safety Services

Green Bay Plant
County Road 640
Post Office Box 960
Bartow, Florida 33831
Tele: 863 533-1141
Fax: 863 533-8793

April 20, 2000

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Syed Arif, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

APR 28 2000

BUREAU OF AIR REGULATION

**SUBJECT: EVALUATION OF DEMONSTRATION TESTS
FOR CONSTRUCTION PERMIT**

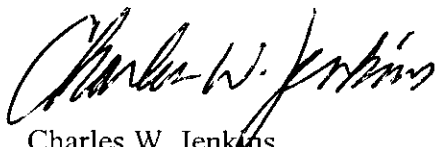
Permit No. 1050053-020-AC

Dear Mr. Arif:

Enclosed please find our evaluation of the demonstration stack tests in accordance with the Specific Condition No. 23 of the Construction Permit. This is offered in completion to the Construction Permit No. 1050053-020-AC, PSD-FL-246.

If you have any questions or need further clarification, please give me a call at my new number of (863) 519-1334.

Sincerely,



Charles W. Jenkins
Manager of Environmental and Safety Services

CWJ:jp\79-00
enc.

cc: Merle Farris, FHLP
Doug Belle, FHLP
Walter Brown, FHLP

CC: EPA
NPS
SWD



CERTIFICATIONS

CERTIFICATION BY RESPONSIBLE OFFICIAL

Based on information and belief formed after reasonable inquiry, I certify that all statements made in this report, including any attachments, are true, accurate and complete.


(Signature of Responsible Official)

April 25, 2000
(Date)

Name: C. M. Farris
(Type or Print)

Title: Vice President
of Operations
(Type or Print)

PROFESSIONAL ENGINEER CERTIFICATION

Based on information and belief formed after reasonable inquiry, I certify that all statements made in this report, including any attachments, are true, accurate and complete.


(Signature of Responsible Official)

April 20, 2000
(Date)

Name: U. K. Custred P.E.
(Type or Print)

Title: Land Manager
(Type or Print)

Registration No. 8166

(seal)

MAP-NORTH GRANULATION PLANT EMISSIONS DISCUSSION

OVERVIEW

According to Specific Condition 23 of Air Construction Permit 1050053-020-AC, four compliance-type (demonstration) stack tests were conducted and complete reports submitted to Mr. William Proses of the Southwest District Office of the DEP. The attached Table 1 titled "Construction Demonstration Runs" is a compilation of the individual run results. This source (source no. 029) is a single source comprised of two emission stacks. The first stack emits gasses from the dryer, the screens, the crushing mills and the product cooler. This is referred to as the Dryer Stack. The second source is a combination of gasses from the ammonia and phosphoric acid reactor and from the fertilizer granulator. This is referred to as the R/G Stack.

For comparison purposes, a second table, Table 2 is included titled "MAP North Granulation (Pre-Construction)" and tabulates the individual run stack test data for the previous five (5) years. Table 3 is a similar historical data table for DAP North Granulation and Table 4 is a tabulation of all the particulate emissions from the first three tables. Graphs of the pre and post construction emissions are included for information.

FLUORIDE EMISSIONS EVALUATION

Farmland Hydro, L.P. recognizes that the DEP considers the limit for fluoride emissions from this granulation plant should be set at 0.0417 pounds per ton (ppt) of P_2O_5 regardless of the product being produced (i.e. DAP or MAP). This level does not appear to be practical for MAP production; however, after increasing the MAP rate by nearly 20 % the average total emissions of fluoride ppt have decreased over 12 %.

The total plant average fluoride emission was 0.0266 ppt and the standard deviation was 0.0172 ppt. Evaluating this data as a standardized random variable, it is found that there is approximately an 81 % probability that we could meet an emission value of 0.0417 ppm. The probability for meeting 0.06 ppt is 97.4 %. This is not a comfortable margin but one that we are prepared to meet. For this reason, we propose the limit of 0.06 ppt for the production of MAP on the North Granulation Plant.

PARTICULATE EMISSIONS EVALUATION

The Department has proposed a total limit of 0.19 ppt of particulate matter (PM) as an appropriate limit for this production plant. No revisions of the scrubber system were made to accommodate reduced particulate emissions. The only expenditure was in the area of minor improvements to the sprays in the high mole scrubber for reduced fluoride emissions. The rest of the modification involved an ability to increase the production rate due to improved knowledge of operations and did not involve any expenditure of capital to modify equipment.

MAP-NORTH GRANULATION PLANT EMISSIONS DISCUSSION (continued)

Table 4 summarizes the particulate emissions for each test run of the North Granulation Plant from 1994 through the present including the four construction demonstration runs. Comparing this data, utilizing the same method as was used for the fluoride emissions, there is a probability of meeting an emission level of 0.19 of 89 %. This is not a comfortable margin for such a limit. We could meet a limit of 0.3 ppt with a probability of 99.9 %. For these reasons, it is the assertion of Farmland Hydro, L.P. that the Title V permit limit for total PM should be 0.3 ppt.

REQUIREMENTS TO MEET RECOMMENDED EMISSION

The most practical engineering means to achieve a consistent emission of under 0.0417 ppt of fluoride and 0.19 ppt of total particulate would be to install a tailgas scrubber on each of the two stacks. This solution has been estimated at about \$ 1 million. Detailed engineering will reveal whether or not greater quantities of pond water will need to be delivered to and from this operating facility. If this proves to be the case, the above estimate will need to be increased by 50% to 60%.

The Engineering Department is concerned that we may also need to install high pressure drop venturis in the Dryer and Screens & Mills scrubbers. Detailed engineering would be required to make the final determination on this point and would require a minimum investment of about \$1.0 million additional for the venturies and increased fans for the added pressure drop.

North Granulation Plant
MAP Construction Permit 1050053-020-AC
Demonstration

CONSTRUCTION DEMONSTRATION RUNS

DEMON- STRATION	DATE	Run #	Product Rate TPH	Feed Rate TPH -P2O5	REACTOR/GRANULATOR STACK				DRYER STACK				TOTAL PLANT			
					F - Emission		PM - Emission		F - Emission		PM - Emission		F - Emission		PM - Emission	
					#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5
#1	4/12/99	1	153.3	79.72	0.9975	0.0125	1.3009	0.0163								
	4/12/99	2	153.3	79.72	0.5987	0.0075	2.3535	0.0295								
	4/12/99	3	153.3	79.72	1.5379	0.0193	3.3371	0.0419								
	4/15/99	1	156.5	81.40					0.9880	0.0121	4.9721	0.0611	1.9855	0.0247	6.2730	0.0774
	4/15/99	2	156.5	81.40					0.7208	0.0089	4.0295	0.0495	1.3195	0.0164	6.3830	0.0790
	4/15/99	3	156.5	81.40					1.0529	0.0129	4.4048	0.0541	2.5908	0.0322	7.7419	0.0960
#2	7/2/99	1	144.6	72.29	1.1613	0.0161	2.2681	0.0314								
	7/2/99	2	144.6	72.29	0.3882	0.0054	1.7437	0.0241								
	7/2/99	3	144.6	72.29	0.3424	0.0047	2.1818	0.0302								
	6/30/99	1	148.2	74.12					1.1784	0.0159	5.2733	0.0711	2.3397	0.0320	7.5414	0.1025
	6/30/99	2	148.2	74.12					4.3134	0.0582	5.3300	0.0719	4.7016	0.0636	7.0737	0.0960
	6/30/99	3	148.2	74.12					0.5403	0.0073	3.7978	0.0512	0.8827	0.0120	5.9796	0.0814
#3	10/27/99	1	138.2	69.09	1.2988	0.0188	4.4190	0.0640								
	10/27/99	2	138.2	69.09	1.2087	0.0175	3.7207	0.0539								
	10/27/99	3	138.2	69.09	0.9887	0.0143	2.2638	0.0328								
	10/26/99	1	143.3	73.40					0.4845	0.0066	6.1093	0.0832	1.7833	0.0254	10.5283	0.1472
	10/26/99	2	143.3	73.40					0.6997	0.0095	6.0677	0.0827	1.9084	0.0270	9.7884	0.1365
	10/26/99	3	143.3	73.40					0.7320	0.0100	4.6532	0.0634	1.7207	0.0243	6.9170	0.0962
#4	3/20/00	1	146.2	76.01	3.4291	0.0451	1.7385	0.0229								
	3/20/00	2	146.2	76.01	0.0602	0.0008	1.7324	0.0228								
	3/20/00	3	146.2	76.01	0.1891	0.0025	1.5399	0.0203								
	3/16/00	1	154.3	77.14					0.4468	0.0058	7.3691	0.0955	3.8759	0.0509	9.1076	0.1184
	3/16/00	2	154.3	77.14					0.2982	0.0039	10.3963	0.1348	0.3584	0.0047	12.1287	0.1576
	3/16/00	3	154.3	77.14					0.2348	0.0030	12.6959	0.1646	0.4239	0.0055	14.2358	0.1848
TEST STATISTICS				Average		0.0137	0.0325		0.0128	0.0819		0.0266	0.1144			
				Max.		0.0451	0.0640		0.0582	0.1646		0.0636	0.1848			
				Min		0.0008	0.0163		0.0030	0.0495		0.0047	0.0774			
				Std. Dev.		0.0119	0.0142		0.0148	0.0351		0.0172	0.0347			
Average + 2 x Standard Deviation						0.0374	0.0609		0.0424	0.1522		0.0610	0.1839			
Average + 3 x Standard Deviation						0.0493	0.0751		0.0571	0.1873		0.0783	0.2186			

TABLE 1

Pre-Construction Data

MAP NORTH GRANULATION (PRE-CONSTRUCTION)

DATE	Run #	Product Rate TPH	Feed Rate TPH -P2O5	REACTOR/GRANULATOR STACK				DRYER STACK				TOTAL PLANT				
				F - Emission		PM - Emission		F - Emission		PM - Emission		F - Emission		PM - Emission		
				#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	
3/1/94	1	119.6	62.20	0.0830	0.0013	0.9400	0.0151									
3/1/94	2	119.6	62.20	0.0740	0.0012	0.8570	0.0138									
3/1/94	3	119.6	62.20	0.9150	0.0147	1.5700	0.0252									
2/27/94	1	119.2	62.00					0.7000	0.0113	5.4130	0.0873	0.7830	0.0126	6.3530	0.1024	
2/27/94	2	119.2	62.00					0.6450	0.0104	7.1920	0.1160	0.7190	0.0116	8.0490	0.1298	
2/27/94	3	119.2	62.00					0.5370	0.0087	5.0240	0.0810	1.4520	0.0234	6.5940	0.1063	
2/2/95	1	118.7	61.70	1.0590	0.0172	2.2660	0.0367									
2/2/95	2	118.7	61.70	1.1230	0.0182	2.6100	0.0423									
2/2/95	3	118.7	61.70	0.2900	0.0047	1.8460	0.0299									
2/4/95	1	119.4	62.10					0.7100	0.0114	13.1940	0.2125	1.7690	0.0286	15.4600	0.2492	
2/4/95	2	119.4	62.10					0.7870	0.0127	6.7800	0.1092	1.9100	0.0309	9.3900	0.1515	
2/4/95	3	119.4	62.10					0.7530	0.0121	11.4930	0.1851	1.0430	0.0168	13.3390	0.2150	
5/1/96	1	124.0	64.50	0.3170	0.0049	2.5880	0.0401									
5/1/96	2	124.0	64.50	0.0610	0.0009	3.2920	0.0510									
5/1/96	3	124.0	64.50	0.0410	0.0006	2.1210	0.0329									
5/3/96	1	123.8	64.40					0.6160	0.0096	6.2400	0.0969	0.9330	0.0145	8.8280	0.1370	
5/3/96	2	123.8	64.40					0.7810	0.0121	8.6910	0.1350	0.8420	0.0131	11.9830	0.1860	
5/3/96	3	123.8	64.40					0.6550	0.0102	8.5960	0.1335	0.6960	0.0108	10.7170	0.1664	
4/8/97	1	133.5	69.43	1.9900	0.0287	1.4900	0.0215									
4/8/97	2	133.5	69.43	1.9120	0.0275	1.4890	0.0214									
4/8/97	3	133.5	69.43	2.3180	0.0334	1.5380	0.0222									
4/10/97	1	131.5	68.36					0.4740	0.0069	2.0960	0.0307	2.4640	0.0356	3.5860	0.0521	
4/10/97	2	131.5	68.36					0.3780	0.0055	2.7410	0.0401	2.2900	0.0331	4.2300	0.0615	
4/10/97	3	131.5	68.36					0.3460	0.0051	2.9670	0.0434	2.6640	0.0384	4.5050	0.0656	
2/13/98	1	117.5	61.11	1.6090	0.0263	1.5990	0.0262									
2/13/98	2	117.5	61.11	3.3750	0.0552	3.7900	0.0620									
2/13/98	3	117.5	61.11	4.6970	0.0769	3.8970	0.0638									
2/11/98	1	120.8	62.80					0.6870	0.0109	4.8100	0.0766	2.2960	0.0373	6.4090	0.1028	
2/11/98	2	120.8	62.80					0.5050	0.0080	4.3060	0.0686	3.8800	0.0633	8.0960	0.1306	
2/11/98	3	120.8	62.80					0.5100	0.0081	6.8560	0.1092	5.2070	0.0850	10.7530	0.1729	
TEST STATISTICALS				Average	0.0208	0.0336		0.0095	0.1017		0.0303	0.1353				
				Max.	0.0769	0.0638		0.0127	0.2125		0.0850	0.2492				
				Min	0.0006	0.0138		0.0051	0.0307		0.0108	0.0521				
				Std. Dev.	0.0220	0.0157		0.0024	0.0509		0.0208	0.0566				
Average + 2 x Standard Deviation					0.0647	0.0650		0.0143	0.2035		0.0719	0.2484				
Average + 3 x Standard Deviation					0.0867	0.0807		0.0168	0.2544		0.0927	0.3050				

TABLE 2

DAP NORTH GRANULATION (PRE-CONSTRUCTION)

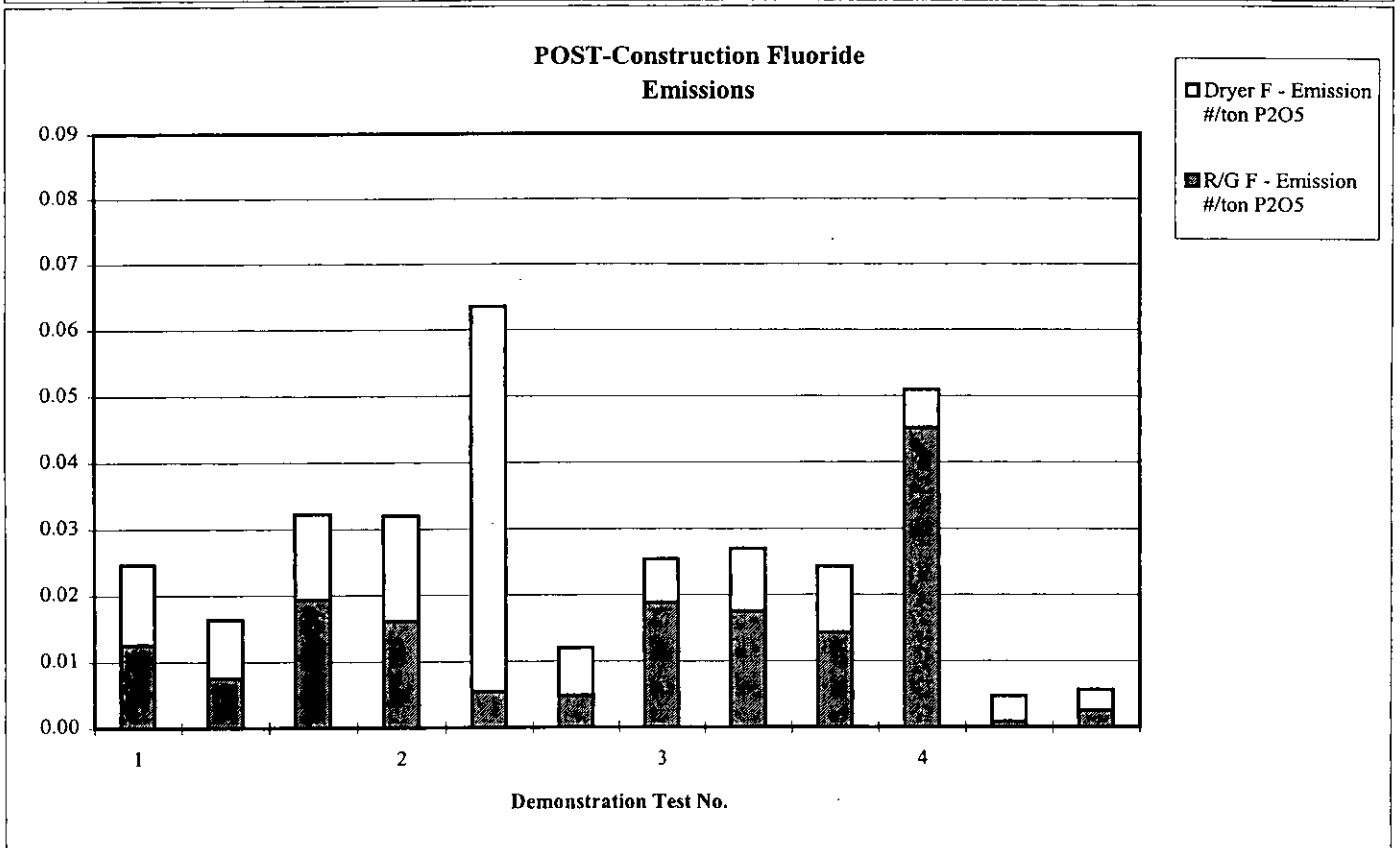
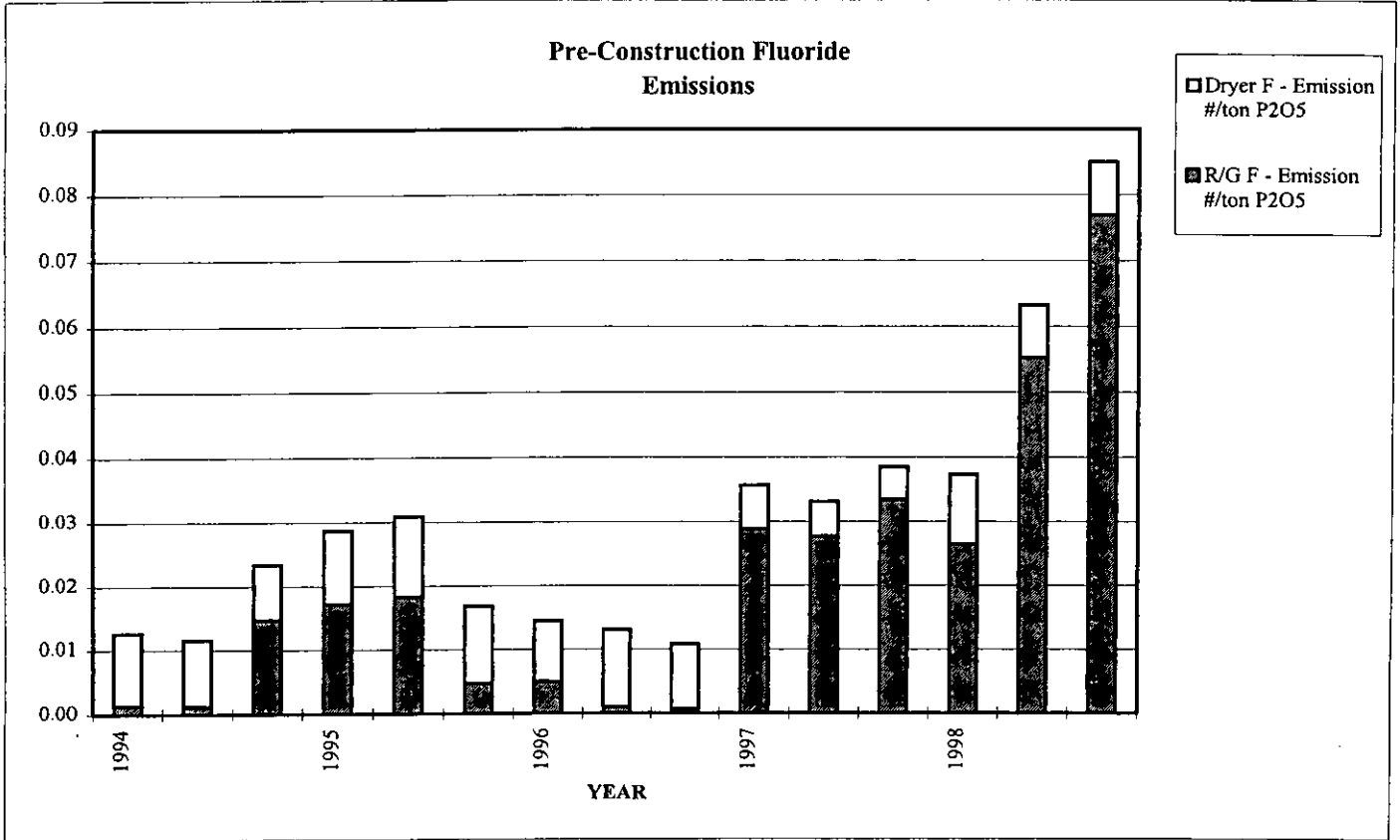
DATE	Run #	Product Rate TPH	Feed Rate TPH -P2O5	REACTOR/GRANULATOR STACK				DRYER STACK				TOTAL PLANT				
				F - Emission		PM - Emission		F - Emission		PM - Emission		F - Emission		PM - Emission		
				#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	#/hour	#/ton P2O5	
2/20/94	1	90.0	41.40	0.1070	0.0026	0.4320	0.0104									
2/20/94	2	90.0	41.40	0.1520	0.0037	0.6880	0.0166									
2/20/94	3	90.0	41.40	0.1230	0.0030	0.6020	0.0145									
2/27/94	1	96.5	44.40					0.7430	0.0167	1.1480	0.0259	0.8500	0.0193	1.5800	0.0363	
2/27/94	2	96.5	44.40					0.7250	0.0163	0.9500	0.0214	0.8770	0.0200	1.6380	0.0380	
2/27/94	3	96.5	44.40					0.7830	0.0176	1.4470	0.0326	0.9060	0.0206	2.0490	0.0471	
2/16/95	1	97.8	45.00	0.8770	0.0195	2.1990	0.0489									
2/16/95	2	97.8	45.00	0.4320	0.0096	3.0830	0.0685									
2/16/95	3	97.8	45.00	0.2490	0.0055	0.3540	0.0079									
2/15/95	1	97.4	44.80					0.8310	0.0185	2.4200	0.0540	1.7080	0.0380	4.6190	0.1029	
2/15/95	2	97.4	44.80					0.7840	0.0175	3.4310	0.0766	1.2160	0.0271	6.5140	0.1451	
2/15/95	3	97.4	44.80					0.8340	0.0186	2.8570	0.0638	1.0830	0.0241	3.2110	0.0716	
5/14/96	1	93.0	42.80	0.1780	0.0042	0.8960	0.0209									
5/14/96	2	93.0	42.80	0.1270	0.0030	0.9780	0.0229									
5/14/96	3	93.0	42.80	0.0710	0.0017	0.9500	0.0222									
5/16/96	1	88.7	40.80					0.6230	0.0153	2.6770	0.0656	0.8010	0.0194	3.5730	0.0865	
5/16/96	2	88.7	40.80					0.7060	0.0173	2.6350	0.0646	0.8330	0.0203	3.6130	0.0874	
5/16/96	3	88.7	40.80					0.7650	0.0188	1.7680	0.0433	0.8360	0.0204	2.7180	0.0655	
3/19/97	1	104.3	47.97	0.3200	0.0067	0.5950	0.0124									
3/19/97	2	104.3	47.97	0.1860	0.0039	0.1850	0.0039									
3/19/97	3	104.3	47.97	0.2180	0.0045	0.7400	0.0154									
3/18/97	1	105.9	48.71					0.8200	0.0168	11.4150	0.2343	1.1400	0.0235	12.0100	0.2467	
3/18/97	2	105.9	48.71					0.8340	0.0171	5.6740	0.1165	1.0200	0.0210	5.8590	0.1203	
3/18/97	3	105.9	48.71					0.6850	0.0141	3.0310	0.0622	0.9030	0.0186	3.7710	0.0777	
1/26/98	1	98.0	45.10	0.2180	0.0048	0.6430	0.0143									
1/26/98	2	98.0	45.10	0.3360	0.0075	1.3660	0.0303									
1/26/98	3	98.0	45.10	0.2070	0.0046	0.4940	0.0110									
1/29/98	1	100.5	46.21					0.6480	0.0140	9.9780	0.2159	0.8660	0.0189	10.6210	0.2302	
1/29/98	2	100.5	46.21					0.5380	0.0116	8.8780	0.1921	0.8740	0.0191	10.2440	0.2224	
1/29/98	3	100.5	46.21					0.5320	0.0115	2.4320	0.0526	0.7390	0.0161	2.9260	0.0636	
TEST STATISTICALS				Average	0.0056	0.0213		0.0161	0.0881		0.0218		0.1094			
				Max.	0.0195	0.0685		0.0188	0.2343		0.0380		0.2467			
				Min	0.0017	0.0039		0.0115	0.0214		0.0161		0.0363			
				Std. Dev.	0.0043	0.0169		0.0023	0.0695		0.0052		0.0704			
Average + 2 x Standard Deviation					0.0143	0.0552		0.0208	0.2271		0.0322		0.2503			
Average + 3 x Standard Deviation					0.0187	0.0721		0.0232	0.2966		0.0374		0.3207			

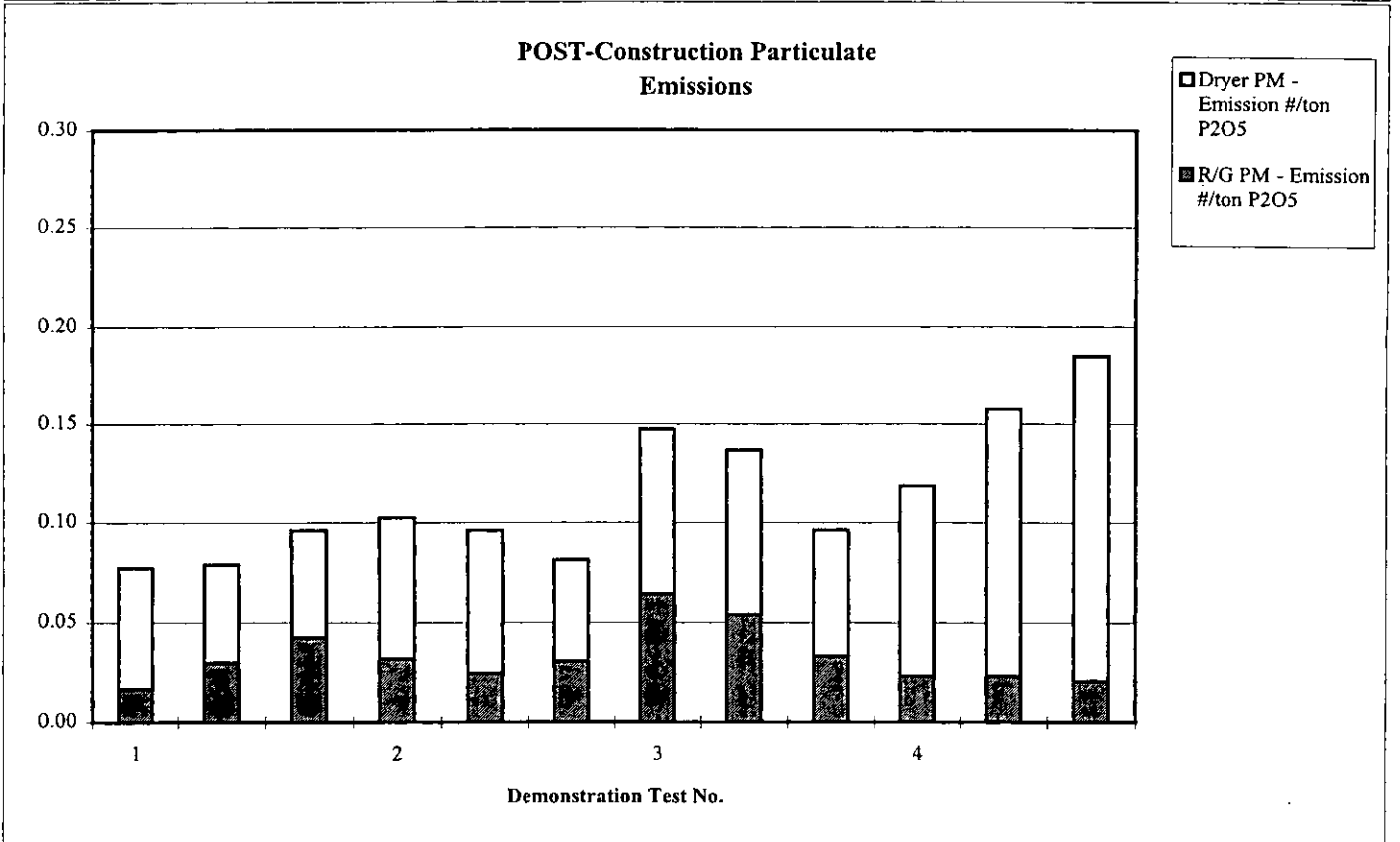
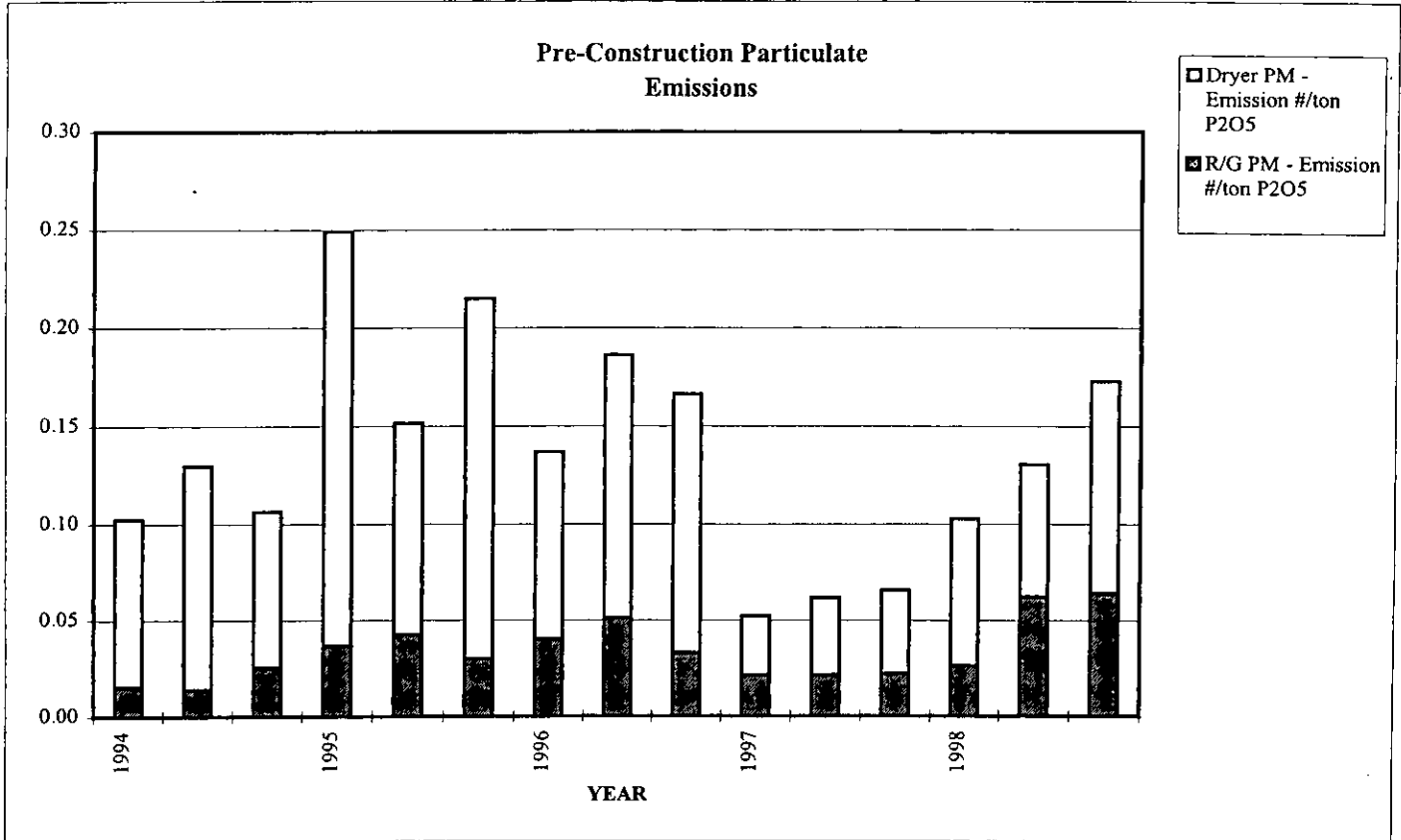
TABLE 3

TABLE 4

TOTAL PM STATS

Product	ppt emission
DAP	0.0363
DAP	0.0380
DAP	0.0471
DAP	0.1029
DAP	0.1451
DAP	0.0716
DAP	0.0865
DAP	0.0874
DAP	0.0655
DAP	0.2467
DAP	0.1203
DAP	0.0777
DAP	0.2302
DAP	0.2224
DAP	0.0636
MAP	0.1024
MAP	0.1298
MAP	0.1063
MAP	0.2492
MAP	0.1515
MAP	0.2150
MAP	0.1370
MAP	0.1860
MAP	0.1664
MAP	0.0521
MAP	0.0615
MAP	0.0656
MAP	0.1028
MAP	0.1306
MAP	0.1729
MAP	0.0774
MAP	0.0790
MAP	0.0960
MAP	0.1025
MAP	0.0960
MAP	0.0814
MAP	0.1472
MAP	0.1365
MAP	0.0962
MAP	0.1184
MAP	0.1576
MAP	0.1848
Average	0.1201
Std. Dev.	0.0570





Farmland Hydro, L.P.

Charles W. Jenkins
Manager of Environmental and Safety Services

Green Bay Plant
County Road 640
Post Office Box 960
Bartow, Florida 33831
Tele: 863 533-1141
Fax: 863 533-8793

April 11, 2000

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Syed Arif, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
APR 17 2000
BUREAU OF AIR REGULATION

SUBJECT: REQUEST FOR EXTENSION OF CONSTRUCTION PERMIT

DEP File No. 1050053-020-AC

Permit No. PSD-FL-246

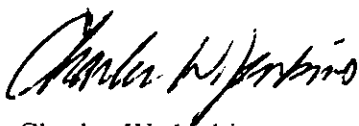
Project: North MAP/DAP Plant Rate Increase

Dear Mr. Arif:

Concerning the above listed Construction Permit, we request a sixty (60) day extension of the current May 1, 2000, expiration date. The extra time is requested in order to prepare and submit a Certificate of Construction.

If you have any questions or need further clarification, please give me a call at my new number of (863) 519-1334.

Sincerely,



Charles W. Jenkins
Manager of Environmental and Safety Services

CWJ:jp\73-00
enc.

cc: Merle Farris, FHLP
Doug Belle, FHLP
Walter Brown, FHLP
Jerry Kissel, FDEP Southwest District



Concerning the information contained in this request for an extension of time:

CERTIFICATION BY RESPONSIBLE OFFICIAL

Based on information and belief formed after reasonable inquiry, I certify that all statements made in this report, including any attachments, are true, accurate and complete.



(Signature of Responsible Official)

April 12, 2000

(Date)

Name: **C. M. Farris**

(Type or Print)

Title: **Vice President
of Operations**

(Type or Print)

Florida Department of
Environmental Protection

Memorandum

RECEIVED

DEC 29 1999

Date: December 22, 1999

From: Ann Quillian, P.E., Air Permit Engineer, Southwest District *W* BUREAU OF AIR REGULATION

To: Southwest District AC53-265755/PSD-FL-225, 1050053-019-AC/PSD-FL-243, and
1050053-012-AV Files

Subject: 7500 Ton Molten Sulfur Storage Tank (Emission Unit -039)
Farmland Hydro, Green Bay Plant

In preparing the Proposed Title V Operation Permit (1050053-012-AV) for the Farmland Hydro's Green Bay Plant, the construction permitting process for the 7500 Ton Molten Sulfur Storage Tank (Emission Unit -039) was reviewed. This memorandum documents the findings regarding this issue.

Background

1. Air Construction Permit AC53-265755/PSD-FL-225 (Tallahassee Issued September 25, 1995) for the Sulfuric Acid Plants 3, 4, 5 Production Increase

The 7500 Ton Molten Sulfur Storage Tank is mentioned in a May 10, 1995 letter from John Koogler to A.A. Linero (The intent of the letter was to respond to the Department's March 22, 1995 request for additional information). The details regarding the tank are described in Appendix 3 of this May 10, 1995 letter. The final permit, PSD-FL-225, is silent regarding the determination, though the May 10, 1995 letter is referenced as a permit attachment.

2. Air Construction Permit 1050053-019-AC/PSD-FL-243 (Tallahassee Issued July 15, 1998) for the Sulfuric Acid Plant 6 and Associated Storage and Handling

On page 2 of the PSD-FL-243 permit, emission units -003, -038, and -030 through -036 are indicated as the emissions units addressed. The permit is silent with regard to emissions unit -039. From discussions with Syed Arif, a 7700 Ton Molten Sulfur Storage Tank was included in the original permit application (This tank was determined to be the 7500 Ton Molten Sulfur Storage Tank and the 7700 ton capacity was a typographical error per Charles Jenkins of Farmland Hydro.) and was included in the PSD analysis. Syed also indicated that the emission unit numbers were taken from ARMS at the time of permit processing.

3. Air Construction Permit 1050053-022-AC (Southwest District Issued April 19, 1999)

The 7500 Ton Molten Sulfur Storage Tank is listed as emissions unit -039 in the facility description located on the placard page of the Air Construction Permit 1050053-022-AC. Research indicated that the emission unit number of -039 was designated by the permittee in the application and was not in ARMS. In addition, this emission unit number was included in the Draft Title V Operation Permit, which had completed the public comment period in April 1999.

December 22, 1999
7500 Ton Molten Sulfur Storage Tank
Farmland Hydro, Green Bay Plant
Page 2

Conclusion:

After discussions with John Reynolds, FDEP/NSR-Tallahassee, and Pradeep Raval, Koogler & Associates, there was no strong indication of the permit determination regarding this 7500 Ton Molten Sulfur Storage Tank under the Air Construction Permit PSD-FL-225.

However as a result of the information gathered regarding the Air Construction Permit PSD-FL-243, it was concluded that this 7500 Ton tank was included in the PSD-FL-243 permit determination. The tank was included in the permit application, even though it was not specifically listed on page 2 of PSD-FL-243.

Therefore, the 7500 Ton Molten Sulfur Storage Tank is subject to the molten sulfur capacity limitation of 2530 tons per day and 924,000 tons per year [Air Construction Permit, 1050053-019-AC/PSD-FL-243, Condition 3. and Title V Operation Permit 1050053-012-AV, Condition N.1.]. It is also subject to other applicable limitations regarding the molten sulfur storage and handling system [Title V Operation Permit 1050053-012-AV, Section III., Subsection N.].

The 7500 Ton Molten Sulfur Tank was inputted into the ARMS system as emission unit -039.

cc: A.A. Linero, FDEP/NSR – Tallahassee (w/o attachments)

/aq



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

KA 123-94-06

December 10, 1999

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DEC 13 1999
BUREAU OF AIR REGULATION

Ms. Ann Quillian, P.E.
Florida Department of
Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, FL 33619-8318

Subject: Farmland Hydro, L.P.
Comments on Proposed Permit 1050053-012-AV

Dear Ms. Quillian:

This is response to the Proposed Title V permit for Farmland Hydro, L.P., dated November 8, 1999. The following comments, all regarding the fluoride requirements for the fertilizer storage and shipping area, are submitted for your consideration.

The recent PSD permit (PSD-FL-246, by Syed Arif, P.E.) removed GTSP capability from the facility. Consequently, the associated fluoride emission limits and compliance testing requirements are not applicable to the storage and shipping building. Please update the Title V permit accordingly. The following specific conditions need to be updated:

1. On Page J1, Specific Condition(S.C.) J.2. should be deleted, as it is no longer applicable.
2. On Page J2, S.C. J.5., the reference to fluorides and EPA Methods 13A and 13B should be deleted.
3. On Page J3, S.C. J.8., the reference to fluorides and Items B and C should be deleted.

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

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK.par

c: C. Jenkins, Farmland
S. Arif, P.E., FDEP