

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 21, 1995

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Charles Jenkins
Environmental Coordinator
Farmland Hydro, L.P.
Post Office Box 906
Bartow, Florida 33830

Dear Mr. Jenkins:

Re: No. 5 SAP Plant
AC53-185490/PSD-FL-143A
Request to Amend permit

The Department hereby amends the above referenced permit as follows:

Specific Condition No. 8:

From:

A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C. Rule 17-2.701. Initial and annual compliance tests shall be conducted using:

EPA Method 7E for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions

Mr. Charles Jenkins
December 21, 1995
Page Two

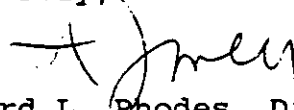
To:

A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C. Rule 62-296.402. Testing for nitrogen oxides shall be done prior to renewal of each operating permit using EPA Method 7E. Initial and annual compliance tests shall be conducted using:

EPA Method 8 for sulfur dioxide and acid mist
EPA Method 9 for visible emissions

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC53-185490/PSD-FL-143A.

Sincerely,

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **PERMIT AMENDMENT** and all copies were mailed by certified mail before the close of business on 12-21-95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

Keri Döben 12-21-95
Clerk Date

Copies to be furnished to:

Jerry Kissel, SWD
Jewell Harper, EPA
Roy Harwood, Polk Co

Z 127 633 225



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sender's Name <i>Charles Jenkins</i>	
Post Office and No. <i>Jarmland Hgdo</i>	
City, State, and Zip Code <i>Baton, FI</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>12-21-95</i>
<i>AC53-185490</i>	
<i>PSD-FI-143A</i>	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse of this form?

- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:
*Charles Jenkins, E.C.
 Jarmland Hgdo, LP
 P O BOX 906
 Baton, FI 33830*

5. Signature (Addressee)

6. Signature (Agent)

Linda Thompson

4a. Article Number

Z 127 633 225

4b. Service Type

- Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

12/27/95

8. Addressee's Address (Only if requested and fee is paid)

receive the
an extra

1. Addressee's Address
 2. Restricted Delivery
 Consult postmaster for fee.

Thank you for using Return Receipt Service.

Florida Department of
Environmental Protection

Memorandum

TO: C. H. Fancy
FROM: Martin Costello *mc 12/18/95*
DATE: December 19, 1995
SUB: No. 5 SAP Plant
AC53-185490/PSD-FL-143A
Request to Amend permit

Attached for your review and approval is a permit amendment which reduces the testing frequency for NO_x.

If you have any questions, I will be glad to discuss the details.

MC/h

Farmland Hydro, L.P.

Charles W. Jenkins
Manager
Environmental/Safety Services

October 25, 1995

Marty Costello
Mr. John Reynolds
Department of Environmental Protection
Bureau of Air Regulations
2600 Blairstone Road
Tallahassee, Florida 32399-2400

RE: AFFIDAVIT OF PUBLICATION

Dear Mr. Reynolds:

Please find enclosed the Affidavit of Publication of Intent to Issue. This is a Permit Amendment to Sulfuric Acid Permit #AO53-200485, AIRS #1050053-005.

AC 53-185990 / PSD-FL-143A

If you have any questions, please contact me at (941) 533-1141, Ext. 334.

Sincerely,



Charles W. Jenkins
Manager,
Environmental and Safety Services

CWJ/ra/cwj171.95

Enclosures

CC: Merle Farris

Green Bay Plant
County Road 640
Post Office Box 960
Bartow, Florida 33831
Tele: 813 533-1141
Fax: 813 533-8793

RECEIVED

OCT 27 1995

**BUREAU OF
AIR REGULATION**



AFFIDAVIT OF PUBLICATION

THE LEDGER Lakeland, Polk County, Florida

Case No.....

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Robert Lee, who on oath says that he is Classified Manager of The Ledger, a daily newspaper published in Polk County, Florida; that the attached copy of advertisement, being a

.....
Notice of Intent
.....

in the matter of

AC 53-185490
.....

in the

Court, was published in said newspaper in the issues of

October 20;
.....

1995
.....

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed 

Classified Advertising Manager

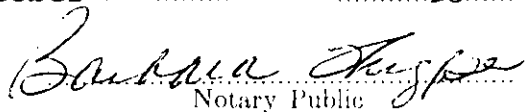
by Robert E. Lee who is

personally known to me

Sworn to and subscribed before me this 20th

day of October A.D. 19 95

(Seal)


Notary Public

BARBARA THIGPEN

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT
AC53-185490/PSD-FL-143A

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Farmland Hydro, L.P., Post Office Box 906, Bartow, Florida, 33830. The Department intends to reduce the required frequency of NOx emission testing at sulfuric acid plant No. 5 located at the company's phosphate fertilizer complex on C.R. 640 West near Bartow, Florida. There will be no change in emissions as a result of this amendment since NOx emissions are low, not subject to rule, and not affected by testing frequency.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

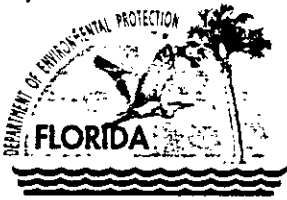
The Petition shall contain the following information: (a) The name, address, and the telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrants reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
8407 Laurel Fair Circle
Tampa, Florida 33619

Any person may send written comments on the proposed action to Administrator, New Source Review Section at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.
F406 - 10-20-1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 7, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles Jenkins
Environmental Coordinator
Farmland Hydro, L.P.
Post Office Box 906
Bartow, Florida 33830

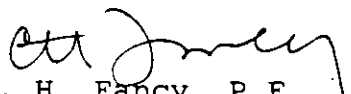
Dear Mr. Jenkins:

Re: No. 5 Sulfuric Acid Plant (SAP) Plant
Amendment to AC53-185490/PSD-FL-143A

Attached is one copy of the Proposed Permit Amendment, Intent to Issue and Public Notice of Intent to Issue Permit Amendment for the above referenced emissions unit.

Please submit any comments you may have concerning the Department's proposed action to Mr. A. A. Linero, P.E., Administrator at the above address. If you have any questions, please call Mr. Martin Costello, P.E. or Mr. Linero at (904) 488-1344.

Sincerely,


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/mc/t

cc: Jerry Kissel, SWD
Jewell Harper, EPA
Roy Harwood, Polk Co.

Z 127 632 536



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

To (Name)		Charles Jenkins	
To (Street and City)		Fairland Hydro	
To (State and ZIP Code)		Bartow, FL	
Postage	\$		
Certified Fee			
Special Delivery Fee			
Restricted Delivery Fee			
Return Receipt Showing to Whom & Date Delivered			
Return Receipt Showing to Whom, Date, and Addressee's Address			
TOTAL Postage & Fees	\$		
Postmark or Date			
No. 5 SAD 10-11-95			
AC 53-1854901			
PSD-FI-143A			

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Charles Jenkins, EC
Fairland Hydro, LP
PO Box 906
Bartow, FL 33830

4a. Article Number
Z 127 632 536

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
10/16/95

5. Signature (Addressee)
Charles Jenkins

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
Linda Thompson

Thank you for using Return Receipt Service.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit Amendment

DEP File Nos. AC53-185490
PSD-FL-143A
Polk County

Mr. Charles Jenkins
Environmental Coordinator
Farmland Hydro, L.P.
Post Office Box 906
Bartow, Florida 33830

INTENT TO ISSUE

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment for the applicant's sulfuric acid plant (SAP) No. 5 as detailed in the application/request specified above for the reasons stated in the Preliminary Determination and discussion below.

The applicant, Farmland Hydro, L.P., requested that the Department allow reduction of the frequency of NO_x emission testing at sulfuric acid plant No. 5 located at its phosphate fertilizer complex on C.R. 640 West near Bartow, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

Intent to Issue
Farmland Hydro, L.P.
AC 53-185490-PSD-FL-143A

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.


If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a

Intent to Issue
Farmland Hydro, L.P.
AC 53-185490-PSD-FL-143A

hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.


**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**


C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE PERMIT AMENDMENT** all copies were mailed by certified mail before the close of business on 10-11-95 to the listed persons.

Clerk Stamp
FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


Clerk

10-11-95
Date

Copies furnished to:

Jerry Kissel, SWD
Jewell Harper, EPA
Roy Harwood, Polk Co.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT
AC53-185490/PSD-FL-143A

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Farmland Hydro, L.P., Post Office Box 906, Bartow, Florida, 33830. The Department intends to reduce the required frequency of NO_x emission testing at sulfuric acid plant No. 5 located at the company's phosphate fertilizer complex on C.R. 640 West near Bartow, Florida. There will be no change in emissions as a result of this amendment since NO_x emissions are low, not subject to rule, and not affected by testing frequency.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application/

Notice of Intent to Issue Permit Amendment
Farmland Hydro, L.P.
AC 53-185490-PSD-FL-143A

request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
8407 Laurel Fair Circle
Tampa, Florida 33619

Any person may send written comments on the proposed action to Administrator, New Source Review Section at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

DRAFT

October XX, 1995

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Charles Jenkins
Environmental Coordinator
Farmland Hydro, L.P.
Post Office Box 906
Bartow, Florida 33830

Dear Mr. Jenkins:

Re: No. 5 Sulfuric Acid Plant (SAP) Plant
Amendment to AC53-185490/PSD-FL-143A

The Department hereby amends the above referenced permit as follows:

Specific Condition No. 8:

From:

A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C. Rule 17-2.701. Initial and annual compliance tests shall be conducted using:

EPA Method 7E for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions

To:

A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C. Rule 62-296.402. **Testing for nitrogen oxides shall be done prior to renewal of each operating permit using EPA Method 7E.** Initial and annual compliance tests shall be conducted using:

EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions

Florida Department of
Environmental Protection

Memorandum

TO: C. H. Fancy
THROUGH: A. A. Linero *aal 10/9*
FROM: Martin Costello *MC 10/6/95*
DATE: October 7, 1995
SUBJ: Farmland Hydro, L.P.
No. 5 Sulfuric Acid Plant (SAP) Plant
Amendment to AC53-185490/PSD-FL-143A

Attached for your review and approval is a permit amendment which reduces the test frequency for NO_x emissions to once per operating permit cycle. There will be no changes in emissions since NO_x emissions from a SAP are uncontrolled and not affected by testing frequency.

If you have any questions, Martin Costello and I will be glad to discuss the details.

AAL/mc/t

1
RECEIVED

SEP 27 1995

Bureau of
Air Regulation

MEMORANDUM

TO: Marty Costello, FDEP
FROM: Pradeep Raval
DATE: September 26, 1995
SUBJECT: Extension of 90 Day Time Limit
Farmland Hydro, L.P.

This is a follow up to our telephone conversation today regarding waiver of the 90 day limit for Farmland Hydro, L.P.'s application for permit amendments.

As it is anticipated that the pending issues on this subject will be resolved soon, the attached waiver extension is granted until October 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. Jenkins, Farmland Hydro, L.P.



ATTACHMENT 1

LIST OF PERMIT AMENDMENTS SUBJECT TO
WAIVER OF THE 90 DAY TIME LIMIT

FARMLAND HYDRO, L.P.
POLK COUNTY, FLORIDA

Item	Unit/Operation	Construction Permit No.
1.	North MAP/DAP Plant	AC53-210886
2.	No. 5 SAP	AC53-185490





Lawton Chiles
Governor

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment 1

Applicant's Name: Farmland Hydro, L.P.

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 30th day of October 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT)

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

MEMORANDUM

RECEIVED

AUG 28 1995

Bureau of
Air Regulation

TO: Marty Costello, FDEP
FROM: Pradeep Raval
DATE: August 24, 1995
SUBJECT: Extension of 90 Day Time Limit
Farmland Hydro, L.P.

This is a follow up to our conversation yesterday regarding waiver of the 90 day limit for Farmland Hydro, L.P.'s application for permit amendments.

As it is anticipated that the pending issues on this subject will be resolved soon, a waiver extension is granted until September 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. Jenkins, Farmland Hydro, L.P.



ATTACHMENT 1

LIST OF PERMIT AMENDMENTS SUBJECT TO
WAIVER OF THE 90 DAY TIME LIMIT

FARMLAND HYDRO, L.P.
POLK COUNTY, FLORIDA

Item	Unit/Operation	Construction Permit No.
1.	North MAP/DAP Plant	AC53-210886
2.	No. 5 SAP	AC53-185490





Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment 1

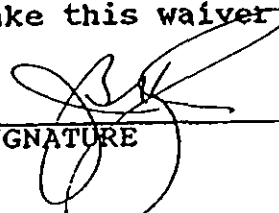
Applicant's Name: Farmland Hydro, L.P.

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 30th day of September 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT) _____

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



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 123-94-07

August 21, 1995

RECEIVED

AUG 23 1995

Bureau of
Air Regulation

Mr. Clair H. Fancy
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information for
Permit Amendment Request
Farmland Hydro, L.P.

Dear Mr. Fancy:

This is in response to your letter dated June 7, 1995, and discussions last week between Martin Costello and Pradeep Raval regarding the permit amendments for several Farmland sources. The information provided below is in the order of the amendments evaluated by FDEP.

Green SPA Plant, AC53-138041

We hereby withdraw the request for amendment of the Green Superphosphoric Acid Plant permit.

No. 5 SAP, AC53-185490, PSD-FL-143A

We hereby withdraw the request for amendment of the No. 5 Sulfuric Acid Plant permit, except for Specific Condition No. 8. We request that the testing frequency for NO_x be reduced from annually to once every five years. It is expected that a corresponding amendment to the operation permit will result in testing for NO_x prior to permit renewal only.

Annual NO_x testing is not justified for the following reasons:

1. NO_x is an uncontrolled byproduct of a manufacturing process which inherently controls the pollutants regulated under 40 CFR 60, Subpart H (sulfur dioxide and sulfuric acid mist).
2. There is no NO_x emission standard for sulfuric acid plants.
3. The permit allows adjustment of the NO_x emission rate if warranted based on future tests. This provision was included in recognition of Item 1 above. It also reflects the relative unimportance of regulating NO_x on this unit.

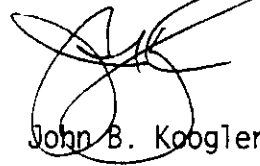
Mr. Clair H. Fancy
Florida Department of
Environmental Protection

August 21, 1995
Page 2

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

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:par

c: Charles Jenkins, Farmland
Gerald Kissel, FDEP Tampa



RECEIVED

JUN 27 1995

Bureau of
Air Regulation

MEMORANDUM

TO: Marty Costello, FDEP
FROM: Pradeep Raval
DATE: June 22, 1995
SUBJECT: Extension of 90 Day Time Limit

This is a follow up to our conversation this week regarding waiver of the 90 day limit for Farmland Hydro, L.P.'s application for permit amendments.

As it is anticipated that the pending issues on this subject will be resolved soon, the attached waiver extension is granted until August 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. Jenkins, Farmland Hydro, L.P.





Lawton Chiles
Governor

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment 1

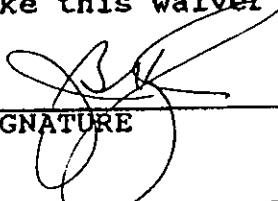
Applicant's Name: Farmland Hydro, L.P.

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 30th day of August 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT)

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

ATTACHMENT 1

LIST OF PERMIT AMENDMENTS SUBJECT TO
WAIVER OF THE 90 DAY TIME LIMIT

FARMLAND HYDRO, L.P.
POLK COUNTY, FLORIDA

Item	Unit/Operation	Construction Permit No.
1.	North MAP/DAP Plant	AC53-210886
2.	Green SPA Plant *	AC53-138041 *
3.	No. 5 SAP	AC53-185490

* Farmland will amend this permit if required by FDEP.



MEMORANDUM

TO: Marty Costello, FDEP
FROM: Pradeep Raval
DATE: June 2, 1995
SUBJECT: Waiver of 90 Day Time Limit

This is a follow up to our conversation this week regarding waiver of the 90 day limit for Farmland Hydro, L.P.'s application for permit amendments.

As it is anticipated that the pending issues on this subject will be resolved soon, the attached waiver is granted until June 30, 1995.

If you have any questions, please give me a call.

par.
enc.

c: C. Jenkins, Farmland Hydro, L.P.

RECEIVED

JUN 2 1995

Bureau of
Air Regulation





Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. See Attachment 1

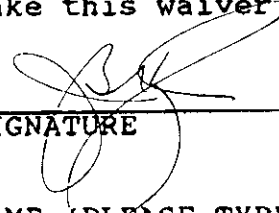
Applicant's Name: Farmland Hydro, L.P.

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 30th day of June 1995.

The undersigned is authorized to make this waiver on behalf of the applicant.



SIGNATURE

NAME (PLEASE TYPE OR PRINT)

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

RECEIVED

JUN 2 1995

F-1

Bureau of
Air Regulation

ATTACHMENT 1

LIST OF PERMIT AMENDMENTS SUBJECT TO
WAIVER OF THE 90 DAY TIME LIMIT

FARMLAND HYDRO, L.P.
POLK COUNTY, FLORIDA

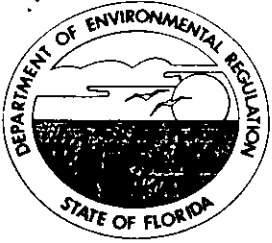
Item	Unit/Operation	Construction Permit No.
1.	North MAP/DAP Plant	AC53-210886
2.	Green SPA Plant	AC53-138041
3.	No. 5 SAP	AC53-185490

RECEIVED

JUN 2 1995

Bureau of
Air Regulation





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

March 5, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. M. Farris, General Manager
Farmland Industries
Post Office Box 960
Bartow, Florida 33603

Dear Mr. Farris:

The Department received a letter on behalf of Farmland dated February 14, 1991, requesting modification of Specific Conditions 5 and 8 of PSD-FL-143A (No. 5 Sulfuric Acid Plant). The following shall be changed:

Specific Condition No. 5:

FROM: Nitrogen oxides emissions shall not exceed:

0.12 lb/ton of 100% sulfuric acid produced
11.9 lbs/hr

52.2 tons/year

TO: Nitrogen oxides emissions shall not exceed:

0.12 lb/ton of 100% sulfuric acid produced
11.9 lbs/hr

52.2 tons/year

The above limits, based on a general emission factor of 18 ppm NOx, are subject to revision if sufficient test data indicate that the emission factor is improper.

Specific Condition No. 8:

FROM:

A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C. Rule 17-2.710. Initial and annual compliance tests shall be conducted using:

EPA Method 7 for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions

Mr. C. M. Farris
Page 2 of 2

TO:

A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C. Rule 17-2.710. Initial and annual compliance tests shall be conducted using:

EPA Method 7E for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions

Attachment to be Incorporated:

Koogler's letter dated February 14, 1991.

This letter must be attached to the above construction permit AC 53-185490, PSD-FL-143A and shall become an attachment to the permit.

Sincerely,



Carol M. Browner
Secretary

CMB/plm

c: W. Thomas, SW District
G. Meier, Farmland

P 256 396 245
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

U.S.G.P.O. 1989-234-555
 PS Form 3800, June 1985

Send to	C. M. Garris
Street and No.	Samland Ind.
P.O., State and ZIP Code	Barlow, OH
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	3-14-91 PDD F-1-143A

SENDER: Complete items 1 and 2 when additional services are desired, and complete 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent from being returned to you. The return receipt fee will provide you the name of the person delivered the date of delivery. For additional fees the following services are available. Consult postmaster and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
 2. Restricted Delivery. (Extra charge)

3. Article Addressed to: Mr. C. M. Garris, Gen. Mgr. Samland Ind. P.O. BOX 960 Barlow, OH 43003	4. Article Number P 256 396 245
5. Signature - Addressee <i>Linda Thompson</i>	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery 3/14/91	8. Addressee's Address (ONLY if requested and fee paid) 63



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

RECEIVED

FEB 15 1991

DER-BAQM

KA 123-90-02

February 14, 1991

Mr. C. H. Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Farmland Industries, Inc.
No. 5 Sulfuric Acid Plant
Request for Permit Amendment
Permit No. AC53-185490, PSD-FL-143A

Dear Mr. Fancy:

As discussed with Mr. John Reynolds of your staff on February 12, 1991, on behalf of Farmland Industries, Inc., two amendments to the above-referenced permit are hereby requested.

1. Specific Condition No. 5

To clarify the basis of the NO_x emission limit, the following change is requested:

FROM: Nitrogen oxides emissions shall not exceed:
0.12 lb/ton of 100% sulfuric acid produced
11.9 lbs/hr
52.2 tons/year

TO: Nitrogen oxides emissions shall not exceed:
0.12 lb/ton of 100% sulfuric acid produced
11.9 lbs/hr
52.2 tons/year

The above NO_x emission limits are based on a general emission factor. If a higher emission factor results from compliance testing, the NO_x emission limits may be revised after FDER review.

Mr. C. H. Fancy
Florida Department
of Environmental Regulation

February 14, 1991
Page 2

2. Specific Condition No. 8

To allow NOx compliance testing using EPA Method 7E, the following change is requested:

FROM: A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C Rule 17-2,710. Initial and annual compliance tests shall be conducted using:

EPA Method 7 for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions.

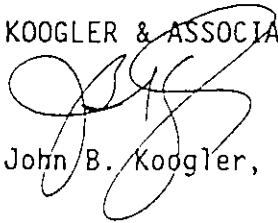
TO: A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C Rule 17-2,710. Initial and annual compliance tests shall be conducted using:

EPA Method 7E for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions.

If you have any questions, please do not hesitate to give me a call.

Very truly yours,

KOGLER & ASSOCIATES


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

JBK:PAR:wa

cc: Mr. Ed Ferking, Farmland
Mr. Gene Muir, Farmland
J. Reynolds
B. Thomas, SW District





State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Carol M. Browner
FROM: Steve Smallwood *[Signature]*
DATE: March 5, 1991
SUBJ: Amendment to Permit PSD-FL-143A
Farmland Industries, Inc.

Attached for your approval and signature is a letter modifying the above permit to show the basis for the NOx emission limits and to allow NOx testing by the instrument method.

The Division recommends approval of this amendment.

SS/plm



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4APT-AEB

FEB 28 1991

RECEIVED
MAR 04 1991
SER-BAQM

Mr. Clair Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Farmland Industries, Inc. (PSD-FL-143A)

Dear Mr. Fancy:

This is to acknowledge receipt of your final determination and permit dated January 28, 1991, for a modification to Farmland Industries' previously issued Prevention of Significant Deterioration (PSD) permit.

We have reviewed this package as requested and have no adverse comments at this time. We concur with your determination of BACT for the sulfuric acid plant.

Thank you for the opportunity to review this package. If you have any questions or comments, please contact Mr. Gregg Worley of my staff at (404) 347-2904.

Sincerely yours,

Douglas Nalley for

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division

cc: Mr. C.M. Farris
General Manager
Farmland Industries, Inc.
P.O. Box 960
Bartow, Florida 33830

*J. Reynolds
B. Andrews
C. Halladay
B. Thomas, SW Dist.*



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

From SWD

WORKING COPY

KA 123-94-06

February 14, 1995

RECEIVED
FEB 17 1995

Department of Environmental Protection
SOUTHWEST DISTRICT

BY _____

Mr. A. A. Linero
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Polk County-AP
Farmland Hydro, L.P.
Permit Amendment Requests

Dear Mr. Linero:

During recent discussions with FDEP staff, the subject of air permit conditions had come up. Based on those discussions, it is our understanding that all emission limitations in current permits must either be based on a standard, or reflect emission limits requested by a permittee to avoid a specific rule applicability (e.g. PSD, etc.). Any emission limit which is not supported by this criteria can be removed from the permit.

It is anticipated that the removal of such emission limitations from current operation permits and source construction permits will facilitate Title V permit application compilation by Farmland as well as the compilation of Title V permit conditions by FDEP. Thus, only valid applicable requirements will remain in the source permits.

Farmland has several air operation (and the preceding construction) permits which contain emission limitations outside of the above FDEP criteria. As a result, we are requesting FDEP to amend the permits tabulated below. A discussion on these permits is provided in the attachments. The attachment number corresponds to the item number in the table below.

In accordance with FDEP protocol, the request for permit amendment is being submitted to the office where the permit was issued. As the source operation permits were issued by FDEP's Tampa office, a request for amendment of those permits is simultaneously being submitted to that office. The amendment request for construction permits issued by the Bureau of Air Regulation (BAR) are being sent to your attention. The permit listing below, however, includes all the permits to be amended so that both the FDEP District and the BAR offices are aware of the scope of the permit amendments

It is requested that the following permits be amended:

Item	Unit/Operation	Operation Permit No.	Construction Permit No.
1.	North MAP/DAP Plant	A053-250142 (1)	AC53-210886 (2)
2.	Green SPA Plant	A053-242141 (1)	AC53-138041 (2)
3.	No. 5 SAP	A053-200485 (1)	AC53-185490 (2)
	Therminol Heater	A053-187834 (3)	None
	Auxiliary Steam Boiler	A053-159758 (3)	None

NOTES:

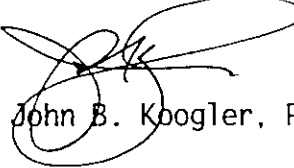
- (1) Operation permit amendment expected from FDEP District office after the construction permit amendment is issued by BAR.
- (2) Construction permit amendment expected from BAR.
- (3) Operation permit amendment expected from FDEP District office.

A check in the amount of \$750 (permit amendments processing fee) is enclosed.

Thank you for your kind assistance. If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:par

c: C. Jenkins, Farmland Hydro, L.P.
G. Kissel, FDEP Tampa



ATTACHMENT 1

Unit/Operation : North MAP/DAP Plant

Permit No. : AC53-210886

Amendment Request :

The above referenced permit contains a 0.5% sulfur content limit for No. 2 fuel oil. This sulfur content reflects a typical analysis of No. 2 fuel oil available on the market. To our knowledge, the sulfur content limit in the permit is not based on a regulatory standard, nor does it reflect an emission limitation requested by Farmland to avoid a specific rule applicability (e.g. PSD, etc.).

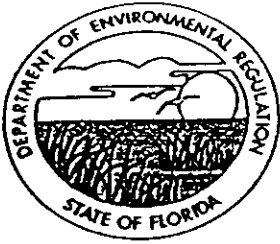
Therefore, it is requested that the construction permit be amended as follows:

Page 8, Specific Condition No. 15:

FROM: The maximum heat input rate to the dryer shall not exceed 50 MMBtu/hour. Natural gas (max. 0.05 MMCF/hr) shall be burned in the dryer; except when the natural gas supply to the plant is curtailed, then No. 2 fuel oil with a maximum of 0.5% sulfur may be burned for upto 400 hours during any 12 month period.

TO: The maximum heat input rate to the dryer shall not exceed 50 MMBtu/hour. Natural gas (max. 0.05 MMCF/hr) shall be burned in the dryer; except when the natural gas supply to the plant is curtailed, then No. 2 fuel oil may be burned for upto 400 hours during any 12 month period.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
Farmland Hydro, L.P.
P. O. Box 960
Bartow, Florida 33830

Permit Number: AC 53-210886
PSD-FL-186
Expiration Date: January 1, 1994*
County: Polk
Latitude/Longitude: 27°50'37"N
81°56'05"W
Project: North GTSP/MAP/DAP
Granulation Plant Modifications

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Authorization to modify the existing North GTSP/MAP/DAP** Granulation Plant to increase allowable production from 70 to 120 TPH MAP and from from 50 to 100 TPH DAP. The modifications include: installing a new reactor-granulator scrubber system followed by a new BFL scrubber system; a new cooler-chiller; a new venturi-cyclonic scrubber system; a new MAP pipe reactor and granulator; new screens and recycle conveyor; new smaller fans for the screens and mills; relocation of existing screens, elevators, elevator drive, and recycle conveyor in the screen system; new controls for the dryer scrubber and the screen/mill scrubber; relocation of the pipe reactor feed tank system; relocation and modification of the DAP reactor system; relocation of the north fines bin; relocation of the reclaim water tank system; removal of the existing GTSP scrubber systems; and other associated alterations. The plant will discharge air pollutants through the existing MAP/DAP main stack (114,000 acfm/88,000 dscfm/129 ft. elevation/7.5 ft. diameter/108°F) and the new reactor-granulator stack (49,700 acfm/27,000 dscfm/129 ft. elevation/5.5 ft. diameter/178°F). The North MAP/DAP Granulation Plant is located at Farmland Hydro, L.P.'s phosphate fertilizer chemical manufacturing facility on County Road 640 West, near Bartow, Polk County, Florida. The UTM coordinates of this facility are Zone 17, 409.5 km E and 3079.5 km N.

PERMITTEE:
Farmland Hydro, L.P.

Permit Number: AC 53-210886
PSD-FL-186
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

- ✓ ~~13.~~ This plant shall not manufacture GTSP. ~~13.~~
- ✓ 14. The plant may operate continuously, 8760 hrs/yr.
- ✓ 15. Heat input to the dryer shall not exceed 50 MMBtu/hr. Only natural gas (max. 0.05 MMCF/hr) shall be burned in the dryer; except when the natural gas supply to the plant is curtailed, then No. 2 fuel oil with a maximum of 0.5% sulfur may be burned for up to 400 hrs during any 12 month period.
- ✓ 16. Lignosulphonates (lignin) shall be used when needed to control unconfined dust emissions when handling MAP and DAP product. Defoamers may be added to the 28% P₂O₅ scrubbing liquid.
- ✓ 17. Reasonable precautions for minimizing fugitive emissions of ammonia shall include routine inspection of vessels, piping, and hoses; placing scrubbers in operation prior to feeding ammonia to the process; and prompt repair of any leaks.

Testing Requirements

- ✓ 18. This plant shall be tested at a production rate of 108 to 120 TPH MAP and 90 to 100 TPH DAP within 60 days of commercial production of these products by the modified plant and annually thereafter for particulate matter, fluorides, and visible emissions. It shall also be tested for ammonia on achieving commercial production and prior to the renewal of any permit to operate issued for the modified plant (test every 5 years). The annual test during MAP and DAP production will be waived if that product is not manufactured during that year. All compliance tests shall meet the requirements listed in F.A.C. Rule 17-2.700. The unit shall not operate above the maximum permitted MAP or DAP production rates; except during the time of the compliance tests.
- ✓ 19. Test methods to determine compliance are EPA Method 5 for particulate matter, EPA Method 9 for visible emissions, and EPA 13A or 13B for fluorides. These methods are described in 40 CFR 60, Appendix A (July 1, 1991). Ammonia emissions shall be determined using a variation of the EPA Draft Method, using large impingers with 100 mls of 1.0 normal sulfuric acid in the first three impingers, the last impinger dry and a probe with an external design similar to that used in EPA Method 16, or any other test method agreed to by the Department.

Administrative Requirements

- 20. The Department's Southwest District shall be notified in

ATTACHMENT 2

Unit/Operation : Green Super Phosphoric Acid Plant

Permit No. : AC53-138041

Amendment Request :

The most recent construction permit in our files was issued November 19, 1987. The permit contains nitrogen oxides (NOx) emission limits of 40.5 pounds per hour and 90.0 tons per year. NOx emissions are a by-product of the process. To our knowledge, the emission limitation in the permit is not based on a standard for GSPA, nor does it reflect an emission limitation requested by Farmland to avoid a specific rule applicability (e.g. PSD, etc.).

It is requested that the construction permit be amended as follows:

Page 6, Specific Condition No. 2:

FROM: The emissions from the Green Superphosphoric Acid plant shall not exceed:

Pollutant	Maximum Allowable Emissions	
	pounds/hour	tons/year
NOx	40.5	90.0
Fluoride	0.2	0.4

TO: Emissions of fluorides from the Green Superphosphoric Acid plant shall not exceed 0.2 pounds per hour, or 0.4 tons/year.

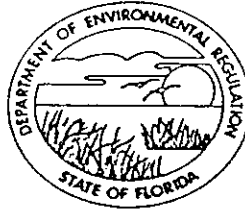
Page 6, Specific Condition No. 8:

FROM: Delete the portion of the condition which requires NOx testing.



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

PERMITTEE:
Farmland Inc.
P. O. Box 960
Bartow, Florida 33830

Permit Number: AC 53-138041
Expiration Date: October 31, 1988
County: Polk
Latitude/Longitude: 27° 50' 37" N
81° 56' 05" W
Project: Green Super Phosphoric
Acid Oxidation Unit

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 Department and made a part hereof and specifically described as follows:

For the construction of a Green Superphosphoric Acid (GSPA) plant located at the permittee's phosphate fertilizer complex near Bartow on State Road 640 in Polk County, Florida. UTM coordinates are 409.5 km E and 3079.5 km N.

Construction shall be in accordance with the attached permit application except as otherwise noted under the Specific Conditions set forth in this permit.

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER form 17-1.202(1), and letter dated August 7, 1987.
2. Southwest District DER letter dated October 16, 1987.
3. Farmland letter dated October 29, 1987, with attached letter from Koogler & Associates dated October 27, 1987.

PERMITTEE:
Farmland, Inc.

Permit Number: AC 53-138041
Expiration Date: October 31, 1988

SPECIFIC CONDITIONS:

2. The emissions from the Green Superphosphoric Acid plant shall not exceed:

Pollutant	Maximum Allowable Emissions	
	lb/hr	T/yr
NOx	40.5	90.0
Fluoride	0.2	0.4

3. Other emissions from the process shall be controlled by sealing and/or venting such emissions to the pollution abatement system.
4. The permittee shall install, calibrate, maintain, operate and record data from flow monitoring devices used to determine total P₂O₅ input to the plant. A daily record on the P₂O₅ input to the plant shall be maintained.
5. The permittee shall measure and record the total pressure drop across the scrubber system. Pressure drop across the scrubber must be at least 4 inches of water during plant operation. These records shall be maintained for 2 years and available for inspection by regulatory agency personnel on request.
6. Construction should commence and be completed within a reasonable time based on the projections in the application.
7. Reasonable precautions to prevent fugitive particulate emissions during modification, such as coating or spraying roads and construction sites used by contractors, shall be taken by the permittee.
8. Before the construction permit expires, the GSPA plant shall be sampled for NOx and fluoride emissions. Test procedures shall be in accordance with EPA reference methods 1, 2, 3, 7 and 7A or 7E, 13A or 13B as published in 40 CFR 60, dated July 1, 1986. The Department shall be notified in writing 15 days or more prior to the compliance test. The test shall be conducted at permitted production capacity or no less than 90% thereof. P₂O₅ input, pH of scrubber water, and pressure drop across the scrubber shall be reported to the Department along with the test data and results.

Final Determination

Farmland Industries
Polk County

Green Super Phosphoric Acid Oxidation Unit
Permit No. AC 53-138041

Florida Department of Environmental Regulation
Central Air Permitting
Bureau of Air Quality Management

November 17, 1987

Final Determination

The Bureau of Air Quality Management completed its review of Farmland's application for a permit to construct a Green Super Phosphoric Acid Oxidation Unit at their Polk County phosphate facility. On October 17, 1987, public notice of the Department's intent to issue the permit was published in the Lakeland Ledger. Copies of the Technical Evaluation and Preliminary Determination were available for public inspection at the Department's offices in Tampa and Tallahassee.

Comments were submitted by the applicant and the Southwest District DER office. The issues and the Department's responses are as follows:

Issue No. 1: Farmland requested a modification to Specific Condition No. 5 reducing the design minimum scrubber pressure drop to 4 inches of water.

The Department is in agreement with this request and the permit will be modified accordingly. If necessary, the minimum pressure drop can be changed again after results are obtained from the compliance test.

Issue No. 2: Farmland requested changes in the test methods specified in Specific Condition No. 8.

These changes were made as requested. NOx test method 7E was not included initially because 40 CFR 60, App. A, Method 7E, paragraph 1.1 states that the method is applicable only to those sources for which it is specified in the NSPS regulations, and Method 7E was not specified for nitric acid plants. Since this source is a one-of-a-kind unit with net emissions below the significant level, the Department agrees that method 7E will be sufficient.

Issue No. 3: The DER Southwest District office requested that a Specific Condition be added to require a maximum 10% opacity limit since the emissions are similar to those from a nitric acid plant.

Farmland has confirmed from their pilot plant data that the opacity will be less than 20% but likely will be more than 10%. Since it is possible that the opacity may be closer to 10% than 20% once fine tuning is completed, the Department is in agreement that a reasonable opacity limitation can be established after the plant starts up and is lined out. Language to this effect was included as Specific Condition No. 10. Since additional time will be needed for this determination, the permit expiration date was changed to October 31, 1988.

ATTACHMENT 3

Unit/Operation : No. 5 Sulfuric Acid Plant

Permit No. : AC53-185490

Amendment Request :

The above referenced permit contains emission limitations for nitrogen oxides. To our knowledge, this limitation in the permit is not based on a standard, nor does it reflect an emission limitation requested by Farmland to avoid a specific rule applicability. In fact FDEP's PSD review in 1989 (PSD-FL-143) acknowledged that NOx is a by-product of the sulfuric acid manufacturing process and there is no method of control to represent Best Available Control Technology for it. It is interesting to note that the PSD review at that time was triggered based on conservative projections of potential emissions from the project. Subsequent testing of the project, as built, have shown that a PSD review for NOx would not have been required if representative plant performance information was available during preconstruction review.

Based on the above discussion it is requested that the construction permit be amended as follows:

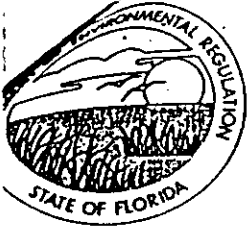
Page 6, Specific Condition No. 5:

Delete this condition regarding NOx emissions.

Page 6, Specific Condition No. 8:

Delete the portion of the condition which requires NOx testing.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Farmland Industries, Inc.
P. O. Box 960
Bartow, FL 33830

Permit Number: AC 53-185490
PSD-FL-143A
Expiration Date: Sept. 30, 1991
County: Polk
Latitude/Longitude: 27°50'37"N
81°56'05"W
Project: Sulfuric Acid Plant
No. 5 - Production Increase to
2400 TPD

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. 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 Department and made a part hereof and specifically described as follows:

For the increase in production from 2000 TPD to 2400 TPD of sulfuric acid in plant No. 5. The source is located at the permittee's existing facility near Bartow, Polk County, Florida. The UTM coordinates are Zone 17, 409.5 km East and 3079.5 km North.

The increase in production shall be carried out in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received on August 23, 1990.

PERMITTEE:
Armland Industries, Inc.

Permit Number: AC 53-185490
PSD-FL-143A
Expiration Date: September 30, 1991

SPECIFIC CONDITIONS:

4. Sulfuric acid mist emissions shall not exceed:

0.15 lb/ton of 100% sulfuric acid produced
15.0 lbs/hr
65.7 tons/yr

5. Nitrogen oxides emissions shall not exceed:

0.12 lb/ton of 100% sulfuric acid produced
11.9 lbs/hr
52.2 tons/year

6. Visible emissions shall not exceed 10% opacity.

7. Sulfuric acid plants No. 1 and No. 2 shall permanently cease operation within 90 days after the No. 5 sulfuric acid plant begins operation.

8. A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C. Rule 17-2.710. Initial and annual compliance tests shall be conducted using:

EPA Method 7 for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions

9. The compliance tests shall be conducted within 30 days after operation begins. The Department's Southwest District office shall be notified in writing 15 days prior to source testing and at least 5 days prior to initial startup. Written reports of the tests shall be submitted to that office within 45 days of test completion.

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).

11. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. The operation permit application shall include a set of conditions acceptable to the Department for sequential startup/shutdown of the permittee's three sulfuric acid plants. To

Technical Evaluation
and
Preliminary Determination

Farmland Industries, Inc.
Green Bay Complex
Bartow, Polk County, Florida

Sulfuric Acid Plant No. 5
Production Increase to 2,400 TPD

Permit No. AC 53-185490
PSD-FL-143A

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

November 15, 1990

III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for each of the regulated air pollutants. The proposed major source is subject to the preconstruction review requirements of F.A.C. Rule 17-2.500, Prevention of Significant Deterioration (PSD). The proposed increases in SO₂ and acid mist emissions exceed significant levels set forth in Table 500-2 of F.A.C. Rule 17-2.500. Preconstruction review must include a determination of best available control technology (BACT), good-engineering practice stack height, ambient impact analysis, impact on soils, vegetation, and visibility. F.A.C. Rules 17-2.660, Table 660-1, Section 60.80, and 17-2.700, Table 700-1, apply to this new major source. Emissions will be limited by the federal new source performance standards for sulfur dioxide, acid mist and visible emissions, and the previous BACT determination for NO_x (PSD-FL-143).

IV. Source Impact Analysis

A. Ambient Air Analysis

Analysis of ambient air impact from the proposed source generally involves assessment of existing air quality, a PSD increment analysis, and an ambient air quality standards analysis. Existing air quality must be established by monitoring data if the emissions from the new source will have an impact equal to or greater than that listed in F.A.C. Rule 17-2.500, Table 500-3, De Minimus Ambient Impacts. However, if it is shown, as here, that the net increase in ambient concentrations of applicable pollutants will be less than the de minimus concentrations listed in Table 500-3, the source is exempt from ambient monitoring as provided by F.A.C. Rule 17-2.500(3)(e). The following table summarizes results of air quality analysis for the proposed project:

	Ambient Impacts (ug/m ³)	Signif. Impact	De Minimus Impact
Sulfur Dioxide			
3-hr	0.01	25.0	N/A
24-hr	(less than 0.01)	5.0	13.0
Annual	(less than 0)	1.0	N/A
Acid Mist (24-hr)	5.0	N/A	5.0*

*No de minimus or significant impact levels have been established for acid mist. This figure was calculated based on adjusted threshold limit value (TLV) in order to arrive at an acceptable ambient level (AAL).

Technical Evaluation
and
Preliminary Determination

Farmland Industries, Inc.
Green Bay Complex
Bartow, Polk County, Florida

Sulfuric Acid Plant No. 5
Permit No. AC 53-171751
PSD-FL-143

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

December 21, 1989

	Air Pollutant (tons/yr)			GSPA	Net Increase	Signif. Increase
	1	2	5			
Sulfuric Acid Plants						
SO ₂						
Present	700	700				
Proposed	(700)	(700)	1460		60	40
Acid Mist						
Present	7.5	7.5				
Proposed	(7.5)	(7.5)	54.8		39.8	7
NO _x						
Present	25.2	25.2*		64.8		
Proposed	(25.2)	(25.2)	43.4	64.8	57.8	40

*Permanently shut down in 1985 but included for contemporaneous emission changes per F.A.C. Rule 17-2.500(2)(e)3.

III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for each of the regulated air pollutants. The proposed major source is subject to the preconstruction review requirements of F.A.C. Rule 17-2.500, Prevention of Significant Deterioration (PSD). The proposed increases in emissions exceed significant levels set forth in Table 500-2 of F.A.C. Rule 17-2.500. Preconstruction review must include a determination of best available control technology (BACT), good-engineering practice stack height, ambient impact analysis, impact on soils, vegetation, and visibility. F.A.C. Rules 17-2.660, Table 660-1, Section 60.80, and 17-2.700, Table 700-1, apply to this new major source. Emissions will be limited by the federal new source performance standards for sulfur dioxide, acid mist and visible emissions, and the BACT determination for NO_x.

IV. Source Impact Analysis

A. Ambient Air Analysis

Analysis of ambient air impact from the proposed source generally involves assessment of existing air quality, a PSD increment analysis, and an ambient air quality standards analysis. Existing air quality must be established by monitoring data if the emissions from the new source will have an impact equal to or greater than that listed in F.A.C. Rule 17-2.500, Table 500-3, De Minimus Ambient Impacts. However, if it is shown, as here, that the net increase in ambient concentrations of applicable pollutants will be less than the de minimus concentrations listed in Table 500-3, the source is exempt from ambient monitoring as provided by F.A.C. Rule 17-2.500(3)(e). The following table summarizes results of air quality analysis for the proposed project:



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

RECEIVED

FEB 15 1991

DER-BAQM

KA 123-90-02

February 14, 1991

Mr. C. H. Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Farmland Industries, Inc.
No. 5 Sulfuric Acid Plant
Request for Permit Amendment
Permit No. AC53-185490, PSD-FL-143A

Dear Mr. Fancy:

As discussed with Mr. John Reynolds of your staff on February 12, 1991, on behalf of Farmland Industries, Inc., two amendments to the above-referenced permit are hereby requested.

1. Specific Condition No. 5

To clarify the basis of the NO_x emission limit, the following change is requested:

FROM: Nitrogen oxides emissions shall not exceed:
0.12 lb/ton of 100% sulfuric acid produced
11.9 lbs/hr
52.2 tons/year

TO: Nitrogen oxides emissions shall not exceed:
0.12 lb/ton of 100% sulfuric acid produced
11.9 lbs/hr
52.2 tons/year

The above NO_x emission limits are based on a general emission factor. If a higher emission factor results from compliance testing, the NO_x emission limits may be revised after FDER review.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609



Mr. C.H. Fancy
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Mr. C. H. Fancy
Florida Department
of Environmental Regulation

February 14, 1991
Page 2

2. Specific Condition No. 8

To allow NOx compliance testing using EPA Method 7E, the following change is requested:

FROM: A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C Rule 17-2,710. Initial and annual compliance tests shall be conducted using:

EPA Method 7 for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions.

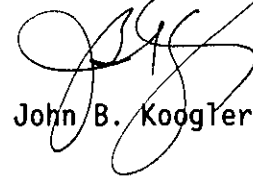
TO: A continuous emission monitor shall be used to monitor sulfur dioxide, in accordance with F.A.C Rule 17-2,710. Initial and annual compliance tests shall be conducted using:

EPA Method 7E for nitrogen oxides
EPA Method 8 for sulfur dioxide and acid mist
DER Method 9 for visible emissions.

If you have any questions, please do not hesitate to give me a call.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:PAR:wa

cc: Mr. Ed Ferking, Farmland
Mr. Gene Muir, Farmland
G. Reynolds
B. Thomas, SW Dist.

