

KOOGLER & 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

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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.

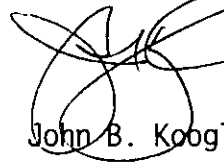
Mr. Clair H. Fancy
Florida Department of
Environmental Protection

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





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ENVIRONMENTAL SERVICES
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GAINESVILLE, FLORIDA 32609
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KA 123-94-05

August 21, 1995

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AUG 23 1995

Bureau of
Air Regulation

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

Subject: Farmland Hydro, L.P.
Sulfuric Acid Production Increase
AC 53-265755 and PSD-FL-225

Dear Mr. Linero:

This is in response to FDEP's Intent to Issue a construction permit for the above referenced project.

We appreciate the effort of the FDEP staff in preparing a well drafted and concise permit for the proposed project. We have only one comment on the FDEP's draft permit. It is our understanding that Specific Condition 1 refers to the sulfuric acid plants and the associated molten sulfur system addressed in this project review, and covered under PSD-FL-225.

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: Charles Jenkins, Farmland

CC: John Reynolds
Cleve Holladay

Farmland Hydro, L.P.

FAXED
8/21/95

Charles W. Jenkins
Manager
Environmental/Safety Services

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AUG 23 1995

Bureau of
Air Regulation

August 21, 1995

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

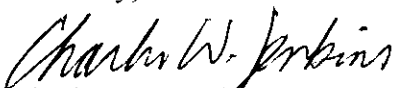
RE: AFFIDAVIT OF PUBLICATION

Dear Mr. Reynolds:

Please find enclosed the Affidavit of Publication of Intent to Issue. This is Construction Permit #AC53-265755.

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

Sincerely,



Charles W. Jenkins
Manager,
Environmental and Safety Services

Enclosures

CWJ:mmb/cwj12795

CC: B. Thomas
R. Harwood
NPS
EPA
Koosler



A Delaware Limited Partnership



AFFIDAVIT OF PUBLICATION

THE LEDGER Lakeland, Polk County, Florida

Case No.....

Attach Notice Here

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

PSD FL 225

.....in the

.....Court, was published in said newspaper in the issues of

August 12;

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 

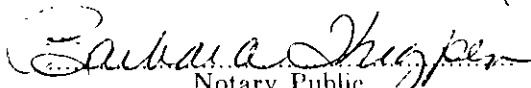
Classified Advertising Manager

by Robert E. Lee who is personally known to me

Sworn to and subscribed before me this..... 12th

.....day of August..... A.D. 19 95

(Seal)


Notary Public
BARBARA THIGPEN

My Commission Expires

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF INTENT TO ISSUE PERMIT PSD-FL-225

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit to Farmland Hydro, L.P., County Road 640 West, Bartow, Florida 33830. This company operates a phosphate fertilizer manufacturing facility at that address. The permit will allow the combined total sulfuric acid production rate of the Nos. 3, 4 and 5 plants to be increased from a total of 5,640 to 7,000 tons per day with only minor physical modifications required. A determination of Best Available Control Technology (BACT) was required since the proposed project is subject to Prevention of Significant Deterioration (PSD) regulations. BACT consists of employment of the Dual Absorption Process plus high efficiency mist eliminators. Modeling results indicate that the proposed project is not expected to cause or significantly contribute to any violation of the ambient air quality standards. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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. 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 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
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, Bureau of Air Regulation 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.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.
F166 - 8-12, 1995



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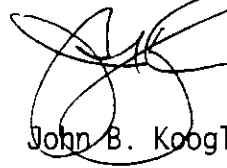
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