

Is your RETURN ADDRESS completed on the reverse side?

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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.

- extra fee):
- Addressee's Address
 - Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
 Charles Jenkins
 Sumland Hydro, LP
 P O Box 960
 Bartow, FL 33831

4a. Article Number
 P 265 659 459

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

7. Date of Delivery
 9/23/97

5. Received By: (Print Name)
 X Jean Hicks

6. Signature
 X Jean Hicks

PS Fo:

8. Addressee's Address (Only if requested and fee is paid)
 X 960

Thank you for using Return Receipt Service.

P 265 659 459.

US Postal Service
Receipt for Certified Mail

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

Sent to	Charles Jenkins
Street & Number	Sumland
Post Office, State, & 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, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	9-18-97
	1050053-015-AC PSD-FI-186

PS Form 3800, April 1995

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT MODIFICATION

In the Matter of an
Application for Permit Modification

Farmland Hydro, L.P.
Post Office Box 960
Bartow, Florida 33831

DEP File No. 1050053-015-AC
PSD-FL-186

Enclosed is the Final modified and reissued Permit Number PSD-FL-186 to combine the allowable emissions from the two stacks at Farmland Hydro's North monoammonium/diammonium phosphate plant, Polk County, into one limit for the process. The original air construction permit was issued pursuant to Rule 62-212.400, F.A.C.-Prevention of Significant Deterioration (PSD permit). This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9-18-97 to the person(s) listed:

*Mr. Charles Jenkins, Farmland Hydro, L.P. *
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Gerald Kissel, SWD
Mr. Roy Harwood, Polk Co.

Clerk Stamp

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

Keri Jober
(Clerk)

9-18-97
(Date)

FINAL DETERMINATION

Farmland Hydro, L.P.
Green Bay Plant

Modification of Permit No. AC53-210886/PSD-FL-186
AIR Permit No. 1050053-015-AC

An Intent to Issue an air construction permit modification for Farmland Hydro, L.P.'s North monoammonium/diammonium phosphate (MAP/DAP) plant located at the Green Bay facility at 4390 County Road 640 West near Bartow, Polk County, Florida was distributed on July 24, 1997. The Public Notice of Intent to Issue Air Construction Permit Modification was published in the Ledger on August 4, 1997. No comments were submitted in response to the public notice. Copies of the modification were available for public inspection at the Department offices in Tampa and Tallahassee.

The final action of the Department will be to issue the permit modification as proposed.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:

Farmland Hydro, L. P.
Post Office Box 960
Bartow, Florida 33831

FID No.:	1050053
PSD No.:	PSD-FL-186
SIC No.:	2874
Project:	Green Bay MAP/DAP Plant
Permit No.:	1050053-015-AC
Expires:	March 20, 1998

Authorized Representative:
Mr. Charles W. Jenkins
Manager of Environmental and Safety Services

PROJECT AND LOCATION:

Modified and reissued air construction and PSD permit for a monoammonium/diammonium phosphate plant at the Farmland Hydro, L.P. Green Bay facility at 4390 County Road 640 West near Bartow, Polk County. Modification combines separate allowable emission limits from two stacks serving a single emission unit into a set of emission limits for the individual process. UTM coordinates are Zone 17; 409.50 km E; 3080.10 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached Appendices and Tables made a part of this permit:

Appendix GC
Appendix SC

Construction Permit General Conditions
Emission Unit(s) Common Specific Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

APPENDIX SC
SPECIFIC CONDITIONS

1. This permit supersedes permit AC53-210886 (PSD-FL-186), dated July 28, 1992 and its revisions dated November 8, 1993, February 23, 1994, April 19, 1994, and December 21, 1995.

The provisions of the air construction permit AC53-210886 (PSD-FL-186), dated July 28, 1992 and the revisions to that permit, attached and listed above, are incorporated into this air construction permit except for the changes that follow in Specific Condition No. 2 below.

2. Previous Specific Condition No. 5 is changed as follows:

Emissions from the modified plant shall not exceed any of the limits listed for fluorides and particulate matter in the following tables:

MAP PRODUCTION

<u>Pollutant</u>		<u>Main Stack</u>	<u>R/G Stack</u>	<u>Plant Total</u>
Fluorides	lbs/ton P ₂ O ₅	--	--	0.06
	lbs/hr	1.87	1.87	3.74
	TPY	8.2	8.2	16.4
Particulate Matter	lbs/hr	15.9	6.6	22.5
	TPY	69.6	29.0	98.6
Ammonia*	lbs/hr	7.0	30.9	37.9
	TPY	30.7	135.5	166.2

DAP PRODUCTION

<u>Pollutant</u>		<u>Main Stack</u>	<u>R/G Stack</u>	<u>Plant Total</u>
Fluorides	lbs/ton P ₂ O ₅	--	--	0.06
	lbs/hr	1.60	1.16	2.76
	TPY	7.0	5.1	12.1
Particulate Matter	lbs/hr	10.6	5.5	16.1
	TPY	46.5	24.2	70.7
Ammonia*	lbs/hr	5.2	128.7	133.9
	TPY	22.7	563.7	586.4

*Ammonia emission estimates (24-hour averages) listed in these tables are for inventory purposes only. Should the ammonia emissions exceed the listed estimates, the permittee shall model the maximum ammonia emissions to show that the Acceptable Ambient Concentration for ammonia of 100 ug/m³ (annual average) is not being exceeded and submit a report on these results to the Southwest District.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (*X*)
 - (b) Determination of Maximum Achievable Control Technology ()
 - (c) Determination of Prevention of Significant Deterioration (*X*); and
 - (d) Compliance with New Source Performance Standards (*X*).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy
Al Linero *ACL 9/15*

FROM: Willard Hanks

DATE: September 15, 1997

SUBJECT: Farmland Hydro, L.P.
Modification of Permit No. AC53-210886, PSD-FL-186

WILLARD

Attached for your approval and signature is a reissued and revised PSD construction permit for Farmland's MAP/DAP plant located in Polk County near Bartow.

This revision will combine the allowable emissions between the two stacks serving this plant. This is allowable and appropriate because the two stacks serve a single emission unit. Emission limits for the NSPS for fertilizer processes are normally done on an emission unit basis. The combined emission standard will not result in an increase in the permitted emissions or production. This action does not constitute "bubbling."

I recommend your approval and signature.

CHF/wh

Attachments

Check Sheet

Company Name: Farmland Hydro
Permit Number: LP-1050053-015-AC
PSD Number: PSD-FL-186
Permit Engineer: Willard Hanks

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Cross References:

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other

- Proof of Publication
 - Petitions - (Related to extensions, hearings, etc.)
 - Waiver of Department Action
 - Other

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

Farmland Hydro, L.P.

Charles W. Jenkins
Manager of Environmental and Safety Services



Green Bay Plant
County Road 640
Post Office
Bartow, Florida 33831
Tele: 941 533-1141
Fax: 941 533-8793

RECEIVED
AUG 06 1997
BUREAU OF
AIR REGULATION

August 6, 1997

Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, Mail Station #5505
Tallahassee, FL 32399-2400

RECEIVED
AUG 06 1997
BUREAU OF
AIR REGULATION

Attention: Kim Tober

Re: Affidavit of Publication on Air Permit No. AC53-210886

RECEIVED
AUG 07 1997
BUREAU OF
AIR REGULATION

Dear Ms. Tober:

Enclosed please find the signed and notarized Affidavit of Publication for the above referenced Air Construction Permit modification. Please call me at (941) 533-1141, extension 334 with any questions or concerns regarding this matter.

Sincerely,

Charles W. Jenkins
Manager of Environmental and Safety Services

CWJ:jp\200-97
enc.

cc: Merle Farris

CC: W. Hanks, BAR
B. Thomas, SWD
EPA
NPS



AFFIDAVIT OF PUBLICATION

THE LEDGER Lakeland, Polk County, Florida

Case No

STATE OF FLORIDA)
COUNTY OF POLK)

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

Public Notice Of Intent

in the matter of

No. 1050053-015-AC (PSD-FL-186)


in the

Court, was published in said newspaper in the issues of

August 4;

1997

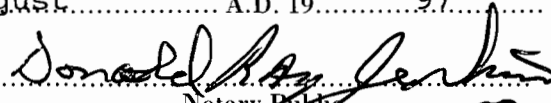
Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said 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.

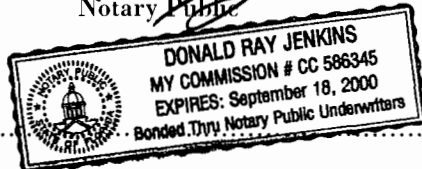
Signed 
Nelson Kirkland
Classified Advertising Manager
By Nelson Kirkland who is personally known to me

Sworn to and subscribed before me this 4th

day of August A.D. 19..... 97

(Seal)


Notary Public



My Commission Expires

Order#637937
L

A527

**PUBLIC NOTICE OF INTENT TO ISSUE
AIR CONSTRUCTION PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT Permit Modification No. 1050053-015-AC, (PSD-FL-186)
Green Bay Facility
Polk County**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Farmland Hydro, L.P. for the North monoammonium/diammonium phosphate (MAP/DAP) plant located at the Green Bay Facility at 4390 County Road 640 West near Bartow in Polk County. The previous Best Available Control Technology (BACT) determination for fluoride emissions will be modified. The applicant's name and address are: Farmland Hydro, L.P. Post Office Box 960, Bartow, Florida, 33831.

The modification is to combine the allowable emissions from the two stacks serving the same process into a single limit for the two stacks. The modification does not authorize an increase in production or emissions from the plant. Neither actual nor allowable emissions will increase as a result of this revision.

Total emissions from the main stack and the reactor/granulator stack shall not exceed the following limits:

Pollutant	Maximum Emissions		Production	Product
	lbs/hr	TPY		
Fluoride	3.74	16.4	120 TPH	MAP
Particulate Matter	22.5	98.6	120 TPH	MAP
Fluoride	2.76	12.1	100 TPH	DAP
Particulate Matter	16.1	70.5	100 TPH	DAP

A new air quality impact analysis was not required as part of this modification. Emissions from this plant already consume PSD increment but do not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Modification with the conditions of the DRAFT Permit Modification unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9370, fax: 850/487-4938. Petitions 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. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) 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 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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 of intent. 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.

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement, and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

A complete project file 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 Telephone: 850/488-1344 Fax: 850/922-6979	Department of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, Florida 33610 Telephone: 813/744-6100 Fax: 813/744-6458
--	--

The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-1344, for additional information.

A-527 - 8-4; 1997

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: 941 533-1141
Fax: 941 533-8793

June 16, 1997

RECEIVED

JUN 24 1997

**BUREAU OF
AIR REGULATION**

Mr. A. A. Linero, P.E.
Administrator
Florida Department of Environmental Protection
New Source Review Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: **Revision to Permit No. AC53-210886**
AIRS I.D. No. 1050053-029 015

Dear Mr. Linero:

The following information is offered in response to your letter of June 12, 1997. The specific request for additional information is repeated in italics and the appropriate answer follows each.

1. *Your request addresses the fluoride standard only. Each stack also has a PM standard. Are you requesting a facility PM standard also?*

Yes. The facility has two granulation trains, North and South. The most recent one to obtain a Construction Permit (AC53-272210 the South Train) has two stacks also, a Reactor/Granulator stack and a Dryer Stack. This most recent facility obtained limits for fluoride and particulate which apply to the combined stacks without individual allocation. We desire the same for this facility.

2. *Please provide a summary of all of the fluoride and particulate matter (PM) emission test results for each stack since the modifications authorized by permit No. AC53-210886 were completed. Include the product (MAP or DAP) and production rate during each test.*

See the enclosed tables.

3. *The hourly MAP and DAP production for this plant is limited by Specific Condition No. 8 of permit No. AC53-210886. Has the plant operated at its maximum permitted production limit? Are you planning on operating above these hourly rates if the facility wide standard is granted?*



A.A. Linero

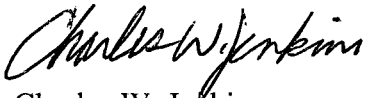
2.

June 16, 1997

This plant has operated with DAP at a production rate maximum of 95% of Specific Condition No. 8 permitted limit of 100 TPH metric. The plant has been operated on MAP product at a maximum of the permitted rate of 120 TPH metric. We do not at this time request a rate change for this facility.

Should you have any questions or other concerns, please don't hesitate to call me at (941) 533-1141, extension 334.

Sincerely,



Charles W. Jenkins
Manager of Environmental and Safety Services

CWJ:jp\158-97
enc.

cc: W. Hanks, BAR
S W D

GRANULATION NORTH STACK RESULTS
MAP Product

STACK & EMISSION			STACK TEST YEAR			
			1994	1995	1996	1997
R	Reactor/Granulator	F - lb/hr	0.083	1.059	0.317	1.990
U	“	PM - lb/hr	0.940	2.266	2.588	1.490
N	“	Rate TPH	108.7	107.9	112.8	120.0
#1	“	Flow ACFM	57,089	63,677	52,521	62,359
R	Reactor/Granulator	F - lb/hr	0.074	1.123	0.061	1.912
U	“	PM - lb/hr	0.857	2.610	3.292	1.489
N	“	Rate TPH	108.7	107.9	112.8	120.0
#2	“	Flow ACFM	56,493	66,023	56,819	62,764
R	Reactor/Granulator	F - lb/hr	0.915	0.290	0.041	2.318
U	“	PM - lb/hr	1.570	1.846	2.121	1.538
N	“	Rate TPH	108.7	107.9	112.8	120.0
#3	“	Flow ACFM	56,523	64,102	56,057	61,339
R	Dryer/SM/Cooler	F - lb/hr	0.700	0.710	0.616	0.474
U	“	PM - lb/hr	5.413	13.194	6.240	2.096
N	“	Rate TPH	108.4	119.4	112.6	120.0
#1	“	Flow ACFM	141,806	142,741	126,320	166,537
R	Dryer/SM/Cooler	F - lb/hr	0.645	0.787	0.781	0.378
U	“	PM - lb/hr	7.192	6.780	8.691	2.741
N	“	Rate TPH	108.4	119.4	112.6	120.0
#2	“	Flow ACFM	142,105	140,974	126,587	169,063
R	Dryer/SM/Cooler	F - lb/hr	0.537	0.753	0.655	0.346
U	“	PM - lb/hr	5.024	11.493	8.596	2.967
N	“	Rate TPH	108.4	119.4	112.6	120.0
#3	“	Flow ACFM	142,102	143,552	128,203	167,088

GRANULATION NORTH STACK RESULTS
DAP Product

STACK & EMISSION			STACK TEST YEAR			
			1994	1995	1996	1997
R	Reactor/Granulator	F - lb/hr	0.107	0.877	0.178	0.320
U	"	PM - lb/hr	0.432	2.199	0.896	0.595
N	"	Rate TPH	81.8	88.9	84.6	94.7
#1	"	Flow ACFM	56,291	65,769	53,478	66,501
R	Reactor/Granulator	F - lb/hr	0.152	0.432	0.127	0.186
U	"	PM - lb/hr	0.688	3.083	0.978	0.185
N	"	Rate TPH	81.8	88.9	84.6	94.7
#2	"	Flow ACFM	58,206	66,223	53,370	67,615
R	Reactor/Granulator	F - lb/hr	0.123	0.249	0.071	0.218
U	"	PM - lb/hr	0.602	0.354	0.950	0.740
N	"	Rate TPH	81.8	88.9	84.6	94.7
#3	"	Flow ACFM	57,926	67,610	55,189	66,198
R	Dryer/SM/Cooler	F - lb/hr	0.743	0.831	0.623	0.820
U	"	PM - lb/hr	1.148	2.420	2.677	11.415
N	"	Rate TPH	87.7	88.5	80.6	96.2
#1	"	Flow ACFM	136,076	140,913	132,626	173,444
R	Dryer/SM/Cooler	F - lb/hr	0.725	0.784	0.706	0.834
U	"	PM - lb/hr	0.950	3.431	2.635	5.674
N	"	Rate TPH	87.7	88.5	80.6	96.2
#2	"	Flow ACFM	135,798	139,158	132,648	169,746
R	Dryer/SM/Cooler	F - lb/hr	0.783	0.834	0.765	0.685
U	"	PM - lb/hr	1.447	2.857	1.768	3.031
N	"	Rate TPH	87.7	88.5	80.6	96.2
#3	"	Flow ACFM	136,347	139,858	133,977	174,987

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Charles W. Jenkins
Manager of Env. & Safety Serv.
Fairland Hydro, LP
PO Box 960
Bartow, FL 33831

4a. Article Number

P 265 659 243

4b. Service Type

- Registered
- Express Mail
- Return Receipt for Merchandise
- Certified
- Insured
- COD

7. Date of Delivery

7/24/97

5. Received By: (Print Name)

Jean Hicks

6. Signature: (Addressee or Agent)

X

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

X 960

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 243

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to

Charles Jenkins

Street & Number

Fairland Hydro

Post Office, State, & 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, & Addressee's Address

TOTAL Postage & Fees

\$

Postmark or Date

7-24-97

1050053-015-AC

PSD-FL-186

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 24, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles W. Jenkins
Manager of Environmental and Safety Services
Farmland Hydro, L.P.
Post Office Box 960
Bartow, Florida 33831

Re: DRAFT Air Construction Permit Modification AC53-210886, PSD-FL-186
File No. 1050053-015-AC
Green Bay Plant


Dear Mr. Jenkins:

Enclosed is one copy of the Draft Air Construction Permit Modification for the MAP/DAP plant at your Green Bay plant located near Bartow, Polk County. The Department's Intent to Issue Air Construction Permit Modification and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (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 modification.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any questions on this matter, please contact Mr. Willard Hanks or Mr. Linero at 850/488-1344.

Sincerely,


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

CHF/wh
Enclosures

In the Matter of an
Application for Permit Modification by:

Farmland Hydro, L.P.
Post Office Box 960
Bartow, Florida 33831 /

DRAFT Permit Nos. AC53-210886, PSD-FL-186
File No. 1050053-015-AC
Green Bay Plant / Polk County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of DRAFT Permit modification attached) for the proposed project, as detailed in the application specified above, for the reasons stated below.

The applicant, Farmland Hydro, L.P., applied on May 21, 1997, to the Department for an air construction permit modification for its Green Bay Plant located at 4390 County Road 640 West near Bartow, Polk County. The modification will combine the permitted emissions between the two stacks serving the North monoammonium and diammonium phosphate granulation plant instead of allotting a specific emission limit for each plant stack.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit modification, including reissuance of the expired permit, is required to reallocate the allowable emissions for this plant.

The Department intends to issue this air construction permit modification based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

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 "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION". The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "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. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax 850/ 922-6979) within 7 (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 modification pursuant to Rule 62-103.150 (6), F.A.C.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the enclosed DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION." Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., or a party requests mediation as an alternative remedy under Section 120.573 F.S. before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9730, fax: 850/487-4938. Petitions 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. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) 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 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

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 of intent. 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.

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and

documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

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.

Executed in Tallahassee, Florida.



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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION (including the PUBLIC NOTICE, and DRAFT permit modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7-24-97 to the person(s) listed:

Mr. Charles W. Jenkins, Farmland Hydro L.P. *
Mr. Gerald Kissel, SWD
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS

Clerk Stamp

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

Keri Joben
(Clerk)

7-24-97
(Date)

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit Modification No. 1050053-015-AC, (PSD-FL-186)
Green Bay Facility
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Farmland Hydro, L.P. for the North monoammonium/diammonium phosphate (MAP/DAP) plant located at the Green Bay Facility at 4390 County Road 640 West near Bartow in Polk County. The previous Best Available Control Technology (BACT) determination for fluoride emissions will be modified. The applicant's name and address are: Farmland Hydro, L.P., Post Office Box 960, Bartow, Florida, 33831.

The modification is to combine the allowable emissions from the two stacks serving the same process into a single limit for the two stacks. The modification does not authorize an increase in production or emissions from the plant. Neither actual nor allowable emissions will increase as a result of this revision.

Total emissions from the main stack and the reactor/granulator stack shall not exceed the following limits:

<u>Pollutant</u>	<u>Maximum Emissions</u>		<u>Production</u>	<u>Product</u>
	<u>lbs/hr</u>	<u>TPY</u>		
Fluoride	3.74	16.4	120 TPH	MAP
Particulate Matter	22.5	98.6	120 TPH	MAP
Fluoride	2.76	12.1	100 TPH	DAP
Particulate Matter	16.1	70.5	100 TPH	DAP

A new air quality impact analysis was not required as part of this modification. Emissions from this plant already consume PSD increment but do not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Modification with the conditions of the DRAFT Permit Modification unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9370, fax: 850/487-4938. Petitions 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. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) 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 28-5.207 of the Florida Administrative Code.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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 of intent. 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.

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

A complete project file 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
Telephone: 850/488-1344
Fax: 850/922-6979

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33610
Telephone: 813/744-6100
Fax: 813/744-6458

The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-1344, for additional information.

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Farmland Hydro, L.P.

**Green Bay Plant Unit No. 029
North Monoammonium/Diammonium
Phosphate Granulation Plant
Bartow, Florida
Polk County**

Air Construction Permit Modification No. AC53-210886
File No. 1050053-015-AC
PSD-FL-186

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

July 24, 1997

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. APPLICATION INFORMATION

1.1 *Applicant Name and Address*

Farmland Hydro, L.P.
Post Office Box 960
Bartow, Florida 33830

Authorized Representative

Mr. Charles W. Jenkins
Manager of Environmental and Safety Services

1.2 *Reviewing and Process Schedule*

05/21/97 Date of Receipt of Application
06/12/97 Date of Request for Additional Information
06/24/97 Date of Receipt of Additional Information

2. FACILITY INFORMATION

2.1 *Facility Location*

This existing phosphate fertilizer chemical plant is located in Polk County at 4390 County Road 640 West near Bartow, Florida 33830. The UTM Coordinates of this site are Zone 17, 409.50 km E and 3080.10 km N.

2.2 *Standard Industrial Classification Code (SIC)*

Major Group No.	28	Chemicals and Allied Products
Group No.	287	Agricultural Chemicals
Industry No.	2874	Monoammonium/diammonium phosphate production.

2.3 *Facility Category*

The Green Bay plant is classified as a major air pollutant emitting facility. Air pollutant emissions are over 100 TPY for particulate matter (PM/PM₁₀) and sulfur dioxide (SO₂). Fluorides are emitted in significant rates.

This facility is on the list of the 28 Major Facility Categories, Table 62-212.400-1. This facility is also classified as a Title V facility.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

3. PROJECT DESCRIPTION

3.1 *This permit addresses the following emissions units:*

EMISSION UNIT No.	SYSTEM	EMISSION UNIT DESCRIPTION
ARMS No.	029	North MAP/DAP Granulation Plant

The applicant requested the air permit be modified to combine the allowable emissions between the two stacks serving the North MAP/DAP Granulation Plant into one limit for the plant.

Farmland Hydro, L.P. requested that the allowable emissions from the two stacks for the North monoammonium/diammonium granulation plant in permit No. AC53-210886 be combined into one emission standard for the plant. The results of a recent test that was conducted near permitted capacity of the plant showed one stack, controlling the dryer, screen, and mills in this plant, had lower than allowed emissions. The other stack for the reactor and granulator section of the plant was emitting just above its permitted limit. Other test data on this plant show similar results. The applicant has requested that the Department set a single emissions unit (both stacks) standard, similar to that required by the new source performance standard for diammonium phosphate plants (40CFR60, Subpart V), instead of separate emission limits for each stack. This will remove the arbitrary allocation of emissions and allow the plant to comply with the emission limits for the process. It will not, in itself, allow the plant to increase production. Production of the plant is presently limited by specific condition No. 8 of permit No. AC53-210886 to the quantities listed in the application for this permit. A separate permit modification would be required to increase production from the plant, even if the allowable emissions at higher production were not increased.

4. PROCESS DESCRIPTION

4.1 *General Information*

Ammonia and phosphoric acid are mixed to form MAP and DAP in various process equipment. The material is then dried and screened. Emissions from the plant are routed to the stack serving the dryer, cooler, screens and mills, and the stack serving the reactor and granulator. The pollutants emitted are particulate matter, fluorides, and ammonia. Ammonia is not regulated directly by the Department.

5. RULE APPLICABILITY

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

This facility is located in Polk County, an area designated unclassifiable for lead and PM₁₀, and classified as attainment for all other criteria pollutants in accordance with Rule 62-204.340, F.A.C. The proposed project is not subject to review under Rule 62-212.400., F.A.C., Prevention of Significant Deterioration (PSD), because the allowable emissions of fluorides and particulate matter are not being increased.

The emission units affected by this permit amendment shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules:

Chapter 62-4	Permits.
Rule 62-204.220	Ambient Air Quality Protection
Rule 62-204.240	Ambient Air Quality Standards
Rule 62-204.260	Prevention of Significant Deterioration Increments
Rule 62-204.360	Designation of Prevention of Significant Deterioration Areas
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-212.400	Prevention of Significant Deterioration
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-297.310	General Test Requirements
Rule 62-297.400	EPA Methods Adopted by Reference
Rule 62-297.401	EPA Test Procedures
Rule 62-297.520	EPA Performance Specifications

6. SOURCE IMPACT ANALYSIS

6.1 *Emission Limitations*

The emission unit will emit the following PSD pollutants (Table 212.400-2): particulate matter, and fluorides. The permitted allowable emissions for this unit are summarized in the following table.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

6.2 Emission Summary

EMISSION UNIT 029

		<u>Current Allowable Emissions</u>			<u>Proposed Emission Limit</u>
MAP Production		Main Stack	R/G Stack	PLT. Total	Proposed Plt.
Fluorides	lbs/TP2O5			0.06	0.06
	lbs/hr	1.87	1.87	3.74	3.74
	TPY	8.2	8.2	16.4	16.4
PM	lbs/hr	15.9	6.6	22.5	22.5
	TPY	69.6	29.0	98.6	98.6
DAP Production					
Fluorides	lbs/TP2O5			0.06	0.06
	lbs/hr	1.6	1.16	2.76	2.76
	TPY	7.0	5.1	12.1	12.1
PM	lbs/hr	10.6	5.5	16.1	16.1
	TPY	46.5	24.2	70.7	70.7

Footnotes:

Maximum allowable MAP production: 62.4 TPH P2O5

Maximum allowable DAP production: 46 TPH P2O5

6.3 Control Technology Review

The BACT document describes the control technology used at this plant. This modification does not authorize a change in the control equipment for this plant. The modification combines the allowable emissions from the two stacks into one limit for this plant.

6.4 Air Quality Analysis

An air quality analysis was not conducted for the proposed modification. As the modification does not authorize an increase in emissions, the ambient air impact of the emissions should not change.

7. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by Farmland Hydro L.P., the Department has made a preliminary determination that

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

the proposed project will comply with all applicable state and federal air pollution regulations provided the Department's revised Best Available Control Technology Determination is implemented and certain conditions are met. The General and Specific Conditions are listed in the original permit.

Permit Engineer: Willard Hanks

Reviewed and Approved by A. A Linero, P.E.

DRAFT

PERMITTEE:

Farmland Hydro, L. P.
Post Office Box 960
Bartow, Florida 33831

Authorized Representative:
Mr. Charles W. Jenkins
Manager of Environmental and Safety Services

Permit No.	AC53-210886
PSD No.	PSD-FL-186
File No.	1050053-015-AC
Expires No.	March 20, 1998
Facility	Green Bay Plant

LOCATED AT:

Farmland Hydro, L. P., Green Bay Plant
Project: North Monoammonium/Diammonium Plant
Standard Industrial Classification Code (SIC): 2874
Polk County, Florida

Location: UTM Zone 17; 409.50 km E ; 3080.10 km N
Directions: 4390 County Road 640 West, near Bartow, Polk County

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached Appendices and Tables made a part of this permit:

Appendix GC
Appendix CSC

Construction Permit General Conditions
Emission Unit(s) Common Specific Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

APPENDIX SC SPECIFIC CONDITIONS

1. This permit supersedes permit AC53-210886 (PSD-FL-186), dated July 28, 1992 and its revisions dated November 8, 1993, February 23, 1994, April 19, 1994, and December 21, 1995.

The provisions of the air construction permit AC53-210886 (PSD-FL-186), dated July 28, 1992 and the revisions to that permit, attached and listed above, are incorporated into this air construction permit except for the changes that follow in Specific Condition No. 5

2. Previous Specific Condition No. 5 is changed as follows:

FROM:

Emissions from the modified plant shall not exceed any of the limits listed for fluorides and particulate matter in the following tables:

MAP PRODUCTION

<u>Pollutant</u>		<u>Main Stack</u>	<u>R/G Stack</u>	<u>Plant Total</u>
Fluorides	lbs/TP2O5	--	--	0.06
	lbs/hr	1.87	1.87	3.74
	TPY	8.2	8.2	16.4
Particulate Matter	lbs/hr	15.9	6.6	22.5
	TPY	69.6	29.0	98.6
Ammonia*	lbs/hr	7.0	30.9	37.9
	TPY	30.7	135.5	166.2

DAP PRODUCTION

<u>Pollutant</u>		<u>Main Stack</u>	<u>R/G Stack</u>	<u>Plant Total</u>
Fluorides	lbs/TP2O5	--	--	0.06
	lbs/hr	1.60	1.16	2.76
	TPY	7.0	5.1	12.1
Particulate Matter	lbs/hr	10.6	5.5	16.1
	TPY	46.5	24.2	70.7
Ammonia*	lbs/hr	5.2	128.7	133.9
	TPY	22.7	563.7	586.4

*Ammonia emission estimates (24-hour averages) listed in these tables are for inventory purposes only. Should the ammonia emissions exceed the listed estimates, the permittee shall model the maximum ammonia emissions to show that the Acceptable Ambient Concentration for ammonia of 100 ug/m³ (annual average) is not being exceeded and submit a report on these results to the Southwest District.

APPENDIX SC SPECIFIC CONDITIONS

TO:

Emissions from the modified plant shall not exceed any of the limits listed for fluorides and particulate matter in the following tables:

MAP PRODUCTION

<u>Pollutant</u>		<u>Plant Total</u>
Fluorides	lbs/TP2O5	0.06
	lbs/hr	3.74
	TPY	16.4
Particulate Matter	lbs/hr	22.5
	TPY	98.6
Ammonia*	lbs/hr	37.9
	TPY	166.2

DAP PRODUCTION

<u>Pollutant</u>		<u>Plant Total</u>
Fluorides	lbs/TP2O5	0.06
	lbs/hr	2.76
	TPY	12.1
Particulate Matter	lbs/hr	16.1
	TPY	70.7
Ammonia*	lbs/hr	133.9
	TPY	586.4

*Ammonia emission estimates (24-hour averages) listed in these tables are for inventory purposes only. Should the ammonia emissions exceed the listed estimates, the permittee shall model the maximum ammonia emissions to show that the Acceptable Ambient Concentration for ammonia of 100 ug/m³ (annual average) is not being exceeded and submit a report on these results to the Southwest District.

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (*X*)
 - (b) Determination of Prevention of Significant Deterioration (*X*); and
 - (c) Compliance with New Source Performance Standards (*X*).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy
THRU: Al Linero *ALJ 7/23*
FROM: Willard Hanks *isml*
DATE: July 23, 1997
SUBJECT: Farmland Hydro, L.P.
Amendment of Permit No. AC53-210886, PSD-FL-186

Attached is a reissued and revised PSD construction permit for Farmland's MAP/DAP plant located in Polk County near Bartow.

This revision will combine the allowable emissions between the two stacks serving this plant. The combined emission standard will not result in an increase in the permitted emissions or production.

I recommend your approval and signature.

CF/wh

Attachments



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

P.E. Certification Statement

Permittee:

Farmland Hydro, L.P.
Green Bay Plant

Permit No.: AC53-210886

File ID No.: 1050053-015-AC

PSD-FL-186

Project type: Air Construction Permit Reissue and Permit Modification

This project is a permit reissuance and modification that will combine the permitted emissions between the two stacks serving a single process (the North MAP/DAP Plant) instead of allotting a specific emission limit for each plant stack. No emissions increases or production increases are associated with this permitting action.

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

A.A. Linero, P.E.

Registration Number: 26032

7/23/97

Date

Department of Environmental Protection
Bureau of Air Regulation
New Source Review Section
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Phone (850) 488-1344
Fax (850) 922-6979



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

Fold at line over top of envelope

Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ 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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Charles W. Jenkins Farmland Hydro, CP P O Box 640 Bartow, FL 33831	4a. Article Number P 265 659 223	
	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
	7. Date of Delivery 6/16/97	
5. Received By: (Print Name) Denise Burney	8. Addressee's Address (Only if requested and fee is paid) \$ 960	
6. Signature: (Addressee or Agent) X Denise Burney		
PS Form 3811, December 1994		Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 223

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

Sent to Charles Jenkins	
Street & Number Farmland Hydro	
Post Office, State, & 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, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 1050053-015-AC 6-12-97	

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 12, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles W. Jenkins
Manager of Environmental and Safety Services
Farmland Hydro, L.P.
Post Office Box 640
Bartow, Florida 33831

Re: Revision to Permit No. AC53-210886
AIRS I.D. No. 1050053-015-AC

Dear Mr. Jenkins:

The Department has reviewed your request to amend the referenced permit for the North Monoammonium (MAP)/Diammonium (DAP) Granulation Plant by replacing the emission limits for the two stacks by one emission limit for the facility. Additional information is needed to process this request.

1. Your request addresses the fluoride standard only. Each stack also has a PM standard. Are you requesting a facility PM standard also?
2. Please provide a summary of all of the fluoride and particulate matter (PM) emission test results for each stack since the modifications authorized by permit No. AC53-210886 were completed. Include the product (MAP or DAP) and production rate during each test.
3. The hourly MAP and DAP production for this plant is limited by Specific Condition No. 8 of permit No. AC53-210886. Has the plant operated at its maximum permitted production limit? Are you planning on operating above these hourly rates if the facility wide standard is granted?

The Department will resume processing your application after receipt of the requested information. If you have any questions of this matter, please call Willard Hanks at 904/488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/wh/t

cc: Gerald Kissel, SWD

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: 941 533-1141
Fax: 941 533-8793

May 12, 1997

RECEIVED

MAY 21 1997

**BUREAU OF
AIR REGULATION**

Mr. A. A. Linero
Florida Department of Environmental Protection
Bureau of Air Regulations
2600 Blairstone Road
Tallahassee, FL 32399-2400

RE: **Application for Minor Revision to Construction Permit AC53-210886 and
Amendment to Title V Application Facility No. 1050053 - (015-AC)**

Dear Mr. Linero;

Enclosed please find a check in the amount of \$250.00 and four copies of a Long Form Air Permit Application to make a minor change to the North Granulation Plant Construction Permit issued in mid 1992, # AC53-210886. This permit covers a normal granulated fertilizer production facility with two separate stacks and the capability to produce either granular MAP or DAP. One stack is for the reaction and granulation functions and the other to vent the gasses from the dryer, screens and mills and cooler. Our most recent North Granulation Plant stack compliance test involving the production of granular MAP yielded the following results for the pollutant fluoride:

RUN #	Dryer/Cooler Screen & Mills	Reactor/Gran. Stack	Total Plant	
	F - lb/hr	F - lb/hr	lb/hr	lb/ton
1	0.474	1.990	2.464	0.039
2	0.378	1.912	2.290	0.036
3	0.346	2.318	2.664	0.042
Ave.	0.400	2.073	2.473	0.039
Total Plant Permitted			3.740	0.060

Our problem is that the original Construction Permit AC53-210886 and the subsequent Operating Permit AO53-250142 contain an allocation for fluoride of 1.87 pounds per hour for each of these stacks. This allocation estimate was made based on best engineering judgment at the time. It was understood by us that the allocation of fluorides could be changed later based on actual test data. This is not considered to be a significant issue, as the applicable standard is the NSPS of 0.06 pounds per ton of P₂O₅ fed.



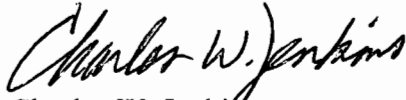
A Delaware Limited Partnership



It is our hope that we can have the existing permit and Title V application amended to remove individual stack allocations of fluoride and make the permit reflect a combined limit. As I understand, the FDEP has agreed, in principle, to remove requirements from existing permits which have no rule basis and which do not affect rule applicability.

If you have any questions, please give me a call at (941) 533-1141, extension 334.

Sincerely,



Charles W. Jenkins
Manager of Environmental and Safety Services

CWJ:jp\120-97
enclosures

cc Merle Farris

cc: SWD



Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

See Instructions for Form No. 62-210.900(2)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and the professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application


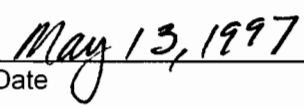
Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: Farmland Hydro, L.P.	
2. Site Name: Green Bay Plant	
3. Facility Identification Number: 1050053 [] Unknown	
4. Facility Location: Street Address or Other Locator: 4390 CR 640 West City: Bartow County: Polk Zip Code: 33830	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	21 May 1997
2. Permit Number:	1050053 - 015 - AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: C. M. Farris, Vice President of Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Farmland Hydro, L.P. Street Address: 4390 CR 640 W City: Bartow State: FL Zip Code: 33830
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941) 533-1141 Fax: (941) 533 - 8793
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions unit and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  _____ Signature  _____ Date

* Attach letter of authorization if not currently on file.

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operating permit to be renewed: _____

Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operating permit to be revised: _____

Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operating permit to be revised: AO53-250142

Reason for revision: _____

Category II: All Air Operation Permit Applications Subject to Processing Under Chapter 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Chapter 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s):

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified units.

Operating permit to be revised: _____

Reason for revision: _____

Category III: All Air Construction Permit Applications for All Facilities and Emissions Units

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: _____

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

- Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

Attached - Amount: \$ \$250.00

Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Removal of individual fluoride allocations for the two stacks and the imposition of a combined limit for the North Granulation Plant.

2. Date of Commencement of Construction:

NA

3. Projected Date of Completion of Construction:

Professional Engineer Certification

1. Professional Engineer Name: **UK Custred, P.E.**

Registration Number: **8166**

2. Professional Engineer Mailing Address:

Organization/Firm: **Farmland Hydro, L.P.**

Street Address: **PO Box 960**

City: **Bartow**

State: **FL**

Zip Code: **33831**

3. Professional Engineer Telephone Numbers:

Telephone: **(941) 533-1141**

Fax: **(941) 533-8793**

Professional Engineer Certification

4. Professional Engineer Statement:

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

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

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

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

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

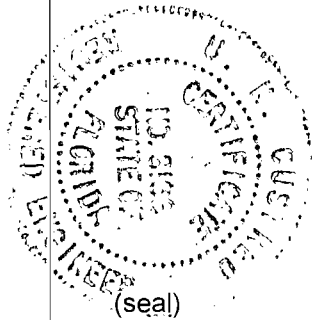
If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions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

[Handwritten Signature]

Signature

5-13-97

Date



* Attach any exception to certification statement.

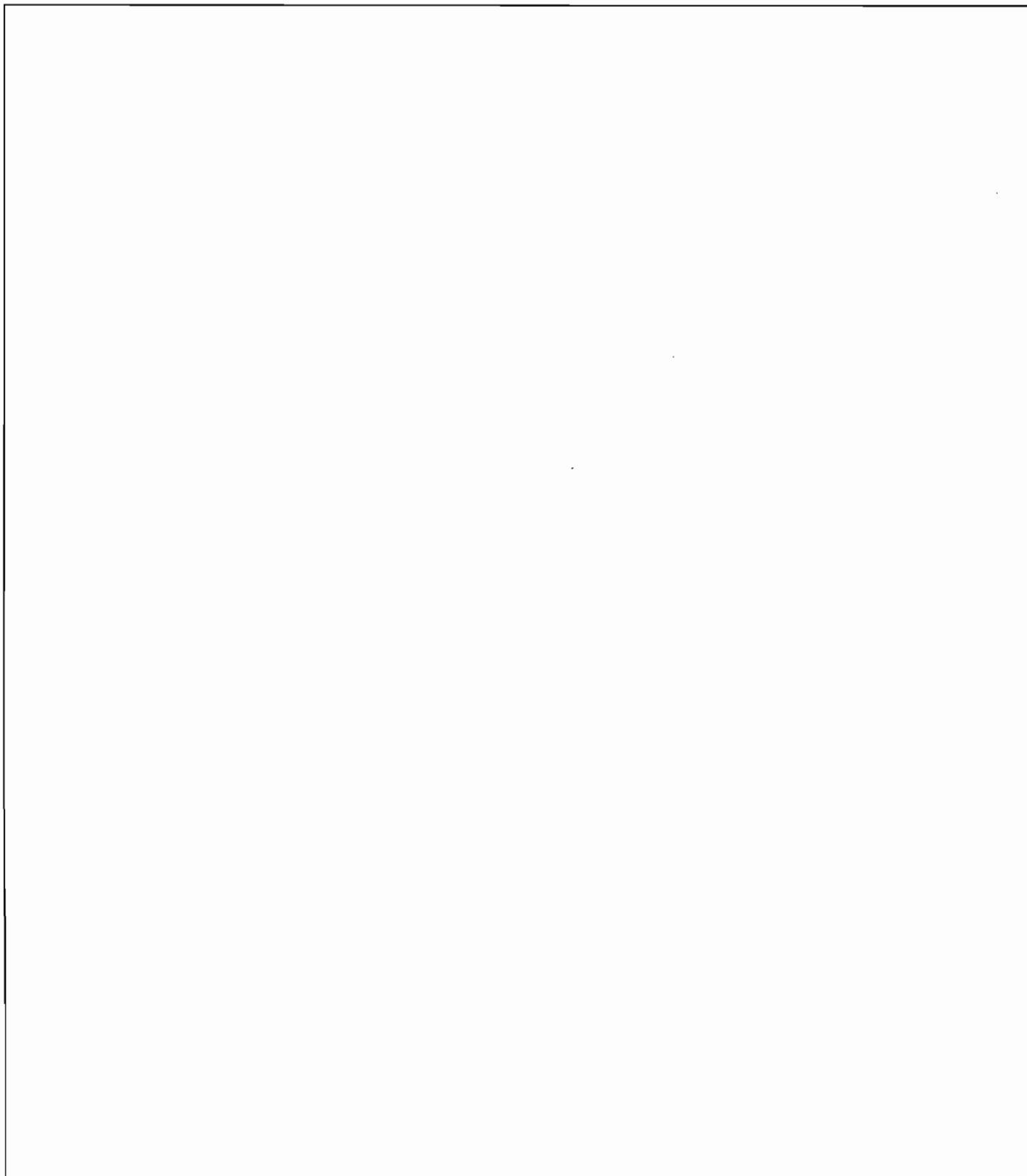
Application Contact

1. Name and Title of Application Contact:			
Charles Jenkins, Manager of Environmental and Safety Services			
2. Application Contact Mailing Address:			
Organization/Firm:	Farmland Hydro, L.P.		
Street Address:	PO Box 960		
City:	Bartow	State: FL	Zip Code: 33831
3. Application Contact Telephone Numbers:			
Telephone:	(941) 533 - 1141	Fax:	(941) 533- 8793

Application Comment

Minor modification of existing permit.	
Change Specific Condition No. 12 From:	
A. MAP Production - Allowable Fluoride Emissions	- Main Stack 1.87 lbs/hr - R/G Stack 1.87 lbs/hr - Plant Total 3.74 lbs/hr
B. DAP Production - Allowable Fluoride Emissions	- Main Stack 1.60 lbs/hr - R/G Stack 1.16 lbs/hr - Plant Total 2.76 lbs/hr
Change Specific Condition No. 12 To:	
A. MAP Production - Allowable Fluoride Emissions	- Plant Total 3.74 lbs/hr
B. DAP Production - Allowable Fluoride Emissions	- Plant Total 2.76 lbs/hr

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See instructions.)



List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See instructions.)

FDEP Core List	

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
N/A	

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Detail Information: Pollutant _____ of _____

1. Pollutant Emitted: N/A
2. Requested Emissions Cap: _____ (lb/hour) _____ (tons/year)
3. Basis for Emissions Cap Code:
4. Facility Pollutant Comment (limit to 400 characters):

Facility Pollutant Detail Information: Pollutant _____ of _____

1. Pollutant Emitted: N/A
2. Requested Emissions Cap: _____ (lb/hour) _____ (tons/year)
3. Basis for Emissions Cap Code:
4. Facility Pollutant Comment (limit to 400 characters):

E. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. List of Equipment/Activities Regulated under Title V: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
9. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

11. Identification of Additional Requirements:
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Compliance Assurance Monitoring Plan:
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification:
<input type="checkbox"/> Plan Submitted to Implementing Agency - Verification Attached, Document ID: _____
<input type="checkbox"/> Plan to be Submitted to Implementing Agency by Required Date
<input type="checkbox"/> Not Applicable
14. Compliance Report and Plan:
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required):
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for submitted as part of this application.

A. TYPE OF EMISSION UNIT (Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

- This emissions unit addresses in this Emissions Unit Information Section is a regulated emissions unit.
- This emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group Process, or Fugitive Only? Check one:

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

**B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)**

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): North Granulation Plant		
2. Emissions Unit Identification Number: 029 [] No Corresponding ID [] Unknown		
3. Emissions Unit Status Code: A	4. Acid Rain Unit? [] Yes [X] No	5. Emissions Unit Major Group SIC Code: 28
6. Emissions Unit Comment (limit to 500 characters):		

Emissions Unit Control Equipment

A.

1. Description (limit to 200 characters): Dry cyclonic separators for the particulate gas streams.
2. Control Device or Method Code: 008

B.

1. Description (limit to 200 characters): Venturi style scrubbers for the reactor/granulator and cooler gases.
2. Control Device or Method Code: 053

C.

1. Description (limit to 200 characters): Cross-flow scrubber for the dryer and the screening/milling gasses.
2. Control Device or Method Code: 013

**C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Details

1. Initial Startup Date: September, 1992		
2. Long-term Reserve Shutdown Date: NA		
3. Package Unit: NA		
Manufacturer:	Model Number:	
4. Generator Nameplate Rating: NA	MW	
5. Incinerator Information: NA		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate:		mmBtu/hr 50
2. Maximum Incineration Rate: NA	lb/hr	tons/day
3. Maximum Process or Throughput Rate: NA		
4. Maximum Production Rate: 100 Metric Tons Per Hour of DAP and 120 TPH of MAP		
5. Operating Capacity Comment (limit to 200 characters):		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year

**D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See instructions.)

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See instructions.)

FDEP Core List	

**E. EMISSIONS POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: North Granulation Plant Dryer/Cooler/Screens & Mills Stack and Reactor/Granulator Stack		
2. Emissions Point Type Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4		
3. Description of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): 		
4. ID Numbers or Description of Emissions Units with this Emission Point in Common: N/A		
5. Discharge Type Code: <input type="checkbox"/> D <input type="checkbox"/> F <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> R <input checked="" type="checkbox"/> V <input type="checkbox"/> W		
6. Stack Height:	128 / 116.5	feet
7. Exit Diameter:	7.5 / 5.5	feet
8. Exit Temperature:	117 / 120	°F

Emissions Unit Information Section 1 of 1

9. Actual Volumetric Flow Rate:	170,000 / 65,000	acfm
10. Percent Water Vapor:	8 / 72	%
11. Maximum Dry Standard Flow Rate:	148,500 / 18,200	dscfm
12. Nonstack Emission Point Height:	N/A	feet
13. Emission Point UTM Coordinates:		
Zone:	East (km):	North (km):
14. Emission Point Comment (limit to 200 characters):		

**F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) DAP/MAP production utilizing a natural gas fired drying burner which can be fired using # 2 diesel fuel oil or propane if needed.	
2. Source Classification Code (SCC): <p style="text-align: center;">3-01-030-01</p>	
3. SCC Units: <p style="text-align: center;">Tons Produced or Manufactured</p>	
4. Maximum Hourly Rate: 100 tons/hour DAP or 120 tons/hour MAP	5. Maximum Annual Rate: 876,000 tons DAP / 1,051,200 tons MAP
6. Estimated Annual Activity Factor: <p style="text-align: center;">N/A</p>	
7. Maximum Percent Sulfur: <p style="text-align: center;">N/A</p>	8. Maximum Percent Ash: <p style="text-align: center;">N/A</p>
9. Million Btu Per SCC Unit: <p style="text-align: center;">N/A</p>	
10. Segment Comment (limit to 200 characters): 	

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters) <p style="text-align: center;">N/A</p>	
2. Source Classification Code (SCC):	
3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu Per SCC Unit:	
10. Segment Comment (limit to 200 characters):	

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information: Pollutant 1 of 3

1. Pollutant Emitted:	PM		
2. Total Percent Efficiency of Control:	90+		%
3. Potential Emissions:	16.1 / 22.5	lb/hour	70.5 / 98.6 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: 0.161 lb PM/ton DAP & 0.1875 lb PM/ton MAP Reference: Permit			
7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters): $\begin{aligned} \text{PM for DAP} &= 0.161 \text{ lb PM/ton DAP} \times 100 \text{ tph DAP} = 16.1 \text{ lbs/hr} \\ &\quad \times 8760 \text{ hrs/year} \times \text{ton}/2,000 \text{ lbs} \quad = 70.5 \text{ tpy} \\ \\ \text{PM for MAP} &= 0.1875 \text{ lb PM/ton DAP} \times 120 \text{ tph MAP} = 22.5 \text{ lbs/hr} \\ &\quad \times 8760 \text{ hrs/year} \times \text{ton}/2,000 \text{ lbs} \quad = 98.6 \text{ tpy} \end{aligned}$			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): The above emissions represent the combined emissions from the reactor/granulator system as well as dryer/cooler/screens/mills system (ref. Permit AO53-250142).			

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code:	Rule	
2. Future Effective Date of Allowable Emissions:	N/A	
3. Requested Allowable Emissions and Units:	16.1 / 22.5 lbs/hour	
4. Equivalent Allowable Emissions:	lb/hour 16.1 / 22.5	tons/year 70.5 / 98.6
5. Method of Compliance (limit to 60 characters):	EPA Method 5	
6. Pollutant Allowable Emissions Comment (Desc. Of Related Operating Method/Mode) (limit to 200 characters):	Rule 62-296.705(2)(a), F.A.C.	

B.

1. Basis for Allowable Emissions Code:	N/A	
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. Of Related Operating Method/Mode) (limit to 200 characters):		

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information: Pollutant 2 of 3

1. Pollutant Emitted:	PM₁₀		
2. Total Percent Efficiency of Control:	90+		%
3. Potential Emissions:	16.1 / 22.5	lb/hour	70.5 / 98.6 tons/year
4. Synthetically Limited?			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions:			
<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: 0.161 lb PM/ton DAP & 0.1875 lb PM/ton MAP			
Reference: Permit			
7. Emissions Method Code:			
<input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters):			
PM₁₀ is assumed the same as PM			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):			
The above emissions represent the combined emissions from the reactor/granulator system as well as dryer/cooler/screens/mills system (ref. Permit AO53-250142).			

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: <p style="text-align: center;">N/A</p>		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. Of Related Operating Method/Mode) (limit to 200 characters):		

B.

1. Basis for Allowable Emissions Code: <p style="text-align: center;">N/A</p>		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. Of Related Operating Method/Mode) (limit to 200 characters):		

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information: Pollutant 3 of 3

1. Pollutant Emitted:	Fluoride		
2. Total Percent Efficiency of Control:	99+		%
3. Potential Emissions:	2.76 / 3.74	lb/hour	12.09 / 16.38 tons/year
4. Synthetically Limited?			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions:			
<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: 0.06 lb F/ton P₂O₅			
Reference: Permit			
7. Emissions Method Code:			
<input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5			
8. Calculation of Emissions (limit to 600 characters):			
$\begin{aligned} \text{F for DAP} &= 0.06 \text{ lb F/ton P}_2\text{O}_5 \times 46 \text{ tph DAP} = 2.76 \text{ lbs/hr} \\ &\quad \times 8760 \text{ hrs/year} \times \text{ton}/2,000 \text{ lbs} = 12.09 \text{ tpy} \\ \\ \text{F for MAP} &= 0.06 \text{ lb F/ton P}_2\text{O}_5 \times 62.4 \text{ tph DAP} = 3.74 \text{ lbs/hr} \\ &\quad \times 8760 \text{ hrs/year} \times \text{ton}/2,000 \text{ lbs} = 16.38 \text{ tpy} \end{aligned}$			
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):			
<p>The above emissions represent the combined emissions from the reactor/granulator system as well as dryer/cooler/screens/mills system (ref. Permit AO53-250142).</p>			

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code:	Rule		
2. Future Effective Date of Allowable Emissions:	N/A		
3. Requested Allowable Emissions and Units:	0.06 lb/ton of P₂O₅		
4. Equivalent Allowable Emissions:	lb/hour		tons/year
	2.76 / 3.74	12.09 / 16.38	
5. Method of Compliance (limit to 60 characters):	EPA Method 13B		
6. Pollutant Allowable Emissions Comment (Desc. Of Related Operating Method/Mode) (limit to 200 characters):	Rule 62-296.403(2), F.A.C.		

B.

1. Basis for Allowable Emissions Code:	N/A		
2. Future Effective Date of Allowable Emissions:			
3. Requested Allowable Emissions and Units:			
4. Equivalent Allowable Emissions:	lb/hour		tons/year
5. Method of Compliance (limit to 60 characters):			
6. Pollutant Allowable Emissions Comment (Desc. Of Related Operating Method/Mode) (limit to 200 characters):			

**I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)**

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype:	VE		
2. Basis for Allowable Opacity:	<input checked="" type="checkbox"/> Rule	<input type="checkbox"/> Other	
3. Requested Allowable Opacity:			
Normal Conditions:	20	%	Exceptional Conditions: %
Maximum Period of Excess Opacity Allowed:			min/hour
4. Method of Compliance:	EPA Method 9		
5. Visible Emissions Comment (limit to 200 characters):			

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	N/A		
2. Basis for Allowable Opacity:	<input type="checkbox"/> Rule	<input type="checkbox"/> Other	
3. Requested Allowable Opacity:			
Normal Conditions:	%	%	Exceptional Conditions: %
Maximum Period of Excess Opacity Allowed:			min/hour
4. Method of Compliance:			
5. Visible Emissions Comment (limit to 200 characters):			

**J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)**

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code: N/A	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code: N/A	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

**K. PREVENTION OF SIGNIFICANT DETERIATION (PSD) INCREMENT
TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)**

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip the remaining statements.

- The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
- For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
- None of the above apply. If so, the baseline emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

Emissions Unit Information Section 1 of 1

2. Increment Consuming Dioxide?

If the emissions unit addressed in this section emits nitrous oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check the first statement, if any, that applies and skip the remaining statements.

- The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment..
- For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:		
PM	[] C	[] E [] Unknown
SO ₂	[] C	[] E [] Unknown
NO ₂	[] C	[] E [] Unknown
2. Baseline Emissions:		
PM	lb/hour	tons/year
SO ₂	lb/hour	tons/year
NO ₂	lb/hour	tons/year
5. PSD Comment (limit to 200 character):		

**L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements for All Applications

1. Process Flow Diagram	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Not Applicable	<input checked="" type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Not Applicable	<input checked="" type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Not Applicable	<input checked="" type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Not Applicable	<input checked="" type="checkbox"/> Waiver Requested
5. Compliance Test Report	<input type="checkbox"/> Attached, Document ID: _____		
	<input checked="" type="checkbox"/> Previously submitted, Date: <u>April 17, 1997</u>		
	<input type="checkbox"/> Not Applicable		
6. Procedures for Startup and Shutdown	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable	
7. Operation and Maintenance Plan	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable	
8. Supplemental Information for Construction Permit Application	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable	
9. Other Information Required by Rule or Statute	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable	

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Acid Rain Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

Farmland Hydro, L.P.

Post Office Box 960 Bartow, Florida 33831

FHL
NBCDA
FHAP

CODE	CHECK NO.
IO	0000000158
DATE	PAGE
05/16/1997	1 of 1

VENDOR NO.

101890

VENDOR NAME

000000158

FLORIDA DEPT OF ENVIRONMENTAL
FARMLAND HYDRO, L.P. ACCOUNTS PAYABLE CHECK DETAIL

B.A.	DATE	INVOICE NO.	DOCUMENT NO.	GROSS	DISCOUNT	NET
FHL Return to Joan	05/16/1997	51497	100000564	\$250.00		\$250.00
Total				\$250.00		\$250.00

RECEIVED
MAY 21 1997
BUREAU OF
AIR REGULATION

DETACH VOUCHER BEFORE DEPOSITING



Farmland Hydro, L.P.
Post Office Box 960 Bartow, Florida 33831



NationsBank, N.A. (South)
Atlanta, Dekalb County, Georgia
64-1278/611

NO. 000000158

DATE	CHECK NO.
05/14/1997	0000000158

AMOUNT VOID AFTER 180 DAYS

AMOUNT
*****\$250.00

PAY EXACTLY *****250 DOLLARS AND 00 CENTS

TO
THE
ORDER
OF

FLORIDA DEPT OF ENVIRONMENTAL
PROTECTION
BUREAU OF AIR REGULATIONS
2600 BLAIRSTONE RD
TALLAHASSEE, FL 32399

FARMLAND HYDRO, L.P. ACCOUNTS PAYABLE

CMorris
Joan Adams

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: 941 533-1141
Fax: 941 533-8793

April 30, 1997

Mr. W. C. Thomas
Florida Department of Environmental Protection
Southwest District Office
Division of Air Resources Management
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: **Amendment to Application for Title V Facility No. 1050053**

1050053-015-AC

Dear Mr. Thomas:

Our most recent North Granulation Plant stack compliance test involving the production of granular MAP yielded the following results for the pollutant fluoride:

RUN #	Dryer/Cooler Screen & Mills	Reactor/Gran. Stack	Total Plant	
	F - lb/hr	F - lb/hr	lb/hr	lb/ton
1	0.474	1.990	2.464	0.039
2	0.378	1.912	2.290	0.036
3	0.346	2.318	2.664	0.042
Ave.	0.400	2.073	2.473	0.039
Total Plant Permitted			3.740	0.060

In the original Construction Permit **AC53-272210** and in the subsequent Operating Permit AO53-250142, an allocation of 1.87 pounds per hour was made for fluoride from each of these stacks. This allocation estimate was made based on our best engineering judgment. It was understood by us that the allocation of fluorides could be changed based on actual test data. This is not considered to be a significant issue, as the applicable standard is the NSPS of 0.06 pounds per ton of P₂O₅ fed.

Fluoride emissions are the most unstable in the reaction part of the process and are subject to many variables. Some of these variables are the reaction temperature, the exact reaction nitrogen to phosphate mole ratio and, of course, the exact chemical composition of the acids used at the time.



I have prepared the following table of individual run stack emissions for fluorides for the previous three years.

STACK RESULTS

	DRYER STACK F - lb/hr	REACTOR/GRAN. F - lb/hr
	0.700	0.083
	0.645	0.074
	0.537	0.915
	0.710	1.056
	0.787	1.123
	0.753	0.290
	0.616	0.317
	0.781	0.061
	0.655	0.041
Average	0.687	0.440
Standard Deviation	0.082	0.458

You can see by these results the unpredictability of the Reactor/Granulator stack.

We would like to request an amendment to the current operating permit and the Title V application to reflect a combined emission of fluoride not to exceed 0.06 pounds per ton of P_2O_5 fed, and not have individual allocations.

If you have any questions, please give me a call at (941) 533-1141, extension 334.

Sincerely,



Charles W. Jenkins
Manager of Environmental and Safety Services

CWJ:jp\112-97

cc: Merle Farris