STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an Application for Permit by:

Mosaic Phosphates Company 7450 Highway 630 Mulberry, FL 33860 Authorized Representative: Jeffry A. Golwitzer, Plant Manager South Pierce Facility Air Permit No. 1050055 Project 1050055-015-AC

Enclosed is Final Air Permit No. 1050055-015-AC, which authorizes the deletion of emissions units, deletion of obsolete conditions, and the addition of clarifying conditions to the Title V Operation Permit. The South Pierce Facility is located in Polk County, Florida. As noted in the attached Final Determination, only minor changes and clarifications were made. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Trina Vielhauer, Chief Bureau of Air Regulation

CERTIFICATE OF SERVICE

Jeffry Golwitzer, Plant Manager*
Dean Ahrens, Mosaic Phosphates Company
Pradeep Raval, Koogler and Associates

Southwest District Office

Clerk Stamp

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

FINAL DETERMINATION

Mosaic Phosphates Company South Pierce Facility DEP File No. 1050055-015-AC

The Department distributed a public notice package on March 22, 2005 which deletes obsolete conditions from the Title V Permit No. 1050055-008-AV and incorporated into the Title V Renewal, 1050055-014-AV, at the South Pierce Facility, located at 7450 Highway 630 in Polk County, Florida. The <u>Public Notice of Intent to Issue</u> was published in The Ledger on April 3, 2005.

COMMENTS/CHANGES

Comments were received from the applicant's Consultant, Dr. John Koogler, by letter received on May 20, 2005. Dr. Koogler commented only on the draft permit. The corrections are summarized below. The comments request for changes to the Public Notice, Section I- General Information, Section II- Facility Wide Specific Conditions and Section III - Emissions Unit Specific Conditions of the permit.

1. Comment:

Public Notice- Please remove the referenced to MAP/DAP from the plant facility.

Response:

The notice has been published. This change is not required.

2. Comment:

Section I, General Information- Please remove the referenced to MAP/DAP from the plant facility.

Response:

Section I, General Information will be revised as follows:

From: The fertilizer complex processes phosphate rock into several different fertilizer products. This is accomplished by reacting the phosphate rock with sulfuric acid to produce phosphoric acid and then converting the phosphoric acid to fertilizer. This facility consists of two sulfuric acid plants; two phosphoric acid plants (Trains A and B); a monoammonium phosphate/diammonium phosphate (MAP/DAP) plant; an auxiliary boiler; a granular triple superphosphate (GTSP) production plant; a molten sulfur storage and handling system; one dry ball mill grinding system; three MAP/DAP storage silos; MAP/DAP Plant -- bagging machine; MAP/DAP Plant -- bulk truck loading; MAP/DAP Plant -- bulk railcar loading; GTSP storage building; and a GTSP rock hopper.

To: The fertilizer complex processes phosphate rock into several different fertilizer products. This is accomplished by reacting the phosphate rock with sulfuric acid to produce phosphoric acid and then converting the phosphoric acid to fertilizer. This facility consists of two sulfuric acid plants; two phosphoric acid plants (Trains A and B); a monoammonium phosphate/diammonium phosphate (MAP/DAP) plant; an auxiliary boiler; a granular triple superphosphate (GTSP) production plant; a molten sulfur storage and handling system; one dry ball mill grinding system; three MAP/DAP storage silos; MAP/DAP Plant — bagging machine; MAP/DAP Plant — bulk truck loading; MAP/DAP Plant — bulk railear loading; GTSP storage building; and a GTSP rock hopper.

3. Comment:

Section II. Condition 21- This permit needs to reflect 30 days of operation, as previously permitted, to allow for the 15 day notice and the required testing at higher rates.

Response: The revision was made to properly reflect Rule 62-297.310(2)(b). No changes will be made.

FINAL DETERMINATION

Mosaic Phosphates Company South Pierce Facility DEP File No. 1050055-015-AC

4. Comment:

Section III, Facility Description- Please remove the referenced to MAP/DAP from the plant facility.

Response:

Section III, Facility Description will be revised as follows:

From: The fertilizer complex processes phosphate rock into several different fertilizer products. This is accomplished by reacting the phosphate rock with sulfuric acid to produce phosphoric acid and then converting the phosphoric acid to fertilizer. This facility consists of two sulfuric acid plants; two phosphoric acid plants (Trains A and B); a monoammonium phosphate/diammonium phosphate (MAP/DAP) plant; an auxiliary boiler; a granular triple superphosphate (GTSP) production plant; a molten sulfur storage and handling system; one dry ball mill grinding system; three MAP/DAP storage siles; MAP/DAP Plant — bagging machine; MAP/DAP Plant — bulk truck loading; MAP/DAP Plant — bulk railear loading; GTSP storage building; and a GTSP rock hopper.

To: The fertilizer complex processes phosphate rock into several different fertilizer products. This is accomplished by reacting the phosphate rock with sulfuric acid to produce phosphoric acid and then converting the phosphoric acid to fertilizer. This facility consists of two sulfuric acid plants; two phosphoric acid plants (Trains A and B); a monoammonium phosphate/diammonium phosphate (MAP/DAP) plant; an auxiliary boiler; a granular triple superphosphate (GTSP) production plant; a molten sulfur storage and handling system; one dry ball mill grinding system; three MAP/DAP storage silos; MAP/DAP Plant — bagging machine; MAP/DAP Plant — bulk truck loading; MAP/DAP Plant — bulk railear loading; GTSP storage building; and a GTSP rock hopper.

5. For Clarification, the Department will revise Section II, Condition 1.b. as follows:

From: For future permitting actions, all documents related to applications for permits to construct or modify an emissions unit should be submitted to the Florida Department of Environmental Protection (FDEP), Southwest District, 3804 Coconut Palm Drive, Tampa, FL 33619-1352 and phone number (813) 744-6100.

To: For future permitting actions, all documents related to applications for <u>PSD-minor</u> permits to construct or modify an emissions unit should be submitted to the Florida Department of Environmental Protection (FDEP), Southwest District, 3804 Coconut Palm Drive, Tampa, FL 33619-1352 and phone number (813) 744-6100.

6. In May 2005, the facility conducted testing to determine applicability to the HF MACTS, 40 CFR 63 Subparts AA and BB. The tests concluded the facility was a major source for HF. The Department will revise the applicability paragraph of the Facility Description as follows:

From: Based on the Title V Air Operation Permit Renewal application received September 26, 2003, the Department has determined that this facility is a major source of hazardous air pollutants (HAPs), based upon its estimation of emissions of hydrogen fluoride. If additional testing and modeling demonstrate 1) that the facility is not and has never been a major source of hazardous air pollutants since at least June 10, 2002, or 2) if prospective changes to Subparts AA and BB warrant such an outcome, the permittee shall have the right to request that the Department revise the determination of major source status and revise this permit to remove all requirements and conditions based on 40 CFR Part 63 and Compliance Plan CP-1.

FINAL DETERMINATION

Mosaic Phosphates Company South Pierce Facility DEP File No. 1050055-015-AC

To: Based on the Title V Air Operation Permit Renewal application received September 26, 2003, the Department has determined that this facility is a major source of hazardous air pollutants (HAPs), based upon its estimation of emissions of hydrogen fluoride, and testing conducted by the facility in May 2005 in accordance with Compliance Plan CP-1. If additional testing and modeling demonstrate 1) that the facility is not and has never been a major source of hazardous air pollutants since at least June 10, 2002, or 2) if prospective changes to Subparts AA and BB warrant such an outcome, the permittee shall have the right to request that the Department revise the determination of major source status and revise this permit to remove all requirements and conditions based on 40 CFR Part 63 and Compliance Plan CP 1. The Department has determined that this facility is a major source of hazardous air pollutants (HAP) based on the following: The application for Title V air operation permit renewal received September 26, 2003; estimation of hydrogen fluoride emissions; and testing conducted at the facility in May 2005 in accordance with Compliance Plan CP-1.

CONCLUSION

The final action of the Department is to issue the permit with the changes described above.



Department of Environmental Protection

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

Colleen M. Castille Secretary

PERMITTEE:

Mosaic Phosphates Company South Pierce Plant 7450 Highway 630 Mulberry, FL 33860

Authorized Representative:
Jeffry A. Golwitzer, Plant Manager
South Pierce Plant

Permit No. 1050055-015-AC

Project: Deletion of Emissions

Units and Removal of

obsolete conditions

SIC: 2874

Expires: January 30, 2007

PROJECT AND LOCATION:

This air construction permit is for the deletion of emissions units, deletion of obsolete conditions, and the addition of clarifying conditions as applicable to the Title V Operation Permit.

The Mosaic Phosphates Company South Pierce Plant is located at 7450 Highway 630, Mulberry, Polk County. UTM coordinates are Zone 17; 407.5 km E; 3071.4 km N.

STATEMENT OF BASIS:

This air construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to construct/operate 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 made a part of this permit:

Appendix GC Construction Permit General Conditions

Michael G. Cooke, Director Division of Air Resource

Audi J. Crochen

Management

"More monotion Less Process"

Printed on recycled paper

FACILITY DESCRIPTION

The fertilizer complex processes phosphate rock into several different fertilizer products. This is accomplished by reacting the phosphate rock with sulfuric acid to produce phosphoric acid and then converting the phosphoric acid to fertilizer. This facility consists of two sulfuric acid plants; two phosphoric acid plants (Trains A and B); an auxiliary boiler; a granular triple superphosphate (GTSP) production plant; a molten sulfur storage and handling system; one dry ball mill grinding system; GTSP storage building; and a GTSP rock hopper.

EMISSIONS UNITS

This permit revision addresses the following emissions units. Emission Units shown as stricken through are no longer permitted.

• .	
E.U. ID	
No.	Brief Description
-00 1	Auxiliary Boiler
-003	Purified MAP/DAP Plant
-004	Sulfuric Acid Plant #10
-005	Sulfuric Acid Plant #11
-008	Phosphoric Acid Plant - A Train
-009	Phosphoric Acid Plant - B Train
-012	Purified MAP/DAP Plant Storage Silo No. 3
-013	Purified MAP/DAP-Plant-Bagging Machine
-014	Purified MAP/DAP Plant Bulk Truck Loading
-022	No. 2 Ball Mill Grinding System
-023	GTSP Production Plant
-024	GTSP East Storage Building - North Scrubber
-025	GTSP East Storage Building - South Scrubber
-026	GTSP Rock Hopper Bin
-027	Purified MAP/DAP Plant Storage Silo No. 2
-028	Purified MAP/DAP Plant Storage Silo No. 1
-029	Purified MAP/DAP Plant Bulk Railcar Loading
-030	Molten Sulfur Storage - (East) Tank 1 - Vent 1
-031	Molten Sulfur Storage - (East) Tank 1 - Vent 2
-032	Molten Sulfur Storage - (East) Tank 1 - Vent 3
-033	Molten Sulfur Storage - (East) Tank 1 - Vent 4
-034	Molten-Sulfur Storage - (East) Tank 1 - Vent 5
-035	Molten Sulfur Storage - (West) Tank 2 - Vent 1
-036	Molten Sulfur Storage - (West) Tank 2 - Vent 2
-037	Molten Sulfur Storage - (West) Tank 2 - Vent 3
-038	Molten Sulfur Storage - (West) Tank 2 - Vent 4
-039	Molten Sulfur Storage - (West) Tank 2 - Vent 5
-040	Molten Sulfur Truck Pit - East Vent with Fan
-041	Molten Sulfur Truck Pit - East Vent without Fan
-042	Molten Sulfur Truck Pit - West Vent with Fan
-043	Molten Sulfur Truck Pit - West Vent without Fan
-044	Molten Sulfur Rail Pit North Vent
-045	Molten Sulfur Rail Pit - South Vent
-048	Phosphogypsum Stack

SECTION I. GENERAL INFORMATION

REGULATORY CLASSIFICATION

Because potential emissions of at least one regulated pollutant exceed 100 tons per year, the existing facility is a Title V Source and major source of air pollution in accordance with Chapter 62-213, F.A.C. Regulated pollutants include pollutants such as nitrogen oxides (NO_X), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and sulfuric acid mist (SAM).

In addition, the Department has determined the facility to be a major source of hazardous air pollutants (HAPs) and affected sources are subject to 40 CFR 63 Subparts AA and BB.

Sulfuric Acid Plants No. 10 and No. 11 are subject to 40 CFR 60.80-85 as they apply to emissions of sulfuric acid mist only.

RELEVANT DOCUMENTS

• Construction Permit Application 1050055-015-AC received February 14, 2005, including request for concurrent processing of Title V Air Operation Permit Revision. The Title V Air Operation Permit Revision will be incorporated into the Title V Air Operation Permit Revision/Renewal project 1050055-014-AV.

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

1. Permitting Authority:

- a. For this permit, the permitting authority is the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and phone number (850)488-0114.
- b. For future permitting actions, all documents related to applications for PSD-minor permits to construct or modify an emissions unit should be submitted to the Florida Department of Environmental Protection (FDEP), Southwest District, 3804 Coconut Palm Drive, Tampa, FL 33619-1352 and phone number (813) 744-6100.
- 2. <u>Compliance Authority:</u> All documents related to operation, reports, tests, and notifications should be submitted to the Department of Environmental Protection Southwest District Office at

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-1352
Telephone: 813/744/6100 Fax: 813/744-6084

- 3. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- 4. <u>Terminology</u>: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
- 5. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
- 6. <u>Modifications</u>: The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212, F.A.C.]
- 7. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
- 8. Completion of Construction: The permit expiration date is January 30, 2006.
- 9. Permit Expiration Date Extension: The permittee, for good cause, may request that this permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rule 62-4.080, F.A.C.]
- 10. <u>Application for Title V Permit Revision</u>: Concurrent processing of Air Construction Permit Application-1050055-015-AC and Title V Permit Revision/Renewal 1050055-014-AV.
- 11. Plant Operation Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify the

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]

- 12. Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All plant operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]
- 13. <u>Circumvention</u>: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without the applicable air control device operating properly. [Rule 62-210.650, F.A.C.]
- 14. <u>Unconfined Particulate Matter Emissions</u>: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]
- 15. <u>Test Notification</u>: The permittee shall notify the Compliance Authority in writing at least 30 days prior to any initial performance tests and at least 15 days prior to any other required tests. Notification shall include the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and conducting the test. [Rule 62-297.310(7)(a)9., F.A.C. and 40 CFR 60.7, 60.8]
- 16. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

17. Applicable Test Procedures

- a. Required Sampling Time. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be sixty (60) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur. [Rule 62-297.310(4)(a)1. and 2., F.A.C.]
- b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet. [Rule 62-297.310(4)(b), F.A.C.]
- c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C. [Rule 62-297.310(4)(d), F.A.C.]

18. Determination of Process Variables

- a. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. [Rule 62-297.310(5)(a), F.A.C.]
- b. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5)(b), F.A.C.]

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

- 19. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
- 20. <u>Stack Testing Facilities</u>: Required stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C. [Rule 62-297.310]
- 21. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2)(b), F.A.C.]
- 22. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department, upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]
- 23. Emissions Performance Test Results Reports: A report indicating the results of any required emissions performance test shall be submitted to the Compliance Authority no later than 45 days after completion of the last test run. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]
- 24. <u>Annual Operating Reports</u>: The permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP Southwest District by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

The following descriptions and specific conditions established in the initial Title V Air Operation Permit, No. 1050055-008-AV are changed as follows. Additions are highlighted, and deletions are shown by strikethroughs:

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SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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<u>K.</u>]]	048 Phosphogypsum Stack

Section I. Facility Information, Subsections A and B

Subsection A. Facility Description.

The fertilizer complex processes phosphate rock into several different fertilizer products. This is accomplished by reacting the phosphate rock with sulfuric acid to produce phosphoric acid and then converting the phosphoric acid to fertilizer. This facility consists of two sulfuric acid plants; two phosphoric acid plants (Trains A and B); a monoammonium phosphate/diammonium phosphate (MAP/DAP) plant; an auxiliary boiler; a granular triple superphosphate (GTSP) production plant; a molten sulfur storage and handling system; one dry ball mill grinding system; three MAP/DAP storage silos: MAP/DAP Plant — bagging machine; MAP/DAP Plant — bulk truck loading; MAP/DAP Plant — bulk railear loading; GTSP storage building; and a GTSP rock hopper.

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

Based on the initial Title V permit application received June 14, 1996 (which contained a qualifying statement related to hazardous air pollutants), this facility is not a major source of hazardous air pollutants (HAPs). Based on the proposed rule "National Emission Standards for Hazardous Air Pollutants Phosphoric Acid Manufacturing and Phosphate Fertilizers Production" (reference Federal Register 12/27/96), this facility will probably be considered a major source of HAPS, and permitting considerations will be deferred until the promulgation of this MACT rule.

The Department has determined that this facility is a major source of hazardous air pollutants (HAP) based on the following. The application for Title V air operation permit renewal received September 26, 2003; estimation of hydrogen fluoride emissions, and testing conducted at the facility in May 2005 in accordance with Compliance Plan CP-1.

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

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

<u>E.U. ID</u>	
No.	Brief Description
-001	Auxiliary Boiler
-003	Purified MAP/DAP Plant
-004	Sulfuric Acid Plant #10
-005	Sulfuric Acid Plant #11
-008	Phosphoric Acid Plant - A Train
-009	Phosphoric Acid Plant - B Train
-012	Purified MAP/DAP Plant Storage Sile No. 3
-013	Purified MAP/DAP Plant Bagging Machine
-014	Purified MAP/DAP Plant Bulk Truck Loading
-022	No. 2 Ball Mill Grinding System
-023	GTSP Production Plant
-024	GTSP East Storage Building - North Scrubber
-025	GTSP East Storage Building - South Scrubber
-026	GTSP Rock Hopper Bin
-027	Purified MAP/DAP Plant Storage Silo No. 2
-028	Purified MAP/DAP Plant Storage Silo No1
-029	Purified MAP/DAP Plant Bulk Railcar Loading
-030	Molten Sulfur Storage - (East) Tank 1 - Vent 1
-031	Molten Sulfur Storage - (East) Tank 1 - Vent 2
-032	Molten Sulfur Storage - (East) Tank 1 - Vent 3
-033	Molten Sulfur Storage - (East) Tank 1 - Vent 4
-034	Molten Sulfur Storage - (East) Tank 1 Vent 5
-035	Molten Sulfur Storage - (West) Tank 2 - Vent 1
-036	Molten Sulfur Storage - (West) Tank 2 - Vent 2
-037	Molten Sulfur Storage - (West) Tank 2 - Vent 3
-038	Molten Sulfur Storage - (West) Tank 2 - Vent 4
-039	Molten Sulfur Storage - (West) Tank 2 - Vent 5
-040	Molten Sulfur Truck Pit - East Vent with Fan
-041	Molten Sulfur Truck Pit - East Vent without Fan
-042	Molten Sulfur Truck Pit - West Vent with Fan
-043	Molten Sulfur Truck Pit - West Vent without Fan
-044	Molten Sulfur Rail Pit - North Vent
-045	Molten Sulfur Rail Pit - South Vent
-048	Phosphogypsum Stack

Section II. Facility-wide Conditions.

NOTES to PERMITTEE:

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

Subsection	E.U. I.D. No.	Description	Particulate Matter (PM) Limit	
			lbs/hr	Tons per year
A	001	Auxiliary Boiler	2.4	10.7
₽	003	Purified MAP/DAP Plant	4.4 ⁺	19.3 ⁺
E	012	Purified MAP/DAP Plant Storage Sile No. 3	0.03	0.13
E	013	Purified MAP/DAP Plant Bagging Machine	0.091	0.4 ⁺
£	014	MAP/DAP Plant Bulk Truck Loading	0.05	0.22
E	027	Purified MAP/DAP Plant Storage Sile No. 2	0.03	0.13+
E	028	Purified MAP/DAP Plant Storage Silo No. 1	0.03+	0.13+
£	029	MAP/DAP Plant Bulk Railcar Loading	0.05	0.221
F D	022	No. 2 Ball Mill Grinding System	31.8	139.3
G-E	023	GTSP Production Plant	35	153
ΗĒ	024 <u>-25</u>	GTSP East Storage Building - North scrubber system	40.1	175.6
H	025	GTSP East Storage Building South scrubber system		
₽ G	026	GTSP Rock Hopper Bin	22.5	
₽Ĥ	030 -034 033	Molten Sulfur Storage - East Tank	0.50^2	1.40²
₽H	035-039	Molten Sulfur Storage - West Tank	0.50^{2}	1.402
⊁ H	040-043	Molten Sulfur Storage - Truck Pit	0.922	4.06 ²
ł	044-045	Molten Sulfur Storage Rail Pit	0.222	0.082
		Total	138.62 133.22	

Section III. Emissions Unit(s) and Conditions. Subsection B

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

<u>E.U. 1D</u>

No. Brief Description

-003 Purified MAP/DAP Plant

The Purified Monoammonium Phosphate (MAP)/Diammonium Phosphate (DAP) Plant produces ammoniated phosphates (DAP and MAP). The Purified MAP/DAP Plant consists of MAP and DAP reactors, filter, crystallizer, centrifuge and dryer. Particulate and fluoride emissions from the MAP/DAP plant are controlled by a combination two stage venturi-cyclonic and packed bed scrubber equipped with a mist eliminator.

(Permitting note(s): This emissions unit is regulated under NSPS—40 CFR 60, Subpart V, Standards of Performance for Phosphate Fertilizer Industry: Diammonium Phosphate Plants, adopted and incorporated by reference in Rule 62-204.800(7)(b)27., F.A.C.; Rule 62-212.300, F.A.C., General Preconstruction Review Requirements: Rule 212.400(6), F.A.C., Prevention of Significant Deterioration (PSD): Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated May 22, 1981; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards; and Rule 62-296.403, F.A.C., Phosphate Processing.)

NOTE:-This emissions unit is currently shutdown. The last day of operation was November 23, 1995. If this emissions unit is not reactivated by November 23, 2005, the permittee shall obtain an air construction permit prior to subsequent reactivation. [Rule 62-210.300(2)(a)3.e., F.A.C. allows renewal of operation permits for sources which have been shut down for up to 10 years from the date of shutdown.

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

Essential Potential to Emit (PTE) Parameters

B.1. Capacity

a. The maximum MAP product rate through the Purified MAP/DAP Plant shall not exceed 19.0 tons per hour (maximum P₂O₅ input to MAP/DAP Plant is 8.8 tons/hr).

b. The maximum DAP product rate through the Purified MAP/DAP Plant shall not exceed 17.5 tons per hour (maximum P₂O₅ input to MAP/DAP Plant is 7.6-tons/hr).

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

Emission Limitations and Standards

B.2. Particulate emissions from the Purified MAP/DAP Plant shall not exceed 0.01 grains/dsef, 4.4 lbs./hr., or 19.3 tons/yr.

[Pursuant to the BACT Determination issued May 22, 1981]

12 12	Liluarida (L) miccio	ons shall no	1 avceed (any at tha	fal	lowina	limite
D.J.	T Idonac (1-)-011113310	ms snun mo	t chocca t	arry or the	\mathbf{u}	IUWINE !	mmts.

- ----- a. 0.06 pounds per ton of phosphate material input-expressed as \ 00% P₂O_s;
- b. 0.26 pounds per hour; and
 - c. 0.97-tons per year

[BACT Determination issued May 22, 1981]

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

B.4. Visible emissions from the Purified MAP/DAP Plant shall not exceed 20% opacity. [Rule 62 296.320(4)(b), F.A.C.]

Test Methods and Procedures

B.5. Compliance with the emission limitations of Conditions B.2, B.3 and B.4 shall be determined using EPA Methods 1, 2, 4, 5, 9 and 13A or 13B as contained in 40 CFR 60, Appendix A and adopted by reference in Section 62-297, F.A.C. [Rule 62-297, F.A.C.]

B.6. The permittee shall test the emissions from the Purified MAP/DAP Plant scrubber stack for the following pollutants annually on, or during the 60 day period prior to October 10:

a. Particulates

b. Fluorides

c. Opacity
[Rule 62-297.310(7)(a)4, F.A.C.]

Monitoring of Operations

B.7. The permittee shall install, calibrate, maintain, and operate a monitoring device which can be used to determine the mass flow of phosphorus bearing feed material to the process. The monitoring device shall have an accuracy of ±5 percent over its operating range.

[40 CFR 60.223(a)]

B.8. The permittee shall install, calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the process scrubbing system. The monitoring device shall have an accuracy of ± 5 percent over its operating range.

[40 CFR 60.223(e)]

B.9. In order to provide reasonable assurance that the control system is operating properly, the permittee shall create and keep a record log of the scrubber operating parameters. The record log shall contain, at a minimum:

e	}. —	the water flow rate (gallons per minute),
	. 	the scrubber pressure drop (inches of water);
	<u>. </u>	the date and time of the measurements, and
	1	the person responsible for performing the measurements.
	л.	the person responsible for personning the measurements.

A record log entry shall be made at least once for every 12 hour period.

NOTE: The permittee may substitute continuous monitoring and strip chart recordings for the manual recordkeeping required by this Condition.

[Rules 62-4.070(3), 62-4.160(14)(b), and 62-4.160(14)(c), F.A.C.]

B.10. In order to provide reasonable assurance, when the Purified MAP/DAP Plant is operating, that the pollution control equipment is operating properly, the permittee shall comply with Facility wide Condition No. 14.

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

Recordkeeping and Reporting Requirements

B.11. The permittee shall maintain a daily record of the following:

— a.—the equivalent P₂O₃ feed rate according to the procedure specified in 40 CFR 60.223(b) — Monitoring of Operations;

b.—hours of operations.

[40 CFR 60.223, Rule 62 4.070(3), F.A.C.]

Section III. Emissions Unit(s) and Conditions. Subsection E

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

E-U. ID No. Brief Description -012 Purified MAP/DAP Plant Storage Silo No. 3 -013 Purified MAP/DAP Plant Bagging Machine -014 MAP/DAP Plant Bulk Truck Loading -027 Purified MAP/DAP Plant Storage Silo No. 2 -028 Purified MAP/DAP Plant Storage Silo No. 1 -029 MAP/DAP Plant Bulk Railcar Loading

The Purified MAP/DAP Plant Storage Silo No. 3 consists of a storage silo and a baghouse. This silo is located to the northwest of Storage Silos No. 1 and No. 2.

The Purified MAP/DAP Plant Bagging Machine is equipped with a baghouse for controlling particulate matter emissions.

The Purified MAP/DAP Plant Bulk Truck Loading is equipped with a baghouse for controlling particulate matter emissions.

The Purified MAP/DAP Plant Storage Silo No. 2 consists of a storage silo and a baghouse. This silo is located in the center of Storage Silos No. 1 and No. 3.

The Purified MAP/DAP Plant Storage Silo No. 1 consists of a storage silo and a baghouse. This silo is located to the southeast of Storage Silos No. 2 and No. 3.

The Purified MAP/DAP Plant Bulk Railcar Loading is equipped with a baghouse for controlling particulate matter emissions.

{Permitting note(s): This emissions unit is regulated under Rule 62-212.300, F.A.C., General Preconstruction Review Requirements: Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); and Best Available Control Technology (BACT) Determination, dated May 22, 1981.}

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

Essential Potential to Emit (PTE) Parameters

E.1. Capacity.

a. The maximum MAP product rate through the Purified MAP/DAP Plant shall not exceed 19.0 tons per hour (maximum P₂O₅ input to MAP/DAP Plant is 8.8 tons/hr). (see Condition B.1.)

b. The maximum DAP product rate through the Purified MAP/DAP Plant shall not exceed 17.5 tons per hour (maximum P₂O₅ input to MAP/DAP Plant is 7.6 tons/hr). (see Condition **B.1.**) [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions – (PTE)]

Emission Limitations and Standards

E.2. Visible emissions from any of these emissions units, and associated storage and conveying equipment, shall not be equal to or greater than 20% opacity.

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

E.3. Particulate Matter (PM) emissions from these emission units shall not exceed the following:

Point ID:	Description	Particulate Matter (PM) limit		
		lbs/hr	Tons per	
-012	Purified MAP/DAP Plant Storage Silo No. 3	0.03	0.13	
-013	Purified MAP/DAP Plant Bagging Machine	0.092	0.4	
-014	MAP/DAP Plant Bulk Truck Loading	0.052	0.22	
-027	Purified MAP/DAP Plant Storage Sile No. 2	0.03	0.13	
-028	Purified MAP/DAP Plant Storage Sile No. 1	0.031	0.13	
- 029	MAP/DAP Plant Bulk Railcar Loading	0.052	0.22	

¹Based on a compliance grain loading value of 0.01 grains per dry standard cubic foot and a design air flow rate of 300 dry standard cubic feet per minute.

[BACT-determination May 22, 1981.]

Test Methods and Procedures

E.4. The permittee shall test the emissions from Purified MAP/DAP Plant Storage Silos No. 1, No. 2 and No. 3; Purified MAP/DAP Plant Bagging Machine; MAP/DAP Bulk Truck Loading; and MAP/DAP Bulk Railear Loading for the following pollutants on, or during the 60 day period prior to the test due dates and test intervals shown below:

and test filter valis shown below.							
		Test-Due Date					
Pollutant	Test	Purified	Purified	Purified	Purified	Purified	Purified
	Interval	MAP/DAP	MAP/DAP	MAP/DAP	MAP/DAP	MAP/DAP	MAP/DAP
		Plant	Plant	Plant	Plant	Bulk	Bulk
		Storage Silo	Storage Silo	Storage Silo	Bagging	Truck	Railear
		No. 1	No. 2	No. 3	Machine	Loading	Loading
Opacity	annually	60 days after	60 days after	60-days after	60 days	60 days	60 days
		startup	startup	startup	after startup	after startup	after startup
Particulates	five	Expiration	Expiration	Expiration	Expiration	Expiration	Expiration
	years	Date of	Date of	Date of	Date of	Date of	Date of
		Permit	Permit	Permit	Permit	Permit	Permit

Testing at conditions that are not representative of actual operating conditions, failure to include the input rates and actual operating conditions may invalidate the test.

²Based on a compliance grain loading value of 0.01 grains per dry standard cubic foot and a design air flow rate of 500 dry standard cubic feet per minute.

E.5. Compliance with visible and particulate emission limitations of Conditions E.2 and E.3 shall be determined using EPA Methods 1, 2, 4, 5 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. [Rule 62-297, F.A.C.]

Monitoring of Operations

E.6. In order to demonstrate compliance with Rule 62-210.650, the permittee shall record the pressure drop across each baghouse daily.

Rule 62-4.070(3), F.A.C.1

Recordkeeping and Reporting Requirements

E.7. In order to document compliance with the process rate limitations of Condition E.1, the permittee shall maintain records of the MAP and DAP product rate through the Purified MAP/DAP Plant and the total hours of process operations as stated in Condition B.12.

NOTE: The Purified MAP/DAP Plant storage silo transfer rate (Silos Nos. 1, 2 and 3) are dependent on the Purified MAP/DAP Plant production rate. The recording of the amount of material processed and the total hours of process operations for the Purified MAP/DAP Plant should suffice for the Purified MAP/DAP Plant storage silos. [Rule 62-4.070(3), F.A.C.

Section III. Emissions Unit(s) and Conditions. Subsection J

Subsection J. H. This section addresses the following emissions unit(s).

E.U. ID No. **Brief Description** -030 Molten Sulfur Storage - (East) Tank 1 - Vent 1 -031 Molten Sulfur Storage - (East) Tank 1 - Vent 2 -032 Molten Sulfur Storage - (East) Tank 1 - Vent 3 -033 Molten Sulfur Storage - (East) Tank 1 - Vent 4 -034Molten Sulfur Storage - (East) Tank 1 - Vent 5 -035 Molten Sulfur Storage - (West) Tank 2 - Vent 1 -036 Molten Sulfur Storage - (West) Tank 2 - Vent 2 -037 Molten Sulfur Storage - (West) Tank 2 - Vent 3 -038 Molten Sulfur Storage - (West) Tank 2 - Vent 4 Molten Sulfur Storage - (West) Tank 2 - Vent 5 -039 -040 Molten Sulfur Truck Pit - East Vent with Fan -041 Molten Sulfur Truck Pit - East Vent w/out Fan -042 Molten Sulfur Truck Pit - West Vent with Fan -043 Molten Sulfur Truck Pit - West Vent w/out Fan -044Molten Sulfur-Rail Pit North Vent -045Molten Sulfur Rail Pit - South Vent

APPENDIX GC CONSTRUCTION PERMIT GENERAL CONDITIONS [RULE 62–4.160, F.A.C.]

- 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,

APPENDIX GC CONSTRUCTION PERMIT GENERAL CONDITIONS [RULE 62–4.160, F.A.C.]

(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 noncompliance 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 (not applicable to project):
 - (b) Determination of Prevention of Significant Deterioration (not applicable to project); and
 - (c) Compliance with New Source Performance Standards (not applicable to project).

APPENDIX GC CONSTRUCTION PERMIT GENERAL CONDITIONS [RULE 62–4.160, F.A.C.]

- **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.

MEMORANDUM

TO:

Michael G. Cooke

THRU:

Trina Vielhauer

FROM:

Bobby Bull 💋

DATE:

September 26, 2005

SUBJECT:

FINAL Permit No. 1050055-015-AC

Mosaic Phosphates Company

South Pierce Facility

Attached for approval and signature is a final air construction permit modification for the South Pierce Facility. This air construction permit is for the deletion of emissions units, deletion of obsolete conditions, and the addition of clarifying conditions to the Title V Operation Permit.

This project is not subject to PSD because there will be no emissions changes associated with the modification. The facility will be subject to all current emissions limits. This construction permit is being processed concurrently with the Title V Renewal Permit, 1050055-014-AV.

No Comments were received concerning the DRAFT Permit that was clerked on March 22, 2005.

I recommend your approval and signature.

Attachment

TV/rlb

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: 	A Signature. Agent Haddressee Addressee Addressee B. Receives by (Printed Name) C. Date of Delivery D. Is delivery address different from item 1 Yes If YES, enter delivery address below: No
Mr. Jeffry Golwitzer, Plant Manager Mosaic Phosphates Company 7450 Highway 630 Mulberry, Florida 33860	3. Service Type Certified Mail
	4. Restricted Delivery? (Extra Fee)
2. Article Number (Transfer from service label) 7004 1350	0000 1910 4250
PS Form 3811, February 2004 Domestic Ref	· · · · · · · · · · · · · · · · · · ·
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