

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

TO: Victoria J. Tschinkel
FROM: Clair Fancy *[Signature]*
DATE: March 31, 1986
SUBJ: Approval of Attached Air Construction Permit

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
TO: _____	LOCTN: _____
TO: _____	LOCTN: _____
TO: _____	LOCTN: _____
FROM: _____	DATE: _____

Attached for your approval and signature is one Air Construction Permit to Agrico Chemical Company to modify their permit to construct a sulfur pellet handling and melting facility at the South Pierce Chemical Works in Bartow, Polk County, Florida.

Day 90, after which the permit would be issued by default, is April 2, 1986.

The Bureau recommends your approval and signature.

CF/pa

Attachment

P 408 533 186

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. L. C. Lahman	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 4/3/86	

PS Form 3800, Feb. 1982
U.S. POSTAL SERVICE
DOMESTIC RETURN RECEIPT

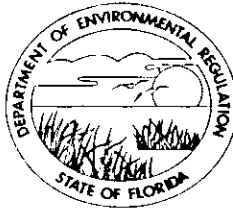
PS Form 3811, July 1983

<p>● SENDER: Complete items 1, 2, 3 and 4.</p> <p>Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.</p>	
<p>1. <input type="checkbox"/> Show to whom, date and address of delivery.</p> <p>2. <input type="checkbox"/> Restricted Delivery.</p>	
<p>3. Article Addressed to: Mr. L. C. Lahman Agrico Chemical Company P. O. Box 1969 Bartow, FL 33830</p>	
<p>4. Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p>	<p>Article Number P 408 533 186</p>
<p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>	
<p>5. Signature — Addressee X</p>	
<p>6. Signature — Agent X Agrico / R. Black</p>	
<p>7. Date of Delivery APR 07 1986</p>	
<p>8. Addressee's Address (ONLY if requested and fee paid)</p>	

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. L. C. Lahman
Plant Manager
Agrico Chemical Company
South Pierce Chemical Works
Post Office Box 1969
Bartow, Florida 33830

April 2, 1986

Enclosed is Permit Number AC 53-111196 to Agrico Chemical Company which authorizes a modification to the permit to construct a sulfur pellet handling and melting facility at the South Pierce Chemical Works in Bartow, Polk County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301; 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 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for C. H. Fancy
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:
William S. Hornbeck, P.E.
Edward de la Parte
Bill Thomas

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on April 3, 1986 to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia G. Adams April 3, 1986
Clerk Date

Final Determination

Agrico Chemical Company
South Pierce Chemical Works
Polk County, Florida

Sulfur Pellets Handling and Melting Facility

Permit No. AC 53-111196

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

March 31, 1986

Final Determination

The application by Agrico Chemical Company to modify their permit to construct a sulfur pellet handling and melting facility at the South Pierce Chemical Works in Bartow, Polk County, Florida, has been reviewed by the Bureau of Air Quality Management. Public Notice of the department's Intent to Issue the modified permit was published in The Ledger on February 15, 1986.

Comments were received from Agrico in response to the Public Notice on:

1. Specific Condition No. 3: Particulate matter (PM) emissions from the vapor scrubber should be 0.2 lb/hr and not 0.02 lb/hr.
2. Specific Condition No. 5(a): Request that DER Method 5 not be required to test for compliance of PM emissions from the vapor scrubber since there are no applicable mass emission standards in Chapter 17-2, Florida Administrative Code.
3. Specific Condition No. 5(c): Request that an Alternate Procedure provision be allowed, should Agrico have site specific problems in conducting EPA Method 15.

The bureau agrees with the comments and the following Specific Conditions will be changed:

No. 3

From:

The emissions of sulfur particulate (PM) and hydrogen sulfide (H₂S) from the sulfur facility shall not exceed 1 ton per year (TPY) for PM, and 5 TPY for H₂S.

Summary of Emissions

Source	Emissions		Pollutant
	lb/hr	TPY	
a) Unloading hopper	0.03	0.12	PM
b) Hopper-conveyor belt transfer	0.04	0.16	PM
c) Belt-surge bin transfer	0.09	0.37	PM
d) Vapor scrubber (i)	0.02	0.08	PM
(ii)	0.84	3.36	H ₂ S

To:

The emissions of sulfur particulate (PM) and hydrogen sulfide (H₂S) from the sulfur facility shall not exceed 2 ton per year (TPY) for PM, and 5 TPY for H₂S.

Summary of Emissions

Source	Emissions		Pollutant
	lb/hr	TPY	
a) Unloading hopper	0.03	0.12	PM
b) Hopper-conveyor belt transfer	0.04	0.16	PM
c) Belt-surge bin transfer	0.09	0.37	PM
d) Vapor scrubber (i)	0.2	0.8	PM
(ii)	0.84	3.36	H ₂ S

No. 5

From:

Initial compliance tests shall be conducted using:

- a) DER Method 5, Determination of Particulate Emissions from Stationary Sources (by liquid impingement), for PM emissions from the vapor scrubber.
- b) DER Method 9, for all sources in the sulfur facility.
- c) EPA Method 15, Determination of H₂S, in the gas stream from the vapor scrubber.

To:

Initial compliance tests shall be conducted using:

- a) DER Method 9, for all sources in the sulfur facility.
- b) EPA Method 15, Determination of H₂S, in the gas stream from the vapor scrubber, or a DER approved Alternate Test Procedure.

No. 11

From:

The following shall be submitted for approval to DER's District office within 45 days of completion of compliance tests, and a minimum of 90 days before the expiration date of this permit (copy to CAPS):

- a) Compliance test results of DER Method 5, DER Method 9 and EPA Method 15.
- b) Initial sulfur deposition monitoring report conducted according to Rule 17-2.753(2), FAC (DER Reference Method for Monitoring the Deposition of Sulfur Particulate).

To:

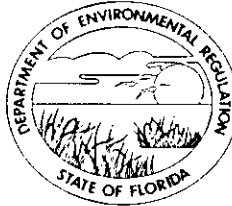
The following shall be submitted for approval to DER's District office within 45 days of completion of compliance tests, and a minimum of 90 days before the expiration date of this permit (copy to CAPS):

- a) Compliance test results of DER Method 9 and EPA Method 15/DER approved Alternate Test Procedure.
- b) Initial sulfur deposition monitoring report conducted according to Rule 17-2.753(2), FAC (DER Reference Method for Monitoring the Deposition of Sulfur Particulate).

The final action of the department will be to issue the modified permit as proposed in the Preliminary Determination with amendments to the permit conditions as a result of the Department's consideration of the afore mentioned comments.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Agrico Chemical Company
P. O. Box 1969
Bartow, Florida 33830

Permit Number: AC 53-111196
Expiration Date: April 1, 1988
County: Polk
Latitude/Longitude: 27° 45' 45"N/
81° 56' 28"W
Project: Sulfur Pellet Handling
and Melting Facility

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

For the construction of a sulfur pellets handling and melting facility consisting of a receiving underground hopper, conveyor belts, 150 ton surge bin, screw conveyors, three 900 tons per day sulfur static melters, a scrubber system, and a water spray system.

Construction shall be in accordance with the attached permit application unless otherwise stated in the General and Specific Conditions herein.

Attachments are as follows:

1. Agrico's application package dated October 1, 1985.
2. DER's letter dated October 31, 1985.
3. Agrico's response dated November 27, 1985.

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-111196
Expiration Date: April 1, 1988

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute a waiver of 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.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement 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.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-111196
Expiration Date: April 1, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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.

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 notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-111196
Expiration Date: April 1, 1988

GENERAL CONDITIONS:

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 revocation of this permit.

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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-111196
Expiration Date: April 1, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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 submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The sulfur pellets handling and melting facility may operate continuously i.e., 8760 hours per year.

2. The maximum sulfur handling and melting rates shall not exceed 1800 long tons per day (LTPD), or 600,000 LTPY.

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-111196
Expiration Date: April 1, 1988

SPECIFIC CONDITIONS:

3. The emissions of sulfur particulate (PM) and hydrogen sulfide (H_2S) from the sulfur facility shall not exceed 2 ton per year (TPY) for PM, and 5 TPY for H_2S .

Summary of Emissions

Source	Emissions		Pollutant
	lb/hr	TPY	
a) Unloading hopper	0.03	0.12	PM
b) Hopper-conveyor belt transfer	0.04	0.16	PM
c) Belt-surge bin transfer	0.09	0.37	PM
d) Vapor scrubber (i)	0.2	0.8	PM
(ii)	0.84	3.36	H_2S

4. Visible emissions from any source in the sulfur facility shall not exceed 10% opacity, as determined by DER Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources.

5. Initial compliance tests shall be conducted using:

- a) DER Method 9, for all sources in the sulfur facility.
- b) EPA Method 15, Determination of H_2S , in the gas stream from the vapor scrubber, or a DER approved Alternate Test Procedure.

6. Annual compliance tests shall be conducted for all sources in the sulfur facility using DER Method 9, unless other tests are also deemed necessary by the results obtained in the initial compliance tests.

7. All applicable emission limiting precautions and procedures specified in this permit application, and in Rule 17-2.600(11), FAC, shall be followed at all times.

8. All compliance tests shall be conducted at 90-100% of the permitted equipment capacities.

9. A 15 day prior notice shall be given to DER's Southwest District office, of the compliance testing date(s).

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-111196
Expiration Date: April 1, 1988

SPECIFIC CONDITIONS:

10. The permittee shall submit a Sulfur Deposition and an Ambient Air Monitoring Plan to the Central Air Permitting (CAPS) office for approval, within 90 days of issuance of this permit. These monitoring plans shall be implemented for a minimum of 2 years from the date of issuance of the initial operating permit. Monitoring may be required beyond the initial 2 years should the department deem it necessary at the end of the initial monitoring period.

11. The following shall be submitted for approval to DER's District office within 45 days of completion of compliance tests, and a minimum of 90 days before the expiration date of this permit (copy to CAPS):

- a) Compliance test results of DER Method 9 and EPA Method 15/DER approved Alternate Test Procedure.
- b) Initial sulfur deposition monitoring report conducted according to Rule 17-2.753(2), FAC (DER Reference Method for Monitoring the Deposition of Sulfur Particulate).

12. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing, 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (Rule 17-4.09, FAC)

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to DER's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rules 17-4.22 and 17-4.23, FAC)

14. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4.10, FAC)

PERMITTEE:
Agrico Chemical Company

Permit Number: AC 53-111196
Expiration Date: April 1, 1988

SPECIFIC CONDITIONS:

15. Upon obtaining an operating permit the permittee will be required to submit annual reports, unless otherwise requested by DER, on the actual operation and emissions of the sources to the DER's District office.

16. Any change in the method of operation, equipment, or operating hours shall be submitted for approval to the DER's District office.

17. This permit shall replace all previous permits issued to the permittee for the construction of the sulfur pellet handling and melting facility.

Issued this 2 day of April, 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND
TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Vicki Tschinkel

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

*I plan to have
our stack sampling
team conduct a
Method 5 particulate
emission test on
the vapor scrubber.
The 0.2 #/hr is
near the detectable
limit of the method.*

*Method 5 is not required for
compliance according to Condition # 5*

FROM
Pradeep Raval
6'86

[Signature]

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

DATE

4/11/86

PHONE