

June 28, 1982

Mr. J. C. Lahman, Plant Manager  
Agrico Chemical Company  
P.O. Box 1969  
Bartow, Florida 33830

Dear Mr. Lahman:

The request for extension of the expiration date of the state construction permits submitted by Mr. Lawrence N. Curtin of Holland & Knight on behalf of Agrico Chemical Company has been reviewed and the following findings noted.

1. State applications for permits to construct were reviewed and construction permits issued based on the air pollution control regulations in effect on January 30, 1981. Time required to construct the sources was listed in the applications. The state permits issued allowed sufficient time for construction or modification, start of operations, and compliance testing. This data is summarized in the following table.

<u>Permit No.</u>	<u>Source</u>	<u>Construction Time</u>	<u>Issue Date</u>	<u>Expiration Date</u>
AC53-34868	Phos. Acid Plant	15 months	1/30/81	6/30/82
AC53-34871	Sulfuric Acid Plant	24 months	1/30/81	3/30/83
AC53-34861	DAP Plant	22 months	1/30/81	1/30/83
AC53-34865	DAP Storage/ Shipping	22 months	1/30/81	1/30/83

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2. A state permit to construct a purified MAP/DAP facility at the same phosphate fertilizer complex was issued by the Department's Southwest District Office (AC53-42155, issued July 17, 1981, expires December 15, 1982).
3. Construction of the purified MAP/DAP facility is proceeding in accordance with state permit, AC53-42155.
4. Construction/modification of the sources listed in 1 above has been delayed at the Company's option, because of the economic conditions associated with a decline in sales of fertilizer products.
5. Agrico Chemical Company, through its agent at Holland & Knight, is requesting that the expiration date of the construction permits for the four sources listed in 1 be extended to December 31, 1985.

Based on the proceeding facts, the Department has reached the following conclusion.

1. Agrico Chemical Company plans to handle the construction/modification allowed by the 5 state permits mentioned earlier in phases with the purified MAP/DAP facility being constructed first and the other sources built at a later date. All sources will be completed and tested by December 31, 1985.
2. This phased construction makes the source subject to Section 17-2.630(3), FAC, Phased Construction Project. This rule requires the owner or operator of the facility to demonstrate the adequacy of any previous determination of BACT before beginning construction.
3. All modifications to permit conditions are subject to Section 17-4.08, FAC. This rule allows the Department to require the permittee to comply with new or additional conditions, for good cause.

Pursuant to Section 17-2.630(3), FAC, and Section 17-4.08, FAC, the Department will extend the expiration dates of the state construction permits as requested and require the agent for the source to demonstrate the adequacy of all BACT determinations for

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there permits before beginning construction. The Department reserved the right to add new or additional conditions, with good cause, if needed to protect the ambient air quality from the impact of the new/modified sources.

A copy of this letter must be attached to each affected construction permit and it becomes a part of that permit. The affected permit numbers are listed below.

<u>Permit No.</u>	<u>Original Expiration Date</u>	<u>Modified Expiration Date</u>
AC53-34868	6/30/82	12/31/85
AC53-34871	3/30/83	12/31/85
AC53-34861	1/30/83	12/31/85
AC53-34865	1/30/83	12/31/85

Sincerely,

/s/Victoria J. Tschinkel

Victoria J. Tschinkel  
Secretary

VT:CF:ras

cc: Southwest District  
Holland & Knight

*Agrico ?*

*Bill Dan Williams*

LAW OFFICES

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PLEASE REPLY TO:

Lakeland, Florida  
June 2, 1982

600 MARYLAND AVENUE, S.W.  
WASHINGTON, D.C. 20024  
(202) 484-9090  
TWX 710-822-9775

CABLE ADDRESS  
HND KNIGHT  
TELEX 5-2630

**RECEIVED**

JUN 7 1982

Dept. of Environmental Regulation  
Office of General Counsel

Martha Hall, Esquire  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Re: Agrico Chemical Company - Construction Permits

Dear Marty:

As we recently discussed, Agrico Chemical Company has received construction permits from the Department of Environmental Regulation (DER) for a planned modification of its South Pierce Chemical Works in Bartow, Florida. The total project for which construction permits were issued includes construction of a new diammonium phosphate plant, a new purified MAP and DAP plant, a new sulfuric acid plant and a new DAP storage and shipping facility. In addition, the existing phosphoric acid plant is planned to be modified to increase production capacity.

Due to economic conditions that have caused an industry-wide decline in sales of fertilizer products, it will not be possible for Agrico to move forward with the total project at this time. The Company, however, still plans to complete the project at such time as the conditions are more favorable. Although projections of economic recovery vary, it is expected that conditions will improve within the foreseeable future.

Based upon the Company's revised construction schedule, we hereby request an extension of the expiration date of the DER construction permits for the phosphoric acid, sulfuric acid, and DAP and product load out phases of the project. Construction on the purified MAP/DAP facility will proceed in accordance with the DER permit. The DER identification numbers of the permits for which we are requesting extensions are as follows:

Martha Hall, Esq.  
June 2, 1982  
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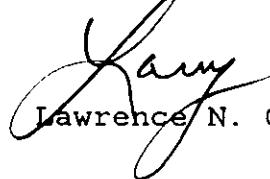
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<u>Permit No.</u>	<u>Source</u>	<u>Current Expiration Date</u>	<u>Extension Request</u>
AC 53-34868	Phosphoric acid plant	June 30, 1982	Dec. 31, 1985
AC 53-34871	Sulfuric acid plant	Mar. 30, 1983	Dec. 31, 1985
AC 53-34861	DAP plant	Jan. 30, 1983	Dec. 31, 1985
AC 53-34865	DAP storage and shipping facility	Jan. 30, 1983	Dec. 31, 1985

Should you have any questions concerning the foregoing or require additional information, please do not hesitate to contact us at your convenience. We look forward to hearing from you regarding the request for extension in the near future.

Sincerely,

HOLLAND & KNIGHT

  
Lawrence N. Curtin

LNC/er  
5674-2431060282:24  
cc: Mr. Ed Mayer

*Copy to Dan Williams on 6-9-82*

Subpart V—Standards of Performance for the Phosphate Fertilizer Industry: Diammonium Phosphate Plants<sup>14</sup>

§ 60.220 Applicability and designation of affected facility.<sup>64</sup>

(4) The affected facility to which the provisions of this subpart apply is each granular diammonium phosphate plant. For the purpose of this subpart, the affected facility includes any combination of: reactors, granulators, dryers, coolers, screens, and mills.

(b) Any facility under paragraph (a) of this section that commences construction or modification after October 23, 1971, is subject to the requirements of this subpart.

§ 60.221 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) "Granular diammonium phosphate plant" means any plant manufacturing granular diammonium phosphate by reacting phosphoric acid with ammonia.

(b) "Total fluorides" means elemental fluorine and all fluoride compounds as measured by reference methods specified in § 60.224, or equivalent or alternative methods.

(c) "Equivalent P<sub>2</sub>O<sub>5</sub> feed" means the quantity of phosphorus, expressed as phosphorous pentoxide, fed to the process.

§ 60.222 Standard for fluorides.

(a) On and after the date on which the performance test required to be conducted by § 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which contain total fluorides in excess of 30 g/metric ton of equivalent P<sub>2</sub>O<sub>5</sub> feed (0.080 lb/ton).

§ 60.223 Monitoring of operations.

(a) The owner or operator of any granular diammonium phosphate plant subject to the provisions of this subpart shall install, calibrate, maintain, and operate a flow monitoring device which can be used to determine the mass flow of phosphorus-bearing feed material to the process. The flow monitoring device shall have an accuracy of ±5 percent over its operating range.

(b) The owner or operator of any granular diammonium phosphate plant shall maintain a daily record of equivalent P<sub>2</sub>O<sub>5</sub> feed by first determining the total mass rate in metric ton/hr of phosphorus-bearing feed using a flow monitoring device meeting the requirements of paragraph (a) of this section and then by proceeding according to § 60.224(d) (2).

(c) The owner or operator of any granular diammonium phosphate plant

subject to the provisions of this part shall install, calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the scrubbing system. The monitoring device shall have an accuracy of ±5 percent over its operating range.

(Sec. 114, Clean Air Act is amended (42 U.S.C. 7414)), 64, 65

§ 60.224 Test methods and procedures.

(a) Reference methods in Appendix A of this part, except as provided for in § 60.8(b), shall be used to determine compliance with the standard prescribed in § 60.222 as follows:

(1) Method 13A or 13B for the concentration of total fluorides and the associated moisture content.

(2) Method 1 for sample and velocity traverses.

(3) Method 2 for velocity and volumetric flow rate, and

(4) Method 3 for gas analysis.

(b) For Method 13A or 13B, the sampling time for each run shall be at least 60 minutes and the minimum sample volume shall be at least 0.85 decm<sup>3</sup> (30 scf) except that shorter sampling times or smaller volumes when necessitated by process variables or other factors, may be approved by the Administrator.

(c) The air pollution control system for the affected facility shall be constructed so that volumetric flow rates and total fluoride emissions can be accurately determined by applicable test methods and procedures.

(d) Equivalent P<sub>2</sub>O<sub>5</sub> feed shall be determined as follows:

(1) Determine the total mass rate in metric ton/hr of phosphorus-bearing feed during each run using a flow monitoring device meeting the requirements of § 60.223(a).

(2) Calculate the equivalent P<sub>2</sub>O<sub>5</sub> feed by multiplying the percentage P<sub>2</sub>O<sub>5</sub> content, as measured by the spectrophotometric molybdovanadophosphate method (AOAC Method 9), times the total mass rate of phosphorus-bearing feed. AOAC Method 9 is published in the Official Methods of Analysis of the Association of Official Analytical Chemists, 11th edition, 1970, pp. 11-12. Other methods may be approved by the Administrator.

(e) For each run, emissions expressed in g/metric ton of equivalent P<sub>2</sub>O<sub>5</sub> feed shall be determined using the following equation:

$$E = \frac{(C_1 Q_1) 10^{-6}}{M_{P_2O_5}}$$

where:

E = Emissions of total fluorides in g/metric ton of equivalent P<sub>2</sub>O<sub>5</sub>

C<sub>1</sub> = Concentration of total fluorides in mg/dcm<sup>3</sup> as determined by Method 13A or 13B.

Q<sub>1</sub> = Volumetric flow rate of the effluent gas stream in dcm<sup>3</sup>/hr as determined by Method 2.

10<sup>-6</sup> = Conversion factor for mg to g.

M<sub>P<sub>2</sub>O<sub>5</sub></sub> = Equivalent P<sub>2</sub>O<sub>5</sub> feed in metric ton/hr as determined by § 60.224(d).

(Sec. 114, Clean Air Act is amended (42 U.S.C. 7414)), 64, 65

36 FR 24876, 12/23/71 (1)

as amended

40 FR 33162, 8/6/76 (14)

42 FR 37936, 7/26/77 (64)

42 FR 41424, 8/17/77 (68)

43 FR 8800, 3/3/78 (83)

## Subpart H—Standards of Performance for Sulfuric Acid Plants

### § 60.80 Applicability and designation of affected facility. <sup>6, 8</sup>

(a) The provisions of this subpart are applicable to each sulfuric acid production unit, which is the affected facility.

(b) Any facility under paragraph (a) of this section that commences construction or modification after August 17, 1971, is subject to the requirements of this subpart.

### § 60.81 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in Subpart A of this part.

(a) "Sulfuric acid production unit" means any facility producing sulfuric acid by the contact process by burning elemental sulfur, alkylation acid, hydrogen sulfide, organic sulfides and mercaptans, or acid sludge, but does not include facilities where conversion to sulfuric acid is utilized primarily as a means of preventing emissions to the atmosphere of sulfur dioxide or other sulfur compounds.

(b) "Acid mist" means sulfuric acid mist, as measured by Method 8 of Appendix A to this part or an equivalent or alternative method. <sup>8</sup>

### § 60.82 Standard for sulfur dioxide. <sup>8</sup>

(a) On and after the date on which the performance test required to be conducted by § 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which contain sulfur dioxide in excess of 2 kg per metric ton of acid produced (4 lb per ton), the production being expressed as 100 percent H<sub>2</sub>SO<sub>4</sub>.

### § 60.83 Standard for acid mist. <sup>3, 8</sup>

(a) On and after the date on which the performance test required to be conducted by § 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which:

(1) Contain acid mist, expressed as H<sub>2</sub>SO<sub>4</sub>, in excess of 0.075 kg per metric ton of acid produced (0.13 lb per ton), the production being expressed as 100 percent H<sub>2</sub>SO<sub>4</sub>.

(2) Exhibit 10 percent opacity, or greater. <sup>18</sup>

### § 60.84 Emission monitoring. <sup>18</sup>

(a) A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained, and operated by the owner or operator. The pollutant gas used to prepare calibration gas mixtures under paragraph 2.1, Performance Specification 2 and for

calibration checks under § 60.13(d) to this part, shall be sulfur dioxide (SO<sub>2</sub>). Reference Method 8 shall be used for conducting monitoring system performance evaluations under § 60.13(c), except that only the sulfur dioxide portion of the Method 8 results shall be used. The span shall be set at 1000 ppm of sulfur dioxide.

(b) The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of the applicable standard (kg/metric ton, lb/short ton). The conversion factor shall be determined, as a minimum, three times daily by measuring the concentration of sulfur dioxide entering the converter using suitable methods (e.g., the Reich test, National Air Pollution Control Administration Publication No. 999-AP-13 and calculating the appropriate conversion factor for each eight-hour period as follows:

$$CF = k \left[ \frac{1,000 - 0.015r}{r - s} \right]$$

where:

CF = conversion factor (kg/metric ton per ppm, lb/short ton per ppm).

k = constant derived from material balance. For determining CF in metric units, k = 0.0653. For determining CF in English units, k = 0.1306.

r = percentage of sulfur dioxide by volume entering the gas converter. Appropriate corrections must be made for air injection plants subject to the Administrator's approval.

s = percentage of sulfur dioxide by volume in the emissions to the atmosphere determined by the continuous monitoring system required under paragraph (a) of this section.

(c) The owner or operator shall record all conversion factors and values under paragraph (b) of this section from which they were computed (i.e., CF, r, and s).

(d) [Reserved] <sup>8</sup>

(e) For the purpose of reports under § 60.7(c), periods of excess emissions shall be all three-hour periods (or the arithmetic average of three consecutive one-hour periods) during which the integrated average sulfur dioxide emissions exceed the applicable standards under § 60.82. <sup>4, 18</sup>

(Sec. 114, Clean Air Act is amended (42 U.S.C. 7414), 68, 83)

### § 60.85 Test methods and procedures. <sup>8</sup>

(a) The reference methods in Appendix A to this part, except as provided for in § 60.8(b), shall be used to determine compliance with the standards prescribed in §§ 60.82 and 60.83 as follows:

(1) Method 8 for the concentrations of SO<sub>2</sub> and acid mist;

(2) Method 1 for sample and velocity traverses;

(3) Method 2 for velocity and volumetric flow rate; and

(4) Method 3 for gas analysis.

(b) The moisture content can be considered to be zero. For Method 8 the sam-

pling time for each run shall be at least 60 minutes and the minimum sample volume shall be 1.15 dscm (40.6 dscf) except that smaller sampling times or sample volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(c) Acid production rate, expressed in metric tons per hour of 100 percent H<sub>2</sub>SO<sub>4</sub>, shall be determined during each testing period by suitable methods and shall be confirmed by a material balance over the production system.

(d) Acid mist and sulfur dioxide emissions, expressed in g/metric ton of 100 percent H<sub>2</sub>SO<sub>4</sub>, shall be determined by dividing the emission rate in g/hr by the acid production rate. The emission rate shall be determined by the equation, g/hr = Q × c, where Q = volumetric flow rate of the effluent in dscm/hr as determined in accordance with paragraph (a) (3) of this section, and c = acid mist and SO<sub>2</sub> concentrations in g/dscm as determined in accordance with paragraph (a) (1) of this section.

(Sec. 114, Clean Air Act is amended (42 U.S.C. 7414), 68, 83)

36 FR 24876, 12/23/71 (1)

as amended

38 FR 13562, 5/23/73 (3)  
38 FR 28564, 10/15/73 (4)  
39 FR 20790, 6/14/74 (8)  
40 FR 46250, 10/6/75 (18)  
42 FR 37936, 7/25/77 (64)  
42 FR 41424, 8/17/77 (68)  
43 FR 8800, 3/3/78 (83)

Subpart T—Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants<sup>14</sup>

§ 60.200 Applicability and designation of affected facility.<sup>64</sup>

(a) The affected facility to which the provisions of this subpart apply is each wet-process phosphoric acid plant. For the purpose of this subpart, the affected facility includes any combination of: reactors, filters, evaporators, and hot-wells.

(b) Any facility under paragraph (a) of this section that commences construction or modification after October 22, 1974, is subject to the requirements of this subpart.

§ 60.201 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in Subpart A of this part.

(a) "Wet-process phosphoric acid plant" means any facility manufacturing phosphoric acid by reacting phosphate rock and acid.

(b) "Total fluorides" means elemental fluorine and all fluoride compounds as measured by reference methods specified in § 60.204, or equivalent or alternative methods.

(c) "Equivalent P<sub>2</sub>O<sub>5</sub> feed" means the quantity of phosphorus, expressed as phosphorous pentoxide, fed to the process.

§ 60.202 Standard for fluorides.

(a) On and after the date on which the performance test required to be conducted by § 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which contain total fluorides in excess of 10.0 g/metric ton of equivalent P<sub>2</sub>O<sub>5</sub> feed (0.020 lb/ton).

§ 60.203 Monitoring of operations.

(a) The owner or operator of any wet-process phosphoric acid plant subject to the provisions of this subpart 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.

(b) The owner or operator of any wet-process phosphoric acid plant shall maintain a daily record of equivalent P<sub>2</sub>O<sub>5</sub> feed by first determining the total mass rate in metric ton/hr of phosphorus bearing feed using a monitoring device for measuring mass flowrate which meets the requirements of paragraph (a) of this section and then by proceeding according to § 60.204(d) (2).

(c) The owner or operator of any wet-process phosphoric acid subject to the provisions of this part shall install, calibrate, maintain, and operate a monitor-

ing 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.

(Sec. 114, Clean Air Act is amended (42 U.S.C. 7414)), 68, 83

§ 60.204 Test methods and procedures.

(a) Reference methods in Appendix A of this part, except as provided in § 60.8 (b), shall be used to determine compliance with the standard prescribed in § 60.202 as follows:

(1) Method 13A or 13B for the concentration of total fluorides and the associated moisture content.

(2) Method 1 for sample and velocity traverses.

(3) Method 2 for velocity and volumetric flow rate, and

(4) Method 3 for gas analysis.

(b) For Method 13A or 13B, the sampling time for each run shall be at least 60 minutes and the minimum sample volume shall be 0.85 dscm (30 dscf) except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(c) The air pollution control system for the affected facility shall be constructed so that volumetric flow rates and total fluoride emissions can be accurately determined by applicable test methods and procedures.

(d) Equivalent P<sub>2</sub>O<sub>5</sub> feed shall be determined as follows:

(1) Determine the total mass rate in metric ton/hr of phosphorus-bearing feed during each run using a flow monitoring device meeting the requirements of § 60.203(a).

(2) Calculate the equivalent P<sub>2</sub>O<sub>5</sub> feed by multiplying the percentage P<sub>2</sub>O<sub>5</sub> content, as measured by the spectrophotometric molybdovanadophosphate method (AOAC Method 9), times the total mass rate of phosphorus-bearing feed. AOAC Method 9 is published in the Official Methods of Analysis of the Association of Official Analytical Chemists, 11th edition, 1970, pp. 11-12. Other methods may be approved by the Administrator.

(e) For each run, emissions expressed in g/metric ton of equivalent P<sub>2</sub>O<sub>5</sub> feed shall be determined using the following equation:

$$E = \frac{(C, Q_e) 10^{-3}}{M_{P_2O_5}}$$

where:

E = Emissions of total fluorides in g/metric ton of equivalent P<sub>2</sub>O<sub>5</sub> feed.

C<sub>e</sub> = Concentration of total fluorides in mg/dscm as determined by Method 13A or 13B.

Q<sub>e</sub> = Volumetric flow rate of the effluent gas stream in dscm/hr as determined by Method 2.

10<sup>-3</sup> = Conversion factor for mg to g.

M<sub>P<sub>2</sub>O<sub>5</sub></sub> = Equivalent P<sub>2</sub>O<sub>5</sub> feed in metric ton/hr as determined by § 60.204(d).

(Sec. 114, Clean Air Act is amended (42 U.S.C. 7414)), 68, 83

36 FR 24876, 12/23/71 (1)

as amended

40 FR 33152, 8/6/75 (14)  
42 FR 37936, 7/25/77 (64)  
42 FR 41424, 8/17/77 (68)  
43 FR 8800, 3/3/78 (83)



TABLE II  
EMISSION LIMITING STANDARDS

Stationary Sources	Particulates	Objectionable odor	Visible emissions	Fluorides (water soluble or gaseous atomic weight 18) expressed as pounds of fluoride per ton of phosphatic materials input to the system expressed as tons of P <sub>2</sub> O <sub>5</sub>
C. PHOSPHATE PROCESS (cont.)				
(1) (d) Granular triple superphosphate (GTSP) production and auxiliary equipment				
1. GTSP made by granulating run-of-pile TSP				0.06 pounds
2. GTSP made from phosphoric acid and phosphate rock slurry				0.15 pounds
(e) GTSP storage and auxiliary equipment				0.05 pounds
(f) Diammonium phosphate production and auxiliary equipment				0.06 pounds
(g) Calcining or other thermal phosphate rock processing and auxiliary equipment excepting phosphate rock drying and defluorinating				0.06 pounds
(h) Defluorinating phosphate rock by thermal processing and auxiliary equipment				0.37 pounds
(i) All plants, plant sections or unit operations and auxiliary equipment not listed in 17.2.05(6) Table II items C.(1) (a) through (h).	Must comply with best technology pursuant to 17.2.03(1)			
(2) Existing plants or plant sections. Emissions shall comply with 17.2.05(6) Table II item C.(1), Effective July 1, 1975 or				
(3) Existing plant complexes with an operating wet process phosphoric acid section (including any items 17.2.05(6) Table II items C.(1)(a) through (i) and other plant sections processing or handling phosphoric acid or products or phosphoric acid processing				Total emission of the entire complex shall not exceed 0.4 pounds per ton of P <sub>2</sub> O <sub>5</sub> input to the wet process phosphoric acid section
(4) Individual plant sections included in 17.2.05(6) Table II items C.(1) (a) through (i) but not included as a part as defined in C.(3)	If it can be shown by comprehensive engineering study and report to the Department that the existing plant sections are not suitable for the application of existing technology, which may include major rebuilding or repairs and scrubber installations, the emission limiting standard to apply will be the lowest obtained by any similar plant section existing and operating.			