



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

November 14, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dave Turney  
Environmental Coordinator  
IMC-Agrico Company  
Post Office Box 1035  
Mulberry, Florida 33860

Dear Mr. Turney:

Re: South Pierce SAP Plants No. 10 and 11  
AC53-199112(A) / PSD-FL-179(A)  
Request to Amend/Re-issue Construction Permit

Attached is one copy of the proposed re-issued/amended construction permit, Intent to Issue, and Notice of Intent to Issue (for publication by IMC-Agrico) for the above referenced emissions unit.

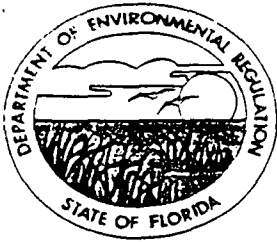
Please submit any comments you may have concerning the Department's proposed action to Mr. A. A. Linero, P.E., at the above address. If you have any questions, please call Mr. Martin Costello or Mr. Linero at (904) 488-1344.

Sincerely,

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

CHF/mc/t

cc: Jerry Kissel, SWD  
Jewell Harper, EPA  
Roy Harwood, Polk Co.  
John Koogler



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**

Agrico Chemical Company  
Post Office Box 1110  
Mulberry, Florida 33860

Permit Number: AC 53-199112  
PSD-FL-179

Expiration Date: Jan. 1, 1994\*

County: Polk

Latitude/Longitude: 27°45'52"N  
81°56'19"W

Project: Sulfuric Acid Plants  
Nos. 10 & 11 - Production Increases  
to 2700 TPD Per Plant (5400 TPD  
total)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 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 modifications to the existing Nos. 10 and 11 sulfuric acid plants that will increase each plant's production to 2700 TPD 100% sulfuric acid (5400 TPD total for both plants). The plant modifications include installing a new turbogenerator, using more efficient economizer units, replacing the tower and acid coolers with heat recovery systems, and adding more catalyst to the converters. These sources are located at the permittee's South Pierce phosphate fertilizer manufacturing facility on SR 630 near Fort Meade, Polk County, Florida 33841. The UTM coordinates of this facility are Zone 17, 407.5 km E and 3071.3 km N.

\*This permit is void if construction does not commence within 18 months of its issuance, if construction is discontinued for more than 18 months, or if construction is not completed and the modified plant placed in operation within a reasonable time.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Agrico's application received June 28, 1991.
2. DER's letter dated June 26, 1991.
3. Koogler & Associates' letter dated October 22, 1991.
4. Koogler & Associates' letter dated February 27, 1992.
5. Koogler & Associates' letter dated April 10, 1992.
6. U.S. Department of Interior's letter dated April 10, 1992

PERMITTEE:  
Agrico Chemical Company

Permit Number: AC 53-199112  
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

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.
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. 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 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, 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.
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

PERMITTEE:  
Agrico Chemical Company

Permit Number: AC 53-199112  
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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.

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

PERMITTEE:  
Agrico Chemical Company

Permit Number: AC 53-199112  
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

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.

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 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

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

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

PERMITTEE:  
Agrico Chemical Company

Permit Number: AC 53-199112  
Expiration Date: January 1, 1994

**GENERAL CONDITIONS:**

records of all data used to complete the application for 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:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates 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 corrected promptly.

**SPECIFIC CONDITIONS:**

1. The maximum production rate of each of the sulfuric acid plants (Nos. 10 & 11) shall not exceed 2700 tons per day based on 100%  $H_2SO_4$  (5400 TPD for both plants).

2. Sulfur dioxide emissions from each plant shall not exceed 4 lbs/ton of 100% sulfuric acid produced, 450.0 lbs/hr, and 1971.0 tons/yr.

3. Sulfuric acid mist emissions from each plant shall not exceed 0.15 lb/ton of 100% sulfuric acid produced, 16.9 lbs/hr, and 73.9 tons/yr.

4. Nitrogen oxides emissions from each plant shall not exceed 0.12 lb/ton of 100% sulfuric acid produced, 13.5 lbs/hr, and 59.1 tons/yr.

The nitrogen oxides limits are subject to revision if sufficient test data indicate that the emission factor is improper.

PERMITTEE:  
Agrico Chemical Company

Permit Number: AC 53-199112  
Expiration Date: January 1, 1994

**SPECIFIC CONDITIONS:**

5. Visible emissions from each plant shall not exceed 10% opacity.

6. A continuous emission monitor shall be used to monitor sulfur dioxide emissions from each plant in accordance with 40 CFR 60, Subpart H (July 1, 1991), Standards of Performance for Sulfuric Acid Plants. Initial and annual compliance tests shall be conducted using: EPA Method 7E for nitrogen oxides, EPA Method 8 for sulfur dioxide and acid mist, and EPA Method 9 for visible emissions as described in 40 CFR 60, Appendix A (July 1, 1991).

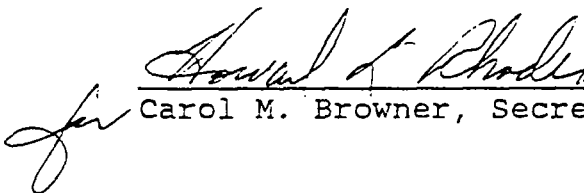
7. The compliance tests shall be conducted at 90 to 100% of the permitted capacity (2430 - 2700 TPH sulfuric acid production) and within 30 days after operating the plant at a rate above 2000 TPH. The Department's Southwest District office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to that office within 45 days of test completion.

8. The permittee, for good cause, may request that this construction 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 (F.A.C. Rule 17-4.090).

9. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. The operation permit application shall include a set of conditions acceptable to the Department for sequential startup/shutdown of the permittee's sulfuric acid plants. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 17 day  
of April, 1992

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
for Carol M. Browner, Secretary