Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

May 16, 2006

Jeffry A. Golwitzer
Facility Manager
Mosaic Fertilizer, LLC
7450 Highway 630
Mulberry, Florida 33860

Re: Title V Air Operation Permit Renewal
PROPOSED Permit Project No.: 1050055-014-AV
South Pierce Facility

Dear Mr. Golwitzer:

One copy of the "PROPOSED Determination" for the renewal of a Title V Air Operation Permit for the South Pierce Facility located at 7450 Highway 630, Mulberry, Polk County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"http://www.dep.state.fl.us/air/eproducts/ards/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Bobby Bull at 850/921-9585.

Sincerely,

Trina L. Vielhauer

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TV/rlb

Enclosures
copy furnished to:
John B. Koogler, PhD., P.E., Koogler and Associates
Pradeep Raval, Consultant, Koogler and Associates
Dean Ahrens, Environmental Superintendent, Mosaic Fertilizer, LLC
C.D. Turley, Mosaic Fertilizer, LLC
Jason Waters, FDEP- SWD
U.S. EPA, Region 4
Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4 , U.S. EPA)

PROPOSED Determination

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to Mosaic Fertilizer, LLC for the South Pierce Facility located at 7450 Highway 630, Mulberry, County was clerked on February 10, 2006. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published in the The Ledger on February 21, 2006. The DRAFT Permit was available for public inspection at the Southwest District Office in Temple Terrace and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on February 28, 2006.

II. Public Comment(s).

Comments were received and the DRAFT Permit was changed. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. Where duplicative comments exist, the original response is referenced.

A. Letter from **Mr. C.D. Turley, Mosaic Fertilizer,** dated March 22, 2006, and received on March 27, 2006.

1. Response: The table of contents does not list all attachments. All attachments should be listed as reflected in Exhibit 1 attached hereto.

As a result of this comment, ***The Table of Contents Appendices and Attachments*** *is hereby changed:*

From: *IV. Appendices and Attachments (listed in sequence as attached)*
Attachment A, Memorandum of Understanding Regarding Best Operational Start-Up Practices for Sulfuric Acid Plants
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix I-1, List of Insignificant Units
Appendix TV-5, Title V Conditions
Appendix SS-1, Stack Sampling Facilities
Appendix A-1, Abbreviations, Definitions, Citations, and ID Numbers
Appendix H-1, Permit History/ID Number Transfers
Figure 1 - Summary Report - Excess Emissions and Monitoring System Performance
Table 297.310-1 Calibration Schedule
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

To: *IV. Appendices and Attachments (listed in sequence as attached)*
Attachment A, Memorandum of Understanding Regarding Best Operational Start-Up Practices for Sulfuric Acid Plants
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix TV-5, Title V Conditions

Appendix SS-1, Stack Sampling Facilities
Appendix A-1, Abbreviations, Definitions, Citations, and ID Numbers (For reference only)
Appendix H-1, Permit History/ID Number Transfers (For reference only)
Figure 1 – Summary Report – Excess Emissions and Monitoring System Performance
Table 297.310-1 Calibration Schedule
Table 1-1, Summary of Air Pollutant Standards and Terms (For reference only)
Table 2-1, Summary of Compliance Requirements (For reference only)
40 CFR Part 61, Subpart A (General Provisions) and Subpart R (Radon Emissions from Phosphogypsum Stacks)
40 CFR Part 63, Subparts A (General Provisions) and Subparts AA and BB
Compliance Assurance Monitoring (CAM) Plan
Compliance Plan CP-1
Alternate Sampling Plans, approved 10/19/05 and 12/20/05, ASP 05-5-AP and ASP 05-L-AP

2. Response: The Cover Letter (Placard Page) does not list all attachments. All attachments should be listed as reflected in Exhibit 1 except those noted "for reference only".

As a result of this comment, ***Placard Page*** *is hereby changed:*

From: Referenced attachments made a part of this permit:
Attachment A, Memorandum of Understanding Regarding Best Operational Start-Up Practices for Sulfuric Acid Plants
Appendix U-1, List of Unregulated Emissions Units and/or Activities
APPENDIX TV-5, TITLE V CONDITIONS (version dated 4/5/05)
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/7/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/7/96)
FIGURE 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)
40 CFR 63 Subparts A (General Provisions for Subparts AA and BB (Combined)
40 CFR 61 Subpart A (General Provisions) and Subpart R (Radon Emissions from Phosphogypsum Stacks)
Compliance Plan CP-1
Alternate Sampling Plans, Approved 10/19/05 and 12/20/05

To: Referenced attachments made a part of this permit:
Attachment A, Memorandum of Understanding Regarding Best Operational Start-Up Practices for Sulfuric Acid Plants
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
APPENDIX TV-5, TITLE V CONDITIONS (version dated 4/5/05)
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/7/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/7/96)
FIGURE 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)
40 CFR 63 Subparts A (General Provisions for Subparts AA and BB (Combined)
40 CFR 61 Subpart A (General Provisions) and Subpart R (Radon Emissions from Phosphogypsum Stacks)

Compliance Plan CP-1
Alternate Sampling Plans, Approved 10/19/05 and 12/20/05

3. Response: Page 5, Section II, Condition 9: The test period changed from 30 to 15 days. This timeframe is impossible to meet because of the 15 or 60 day prior notification requirements for testing. We request the test period be revised to 30 days.

The condition reflects rule 62-297.310, F.A.C. allowing no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.

4. Response: Page 5, Section II, Condition 13: Clarify reporting timeframe. The reference to the permit effective dates creates ambiguity. The reporting requirement should be clearly based on calendar reporting for both monthly and quarterly reporting.

In comments on the draft permit published on March 15, 2005, the applicant requested this language be in the condition after the Department removed it from the March 2005 draft. The language was returned to the permit. The Department will not make any changes.

5. Response: Restore Condition 4 from prior permit stating the list of Insignificant Emission Units and/or Activities is part of the Permit.

*As a result of this comment, the **List of Insignificant Emission Units and/or Activities** will be added to the facility-wide conditions:*

Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. Response: In the prior permit, facility-wide condition 14 provided retesting options to ensure the air pollution control or system were operating properly. Need to include Conditions 14(c) and (d) from the prior permit. These conditions allowed the facility to re-establish scrubber parameter ranges retroactively by retesting within 30 days at the same conditions reflecting a compliance exception to demonstrate compliance at those conditions. These conditions are not precluded by the NESHAP.

The facility is subject to the testing procedures in 40 CFR 63 Subparts A, AA, and BB and alternate sampling plan. This condition will not apply to the sulfuric acid plants since they do not require parametric monitoring. The Department will not restore this condition.

7. Response: In the prior permit, facility-wide condition 14, the drop shall not fall below, the case of pressure drop of less than 5 inches of water, a change of 0.5 inches below the drop reported in the last satisfactory. Condition 14(b)(3) needs to be restored for the cases of +/-20% of low pressure drops. This condition recognizes control and measurement difficulties for drops of water less than 5 inches.

The facility is subject to 40 CFR 63 Subparts A, AA, and BB and alternate sampling plan for testing and monitoring pressure drop. The Department will not restore this condition.

8. Response: Page 13, Section III, Condition B.2.: PTE Sulfuric Acid production; this condition should be stricken; it duplicates H.1.

The condition states the sulfur throughput limit for the facility. This applies to the Sulfuric Acid Plants 10 and 11 in Subsection B and the Molten Sulfur Storage, Truck Pits, and Transfer pits in Subsection H. It is included in both sections for clarity. No change will be made.

9. Response: Page 16, Section III, Condition B.22.: The emission standard testing references specific conditions B.2. and B.3. The condition should reference specific conditions B.3. and B.4.

*As a result of this comment, **Specific Condition B.22., 1st Sentence** is hereby changed:*

***From:** In order to document ongoing compliance with the emission limitations of Conditions B.2. and B.3., the permittee shall maintain monthly records of Sulfuric Acid Plant sulfur dioxide (SO_2) emissions for each emission unit.*

***To:** In order to document ongoing compliance with the emission limitations of Conditions B.3. and B.4., the permittee shall maintain monthly records of Sulfuric Acid Plant sulfur dioxide (SO_2) emissions for each emission unit.*

10. Response: Page 17, Section III, EU Description Permitting Note: The permitting note states that the NESHAP takes precedence over NSPS except for BACT determinations which would take precedence over both. This note should be clarified as it creates ambiguity. There are no BACT determinations at this facility which impose limits more stringent than the NESHAP. 40 CFR Part 63, Subpart AA is equivalent to BACT at this facility for Phosphoric Acid Manufacturing Plant Trains A and B. If this note is intended to refer to other requirements, they should be clearly spelled out.

The Department has included this language in all subsections where the emission unit is subject to 40 CFR 63 Subpart AA or BB. The note states the emission unit is subject to the State and Federal rules, the order in which the unit will be subject, and in the case of EUs 008 and 009, for any future BACT determinations. The affected units remain subject to all applicable requirements. The Department will not revise the language.

11. Response: Page 17, Section III, Condition C.2.: The maximum production rate of 50 tons P2O5 per hour should be removed. Production fluctuates based on recovery and should not be limited in the permit. The limit is based on P2O5 input which defines capacity. The production rate limit would constitute an inappropriate and indirect limit. Strike the last sentence in footnote(2) which restates that fluoride emissions shall not exceed .02 pounds per ton. It is unnecessary, as it is a restatement of condition C.2.

The Department acknowledges the maximum input process rate for each Phosphoric Acid Plant Train shall not exceed 55.45 tons per hour of equivalent P_2O_5 feed rate as the regulated capacity. The Department will remove this production rate limit.

*As a result of this comment, **Specific Condition C.,2.,** is hereby changed:*

From: *Total fluoride emissions[2] from each Phosphoric Acid Plant Train shall not exceed 0.02 pounds per ton (10.0 gram/metric ton) of the equivalent P_2O_5 feed rate[1], and 1.11 pounds per hour at the maximum 55.45 tons per hour equivalent P_2O_5 feed rate (maximum production rate of 50 tons P_2O_5 product per hour). [Permit AC53-34868, 40 CFR 60.202, 40 CFR 63.602(a)]*

*[2] **"Total Fluoride Emissions"** - elemental fluorine and all fluoride compounds as measured by reference methods specified in 40 CFR 60.204, or equivalent or alternative methods. Fluoride emissions for 40 CFR63 subpart AA shall not exceed 0.02 pounds per tons (63.202(a)).*

To: *Total fluoride emissions[2] from each Phosphoric Acid Plant Train shall not exceed 0.02 pounds per ton (10.0 gram/metric ton) of the equivalent P_2O_5 feed rate[1], and 1.11 pounds per hour at the maximum 55.45 tons per hour equivalent P_2O_5 feed rate. [Permit AC53-34868, 40 CFR 60.202, 40 CFR 63.602(a)]*

*[2] **"Total Fluoride Emissions"** - elemental fluorine and all fluoride compounds as measured by reference methods specified in 40 CFR 60.204, or equivalent or alternative methods.*

12. Response: Section III, Conditions C.5., E.10., F.11.: Required prior test notification per 40 CFR63.9. This replaces the 15 day notification. 40 CFR §63.9 covers Title V test notifications. The permit should read "60 day prior written notification of a performance test shall be provided, including, if required, the site specific test plan. [40 CFR §63.9(e); 40 CFR §63.7(c)]." The permit should lay out specific requirements and not just cite applicable regulations. This comment applies to the overall draft permit. Cite regulations in parentheticals.

The Department will not change the language in this condition. However the Department will add a permitting note that this condition is more stringent than the 60-day notification requirements in the state rule. The following language is as followed:

"Permitting Note: This 60-day notification requirement is more stringent than the state requirement of 15-day notification in 62-297.310, F.A.C."

The Department will not change the language in the conditions throughout the permit. However, the Department will reference applicable conditions in addition to the rule cites for the applicable conditions.

13. Response: Page 18, Section III, Condition C.6.: Test for F annually: Strike reference to §63.7(a)(2) – this refers to the initial test which is no longer an applicable requirement. The permit should read "An annual performance test shall be conducted to demonstrate compliance with the applicable emission standard..." Strike references to "new" equipment which isn't applicable, and to non existent equipment or processes – specifically, the superphosphoric acid process line, rock dryer, and rock calciner. Strike all DAP and MAP references in the permit.

The Department recognizes the incorrect rule was cited in this condition. The correct rule should be 40 CFR 63.606(a)(1) for existing emission units. As a result of this comment, the Department will delete any references and conditions to new equipment and delete all references to the superphosphoric acid process line, rock dryer, rock calciner, DAP and MAP throughout the entire permit.

As a result of this comment, ***Specific Condition C.,6.,*** *is hereby changed:*

From: *As required by § 63.7(a)(2) and once each federal fiscal year thereafter, each owner or operator of a phosphoric acid manufacturing plant shall conduct a performance test to demonstrate compliance with the applicable emission standard for each new wet-process phosphoric acid process line, superphosphoric acid process line, phosphate rock dryer, and phosphate rock calciner. The performance test shall include tests from Phosphoric Acid Plant Train A and B scrubbers for fluorides. The owner or operator shall conduct the performance test according to the procedures in subpart A of this part and in this section.*
[40 CFR 63.606(a)(2), and Rule 62-297.310(7)(a)4, F.A.C.]

To: *Each owner or operator of a phosphoric acid manufacturing plant shall conduct an annual performance test to demonstrate compliance with the applicable emission standard for each existing wet-process phosphoric acid process line. The owner or operator shall conduct the performance test according to the procedures in subpart A of this part and in this section.*
[40 CFR 63.606(a)(1), and Rule 62-297.310(7)(a)4, F.A.C.]

14. Response: Section III, Conditions C.7, E.13, and F.10.: In C.7, E.13 and F.10 strike reference to "new" equipment which isn't applicable. In C.7 strike reference to superphosphoric line which does not exist. In E.13 strike reference to DAP and MAP reference. In F.10 change reference to F.3. The permit should read "The performance tests shall be conducted according to the reference methods and procedures specified in C.14 (or E.18)." The last introductory sentence should read "Compliance with the fluoride standards in C.2 (or E.3) shall be determined as follows:"

The Department will delete references to new equipment and equipment that does not exist. Please see Comment 12.

15. Response: Page 18, III, C.7(1) and Page 29, III, E.13(1): Determine lb F/ton P2O5; Please rewrite the formula to recognize there is only one emission point. As written, the formula contemplates multiple emission points.

The equation is the applicable equation provided in 40 CFR 63 63.606 and 63.626. The Department will not change the equation.

16. Response: Section III, Conditions C.7, C.8, C.10, C.12, C.14, C.16, E.4, E.13, E.17, E.18, F.7, F.10, F.15, F.19, F.20: References to Scrubber pressure drops, flow and amps should include the options under the ASPs.

As a result of this comment, the following condition will be added to Subsections C, E, and F to acknowledge the Alternate Sampling Plan:

"This emission unit is also subject to the requirements of Alternate Sampling Plan, 05-L-AP, dated December 20, 2005."

17. Response: Page 38, Section III, Condition F.19.: The Permit should reference C.14 and C.12 in Section C and E.17 and 18 in Section E. In Section F, reference F.19 not §63.625(f)(1) or (2) and strike reference to §63.625 -- it is covered in the compliance plan CP-1, the installation of monitoring with new scrubber.

The Department will not strike this condition. The condition will be applicable after the terms of the Compliance Plan, CP-1, have been satisfied. Also, please see comment 12.

18. Response: 19, III, C.8: Rock dryer testing requirements, Strike- No dryer exists.
*As a result of this comment, **Condition C.8.** will be removed from the permit.*

19. Response: 20, Section III, Condition C.9.: Calciner testing requirements, Strike- No calciner exists.

*As a result of this comment, **Condition C.9.** will be removed from the permit.*

20 and 21. Response: Page 20, Section III, Conditions C.10(e) and (f): Test report information: scrubber gpm and delta P. Strike, See condition C.7(4).

The requirements in C.10.(e) and (f) are data to be included in test reports. The Department will not remove the two conditions, however each condition will be revised to comply with C.7.(4).

*As a result of this comment, **Conditions C.10.(e) and (f)** are hereby changed:*

From: *The following apply to both Trains A & B:*
e. the water flow rate (gallons per minute), and
f. the scrubber pressure drop (inches of water).

To: *The following apply to both Trains A & B (In accordance with 63.605):*
e. the water flow rate, and
f. the scrubber pressure drop.

22. Response: Page 20, Section III, Condition C.12.(2); Change reference to C.13 not 11.
*As a result of this comment, **conditions C.12(2) Permitting Note** will be revised.*

From: *{Permitting Note: This condition takes precedence over Specific Condition C.11. The conditions of C.11. are applicable if the owner of operator is not in compliance with this condition.}*

To: *{Permitting Note: This condition takes precedence over Specific Condition C.13. The conditions of C.13. are applicable if the owner of operator is not in compliance with this condition.}*

23. Response: Section III, Conditions C.13. and E.23.: Establish operating ranges; Strike this condition. In Section C it has been superceded by C.12 and in E by E.17 and no longer applies.

*As a result of this comment, **Conditions C.13. and E.23.** will be removed from the permit.*

24. Response: Section III, Conditions C.14., E.18., and F.19.: In Section C, Change the reference from §63.606 to C.7. In Section E, change reference from 63.626 to E.13 and in Section F. from 63.626 to F.10. Cite regulations in parentheticals.

Please see Comment 12.

25. Response: Section III, Conditions C.14(1), E.18(1), and F.19(1): In Section C, change the reference to C.7, not §63.606(c)(4). Strike (d)(4) and (e)(2) as they apply to rock dryers and rock calciners, equipment that is not present at the facility. In Section E, reference E.13 not 63.626(c)(4) and strike (d)(4) as this applies to the storage buildings and is covered in Section F. In Section F, reference F.10, not 63.626(c)(4). Put regulatory citations in parentheticals. See Comment 6 regarding old II.14(b)3 condition about low pressure drops.

As a result of this comment, the references to the rock dryers and calciners will be deleted. The references to the storage buildings will be deleted where it is not applicable. Please see Comments 6 and 12.

26. Response: Section III, Conditions C.14(2), E.18(2), and F.19(2): In Section C, reference C.7. Strike (d)(4) and (e)(2) as they apply to rock dryers and rock calciners, equipment that is not present at the facility. Change the reference to §63.604 to C.16. In Section E, reference E.13 and in Section F, reference F.10, not 63.606(c)(4) and strike (d)(4). In Section E, change the reference from 63.624 to E.4 and in Section F change the reference from 63.624 to F.7. Regulations should be cited in parentheticals.

As a result of this comment, the references to the rock dryers and calciners will be deleted. Please see Comment 12.

27. Response: Section III, Condition C.15.: Strike – this equipment does not exist.

As a result of this comment, the Department will delete this condition.

28. Response: Section III, Condition C.16.: Change the references from regulatory citations to the relevant conditions and cite the regulations in parentheticals. Specifically, change the reference to §§63.7 and 63.606 to C.7, and the reference to §63.605 to C.14.

Please see comment 12.

29. Response: Section III, Condition C.17.: Strike "new" and superphosphoric line, rock dryer and rock calciner. No new equipment is present and the other equipment does not exist.

As a result of this comment, the Department will remove references to new processes and the superphosphoric line, rock dryer and rock calciner.

30. Response: Page 22, Section 3, Conditions, C.18. and C.19.: Maintain daily record of P_2O_5 feed. C. 18 and C. 19 should be combined to be one condition, not two. The revised single condition should list as regulatory references the provisions in Part 60 and 63 rather than having 2 conditions.

As a result of this comment; Section III Conditions C.18. and C.19. will be combined into one permit condition, C.18.

31. Response: Section III, Conditions C.20., E.21., and F.12.: Condition 20 (and E.21 and F.12) which provides "Each owner or operator…shall comply with the recordkeeping requirements in §63.10" should be stricken. Specific applicable requirements from §63.10 should

be listed. This is done in C.21 (and E.22 and F.13) so C.20 (and E.21 and F.12) is superfluous and should be stricken.

As a result of this comment, The Department will ***combine conditions C.20. with C.21, E.21. with E.22., and F.12 with F.13, respectively.*** *Please see Comment #13.*

32. Response: Section III, Conditions C.21(1), E.22.(1), and F.13(1).: The reference to initial testing requirements should be stricken. Strike references to "as required by §63.10." C.21.(1) should read "The results of the annual performance tests shall be reported within 45 days." Note: The 45 day rule under Florida regulations supersedes the 60 day NESHAP Subpart A. The regulatory citations should be listed at the end in parentheticals.

The references to Sec. 63.10 will not be deleted. The Department will delete references to initial testing. A statement will be added that the rule in 62-297-310 is more stringent. Please see Condition 13. As a result of this comment, Conditions C.21(1), E.22.(1), and F.13(1). are hereby changed:
From: *Performance test report. As required by § 63.10, the owner or operator shall report the results of the initial and annual performance tests as part of the notification of compliance status required in § 63.9 and all applicable requirements of Rule 62-297.310(8), F.A.C.*

To: *Performance test report. As required by § 63.10, the owner or operator shall report the results of the annual performance tests as part of the notification of compliance status required in § 63.9 and all applicable requirements of Rule 62-297.310(8), F.A.C. The 45-day test reporting requirements are more stringent in Rule 62-297.310(8), F.A.C.*

33. Response: Section III, Conditions C.21(2), E.22(2), F.13(2): Strike references to "as required by §63.10." Specific applicable requirements from §63.10 should be listed.

The Department will not delete references and the condition will not be changed. Please see Comment 12.

34. Response: Section III, Conditions C.22, E.25, F.21: This condition should be deleted. It's unclear that is sets forth compliance requirements not already referenced elsewhere in the permit. If it imposes additional obligations not already referenced in the permit, these should be specified. 40 CFR Parts 61 and 63 are listed in permit cover letter but not listed in the table of contents and are not included.

This condition will not be deleted. The General Provisions to Subpart A for Subpart AA will be attachments to this permit. The condition will be clarified for applicability.

35. Response: Section III, Condition C.23.: Reference made to BB – should be AA.

As a result of this comment, ***Condition C.23., Introductory Paragraph,*** *is hereby changed:*

From: *This emission unit is subject to specific requirements of 40 CFR 63, Subpart BB, Appendix A to Subpart BB – Applicability to General Provisions to Subpart BB, and Compliance Plan CP-1. The owner or operator is responsible for remaining in compliance with any updates made to Subpart A or BB. To establish operating parameters for this emissions unit, the owner or operator must comply and demonstrate with the following:*

To: *This emission unit is subject to specific requirements of 40 CFR 63, Subpart AA, Appendix A to Subpart AA– Applicability to General Provisions to Subpart AA, and Compliance Plan CP-1. The owner or operator is responsible for remaining in compliance with any updates made to Subpart A or AA. To establish operating parameters for this emissions unit, the owner or operator must comply and demonstrate with the following:*

36. Response: Section III, Conditions C.23., E.27., and F.23.: Specify as conditions the applicable requirements: such as ssm plan, etc. Strike the permit update language. A Permit cannot be modified via regulatory changes absent inclusion in the SIP and modification of the permit.

The conditions of the SSM plan are specified in Subpart A. The Department will not strike the permit update language. The condition will be clarified for the incorporation of MACT standards.

37. Response: Section III, Condition C.23(2): Strike this condition, it is a duplicate specification.

The Department will not delete this condition.

38. Response: Section III, Conditions C.23.(3), E.27(2), and F.23.(3): As previously explained, expand this to include provision for operation outside range for the period of test without being an exception.

The Department will not change this language. If all testing procedures are followed, the emission unit being tested will not be out of compliance.

39. Response: Section III, Condition C.23.(5), E.27.(5), and F.23.(5): Strike this condition, it is a duplicate specification. (See C.21(1); E.27(1);F.23(1)).

The Department will not delete this condition. This condition will still be applicable after the conditions of Compliance Plan CP-1 are satisfied.

40. Response: Section III, Conditions C.23(6), E.27(6), and F.23(6): Strike this condition, it is a duplicate specification. (See C.21(1); E.27(1); F.23(1) .

The Department will not delete this condition. This condition will still be applicable after the conditions of Compliance Plan CP-1 are satisfied.

41. Response: Section III, Conditions C.23(7), E.27(7), and F.23(5): See Comment 6. As previously explained, the ability to re-establish ranges needs to be added back here in some form.

The facility is subject to the testing procedures in 40 CFR 63 Subparts A, AA, and BB and alternate sampling plan. The Department will not restore this condition. Please see Comment 6.

42. Response: Section III, Condition C.26. : Add "Not federally enforceable" notation back. Also, clarify what FDEP considers reasonable precautions by way of examples.

The Department will not revise the language. After further conversations with the Department, the applicant requested no examples be included in this condition.

43. Response: Section III, Condition E.8.: Strike this condition– this is included in MACT reporting requirements (see E.22(2) for excess emission reporting). The citation to the Florida regulation can be added in parentheticals to E.22.

As a result of this comment, the Department will remove this condition. The rule is currently cited in the condition.

44. Response: Section III, Condition E.11.: Strike reference to §63.630 – this refers to the initial test which is no longer an applicable requirement. Also strike reference to storage building which is covered in F. The permit should read "An annual performance test shall be conducted to demonstrate compliance with the applicable emission standard referenced in E.3,E.5 and E.6..."

As a result of this comment, the Department will remove references to the GTSP storage building and the reference to initial testing.

45. Response: Section III, Conditions E.19. and E.20.: Strike E.19. 40 CFR 60.203(b) applies to Phosphoric Acid plants not GTSP lines. In E.20 strike "the owner or operator is subject to the requirements of 40 CFR 60.203(b)...". This regulation applies to Phosphoric Acid plants not GTSP lines. Also strike the reference to this regulation in the parenthetical. In E.20, the language should read "...using a monitoring system for measuring mass flow rate which shall have an accuracy of +/- 5% over its operating range and then by proceeding in accordance with E.13(3). Further, please note, the GTSP line at this facility is a pre-NSPS source and therefore, NSPS does not apply.

The Department recognizes 40 CFR 60.203(b) was inadvertently included in this subsection. As a result of this comment, Condition E.19. will be removed The rule cite and rule reference to 40 CFR 60.203(b) in the Condition E.20. will be removed. Please see comment 12.

46. Response: Section III, Condition E.26.: Strike this condition. The storage buildings are addressed in Section F. This is an unnecessary and potentially confusing.

The Department recognizes this condition and rule cite was inadvertently included in this subsection. As a result of this comment, Condition E.26. will be removed.

47. Response: Section III, Conditions E.27(2) and F.23(2): Strike – duplicate specification

The Department will not remove this condition.

48-51. Response: Section III, Condition E.28.: Remove the definitions of DAP/MAP process line, Equivalent P2O5 stored, Fresh GTSP, and Research and development facility.

As a result of this comment, the Department will remove these definitions.

52. Response: Section III, Condition E.29.: Add clarification of what events constitute an exceedance versus and an excursion. This information is necessary to properly complete the annual statement of compliance.

This information will be provided in the CAM plan Monitoring Approach for EU 023. Please see comment 73.

53. Response: Section III, Condition F.9.: Strike – performance tests are covered in F.8

The condition is not applicable for existing units and As a result of this comment, the Department will delete this condition.

54. Response: Section III, Condition F.10(2): (2) can be stricken as it restates the introduction in F.10.

The Department recognizes this repetitive language. As a result of this comment, ***Condition F.10.(2)*** *will be reserved.*

55. Response: Section III, Condition F.15.: Revise this is in conflict with F.7. Strike last sentence which provides fan amps as alternate indicator of pressure drops. This is covered under ASP 05-L-AP.

The Department will not delete this condition. Please see comment 17.

56. Response: Section III, Condition F.20.(a): Strike, see F.7. This has been superceded.

As a result of this comment, Conditions F.20. is hereby changed:

From: The permittee shall establish and maintain a record log for the GTSP East Storage Building. The record log shall include, at a minimum:

a. exhaust fan amperage for each scrubber, indicating the scrubber identification, the date and time of the measurements, and the person responsible for performing the measurements. A log entry shall be made at least once during every week of GTSP loading or unloading operations,
b. a reference to loadout records to verify that the 7500 tons per day maximum GTSP production output rate, required by Condition F.1, is not exceeded,
c. a reference to loading records to verify that the 140 tons per hour maximum GTSP production input rate, as stated in Condition F.1, is not exceeded.

The permittee may substitute continuous monitoring, strip chart recordings and/or electronic media recording in lieu of the required manual recordings.
[Rules 62-4.070(3), 62-4.160(14)(b), and 62-4.160(14)(c), F.A.C.]

To: The permittee shall establish and maintain a record log for the GTSP East Storage Building. The record log shall include, at a minimum:

a. a reference to loadout records to verify that the 7500 tons per day maximum GTSP production output rate, required by Condition F.1, is not exceeded,
b. a reference to loading records to verify that the 140 tons per hour maximum GTSP production input rate, as stated in Condition F.1, is not exceeded.

The permittee may substitute continuous monitoring, strip chart recordings and/or electronic media recording in lieu of the required manual recordings.
[Rules 62-4.070(3), 62-4.160(14)(b), and 62-4.160(14)(c), F.A.C.]

57-61. Response: Section III, Condition F.24.: Delete definitions for DAP/MAP process line, Equivalent P2O5 feed, GTSP Process Line, and Research and Development Facility.

As a result of this comment, the Department will delete these definitions from this condition.

62. Response: Section III, Subsection H.: Strike reference to rail unloading.

As a result of this comment, ***Subsection H, Facility Description, 2nd Paragraph, 2nd Sentence****, is hereby changed:*

From: *Molten Sulfur is unloaded into pits via truck or rail.*

To: *Molten Sulfur is unloaded into pits via truck.*

63. Response: Section III, Condition H.2.: Strike – see condition II.11

This condition was incorporated as part of air construction permit 1050055-013-AC. The Department will not remove this condition.

64. Response: Section III, Condition H.9.: Delete reference to railcars.

As a result of this comment, ***Condition H.9****, is hereby changed:*

From: All areas surrounding points where molten sulfur pipes are routinely disconnected and areas where molten sulfur is transferred to trucks or railcars shall be paved and curbed within 20 feet of the point of disconnection or transfer to contain any spilled molten sulfur, or shall be provided with noncorrosible drip pans or other secondary containment, positioned to collect spills, that are adequate to contain amounts of sulfur that may escape during routine disconnect, reconnection or operation of the piping system.

To: All areas surrounding points where molten sulfur pipes are routinely disconnected and areas where molten sulfur is transferred to trucks shall be paved and curbed within 20 feet of the point of disconnection or transfer to contain any spilled molten sulfur, or shall be provided with noncorrosible drip pans or other secondary containment, positioned to collect spills, that are adequate to contain amounts of sulfur that may escape during routine disconnect, reconnection or operation of the piping system.

65. Response: Section III, Condition H.12.: Strike – condition II.2. This is not federally enforceable. If the condition remains it should be noted as, Non-Federally Enforceable.

This condition is a specific condition of air construction permit 1050055-013-AC. This will not be removed, and remain as is.

66. Response: Section III, Condition H.15.: Change 60 back to 30 minutes as in condition H.18. Reference H.3 and VE observations should be for 30 minutes same as in H.18.

Based on air construction permit 1050055-013-AC, the VE observations are 30 minutes for affected units in this subsection. As a result of this comment, all references to VE observations will be for 30 minutes observations.

67. Response: Section III, Condition H.17.: Strike – same as H.15 or at a minimum change reference to H.3.

*As a result of this comment, **Condition H.17.** is hereby changed:*

From: Test Method-Visible Emissions. Compliance with the emission limitations specified in Specific Condition J.7. will be determined using DEP Method 9. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C.
[Rules 62-297.401(9)(c), 62-297.310(4), 62-296.411(1)(j)(1), F.A.C., Air Construction Permit 1050055-013-AC]

To: Test Method-Visible Emissions. Compliance with the emission limitations specified in Specific Condition H.3. will be determined using DEP Method 9. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C.
[Rules 62-297.401(9)(c), 62-297.310(4), 62-296.411(1)(j)(1), F.A.C., Air Construction Permit 1050055-013-AC]

68. Response: Section III, Condition H.18.: Combine H.15, H.17 and H.18. Specify 30 minutes

As a result of this comment, the Department will combine the conditions into one condition with 30 minutes specified as the required test run duration.

69. Response: Section III, Condition H.20.: Strike – condition II.1, TV-1 43. Change reference to H.1,H.2 and H.11.

*The Department will not remove this condition; however it will correct the references in the condition. As a result of this comment, **Condition H.20., 1st paragraph** is hereby changed:*

***From: Recordkeeping.** In order to document compliance with Specific Conditions J.1., J.2., and J.6., the permittee shall keep the following records at a minimum:*

***To: Recordkeeping.** In order to document compliance with Specific Conditions H.1., H.2., and H.11., the permittee shall keep the following records at a minimum:*

70. Response: Section III, Condition H.24.: Strike – condition II.1, TV-1 43

This condition is a specific condition in air construction permit 1050055-013-AC and will not be removed.

71. Response: Section III, Condition H.25.: Strike – included in H.8-11 and H.22-24

The Department will not delete this condition.
72. Response: CAM Plan, Indicator 1: This needs to be clarified - is the tailgas to be based on fan amps or pressure drop?

The Department inadvertently indicated the range for the scrubber is determined by fan amps. This is incorrect and the indicator will be pressure drop across the scrubber.

73. Response: CAM Plan: excursion = 1 hour average; Exceedance averaging time is not defined. It is unclear if an excursion is an exception to the TV permit and therefore reportable in the annual compliance statement. Language in E.29 reads "Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation" Which suggest this not reportable in the annual statement. See discussion below regarding 1 hour excursion reporting for purposes of the annual compliance statement.

*Please refer to **CAM Plan condition 15** for reporting requirements. As a result of this comment and comment 52, the **Monitoring Approach Table for EU 023** is here by changed:*

From:

Monitoring Approach

	Indicator 1	Indicator 2
1. Indicator	Max and Min Fan Amps	Max and Min Liquid Flow Rate
Measuring Approach	Fan Amps are measured with an installed Amp Meter	Liquid Flow is measured with an installed Flow Meter
2. Indicator Range	An excursion is defined as any 1 hour average excluding those events defined as startup, shutdown and malfunctions, flow rate outside of the following range: Tailgas Scrubber: 4.6 – 10.2 in H_2O	An excursion is defined as any 1 hour average excluding those events defined as startup, shutdown and malfunctions, flow rate outside of the following range: Tailgas Scrubber: 4195 - 5064 gpm
	Excursions trigger an inspection, corrective action, and reporting requirement. The corrective action must be conducted to restore the flow rate to within the permitted range and assist in preventing future scrubber malfunctions from occurring.	Excursions trigger an inspection, corrective action, and reporting requirement. The corrective action must be conducted to restore the flow rate to within the permitted range and assist in preventing future scrubber malfunctions from occurring.
A. Representative Data	All CAM-required instrumentation meets or exceeds the accuracy required by the regulations for this plant. The monitoring points are located per the manufacturers recommendations and/or best engineering practices guidelines.	All CAM-required instrumentation meets or exceeds the accuracy required by the regulations for this plant. The monitoring points are located per the manufacturers recommendations and/or best engineering practices guidelines.
B. QA/QC Practices and Criteria	Calibration and maintenance are performed annually or on an as-needed basis. Instrument readings are observed on a continuing basis and any reading outside the normal operating range for this plant is investigated. This includes verification that the proper signal is being produced and that the instrumentation is working properly. Any necessary maintenance is performed and the instrument re-calibrated, as necessary.	Calibration and maintenance are performed annually or on an as-needed basis. Instrument readings are observed on a continuing basis and any reading outside the normal operating range for this plant is investigated. This includes verification that the proper signal is being produced and that the instrumentation is working properly. Any necessary maintenance is performed and the instrument re-calibrated, as necessary.
C. Monitoring Frequency	All parameters are monitored continuously.	All parameters are monitored continuously.
4. Data Collection Procedures	All parameters are averaged in 15-minute blocks based on data collected by the Amp Meter.	All parameters are averaged in 15-minute blocks based on data collected by the Flow Meter.

5. Averaging Period	All parameters are averaged in 15-minute blocks. These 15-minute blocks are then averaged to produce a 1hr average.	All parameters are averaged in 15-minute blocks. These 15-minute blocks are then averaged to produce a 1hr average.

To:

Monitoring Approach

	Indicator 1	**Indicator 2**
1. Indicator	Max and Min Pressure Drop	Max and Min Liquid Flow Rate
Measuring Approach	Pressure drop is measured across the scrubber	Liquid Flow is measured with an installed Flow Meter
2. Indicator Range	An excursion is defined as any 1 hour average excluding those events defined as startup, shutdown and malfunctions, pressure drop outside of the following range: Tailgas Scrubber: 4.6 – 10.2 in H_2O An exceedance is defined as any 3hr average pressure drop outside the above noted range.	An excursion is defined as any 1 hour average excluding those events defined as startup, shutdown and malfunctions, flow rate outside of the following range: Tailgas Scrubber: 4195 - 5064 gpm An exceedance is defined as any 3hr average flow rate outside the above noted range.
	Excursions trigger an inspection, corrective action, and reporting requirement. The corrective action must be conducted to restore the pressure drop to within the permitted range and assist in preventing future scrubber malfunctions from occurring.	Excursions trigger an inspection, corrective action, and reporting requirement. The corrective action must be conducted to restore the flow rate to within the permitted range and assist in preventing future scrubber malfunctions from occurring.
A. Representative Data	All CAM-required instrumentation meets or exceeds the accuracy required by the regulations for this plant. The monitoring points are located per the manufacturers recommendations and/or best engineering practices guidelines.	All CAM-required instrumentation meets or exceeds the accuracy required by the regulations for this plant. The monitoring points are located per the manufacturers recommendations and/or best engineering practices guidelines.
B. QA/QC Practices and Criteria	Calibration and maintenance are performed annually or on an as-needed basis. Instrument readings are observed on a continuing basis and any reading outside the normal operating range for this plant is investigated. This includes verification that the proper signal is being produced and that the instrumentation is working properly. Any necessary maintenance is performed and the instrument re-calibrated, as necessary.	Calibration and maintenance are performed annually or on an as-needed basis. Instrument readings are observed on a continuing basis and any reading outside the normal operating range for this plant is investigated. This includes verification that the proper signal is being produced and that the instrumentation is working properly. Any necessary maintenance is performed and the instrument re-calibrated, as necessary.
C. Monitoring Frequency	All parameters are monitored continuously.	All parameters are monitored continuously.
4. Data Collection Procedures	All parameters are averaged in 15-minute blocks based on data collected across the scrubber.	All parameters are averaged in 15-minute blocks based on data collected by the Flow Meter.
5. Averaging Period	All parameters are averaged in 15-minute blocks. These 15-minute blocks are then averaged to produce a 1hr average.	All parameters are averaged in 15-minute blocks. These 15-minute blocks are then averaged to produce a 1hr average.

74. Response: CAM Plan: tailgas scrubber - 4.6 to 10.2 in hoh; This should be amp for two fans.

Please see comment 72. Fan amps do not apply.

75. Response: CAM Plan: Based on prior discussions, and the facility request in its original CAM the exceedance averaging period should be 3hrs.

Please see comment 73.

76. Response: Section III, Condition B.13.: The referenced conditions should be B.3, B.4 and B.6.

*As a result of this comment, **Condition B.13.** is hereby changed:*

From: Compliance with the emission limitations of Conditions B.2, B.3, and B.4 shall be determined in accordance with 40 CFR 60.85 using EPA Methods 1, 2, 3, 7E, 8 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C.
[Rule 62-297, F.A.C.]

To: Compliance with the emission limitations of Conditions B.3, B.4, and B.6 shall be determined in accordance with 40 CFR 60.85 using EPA Methods 1, 2, 3, 7E, 8 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C.
[Rule 62-297, F.A.C.]

B. Document(s) on file with the permitting authority:
-Letter received March 27, 2006, from Mr. C.D. Turley.

III. Conclusion.
The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.

STATEMENT OF BASIS

Mosaic Fertilizer, LLC
South Pierce Facility
Facility ID No.: 1050055
Polk County

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 1050055-014-AV

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit is for the renewal of Title V Air Operation Permit and the incorporation of air construction permit, No. 1050055-013-AC, air construction permit, No. 1050055-015-AC, the incorporation of a Compliance Plan, CP-1, and two alternate sampling plans, file no. 05-J-AP and 05-L-AP.

Air construction permit No. 1050055-013-AC adds a new molten sulfur pit with a 250 ton capacity to the facility. Molten Sulfur is unloaded into pits via truck or rail. The material is either pumped into storage tanks or into the transfer pit. The transfer pit is used to pump molten sulfur to the sulfuric acid plant or back into the storage tanks. The current pit has two sections. The transfer section is being replaced by the new molten sulfur transfer pit. The existing transfer pit will no longer be used once the new pit is in operation. The existing truck unloading section of the pit will continue to be used. The permitted system throughput rate is to remain unchanged; 2,300 tons per day (5 day rolling average), and 725,000 tons per 12 month consecutive period.

Air construction permit No. 1050055-015-AC will delete ten emissions units (EU) from the current Title V operating permit. The emissions units are 1) EU No.003- Purified Monoammonium /Diammonium (MAP/DAP) Plant, 2) EU No. 012- Purified MAP/DAP Plant Silo No.3, 3) EU No. 013- Purified MAP/DAP Plant Bagging Machine, 4) EU No. 014- Purified MAP/DAP Plant Bulk Truck Loading, 5) EU No. 027- Purified MAP/DAP Plant Silo No.2, 6) EU No. 028- Purified MAP/DAP Plant Silo No.1, 7) EU No. 029- Purified MAP/DAP Plant Bulk Railcar Loading, 8) EU No. 034- Vent 5, Molten Sulfur Rail Pit, North Vent, 9) EU No. 044- Molten Sulfur Rail Pit, North Vent, and 10) EU No. 045- Molten Sulfur Rail Pit, South Vent.

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 (SAP #10 and SAP #11); 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; a ball mill grinding system; GTSP storage building; and a GTSP rock hopper. CAM does apply.

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

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.

Mosaic Fertilizer, LLC
South Pierce Facility
Facility ID No.: 1050055
Polk County

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 1050055-014-AV

Permitting Authority:
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/921-9533

Compliance Authority:
Florida Department of Environmental Protection
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813/632-7600
Fax: 813/632-7668

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 1050055-014-AV

Table of Contents

Table of Contents (Continued)

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 Fertilizer, LLC
7450 Highway 630
Mulberry, FL 33860

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055
SIC Nos.: 28, 2874
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit, incorporate construction permits, No. 1050055-013-AC and No. 1050055-015-AC, incorporate the Compliance Assurance Monitoring (CAM) Plan, incorporate a Compliance Plan (CP-1), and incorporate Alternate Sampling Plans 05-J-AP and 05-L-AP. The existing facility is located at 7450 Highway 630, Mulberry, Polk County; UTM Coordinates: Zone 17, 407.5 km East and 3071.4 km North; Latitude: 27° 46' 56" North and Longitude: 81° 55' 55" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Attachment A, Memorandum of Understanding Regarding Best Operational Start-Up Practices for Sulfuric Acid Plants
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-5, TITLE V CONDITIONS (version dated 4/5/05)
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/7/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/7/96)
FIGURE 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)
40 CFR 63 Subparts A (General Provisions for Subparts AA and BB (Combined)
40 CFR 61 Subpart A (General Provisions) and Subpart R (Radon Emissions from Phosphogypsum Stacks)
Compliance Plan CP-1
Alternate Sampling Plans, Approved 10/19/05 and 12/20/05

Effective Date: ARMS Day 55
Renewal Application Due Date: TBD
Expiration Date: TBD

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

PROPOSED
Michael G. Cooke, Director
Division of Air Resource Management

MGC/JFK/rlb

Section I. Facility Information.

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); 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.

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

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. CAM does apply to Emission Unit 023, GTSP production plant.

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

E.U. ID No.	Brief Description
-001	Auxiliary Boiler
-004	Sulfuric Acid Plant #10
-005	Sulfuric Acid Plant #11
-008	Phosphoric Acid Plant - A Train
-009	Phosphoric Acid Plant - B Train
-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
-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
-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
-048	Phosphogypsum Stack
-050	Molten Sulfur Transfer Pit with two vents

Unregulated Emissions Units and/or Activities
-049 Facility-Wide Fugitive Emissions

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History / ID Number Transfers

These documents are on file with permitting authority:
Application for a Title V Air Operation Permit Renewal received September 29, 2003
Additional Information Request dated November 21, 2003
Additional Time Request received February 19, 2004
Additional Information Response received April, 22, 2004
Additional Information Request dated May 20, 2004
Additional Information Response received July 12, 2004
Additional Information Request dated August 11, 2004
Additional Information Response received October 25, 2004
Comments on Draft Compliance Plan received February 10, 2005
Draft Permit issued March 22, 2005
Comments of Draft Permit received May 18, 2005
Additional Information Received September 7, 2005

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) No(s). on all correspondence, test report submittals, applications, etc.

Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-5, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-5, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,
b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. Compliance Plan. Based on the application, emissions units were not in compliance. Appendix CP-1, Compliance Plan, is a part of this permit and the permittee shall comply with CP-1.
[Rule 62-213.440(2), F.A.C.]

8. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, and industrial related activities such as loading, unloading, storing and handling. These precautions shall include good work practices such as the use of water to keep roadways and work areas damp to control dust and windborne emissions.
[Rule 62-296.320(4)(c)2., F.A.C.]

9. The requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C., *Stationary Sources - Emission Monitoring* and 40 CFR 60, Appendix A. [Rule 62-297.401, F.A.C.]

10. Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
[Rule 62-297.310, F.A.C.]

11. The permittee shall submit to the Southwest District Office of the Department, each calendar year, on or before March 1, a completed DEP Form 62-213.900 (4), an "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year containing the following information pursuant to Subsection 403.061(13), F.S.:

a. Annual amount of materials and/or fuels utilized;
b. Annual emissions (note calculation basis);
c. Hours of operation;
d. Any changes in the information contained in the permit.

[Rule 62-210.370(3), F.A.C.]

12. Hours of Operation - Unless otherwise noted, all emission units are allowed to operate continuously, i.e., 8760 hours/year. [Rule 62-210.200, F.A.C., Definitions - (PTE)]

13. Better Grade Fuel Oil
A better grade fuel oil is defined as a fuel oil with a higher ranking in the following list:

Better Grade (Top of list)
new, No. 2 fuel oil, or No. 2 on-specification fuel oil
new, No. 3 fuel oil, or No. 3 on-specification fuel oil
new, No. 4 fuel oil, or No. 4 on-specification fuel oil
new, No. 5 fuel oil, or No. 5 on-specification fuel oil
new, No. 6 fuel oil, or No. 6 on-specification fuel oil

14. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. {Permitting note: When quarterly reporting is specified within, this shall be interpreted to be mean calendar quarters. When reporting refers to monthly, this shall be interpreted as the beginning of each month.}
[Rule 62-213.440, F.A.C.]

15. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District office:

Department of Environmental Protection
Southwest District Office
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813/632-7600
Fax: 813/632-7668

16. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

17. This permit includes a "Subsection" for each emission unit which includes a description of that emission unit. That description is descriptive only and is not enforceable.

18. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]
{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-5, TITLE V CONDITIONS)}

19. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

20. The permittee shall comply with Alternate Sampling Plans, File No. 05-J-AP executed October 19, 2005 and File No. 05-L-AP, executed on December 20, 2005.
[Rule 62-4.070(3), F.A.C.]

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
D	022	No. 2 Ball Mill Grinding System	31.8	139.3
E	023	GTSP Production Plant	35	153
F	024-025	GTSP East Storage Building - North scrubber system	40.1	175.6
G	026	GTSP Rock Hopper Bin	22.5	
H	030-033	Molten Sulfur Storage - East Tank	0.50[2]	1.40[2]
H	035-039	Molten Sulfur Storage - West Tank	0.50[2]	1.40[2]
H	040-043	Molten Sulfur Storage - Truck Pit	0.92[2]	4.06[2]
Total			133.22	

[2]Emission estimate for emission inventory and PSD purposes.

Section III. Emissions Unit(s) and Conditions.

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

E.U. ID No.	Brief Description
-001	Auxiliary Boiler

The 171 MMBtu per hour auxiliary boiler is used to supply auxiliary steam to the South Pierce facility. The boiler is fired on natural gas or No. 2 fuel oil.

{Permitting note(s): This emissions unit is regulated under NSPS - 40 CFR 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, adopted and incorporated by reference in Rule 62-204.800(7)(b)3., F.A.C.; NESHAP – 40 CFR 63, Subpart DDDDD, NESHAP for ICI Boilers; and Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Emissions Units. CAM does not apply.}

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity.

a. The maximum heat input rate is 171 MMBtu per hour when firing either natural gas or No. 2 fuel oil.
b. The maximum fuel oil firing rate for the boiler shall not exceed 1,070,000 gallons in any consecutive 12 month period.
c. The maximum natural gas firing rate for the boiler shall not exceed 150.0 million cubic feet in any consecutive 12 month period.
d. The annual capacity factor (12-month rolling average basis) for the boiler shall not exceed 10 percent.

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE), Air Construction Permit 1050055-011-AC]
{Permitting Note: Requested by permittee to limit annual operations to 10 percent of maximum to avoid particulate matter and nitrogen oxides emission standards under 40 CFR 60 Subpart Db.}

A.2. Methods of Operation - (i.e., Fuels). The boiler is permitted to fire only natural gas or No. 2 fuel oil (see Condition No. 19). The No. 2 fuel oil shall have a maximum sulfur content of 0.5%, by weight.
[Rules 62-4.160(2), F.A.C. and 62-213.440(1), F.A.C., requested by permittee, Construction permit 1050055-011-AC]

Emission Limitations and Standards

A.3. Visible emissions from the boiler stack shall not exceed 20% opacity, except for one six-minute period per hour during which the opacity shall not exceed 27%.
[40 CFR 60.43b(f), Rule 62-296.406(1), F.A.C.]

A.4. Excess emissions resulting from startup, shutdown, or malfunction are permitted providing: (1) best operational practices to minimize emissions are adhered to and; (2) the duration of excess emissions are minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

A.5. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

A.6. In case of excess emissions resulting from malfunctions, the permittee shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

Test Methods and Procedures

A.7. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department in writing at least 15 days prior to the date on which each formal compliance test is to begin. The notification will include the date, the time, and the place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.
[Rules 62-297.310(7)(a)9 and 62-209.500(5), F.A.C.].

A.8. Within 60 days after achieving the maximum boiler production rate at which the auxiliary boiler will be operated, but not later than 180 days after initial startup of the auxiliary boiler, and annually thereafter, the permittee shall test the boiler stack for visible emissions, per Condition A.3.
[Rule 62-297.310(7) and 62-297.310(8), F.A.C., 40 CFR 60.8, and Air Construction Permit 1050055-011-AC]

A.9. Compliance with the visible emission limitation of Condition A.3 shall be determined using DEP Method 9 and shall be conducted by a certified observer and be a minimum of 60 minutes in duration.
[Rule 62-297.310(4)(a), F.A.C.]

A.10. Testing of visual emissions per Condition A.3 should be conducted during a period when the boiler is cycling up to a normal high firing rate, or is continuously operating at a high firing rate. The permittee shall submit a statement of the operating mode. Failure to submit a statement of the operating mode or operating at less than capacity, may invalidate the test or result in an operating permit limitation.
[Rules 62-297.310(8) and 62-4.070(3), F.A.C.]

A.11. If the hours of operation of the boiler utilizing fuel oil exceed 400 hours since the prior test date, the visible emissions test for the current test year shall be conducted using fuel oil. The visible emissions test for the boiler can be waived, on an annual basis, if the total time that fuel oil has been utilized in the boiler does not exceed 400 hours. In order to qualify for the annual visible emissions test waiver, a letter shall be sent to the Air Compliance Section of the Department of Environmental Protection, at least 15 days prior to the scheduled test date, requesting a visible emissions test waiver and stating that the 400 hour fuel oil limitation has been satisfied for the year prior to the date of the waiver request. Submit with the waiver request a copy of the fuel oil analysis or certification required by Condition A.13. If no fuel oil was utilized, a copy of the fuel oil analysis or certification

is not required. A waiver will not be granted for the visible emission tests (See Condition A.4) for the 12 month period prior to permit renewal.
[Rules 62-297.310(7) and 62-297.310(8), F.A.C.]

A.12. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C.]

A.13. The annual visible emissions test will not be required if the emissions unit does not fire No. 2 fuel oil more than 200 hours per year. The emissions unit will be required to perform the visible emissions test once every five years upon permit renewal.
[Rule 62-297.310, F.A.C.]

Monitoring of Operations

A.14. Except for Saturdays and Sundays, the permittee shall measure the visible emissions from the boiler stack at least once every four hours during daylight shifts when No. 2 fuel oil is combusted in the auxiliary boiler. Each VE observation shall performed by a certified VE observer and be 6 minutes in duration. If the average opacity for a six-minute set of readings exceed 10 percent, the observer must collect two additional six-minute sets of visible emission readings for a total of three data sets.
[40 CFR 60.13(i)(2), letter from Douglas Neeley, U.S. EPA dated September 23, 1998 , in lieu of continuous monitoring requirements in 40 CFR 60.48b(a).]

A.15. The permittee shall maintain the auxiliary boiler according to the procedures and schedules recommended by the boiler manufacturer for a unit with a 10 percent annual operating factor. The permittee shall keep records verifying that the necessary maintenance activities have been performed.
[40 CFR 60.13(i)(2), letter from Douglas Neeley, U.S. EPA dated September 23, 1998 , in lieu of continuous monitoring requirements in 40 CFR 60.48b(a).]
{Permitting Note: The permittee shall submit the maintenance procedures and schedules for the auxiliary boiler (recommended by the manufacturer) to the Department at least 30 days prior to the initial compliance emissions test.}

Recordkeeping and Reporting Requirements

A.16. The permittee shall submit notification of the date of initial startup, as provided by 40 CFR 60.7. This notification shall include but not limited to:

(a) The design heat input capacity of the affected boiler and identification of the fuels to be combusted in the boiler, and

(b) The annual capacity factor at which the permittee anticipates operating the boiler based on all fuels fired and based on each individual fuel fired.

[40 CFR 60.49b]

A.17. Test Reports

a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Air Compliance Section of Southwest District Office of the Department on the results of each such test.

b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed or with the operating permit application, whichever is earlier.

c. The report shall provide sufficient detail on the emissions unit tested (at a minimum , the "Project", "Facility ID" and "Point ID"), the test procedures used to allow the Department to determine if the test report was properly conducted and the test results properly computed. Testing procedures shall be consistent with the requirements of Rule 62-297.310(7), F.A.C.

d. The test report, other than for an EPA or DEP Method 9 test, as a minimum, shall provide the following information:

1. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
2. The normal operating parameters of air pollution control devices installed on each emission unit (e.g., pressure drop, scrubber liquid flow rate, scrubber liquid pressure, total current, etc.), and the operating parameters of air pollution control devices during each test run.

Failure to submit the rates and actual operating conditions in the test report may invalidate the test and fail to provide reasonable assurance of compliance.
[Rules 62-297.310(8), F.A.C., and 62-4.070(3), F.A.C.]

A.18. The permittee shall furnish the Administrator written notification as follows:

(a) A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of the auxiliary boiler is commenced postmarked no later than 30 days after such date.

(b) A notification of the actual date of initial startup of the auxiliary boiler postmarked not more than 60 days nor less than 30 days prior to such date.

(c) A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

[40 CFR 60.7]

A.19. The permittee shall submit a statement of the fuel heat input rate and fuel in use as a part of the compliance test report. Failure to submit the heat input rate, fuel oil sulfur content, or operating at conditions which do not reflect the normal operating conditions, may invalidate the test and fail to provide reasonable assurance of compliance.
[Rule 62-4.070(3), F.A.C.]

A.20. In order to document compliance with Condition A.2, and provide reasonable assurance that No. 2 fuel oil is being utilized, and that the fuel oil sulfur limit of 0.5%, by weight is not exceeded, the permittee can provide either;

a. vendor certified documentation that the fuel oil delivered was No. 2 oil, or

b. a fuel oil analysis indicating the sulfur content, by weight.

[Rules 62-213.440(b)2.b. and 62-4.070(3), F.A.C.]

A.21. The permittee shall maintain daily records of the hours of operation of the auxiliary boiler, the date and time of visible emission observations, the opacity (VE), the hourly steam load, the type and amount of fuel combusted in the boiler. On a monthly basis, the annual hours of operation of the boiler, and the type and amount of fuel used for the previous 12 months shall be determined and included in the records.
[40 CFR 60.43b(f), 40 CFR 60.49b(d), 40 CFR 60.49b(q), Rule 62-4.070(3), F.A.C.].

A.22. The permittee shall calculate and record the annual capacity factor individually for distillate fuel oil (i.e. No. 2) and natural gas for each calendar quarter. The permittee shall submit to the Department, for each quarter the boiler is operated other than maintenance purposes, the annual capacity factor over the previous 12 months. The annual capacity factor is determined on

a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.
[40 CFR 60.49b(d), 40 CFR 60.49b(q)]
{Permitting Note: If the annual capacity factor ever exceeds 10 percent, the permittee would no longer qualify to use an opacity monitoring alternative, and would be required to put on a schedule for installing and certifying a continuous opacity monitor.}

A.23. The permittee shall submit an excess emissions report (EER) to the Department 30 days after the end of each calendar quarter in which there are opacity excess emissions during No. 2 fuel oil combustion. If there are no opacity excess emissions during the calendar quarter, EERs may be submitted on a semiannual basis. If the boiler has not been operated on oil during the prior 6-month period, for other than maintenance purposes, EERs may be submitted with the annual operating report (AOR).
[40 CFR 60.13(i)(2), letter from Douglas Neeley, U.S. EPA dated September 23, 1998 , in lieu of continuous monitoring requirements in 40 CFR 60.48b(a).]
{Permitting Note: For reporting purposes, excess emissions are defined as any six minute period during which the average opacity exceeds 20 percent, and EERs must indicate the total time of the visible emission observations during a calendar quarter and identify the duration of any excess emissions.}

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

E.U. ID No.	Brief Description
-004	Sulfuric Acid Plant #10
-005	Sulfuric Acid Plant #11

Sulfuric acid plant Units Nos. 10 and 11 consist of a double absorption system. These plants have a design production rate of 3,000 tons per day of sulfuric acid (100% H_2SO_4 basis). Acid mist emissions are controlled by high efficiency mist eliminators.

{Permitting note(s): This emissions unit is regulated under NSPS - 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants, adopted and incorporated by reference in Rule 62-204.800(7)(b)10., F.A.C.; Rule 296.402., F.A.C., Emission Standards for Sulfuric Acid Plants; Rule 62-212.300, F.A.C., General Preconstruction Review Requirements; and Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); and Best Available Control Technology (BACT) Determination, dated April 17, 1992. CAM does not apply.}

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

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The sulfuric acid production rate from each sulfuric acid plant shall not exceed 3,000 tons per day, measured as 100% H_2SO_4.
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE), Construction Permit 1050055-010-AC/PSD-FL-235]

B.2. The maximum molten sulfur throughput rate shall neither exceed 2,300 tons per day (calculated as a 5 day rolling average), nor 725,000 tons per year (based on a combined acid production capacity of 6,000 TPD of 100% sulfuric acid from Sulfuric Acid Plant Nos. 10 and 11).
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE), 1050055-013-AC, Applicant Request dated April 15, 2003].

Emission Limitations and Standards

B.3. Sulfur dioxide emissions shall not exceed any of the following:
a. 4 pounds per ton of 100% acid produced;
b. 500 pounds per hour;
c. 2,190 tons per year.
[Rule 62-204.800, F.A.C., 40 CFR 60.82(a), 1050055-010-AC/PSD-FL-235 and BACT Determination of September 15, 1997].

B.4. Acid mist emissions shall not exceed any of the following:
a. 0.15 pounds per ton of 100% acid produced;
b. 18.8 pounds per hour;
c. 82.1 tons per year.
[Rule 62-296.800, F.A.C., 40 CFR 60.83(a)(1), 1050055-010-AC/PSD-FL-235 and BACT Determination of September 15, 1997].

B.5. Visible emissions shall not be equal to or greater than 10% opacity. [Rule 62-204.800, F.A.C., 40 CFR 60.83(a)(2), and BACT Determination of April 17, 1992].

B.6. Nitrogen oxides emissions shall not exceed any of the following:

a. 0.12 pounds per ton of 100% acid produced;
b. 15.0 pounds per hour;
c. 65.7 tons per year.

[1050055-010-AC/PSD-FL-235 and BACT Determination of September 15, 1997].

B.7. Excess emissions resulting from startup, shutdown, or malfunction are permitted providing: (1) best operational practices to minimize emissions are adhered to and; (2) the duration of excess emissions are minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

B.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.].

B.9. In case of excess emissions resulting from malfunctions, the permittee shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.].

Excess Emissions

B.10. This permit acknowledges that leaks of sulfur dioxide and sulfur trioxide, or other fugitive process emissions that do not pass through a stack, may occur as part of routine operations. Best operational practices to minimize these emissions shall be adhered to and shall include regular inspections and the prompt repair or correction of any leaks or other fugitive emissions.

Best operational practices for **Sulfuric Acid Plant #10 only** shall include but not limited to the following:

a. The permittee shall inspect the burner floor for pooled sulfur once per day.
b. On controlled shutdowns, if there is pooled sulfur in the burner, the permittee shall continue to purge with the blower at 1800 RPM. Once the sulfur is consumed, the permittee shall continue to purge for an additional two minutes.
c. The permittee shall change out and maintain sulfur guns semiannually. The permittee shall test the spray pattern with water before installing replacement guns.

[Rules 62-210.700(1), F.A.C. and 62-4.070(3), F.A.C.]

Test Methods and Procedures

B.11. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department in writing at least 15 days prior to the date on which each formal compliance test is to begin. The notification will include the date, the time, and the place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.
[Rules 62-297.310(7)(a)9 and 62-209.500(5), F.A.C.].

B.12. The permittee shall test the emissions from Sulfuric Acid Plants No. 10 and No. 11 for opacity, sulfur dioxide, acid mist, and nitrogen oxides during each federal fiscal year (October 1 – September 30).
[Rule 62-297.310(7)(a)4, F.A.C.]

B.13. Compliance with the emission limitations of Conditions B.3, B.4, and B.6 shall be determined in accordance with 40 CFR 60.85 using EPA Methods 1, 2, 3, 7E, 8 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C.
[Rule 62-297, F.A.C.]

B.14. The visible emissions test shall be conducted by a certified observer and be a minimum of sixty (60) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rule 62-297.310(4)(a), F.A.C.]

B.15. The permittee shall establish a conversion factor for the purpose of converting sulfur dioxide monitoring data into the units of the applicable standard (lb/ton). The conversion factor shall be determined , as a minimum, three times daily in accordance with 40 CFR 60.84(b) or equivalent method. A record of all conversion factors and values from which they were calculated shall be maintained. The permittee may also use the alternative method, including electronic data systems, of determining sulfur dioxide emission rates using the continuous emission monitoring approach and calculation procedures referenced in 40 CFR 60.84(d).
[Rule 62-204.800, F.A.C., and 40 CFR 60.84].

B.16. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C.]

Continuous Monitoring Requirements

B.17. The continuous emission monitoring system for the measurement of sulfur dioxide shall be calibrated, maintained and operated as specified in 40 CFR 60.84. The span value of the continuous monitor shall be set at 1000 PPM.
[Rules 62-204.800 and 62-296.402, F.A.C., and 40 CFR 60.84].

Recordkeeping and Reporting Requirements

B.18. In accordance with 40 CFR 60.7(b), the permittee shall maintain records of any periods during which the sulfur dioxide monitor system is inoperative. Records on monitoring system performance evaluations, calibrations and maintenance shall be maintained in accordance with 40 CFR 60.7(d).
[Rule 62-204.800, F.A.C., 62-4.070(3), and 40 CFR 60.7].

B.19. The permittee shall submit a written report of excess sulfur dioxide emissions quarterly in accordance with 40 CFR 60.7 (b) and (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 standard under 40 CFR 60.82. The excess emission report shall also include a statement of all periods during the quarter when the sulfur dioxide monitoring system was inoperative. Copies of the quarterly sulfur dioxide excess emission report shall be submitted to the Southwest District Office. [Rule 62-204.800, F.A.C., and 40 CFR 60.7 and 60.84(e)].

B.20. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the sulfuric acid plants; or any malfunction of the air pollution control equipment.
[Rule 62-204.800(7)(b)10, F.A.C. and 40 CFR 60.7].

B.21. In order to document compliance with Condition B.1, the permittee shall maintain a daily record of sulfuric acid plant H_2SO_4 production for each emission unit. Documentation as to how daily production rates were calculated shall be included as part of the records.
[Rule 62-4.070(3), F.A.C.].

B.22. In order to document ongoing compliance with the emission limitations of Conditions B.3 and B.4, the permittee shall maintain monthly records of Sulfuric Acid Plant sulfur dioxide (SO_2) emissions for each emission unit. The records shall include the following for each day of the month:

a. daily acid production (in tons as 100% H_2SO_4);
b. hours operated;
c. daily average pounds/ton SO_2 emission rate;

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

B.23. Test Reports

a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Air Compliance Section of Southwest District Office of the Department on the results of each such test.
b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed or with the operating permit application, whichever is earlier.
c. The report shall provide sufficient detail on the emissions unit tested (at a minimum , the "Project", "Facility ID" and "Point ID"), the test procedures used to allow the Department to determine if the test report was properly conducted and the test results properly computed. Testing procedures shall be consistent with the requirements of Rule 62-297.310(7), F.A.C.
d. The test report, other than for an EPA or DEP Method 9 test, as a minimum, shall provide the following information:
   1. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
   2. The normal operating parameters of air pollution control devices installed on each emission unit (e.g., pressure drop, scrubber liquid flow rate, scrubber liquid pressure, total current, etc.), and the operating parameters of air pollution control devices during each test run.

   Failure to submit the rates and actual operating conditions in the test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rules 62-297.310(8), F.A.C., and 62-4.070(3), F.A.C.]

Reasonable Assurances

B.24. Not federally enforceable. The permittee shall follow the attached Memorandum of Understanding Regarding Best Operational Start-Up Practices for Sulfuric Acid Plants.
[Signed and executed on November 1, 1989.]
[Rule 62-4.070(3), F.A.C.]

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

E.U. ID No.	Brief Description
-008	Phosphoric Acid Plant - A Train
-009	Phosphoric Acid Plant - B Train

The Phosphoric Acid Plant (PAP) consists of an "A" and "B" Train. Fluoride emissions from the Phosphoric Acid Plant "A" and "B" Train reactors, filters, and other process equipment are controlled by two packed bed, cross-flow scrubbers.

{Permitting note(s): These emissions units are regulated under NSPS - 40 CFR 60, Subpart T, Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants, adopted and incorporated by reference in Rule 62-204.800(7)(b)25., F.A.C.; Rule 62-296.403, F.A.C., Phosphate Processing, and 40 CFR 63 Subpart AA, Phosphoric Acid Manufacturing Plants. CAM does not apply. **The Part 40 CFR 63 Subparts A and AA take precedence over NSPS standards, but will not take precedence over BACT determinations. However these units are subject to all applicable NSPS standards if these units are out of compliance with the NESHAP. State Implementation Plan (SIP) rules apply if these units are out of compliance with the NSPS standards or if there is no applicable NSPS standard when out of compliance with the NESHAP.}**

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

Essential Potential to Emit (PTE) Parameters

C.1. Capacity. The maximum input process rate for each Phosphoric Acid Plant Train shall not exceed 55.45 tons per hour of equivalent P_2O_5 feed rate[(1)].
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)]
[(1)] **"Equivalent P_2O_5 Feed Rate"** - the quantity of phosphorus, expressed as phosphorous pentoxide, feed to the process.

Emission Limitations and Standards
C.2. Total fluoride emissions[(2)] from each Phosphoric Acid Plant Train shall not exceed 0.02 pounds per ton (10.0 gram/metric ton) of the equivalent P_2O_5 feed rate[(1)], and 1.11 pounds per hour at the maximum 55.45 tons per hour equivalent P_2O_5 feed rate. [Permit AC53-34868, 40 CFR 60.202, 40 CFR 63.602(a)]

[(2)] **"Total Fluoride Emissions"** - elemental fluorine and all fluoride compounds as measured by reference methods specified in 40 CFR 60.204, or equivalent or alternative methods.

C.3. Excess emissions resulting from startup, shutdown, or malfunction are permitted providing: (1) best operational practices to minimize emissions are adhered to and; (2) the duration of excess emissions are minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

C.4. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.].

Test Methods and Procedures

C.5. Each owner or operator subject to the requirements of this subpart shall comply with the notification requirements in § 63.9. Test notification must be in accordance with § 63.9(e). This test requirement is more stringent than the state requirement of 15-day notification in 62-297.310, F.A.C.
[40 CFR 63.607(a)]

C.6. Each owner or operator of a phosphoric acid manufacturing plant shall conduct an annual performance test to demonstrate compliance with the applicable emission standard for each existing wet-process phosphoric acid process line. The owner or operator shall conduct the performance test according to the procedures in subpart A of this part and in this section.
[40 CFR 63.606(a)(1), and Rule 62-297.310(7)(a)4, F.A.C.]

C.7. In conducting performance tests, each owner or operator of an affected source shall use as reference methods and procedures the test methods in 40 CFR Part 60, Appendix A, or other methods and procedures as specified in this section (See SC C.11.) and in 62-297, F.A.C., except as provided in § 63.7(f). Each owner or operator of an existing wet-process phosphoric acid process line shall determine compliance with the applicable total fluorides standards in § 63.602 or § 63.603 (See SC C.2.) as follows:

(1) The emission rate (E) of total fluorides shall be computed for each run using the following equation:

$$E = \left(\sum_{i=1}^{N} \mathbf{C_{si}}\, \mathbf{Q_{sdi}}\right)/(\mathbf{PK})$$

where:
E = emission rate of total fluorides, g/metric ton (lb/ton) of equivalent P_2O_5 feed.
$\mathbf{C_{si}}$ = concentration of total fluorides from emission point ``i,'' mg/dscm (mg/dscf).
$\mathbf{Q_{sdi}}$ = volumetric flow rate of effluent gas from emission point ``i,'' dscm/hr (dscf/hr).
N = number of emission points associated with the affected facility.
P = equivalent P_2O_5 feed rate, metric ton/hr (ton/hr).
K = conversion factor, 1000 mg/g (453,600 mg/lb).

(2) Method 13A or 13B (40 CFR part 60, appendix A) shall be used to determine the total fluorides concentration (C_{si}) and volumetric flow rate (Q_{sdi}) of the effluent gas from each of the emission points. If Method 13B is used, the fusion of the filtered material described in Section 7.3.1.2 and the distillation of suitable aliquots of containers 1 and 2, described in section 7.3.3 and 7.3.4. in Method 13 A, may be omitted. The sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30 dscf).

(3) The equivalent P_2O_5 feed rate (P) shall be computed using the following equation:

$$P = M_p R_p$$

where:
M_p = total mass flow rate of phosphorus-bearing feed, metric ton/hr (ton/hr).
R_p = P_2O_5 content, decimal fraction.

(i) The accountability system described in § 63.605(a) and (b) shall be used to determine the mass flow rate (M_p) of the phosphorus-bearing feed.

(ii) The P_2O_5 content (R_p) of the feed shall be determined using as appropriate the following methods (incorporated by reference- see 40 CFR 63.14) specified in the Book of

Methods Used and Adopted By The Association Of Florida Phosphate Chemists, Seventh Edition 1991, where applicable:

(A) Section IX, Methods of Analysis For Phosphate Rock, No. 1 Preparation of Sample.

(B) Section IX, Methods of Analysis For Phosphate Rock, No. 3 Phosphorus-P_2O_5 or $Ca_3(PO_4)_2$, Method A-Volumetric Method.

(C) Section IX, Methods of Analysis For Phosphate Rock, No. 3 Phosphorus-P_2O_5 or $Ca_3(PO_4)_2$, Method B-Gravimetric Quimociac Method.

(D) Section IX, Methods of Analysis For Phosphate Rock, No. 3 Phosphorus-P_2O_5 or $Ca_3(PO_4)_2$, Method C-Spectrophotometric Method.

(E) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method A-Volumetric Method.

(F) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method B-Gravimetric Quimociac Method.

(G) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method C-Spectrophotometric Method.

(4) To comply with § 63.605(d)(1) or (2) (see SC C.12.), the owner or operator shall use the monitoring systems in § 63.605(c) (See SC C.11) to determine the average pressure loss of the gas stream across each scrubber in the process scrubbing system and to determine the average flow rate of the scrubber liquid to each scrubber in the process scrubbing system during each of the total fluoride runs. The arithmetic averages of the three runs shall be used as the baseline average values for the purposes of § 63.605(d)(1) or (2) (see SC C.12.).
[40 CFR 63.606(b) and (c)]

C.8. The following scrubber operating parameters shall be monitored and recorded during any compliance test and a summary of this data shall be included in any emissions test report:

<u>The following apply to the Phosphoric Acid Plant Train A Only:</u>

a. the dates the pads were placed into service,
b. the dates the pads were replaced,
c. the dates the pads were inspected,
d. the person responsible for performing the pad replacement or inspection,

<u>The following apply to both Trains A & B (in accordance with 63.605):</u>

e. the water flow rate, and
f. the scrubber pressure drop.

Failure to submit the scrubber operating parameters with the test report(s) may invalidate the test and fail to provide reasonable assurance of compliance.
[Rules 62-4.070(3), and 62-297.310(8)(c), F.A.C.]

C.9. This emission unit is also subject to the requirements of Alternate Sampling Plan, 05-L-AP, dated December 20, 2005.
[Alternate Sampling Plan, 05-L-AP, dated December 20, 2005]

C.10. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C.]

Monitoring of Operations

C.11. Each owner or operator using a wet scrubbing emission control system shall install, calibrate, maintain, and operate the following monitoring systems:

(1) A monitoring system which continuously measures and permanently records the pressure drop across each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.

(2) A monitoring system which continuously measures and permanently records the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.

[40 CFR 63.605(c) and 40 CFR 60.203]

C.12. Following the date on which the performance test required in § 63.606 (See SC C.7.) is completed, the owner or operator of a new or existing affected source using a wet scrubbing emission control system and subject to emissions limitations for total fluorides or particulate matter contained in this subpart must establish allowable ranges for operating parameters using the methodology of either paragraph (d)(1) or (2) of this section:

(1) The allowable range for the daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system is ± 20 percent of the baseline average value determined as a requirement of § 63.606(c)(4) (See SC C.7.). The Administrator retains the right to reduce the ± 20 percent adjustment to the baseline average values of operating ranges in those instances where performance test results indicate that a source's level of emissions is near the value of an applicable emissions standard, but, in no instance shall the adjustment be reduced to less than ± 10 percent. The owner or operator must notify the Administrator of the baseline average value and must notify the Administrator each time that the baseline value is changed as a result of the most recent performance test. The baseline average values used for compliance shall be based on the values determined during the most recent performance test. The new baseline average value shall be effective on the date following the performance test.

(2) The owner or operator of any new or existing affected source shall establish, and provide to the Administrator for approval, allowable ranges of baseline average values for the pressure drop across and of the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system for the purpose of assuring compliance with this subpart. Allowable ranges may be based upon baseline average values recorded during previous performance tests using the test methods required in this subpart and established in the manner required in § 63.606(c)(4) (See SC C.7.). As an alternative, the owner or operator can establish the allowable ranges of baseline average values using the results of performance tests conducted specifically for the purposes of this paragraph using the test methods required in this subpart and established in the manner required in § 63.606(c)(4), (d)(4), or (e)(2) (See SC C.7.). The source shall certify that the control devices and processes have not been modified subsequent to the testing upon which the data used to establish the allowable ranges were obtained. The allowable ranges of baseline average values developed pursuant to the provisions of this paragraph must be submitted to the Administrator for approval. The owner or operator must request and obtain approval of the Administrator for changes to the allowable ranges of baseline values. When a source using the methodology of this paragraph is retested, the owner operator shall determine new allowable ranges of baseline average values unless the retest indicates no change in the operating parameters from previous tests. Any new allowable ranges of baseline average values resulting from the most recent performance test shall be effective on the date following the retest. Until changes to allowable ranges of baseline average values are approved by the Administrator, the

allowable ranges for use in § 63.604 (See SC C.13.) shall be based upon the range of baseline average values proposed for approval.
[40 CFR 63.605(d)]

C.13. On or after the date on which the performance test required to be conducted by §§ 63.7 and 63.606 (See SC C.7.) is required to be completed, the owner/operator using a wet scrubbing emission control system must maintain daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber within the allowable ranges established pursuant to the requirements of § 63.605(d)(1) or (2) (See SC 12.).
[40 CFR 63.604]

C.14. Each owner or operator of an existing wet-process phosphoric acid process line subject to the provisions of this subpart shall install, calibrate, maintain, and operate a monitoring system which can be used to determine and permanently record the mass flow of phosphorus-bearing feed material to the process. The monitoring system shall have an accuracy of ±5 percent over its operating range.
[40 CFR 63.605(a)]

Recordkeeping and Reporting Requirements

C.15. The owner or operator shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using a monitoring system for measuring mass flowrate which meets the requirements of paragraph (a) of this section and then by proceeding according to §63.606(c)(3) (See SC C.7.). The permittee shall maintain a daily record of the equivalent P_2O_5 feed rate according to the procedure specified in 40 CFR 60.203(b)- Monitoring of Operations. The permittee daily log shall be maintained at the facility [40 CFR 63.605(b)(1), 40 CFR 60.203(b) and Rules 62-4.070(3), F.A.C., and 62-213.440(b)2.b., F.A.C.]

C.16. The owner or operator of an affected source shall comply with the reporting requirements specified in § 63.10 as follows:
(1) Performance test report. As required by § 63.10, the owner or operator shall report the results of the annual performance tests as part of the notification of compliance status required in § 63.9 and all applicable requirements of Rule 62-297.310(8), F.A.C. The 45-day test reporting requirements are more stringent in Rule 62-297.310(8), F.A.C.

(2) Excess emissions report. As required by § 63.10, the owner or operator of an affected source shall submit an excess emissions report for any exceedance of an operating parameter limit. The report shall contain the information specified in § 63.10. When no exceedances of an operating parameter have occurred, such information shall be included in the report. The report shall be submitted semiannually and shall be delivered or postmarked by the 30th day following the end of the calendar half. If exceedances are reported, the owner or operator shall report quarterly until a request to reduce reporting frequency is approved as described in § 63.10, and the owner or operator shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. with a full written report on the malfunctions being submitted in a quarterly report.

(3) Summary report. If the total duration of control system exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, the owner or operator shall submit a summary report containing the information specified in § 63.10 rather than the full excess emissions report, unless required by the Administrator. The summary report

shall be submitted semiannually and shall be delivered or postmarked by the 30th day following the end of the calendar half.

(4) If the total duration of control system operating parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, the owner or operator shall submit a summary report and the excess emissions report.
[40 CFR 63.607 (b) and (c), and Rule 62-210.700(6), F.A.C.]

C.17. The requirements of the general provisions in subpart A of this part that are applicable to the owner or operator subject to the requirements of this subpart are shown in the subpart A attachment to this permit. The facility is subject to the applicable conditions of Subpart A as they apply to the two existing phosphoric acid plants.
[40 CFR 63.608]

C.18. This emission unit is subject to specific requirements of 40 CFR 63, Subpart AA, Appendix A to Subpart AA – Applicability to General Provisions to Subpart AA, and Compliance Plan CP-1. The owner or operator is responsible for remaining in compliance with any updates made to Subpart A or AA upon the effective date in the final promulgated rule. Subsequently, this permit will be reopened to incorporate any applicable updates in accordance with Rule 62-213.430(4), F.A.C. To establish operating parameters for this emissions unit, the owner or operator must comply and demonstrate with the following:

1) Must comply with all conditions of Compliance Plan CP-1,
2) Must comply with all applicable requirements of Subparts A and AA,
3) Specifically notify the department the testing will be for establishing allowable ranges for this emissions unit according to Subparts A, AA, and alternate sampling plan,
4) All tests must be precisely conducted according to the MACT standards and all applicable test methods,
5) All tests must clearly demonstrate compliance with all MACT standards and applicable test methods and requirements,
6) All tests shall be submitted to the Department in accordance with Subparts A and AA,
7) The test results will become the new allowable ranges after the Department has had 30 days to review the test results. Failure to meet any requirements of this condition, Subpart A or AA, or the alternate sampling plan will negate use of any new ranges derived from the test.

[40 CFR 63- Subpart A, 40 CFR 63- Subpart AA, Compliance Plan (CP-1) and 62-4.070, F.A.C.]

C.19. Phosphoric Acid Plant Train A Only
After 12 months of service, the mesh pads in the scrubbers shall be inspected. If the results of the inspection indicate that replacement is not warranted, then the pads may continue in service. After the initial annual inspection, the mesh pads in the scrubber shall be inspected every six months until the scrubber mesh pads are replaced. The mesh pads shall be replaced, if warranted by the results of inspection or at any other earlier time based on the operator's judgment.
[Rule 62-4.070(3), F.A.C.]

C.20. Phosphoric Acid Plant Train A Only
In order to provide reasonable assurance that the scrubber mesh pads are maintained per Condition C.8., the permittee shall establish a record log of the scrubber mesh pad inspection and replacement, which shall include, at a minimum:

a. the dates the pads were placed into service,
b. the dates the pads were replaced,

c. the dates the pads were inspected, and
d. the person responsible for performing the pad replacement or inspection.
[AO53-212236 and Rule 62-4.070(3), F.A.C.]

Reasonable Assurances

C.21. All reasonable precautions shall be taken to minimize and control the generation of fugitive fluoride emissions.
[Rule 62-4.070(3), F.A.C.]

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

E.U. ID No.	Brief Description
-022	No. 2 Ball Mill Grinding System

The No. 2 Ball Mill Grinding System is used for grinding dry, coarse phosphate rock. The system consists of a conveyor, ball mill and centrifugal classifier. Emissions are controlled by two (2) cyclonic separators venting to a baghouse. {Permitting note(s): This emissions unit is regulated under Rule 62-296.700, F.A.C., RACT Particulate Matter and Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. CAM does not apply.}

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

Essential Potential to Emit (PTE) Parameters

D.1. Capacity. The process/operation rate for the No. 2 Ball Mill Grinding System shall not exceed 70.0 tons per hour. [Based on 12/15/75 Construction Application]
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)]

Emission Limitations and Standards

D.2. The maximum allowable particulate matter emission rate from the No. 2 Ball Mill Grinding System baghouse exhaust shall not exceed 31.8 pounds per hour and 139.3 tons per year. This particulate matter emission rate limitation qualifies the facility for the PM-RACT exemption per Rule 62-296.700(2)(b), F.A.C.
[Requested by applicant, Based on the 4/29/83 screen model memorandum for PM-RACT exemption]

D.3. Visible emissions from the baghouse exhaust, conveyor and associated equipment, shall not be equal to or greater than 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.]

D.4. Excess emissions resulting from startup, shutdown, or malfunction are permitted providing: (1) best operational practices to minimize emissions are adhered to and; (2) the duration of excess emissions are minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

D.5. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.].

D.6. In case of excess emissions resulting from malfunctions, the permittee shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.].

Test Methods and Procedures

D.7. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department in writing at least 15 days prior to the date on which each formal compliance test

is to begin. The notification will include the date, the time, and the place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted. [Rules 62-297.310(7)(a)9 and 62-209.500(5), F.A.C.].

D.8. Test the baghouse exhaust for visible emissions per Condition D.3 annually during each federal fiscal year (October 1 – September 30).
[Rule 62-297.310(7)(a)4, F.A.C.]

D.9. Test for particulate matter emissions per Condition D.2, on or during the 180 day period prior to the expiration date of this permit. The annual visible emissions test required per Condition F.3 shall be conducted concurrently with this particulate matter emissions test. Testing at conditions that are not representative of actual operating conditions may invalidate the test.
[Rules 62-297.310(7), and 62-297.310(8), F.A.C.]

D.10. Compliance with the emission limitations of Conditions D.2 and D.3, shall be determined using EPA Methods 1, 2, 4, 5 and 9 contained in 40 CFR 60, Appendix A, adopted by reference in Rule 62-297, F.A.C. The test observation period shall include the period during which the highest opacity can be reasonably expected to occur. The visible emissions test shall be conducted by a certified observer and be a minimum of 60 minutes in duration.
[Rules 62-297.310(4)(a), and 62-4.070, F.A.C.]

D.11. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C.]

Monitoring of Operations

D.12. In order to demonstrate compliance with Rule 62-210.650, the permittee shall record the pressure drop across the baghouse daily.
[Rule 62-4.070(3), F.A.C.]

Recordkeeping and Reporting Requirements

D.13. In order to document compliance with the process rate limitation of Condition D.1, the permittee shall maintain daily records of the amount of material processed and the total hours of process operations.
[Rule 62-4.070(3), F.A.C.]

D.14. Test Reports

a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Air Compliance Section of Southwest District Office of the Department on the results of each such test.

b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed or with the operating permit application, whichever is earlier.

c. The report shall provide sufficient detail on the emissions unit tested (at a minimum , the "Project", "Facility ID" and "Point ID"), the test procedures used to allow the Department to determine if the test report was properly conducted and the test results properly computed. Testing procedures shall be consistent with the requirements of Rule 62-297.310(7), F.A.C.

[Rules 62-297.310(8), F.A.C., and 62-4.070(3), F.A.C.]

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

E.U. ID No.	Brief Description
-023	GTSP Production Plant

The Granular Triple Super Phosphate (GTSP) production plant has a permitted production rate of 140 tons per hour. Emission sources at the GTSP plant include the reactors, granulator, dryer, cooler, and miscellaneous points. The dryer is fired with natural gas or No. 6 fuel oil, or a better grade fuel oil.

Emissions from the reactors, granulator, cooler and miscellaneous points are vented to a venturi scrubber designated as the "RGCV" scrubber. Emissions from the cooler vent to a cyclone prior to the RGCV scrubber. Emissions from the dryer are vented to a separate cyclone followed by a venturi scrubber designated as the "Dryer" scrubber. The RGCV and Dryer scrubbers use pond water as the scrubbing liquid. Gases from the RGCV and Dryer scrubbers vent to a 2-stage packed bed tailgas scrubber then to the atmosphere at approximately 140,000 acfm. The packed bed tailgas scrubber also uses pond water as the scrubbing liquid.

{Permitting note(s): This emissions unit is regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards; Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.403, F.A.C., Phosphate Processing; and 40 CFR 63, Subpart BB, Phosphate Fertilizer Production. CAM does apply. **The Part 40 CFR 63 Subparts A and BB take precedence, however these units are subject to all applicable State Implementation Plan (SIP) rules if these units are out of compliance with the NESHAP.**}

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

Essential Potential to Emit (PTE) Parameters

E.1. Capacity.
a. The GTSP plant production rate shall not exceed 140 tons per hour.
b. The heat input rate for the dryer shall not exceed 113 MMBtu per hour when firing natural gas.
c. The heat input rate for the dryer shall not exceed 65 MMBtu per hour when firing No. 6 fuel oil.
[Applicant Request for Natural Gas 10/16/95, Permit AO53-235041 amendment, 6/1/95 and Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)]

E.2. Methods of Operation - (i.e., Fuels). The dryer shall be fired only with natural gas, or No. 6 fuel oil or a better grade oil. [Applicant Request for Natural Gas 10/16/95, Permit AO53-235041 amendment, Rules 62-4.160(2), F.A.C. and 62-213.440(1), F.A.C.]

Emission Limitations and Standards

E.3. Granular triple superphosphate process line. On and after the date on which the performance test required to be conducted by §§ 63.7 and 63.626 (see SC E.12.) is required to be completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected source any gases which contain total fluorides in excess of 75 grams/metric ton of equivalent P_2O_5 feed (0.150 lb/ton).
[40 CFR 63.622(b), Rule 62-296.403(1)(d)2. and application dated 7/23/93]

E.4. On or after the date on which the performance test required to be conducted by §§ 63.7 and 63.626 (see SC E.12.) is required to be completed, the owner/operator using a wet scrubbing emission control system must maintain daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber within the allowable ranges established pursuant to the requirements of § 63.625(f)(1) or (2) (see SC E.18).
[40 CFR 63.624]

E.5. Pursuant to Rule 62-296.320(4)(a), F.A.C. and the application dated 7/23/93, particulate matter emissions from this plant shall not exceed any of the following limits:

a. 35 pounds per hour (based originally on 80 tons per hour production rate),
b. For 80 tons per hour production rate or less:

Where: E = Emission limit in pounds per hour, and
P = Input process rate in tons per hour,
Then: (1) $E = (3.59) P^{0.62}$, where P is less than or equal to 30 tons per hour, or
(2) $E = (17.31) P^{0.16}$, where P is greater than 30 tons per hour,

c. 153 tons per year.

This particulate matter emission rate limitation qualifies the facility for the PM-RACT exemption per Rule 62-296.700(2)(b), F.A.C. [Requested by applicant, Based on the 12/30/81 dispersion modeling memorandum for PM-RACT exemption]

E.6. Visible emissions from the GTSP plant shall not be equal to or greater than 20% opacity.
[Rules 62-296.320(4)(b), F.A.C.]

E.7. Excess emissions resulting from startup, shutdown, or malfunction are permitted providing: (1) best operational practices to minimize emissions are adhered to and; (2) the duration of excess emissions are minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

E.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

E.9. Each owner or operator subject to the requirements of this subpart shall comply with the notification requirements in § 63.9. Test notification must be in accordance with § 63.9(e). This test requirement is more stringent than the state requirement of 15-day notification in 62-297.310, F.A.C.
[40 CFR 63.607(a)]

E.10. Once every fiscal year, each owner or operator of a phosphate fertilizers production plant subject to the provisions of this subpart shall conduct a performance test to demonstrate compliance with the applicable emission standard for each existing or granular triple superphosphate storage building. The owner or operator shall conduct the performance test according to the procedures in subpart A of this part and in this section (see SC E.12.). The

owner of operator must Test the stack emissions for particulate matter, fluorides, and visible emissions annually during each federal fiscal year.
[40 CFR 63.626(a)(1) and Rule 62-297.310(7)(a)4, F.A.C.]

E.11. In conducting performance tests, each owner or operator of an affected source shall use EPA Methods 1,2,3,4,5,9 and 13A or 13B as reference methods and procedures the test methods in 40 CFR Part 60, Appendix A, or other methods and procedures as specified in this section (see SC E.18.), except as provided in § 63.7(f).
[40 CFR 63.626(b) and Rule 62-297, F.A.C.]

E.12. Each owner or operator of an existing granular triple superphosphate process line shall determine compliance with the applicable total fluorides standards in § 63.622 or § 63.623 (see SC E.3.) as follows:

(1) The emission rate (E) of total fluorides shall be computed for each run using the following equation:

$$E = \left(\sum_{i=1}^{N} C_{si}\, Q_{sdi}\right)/(PK)$$

where:

E = emission rate of total fluorides, g/metric ton (lb/ton) of equivalent P_2O_5 feed.
C_{si} = concentration of total fluorides from emission point "i," mg/dscm (mg/dscf).
Q_{sdi} = volumetric flow rate of effluent gas from emission point ``i," dscm/hr (dscf/hr).
N = number of emission points associated with the affected facility.
P = equivalent P_2O_5 feed rate, metric ton/hr (ton/hr).
K = conversion factor, 1000 mg/g (453,600 mg/lb).

(2) Method 13A or 13B (40 CFR part 60, appendix A) shall be used to determine the total fluorides concentration (C_{si}) and volumetric flow rate (Q_{sdi}) of the effluent gas from each of the emission points. If Method 13 B is used, the fusion of the filtered material described in section 7.3.1.2 and the distillation of suitable aliquots of containers 1 and 2, described in sections 7.3.3 and 7.3.4 in Method 13 A, may be omitted. The sampling time and sample volume for each run shall be at least one hour and 0.85 dscm (30 dscf).

(3) The equivalent P_2O_5 feed rate (P) shall be computed using the following equation:

$$\mathbf{P = M_p\, R_p}$$

where:
M_p = total mass flow rate of phosphorus-bearing feed, metric ton/hr (ton/hr).
R_p = P_2O_5 content, decimal fraction.

(i) The accountability system described in § 63.625(a) and (b) shall be used to determine the mass flow rate (M_p) of the phosphorus-bearing feed.

(ii) The P_2O_5 content (R_p) of the feed shall be determined using as appropriate the following methods (incorporated by reference- see 40 CFR 63.14) specified in the Book of Methods Used and Adopted By The Association Of Florida Phosphate Chemists, Seventh Edition 1991, where applicable:

(A) Section IX, Methods of Analysis For Phosphate Rock, No. 1 Preparation of Sample.

(B) Section IX, Methods of Analysis For Phosphate Rock, No. 3 Phosphorus-P_2O_5 or $Ca_3(PO_4)_2$, Method A-Volumetric Method.

(C) Section IX, Methods of Analysis For Phosphate Rock, No. 3 Phosphorus-P_2O_5 or $Ca_3(PO_4)_2$, Method B-Gravimetric Quimociac Method.

(D) Section IX, Methods of Analysis For Phosphate Rock, No. 3 Phosphorus-P_2O_5 or $Ca_3(PO_4)_2$, Method C-Spectrophotometric Method.

(E) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method A-Volumetric Method.

(F) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method B-Gravimetric Quimociac Method.

(G) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method C-Spectrophotometric Method.

(4) To comply with § 63.625(f)(1) or (2) (see SC E.18.), the owner or operator shall use the monitoring systems in § 63.625(c) (see SC E.17.) to determine the average pressure loss of the gas stream across each scrubber in the process scrubbing system and to determine the average flow rate of the scrubber liquid to each scrubber in the process scrubbing system during each of the total fluoride runs. The arithmetic averages of the three runs shall be used as the baseline average values for the purposes of § 63.625(f)(1) or (2) (see SC E.18.).
[40 CFR 63.626(c)]

E.13. The visible emissions test shall be conducted by a certified observer and be a minimum of 60 minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rules 62-297.310(4)(a), and 62-4.070, F.A.C.]

E.14. If fuel oil of any grade (No. 2 to No. 6, inclusive) has been used in the dryer for a sum total of more than 400 hours from the previous compliance test, then compliance testing shall be conducted while firing fuel oil. If a test is conducted while firing natural gas, and in the 12 month period following the test, oil of any grade is burned for a sum total of more than 400 hours, then an additional visible emission test per Condition E.5 shall be conducted, while burning oil in the dryer, within 30 days of having exceeded the 400th hour oil burning limit. A compliance test submitted using a lower grade number fuel oil than grade No. 6 fuel oil, will automatically amend the dryer to allow subsequent operation on less than or equal grade numbers than that lower grade number fuel oil.
[Rules 62-297.310(7), and 62-4.070(3), F.A.C.]

E.15. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C.]

E.16. This emission unit is also subject to the requirements of Alternate Sampling Plan, 05-L-AP, dated December 20, 2005.
[Alternate Sampling Plan, 05-L-AP, dated December 20, 2005]

Monitoring of Operations

E.17. Each owner or operator of a new or existing diammonium and/or monoammonium phosphate process line, granular triple superphosphate process line, or granular triple superphosphate storage building using a wet scrubbing emission control system shall install, calibrate, maintain, and operate the following monitoring systems:

(1) A monitoring system which continuously measures and permanently records the pressure drop across each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.

(2) A monitoring system which continuously measures and permanently records the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.

[40 CFR 63.625(c)]

E.18. Following the date on which the performance test required in § 63.626 (see SC E.12.) is completed, the owner or operator of an existing affected source using a wet scrubbing emission control system and subject to emissions limitations for total fluorides or particulate matter contained in this subpart must establish allowable ranges for operating parameters using the methodology of either paragraph (f)(1) or (2) of this section:

(1) The allowable range for the daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system is ± 20 percent of the baseline average value determined as a requirement of § 63.626(c)(4) (see SC E.12.). The Administrator retains the right to reduce the ± 20 percent adjustment to the baseline average values of operating ranges in those instances where performance test results indicate that a source's level of emissions is near the value of an applicable emissions standard, but, in no instance shall the adjustment be reduced to less than ± 10 percent. The owner or operator must notify the Administrator of the baseline average value and must notify the Administrator each time that the baseline value is changed as a result of the most recent performance test. The baseline average values used for compliance shall be based on the values determined during the most recent performance test. The new baseline average value shall be effective on the date following the performance test.

(2) The owner or operator of any new or existing affected source shall establish, and provide to the Administrator for approval, allowable ranges of baseline average values for the pressure drop across and of the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system for the purpose of assuring compliance with this subpart. Allowable ranges may be based upon baseline average values recorded during previous performance tests using the test methods required in this subpart and established in the manner required in § 63.626(c)(4) (see SC E.12.). As an alternative, the owner or operator can establish the allowable ranges of baseline average values using the results of performance tests conducted specifically for the purposes of this paragraph using the test methods required in this subpart and established in the manner required in § 63.626(c)(4) (see SC E.12.). The source shall certify that the control devices and processes have not been modified subsequent to the testing upon which the data used to establish the allowable ranges were obtained. The allowable ranges of baseline average values developed pursuant to the provisions of this paragraph must be submitted to the Administrator for approval. The owner or operator must request and obtain approval of the Administrator for changes to the allowable ranges of baseline average values. When a source using the methodology of this paragraph is retested, the owner operator shall determine new allowable ranges of baseline average values unless the retest indicates no change in the operating parameters from previous tests. Any new allowable ranges of baseline average values resulting from the most recent performance test shall be effective on the date following the retest. Until changes to allowable

ranges of baseline average values are approved by the Administrator, the allowable ranges for use in § 63.624 (See SC E.4) shall be based upon the range of baseline average values proposed for approval.
[40 CFR 63.625(f)]

Recordkeeping and Reporting Requirements

E.19. Each owner or operator of an existing granular triple superphosphate process line subject to the provisions of this subpart shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using a monitoring system for measuring mass flowrate which meets the requirements of 63.625(a) and then by proceeding according to §63.626(c)(3) (see SC E.12.).
[40 CFR 63.625(b)]

E.20. The owner or operator of an affected source shall comply with the reporting requirements specified in § 63.10 and Rule 62-297.310(8) as follows:

(1) Performance test report. As required by § 63.10, the owner or operator shall report the results of the initial and annual performance tests as part of the notification of compliance status required in § 63.9. The 45-day test reporting requirements are more stringent in Rule 62-297.310(8), F.A.C.

(2) Excess emissions report. As required by § 63.10, the owner or operator of an affected source shall submit an excess emissions report for any exceedance of an operating parameter limit. The report shall contain the information specified in § 63.10. When no exceedances of an operating parameter have occurred, such information shall be included in the report. The report shall be submitted semiannually and shall be delivered or postmarked by the 30th day following the end of the calendar half. If exceedances are reported, the owner or operator shall report quarterly until a request to reduce reporting frequency is approved as described in § 63.10, and the owner or operator shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. with a full written report on the malfunctions being submitted in a quarterly report.

(3) Summary report. If the total duration of control system exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, the owner or operator shall submit a summary report containing the information specified in § 63.10 rather than the full excess emissions report, unless required by the Administrator. The summary report shall be submitted semiannually and shall be delivered or postmarked by the 30th day following the end of the calendar half.

(4) If the total duration of control system operating parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, the owner or operator shall submit a summary report and the excess emissions report.
{Permitting Note: The conditions of 40 CFR 63.627(c) take precedence over 62-210.700(6) and 62-297.310(8)}
[40 CFR 63.627 (b) and (c), Rules 62-210.700(6) and 62-297.310(8), F.A.C.]

E.21. A record log shall be established and maintained for all fuel fired in the GTSP Plant dryer. The log shall include, at a minimum, the quantity of natural gas and fuel oil utilized in the dryer and the sulfur content of the fuel oil delivered which is utilized in the dryer (example: Fuel oil delivery invoices indicating sulfur content are acceptable). [Applicant Request For Natural Gas, 09/18/95, AO53-235041 amendment, dated 6/1/95 and Rules 62-4.070(3), and 62-213.440(b)2.b., F.A.C.]

Applicability of general provisions.

E.22. The requirements of the general provisions in subpart A of this part that are applicable to the owner or operator subject to the requirements of this subpart are shown in appendix A to this subpart. The facility is subject to the applicable conditions of Subpart A as they apply to the existing GTSP plant.
[40 CFR 63.628)]

Miscellaneous requirements.

E.23. This emission unit is subject to specific requirements of 40 CFR 63, Subpart BB, Appendix A to Subpart BB – Applicability to General Provisions to Subpart BB, and Compliance Plan CP-1. The owner or operator is responsible for remaining in compliance with any updates made to Subpart A or BB upon the effective date in the final promulgated rule. Subsequently, this permit will be reopened to incorporate any applicable updates in accordance with Rule 62-213.430(4), F.A.C. To establish operating parameters for this emissions unit, the owner or operator must comply and demonstrate with the following:

1) Must comply with all conditions of Compliance Plan CP-1,
2) Must comply with all applicable requirements of Subparts A and BB,
3) Specifically notify the department the testing will be for establishing allowable ranges for this emissions unit according to Subparts A and BB,
4) All tests must be precisely conducted according to the MACT standards and all applicable test methods,
5) All tests must clearly demonstrate compliance with all MACT standards and applicable test methods and requirements,
6) All tests shall be submitted to the Department in accordance with Subparts A and BB,
7) The test results will become the new allowable ranges after the Department has had 30 days to review the test results. Failure to meet any requirements of this condition, Subpart A or BB, or the alternate plan will negate use of any new ranges derived from the test.

[40 CFR 63- Subpart A, 40 CFR 63- Subpart BB, and Compliance Plan, CP-1]

E.24. Definitions- Terms used in this subpart are defined in the Clean Air Act, in § 63.2, or in this section as follows:

Equivalent P_2O_5 feed means the quantity of phosphorus, expressed as phosphorous pentoxide, fed to the process.

Exceedance means a departure from an indicator range established for monitoring under this subpart, consistent with any averaging period specified for averaging the results of the monitoring.

Granular triple superphosphate process line means any process line, not including storage buildings, manufacturing granular triple superphosphate by reacting phosphate rock with phosphoric acid.

Total fluorides means elemental fluorine and all fluoride compounds, including the HAP hydrogen fluoride, as measured by reference methods specified in 40 CFR Part 60, Appendix A, Method 13 A or B, or by equivalent or alternative methods approved by the Administrator pursuant to §63.7(f).
[40 CFR 63.630]

CAM Requirements

E.25. This emissions unit is subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and, Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

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

E.U. ID No.	Brief Description
-024	GTSP East Storage Building - North scrubber system
-025	GTSP East Storage Building - South scrubber system

The amount of process input rate to the Granular Triple Super Phosphate (GTSP) East Storage Building is 140 tons per hour of GTSP from the GTSP production plant, and the process output rate from the GTSP East Storage Building is 7,500 tons per day to railcar or truck loadout.

Two scrubber systems control emissions generated at the East Storage Building. A North scrubber system controls emissions generated in the northern part of the East Storage Building and a South scrubber system controls emissions generated in the southern part of the East Storage Building. The scrubber systems are similar in construction and operation. Each scrubber system consists of collector ducts alongside the Building and two wet cyclonic scrubbers in parallel exhausting to a common stack. The stack gas flow rate of the North scrubber system is approximately 102,000 acfm and the stack gas flow rate of the South scrubber system is approximately 123,000 acfm. Both scrubber systems use process water as the scrubbing liquid.

{Permitting note(s): This emissions unit is regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards; Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.403, F.A.C., Phosphate Processing; and 40 CFR 63, Subpart BB, Phosphate Fertilizer Production. CAM does not apply. **The Part 40 CFR 63 Subparts A and BB take precedence, however these units are subject to all applicable State Implementation Plan (SIP) rules if these units are out of compliance with the NESHAP.**}

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

Essential Potential to Emit (PTE) Parameters

F.1. Capacity.
a. The process input rate to the GTSP East Storage Building shall not exceed 140 tons per hour of GTSP (see Condition **E.1.**).
b. The process output rate from the GTSP East Storage Building shall not exceed 7,500 tons per day of GTSP.
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE), Requested by Applicant, April 20, 1995]

Emission Limitations and Standards
F.2. Particulate matter emissions from both scrubber systems, combined, shall not exceed any of the following limits:

a. 40.1 pounds per hour for a total GTSP product weight rate greater than 190 tons per hour.
b. For a total GTSP product weight rate equal to or less than 190 tons per hour, the particulate matter emission rate is, E:
Where: E = pounds per hour, and P = total GTSP rate, tons per hour,
(1) $E = (3.59)\ P^{0.62}$, where P is less than or equal to 30 tons per hour, or
(2) $E = (17.31)\ P^{0.16}$, where P is greater than 30 tons per hour.
c. 175.6 tons per year.

This particulate matter emission rate limitation qualifies the facility for the PM-RACT exemption per Rule 62-296.700(2)(b), F.A.C.
[Requested by applicant, Based on the 4/29/83 screen model memorandum for PM-RACT exemption, Rule 62-296.320(4)(a)2, F.A.C.]

F.3. Granular triple superphosphate storage building.

(1) On and after the date on which the performance test required to be conducted by §§ 63.7 and 63.626 (see SC F.9.) is required to be completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected source any gases which contain total fluorides in excess of 0.250 grams/hr/metric ton of equivalent P_2O_5 stored (5.0×10^{-4} lb/hr/ton of equivalent P_2O_5 stored).

(2) No owner or operator subject to the provisions of this subpart shall ship fresh granular triple superphosphate from an affected facility.

(3) If the owner operator does not meet the conditions (1) and (2) of this Specific condition, Fluoride emissions from both scrubber systems, the North and the South scrubber system, shall not exceed 7.8 pounds per hour and 34.2 tons per year.
[40 CFR 63.622(c), Rule 62-296.403(2) and application dated 7/23/93.]

F.4. Visible emissions from the East Storage Building operations shall not be equal to or greater than 20% opacity. [Rule 62-296.320(4)(b), F.A.C.]

F.5. Excess emissions resulting from startup, shutdown, or malfunction are permitted providing: (1) best operational practices to minimize emissions are adhered to and; (2) the duration of excess emissions are minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

F.6. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.].

F.7. On or after the date on which the performance test required to be conducted by §§ 63.7 and 63.626 (see SC F.9.) is required to be completed, the owner/operator using a wet scrubbing emission control system must maintain daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber within the allowable ranges established pursuant to the requirements of § 63.625(f)(1) or (2) (See SC E.18.).
[40 CFR 63.624]

Test Methods and Procedures

F.8. On or before the applicable compliance date in § 63.630 and once every federal fiscal year thereafter, each owner or operator of a phosphate fertilizers production plant subject to the provisions of this subpart shall conduct a performance test to demonstrate compliance with the applicable emission standard for each existing granular triple superphosphate storage building. The owner or operator shall conduct the performance test according to the procedures in subpart A of this part and in this section. The owner or operator must test the North scrubber system stack and the South scrubber system stack for particulate matter emissions, fluorides emissions, and visible emissions annually. The testing of each stack shall occur simultaneously, or within one consecutive five day period. If two tests are performed, the second series of test runs shall

begin no later than five days after completion of the first series of test runs, and the lower of each production rate recorded during the tests shall be used for establishing allowable rates. [40 CFR 63.626(a)(1), Rules 62-297.310(7), 62-297.310(1) and 62-297.310(8), F.A.C.]

F.9. In conducting performance tests, each owner or operator of an affected source shall use Methods 1, 2, 4, 5, 9 and 13A or 13B as reference methods and procedures the test methods in 40 CFR Part 60, Appendix A, or other methods and procedures as specified in this section, except as provided in § 63.7(f). The EPA Method 9 test shall be conducted by a certified observer and be a minimum of 60 minutes in duration. Each owner or operator of an existing granular triple superphosphate storage building shall determine compliance with the applicable total fluorides standards in § 63.622 or § 63.623 as follows:

(1) The owner or operator shall conduct performance tests only when the following quantities of product are being cured or stored in the facility.

(i) Total granular triple superphosphate is at least 10 percent of the building capacity, and

(ii) Fresh granular triple superphosphate is at least six percent of the total amount of granular triple superphosphate, or

(iii) If the provision in paragraph (d)(1)(ii) of this sub-section exceeds production capabilities for fresh granular triple superphosphate, fresh granular triple superphosphate is equal to at least 5 days maximum production.

(2) [reserved]

(3) The owner or operator shall determine compliance with the total fluorides standard in §§ 63.622 and 63.623 as follows:

(i) The emission rate (E) of total fluorides shall be computed for each run using the following equation:

$$E = \left(\sum_{i=1}^{N} C_{si}\, Q_{sdi}\right)/(PK)$$

where:

E = emission rate of total fluorides, g/hr/metric ton (lb/hr/ton) of equivalent P_2O_5 stored.
C_{si} = concentration of total fluorides from emission point ``i,'' mg/dscm (mg/dscf).
Q_{sdi} = volumetric flow rate of effluent gas from emission point ``i,'' dscm/hr (dscf/hr).
N = number of emission points in the affected facility.
P = equivalent P_2O_5 stored, metric tons (tons).
K = conversion factor, 1000 mg/g (453,600 mg/lb).

(ii) Method 13A or 13B (40 CFR part 60, appendix A) shall be used to determine the total fluorides concentration (C_{si}) and volumetric flow rate (Q_{sdi}) of the effluent gas from each of the emission points. If Method 13B is used, the fusion of the filtered material described in section 7.3.1.2 and the distillation of suitable aliquots of containers 1 and 2, described in Sections 7.3.3 and 7.3.4 in Method 13 A, may be omitted. The sampling time and sample volume for each run shall be at least one hour and 0.85 dscm (30 dscf).

(iii) The equivalent P_2O_5 feed rate (P) shall be computed using the following equation:

$$P = M_p\, R_p$$

where:

M_p = amount of product in storage, metric ton (ton).

R_p = P_2O_5 content of product in storage, weight fraction.

(iv) The accountability system described in § 63.625(d) and (e) shall be used to determine the amount of product (M_p) in storage.

(v) The P_2O_5 content (R_p) of the product stored shall be determined using as appropriate the following methods (incorporated by reference- see 40 CFR 63.14) specified in the Book of Methods Used and Adopted By The Association Of Florida Phosphate Chemists, Seventh Edition 1991, where applicable:

(A) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method A-Volumetric Method.

(B) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method B-Gravimetric Quimociac Method.

(C) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-P_2O_5, Method C-Spectrophotometric Method, or,

(vi) The P_2O_5 content (R_p) of the product stored shall be determined using as appropriate the following methods (incorporated by reference- see 40 CFR 63.14) specified in the Official Methods of Analysis of AOAC International, sixteenth Edition, 1995, where applicable:

(A) AOAC Official Method 957.02 Phosphorus (Total) In Fertilizers, Preparation of Sample.

(B) AOAC Official Method 929.01 Sampling of Solid Fertilizers.

(C) AOAC Official Method 929.02 Preparation of Fertilizer Sample.

(D) AOAC Official Method 978.01 Phosphorus (Total) In Fertilizers, Automated Method.

(E) AOAC Official Method 969.02 Phosphorus (Total) In Fertilizers, Alkalimetric Quinolinium Molybdophosphate Method.

(F) AOAC Official Method 962.02 Phosphorus (Total) In Fertilizers, Gravimetric Quinolinium Molybdophosphate Method.

(G) AOAC Official Method 958.01 Phosphorus (Total) in Fertilizer, Spectrophotometric Molybdovanadophosphate Method.

(4) To comply with § 63.625(f)(1) or (2) (See SC E.18), the owner or operator shall use the monitoring systems described in § 63.625(c) (see SC E.16.) to determine the average pressure loss of the gas stream across each scrubber in the process scrubbing system and to determine the average flow rate of the scrubber liquid to each scrubber in the process scrubbing system during each of the total fluoride runs. The arithmetic averages of the three runs shall be used as the baseline average values for the purposes of § 63.625(f)(1) or (2) (See SC E.18.).
{Permitting Note- The conditions of 40 CFR 63.626 take precedence over the conditions referenced in 62-297, F.A.C.}
[40 CFR 63.626(b) and (d) and Rule 62-297, F.A.C.]

F.10. Each owner or operator subject to the requirements of this subpart shall comply with the notification requirements in § 63.9. Test notification must be in accordance with § 63.9(e). This test requirement is more stringent than the state requirement of 15-day notification in 62-297.310, F.A.C.
[40 CFR 63.607(a)]

F.11. The owner or operator of an affected source shall comply with the reporting requirements specified in § 63.10 and Rule 62.297.310(8) as follows:

(1) Performance test report. As required by § 63.10, the owner or operator shall report the results of the initial and annual performance tests as part of the notification of compliance

status required in § 63.9. The 45-day test reporting requirements are more stringent in Rule 62-297.310(8), F.A.C.

(2) Excess emissions report. As required by § 63.10, the owner or operator of an affected source shall submit an excess emissions report for any exceedance of an operating parameter limit. The report shall contain the information specified in § 63.10. When no exceedances of an operating parameter have occurred, such information shall be included in the report. The report shall be submitted semiannually and shall be delivered or postmarked by the 30th day following the end of the calendar half. If exceedances are reported, the owner or operator shall report quarterly until a request to reduce reporting frequency is approved as described in § 63.10, and the owner or operator shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. with a full written report on the malfunctions being submitted in a quarterly report.

(3) Summary report. If the total duration of control system exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, the owner or operator shall submit a summary report containing the information specified in § 63.10 rather than the full excess emissions report, unless required by the Administrator. The summary report shall be submitted semiannually and shall be delivered or postmarked by the 30th day following the end of the calendar half.

(4) If the total duration of control system operating parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, the owner or operator shall submit a summary report and the excess emissions report.
{Permitting Note: The conditions of 40 CFR 63.627(c) take precedence over 62-210.700(6) and 62-297.310(8)}
[40 CFR 63.627 (b) and (c), Rules 62-210.700(6) and 62-297.310(8), F.A.C.]

F.12. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C.]

F.13. This emission unit is also subject to the requirements of Alternate Sampling Plan, 05-L-AP, dated December 20, 2005.
[Alternate Sampling Plan, 05-L-AP, dated December 20, 2005]

Monitoring of Operations

F.14. The permittee shall install, calibrate, maintain, and operate monitoring devices which measure the exhaust fan amperages for both the North and South scrubber systems as applicable to MACT and alternate sampling plan.
[Rule 62-4.070(3), F.A.C.]

F.15. The owner or operator of any granular triple superphosphate storage building subject to the provisions of this subpart shall maintain an accurate account of granular triple superphosphate in storage to permit the determination of the amount of equivalent P_2O_5 stored.
[40 CFR 63.625(d)]

F.16. Each owner or operator of an existing granular triple superphosphate storage building subject to the provisions of this subpart shall maintain a daily record of total equivalent P_2O_5

stored by multiplying the percentage P_2O_5 content, as determined by § 63.626(d)(3) (see SC F.9.), times the total mass of granular triple superphosphate stored.
[40 CFR 63.625(e)(1)]

F.17. The owner or operator of any granular triple superphosphate storage building subject to the provisions of this subpart shall develop for approval by the Administrator a site-specific methodology including sufficient recordkeeping for the purposes of demonstrating compliance with § 63.622(c)(2), as applicable.
[40 CFR 63.625(e)(2)]

F.18. Following the date on which the performance test required in § 63.626 (see SC F.9.) is completed, the owner or operator of a new or existing affected source using a wet scrubbing emission control system and subject to emissions limitations for total fluorides or particulate matter contained in this subpart must establish allowable ranges for operating parameters using the methodology of either paragraph (f)(1) or (2) of this section:

(1) The allowable range for the daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system is ± 20 percent of the baseline average value determined as a requirement of § 63.626(c)(4) or (d)(4) (see SC F.9.). The Administrator retains the right to reduce the ± 20 percent adjustment to the baseline average values of operating ranges in those instances where performance test results indicate that a source's level of emissions is near the value of an applicable emissions standard, but, in no instance shall the adjustment be reduced to less than ± 10 percent. The owner or operator must notify the Administrator of the baseline average value and must notify the Administrator each time that the baseline value is changed as a result of the most recent performance test. The baseline average values used for compliance shall be based on the values determined during the most recent performance test. The new baseline average value shall be effective on the date following the performance test.

(2) The owner or operator of any new or existing affected source shall establish, and provide to the Administrator for approval, allowable ranges of baseline average values for the pressure drop across and of the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system for the purpose of assuring compliance with this subpart. Allowable ranges may be based upon baseline average values recorded during previous performance tests using the test methods required in this subpart and established in the manner required in § 63.626(c)(4) or (d)(4) (see SC F.9.). As an alternative, the owner or operator can establish the allowable ranges of baseline average values using the results of performance tests conducted specifically for the purposes of this paragraph using the test methods required in this subpart and established in the manner required in § 63.626(c)(4) or (d)(4) (see SC F.9.). The source shall certify that the control devices and processes have not been modified subsequent to the testing upon which the data used to establish the allowable ranges were obtained. The allowable ranges of baseline average values developed pursuant to the provisions of this paragraph must be submitted to the Administrator for approval. The owner or operator must request and obtain approval of the Administrator for changes to the allowable ranges of baseline average values. When a source using the methodology of this paragraph is retested, the owner operator shall determine new allowable ranges of baseline average values unless the retest indicates no change in the operating parameters from previous tests. Any new allowable ranges of baseline average values resulting from the most recent performance test shall be effective on the date following the retest. Until changes to allowable ranges of baseline average values are approved by the Administrator, the allowable ranges for use in § 63.624 (See SC F.7.) shall be based upon the range of baseline average values proposed for approval.
[40 CFR 63.625(f)]

Recordkeeping and Reporting Requirements

F.19. The permittee shall establish and maintain a record log for the GTSP East Storage Building. The record log shall include, at a minimum:

a. a reference to loadout records to verify that the 7500 tons per day maximum GTSP production output rate, required by Condition F.1, is not exceeded,
b. a reference to loading records to verify that the 140 tons per hour maximum GTSP production input rate, as stated in Condition F.1, is not exceeded.

The permittee may substitute continuous monitoring, strip chart recordings and/or electronic media recording in lieu of the required manual recordings.
[Rules 62-4.070(3), 62-4.160(14)(b), and 62-4.160(14)(c), F.A.C.]

Applicability of general provisions.

F.20. The requirements of the general provisions in subpart A of this part that are applicable to the owner or operator subject to the requirements of this subpart are shown in appendix A to this subpart. The facility is subject to the applicable conditions of Subpart A as they apply to the existing GTSP storage building.
[40 CFR 63.628]

Miscellaneous requirements.

F.21. The Administrator retains the authority to approve site-specific test plans for uncontrolled granular triple superphosphate storage buildings developed pursuant to § 63.7(c)(2)(i).
[40 CFR 63.629]

F.22. This emission unit is subject to specific requirements of 40 CFR 63, Subpart BB, Appendix A to Subpart BB – Applicability to General Provisions to Subpart BB, and Compliance Plan CP-1. The owner or operator is responsible for remaining in compliance with any updates made to Subpart A or BB upon the effective date in the final promulgated rule. Subsequently, this permit will be reopened to incorporate any applicable updates in accordance with Rule 62-213.430(4), F.A.C. To establish operating parameters for this emissions unit, the owner or operator must comply and demonstrate with the following:

1) Must comply with all conditions of Compliance Plan CP-1,
2) Must comply with all applicable requirements of Subparts A and BB,
3) Specifically notify the department the testing will be for establishing allowable ranges for this emissions unit according to Subparts A and BB,
4) All tests must be precisely conducted according to the MACT standards and all applicable test methods,
5) All tests must clearly demonstrate compliance with all MACT standards and applicable test methods and requirements,
6) All tests shall be submitted to the Department in accordance with Subparts A and BB,
7) The test results will become the new allowable ranges after the Department has had 30 days to review the test results. Failure to meet any requirements of this condition, Subpart A or BB, or the alternate plan will negate use of any new ranges derived from the test.

[40 CFR 63- Subpart A, 40 CFR 63- Subpart BB, and Compliance Plan, CP-1]

F.23. Definitions- Terms used in this subpart are defined in the Clean Air Act, in § 63.2, or in this section as follows:

Equivalent P_2O_5 stored means the quantity of phosphorus, expressed as phosphorus pentoxide, being cured or stored in the affected facility.

Exceedance means a departure from an indicator range established for monitoring under this subpart, consistent with any averaging period specified for averaging the results of the monitoring.

Fresh granular triple superphosphate means granular triple superphosphate produced within the preceding 72 hours.

Granular triple superphosphate storage building means any building curing or storing fresh granular triple superphosphate.

Total fluorides means elemental fluorine and all fluoride compounds, including the HAP hydrogen fluoride, as measured by reference methods specified in 40 CFR Part 60, Appendix A, Method 13 A or B, or by equivalent or alternative methods approved by the Administrator pursuant to §63.7(f).

[40 CFR 63.621]

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

E.U. ID No.	Brief Description
-026	GTSP Rock Hopper Bin

The phosphate rock storage bin at the GTSP plant operates automatically to maintain sufficient rock supply. Material is pneumatically conveyed to the storage bin at a rate of 70 tons per hour. Particulate matter emissions are controlled by a dust collector, with a design flow rate of 2400 ACFM. Material collected by the dust collector is returned to the storage bin.

{Permitting note(s): This emissions unit is regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards; and Rule 62-296.700, F.A.C., RACT Particulate Matter. CAM does not apply.}

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

Essential Potential to Emit (PTE) Parameters

G.1. Capacity. The transfer rate shall not exceed 70.0 tons per hour.
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)]

Emission Limitations and Standards
G.2. Visible emissions from the GTSP rock storage bin baghouse exhaust, and conveying equipment, shall not be equal to or greater than 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.]

G.3. The maximum allowable emission rate of particulate matter from the GTSP rock storage bin baghouse exhaust shall not exceed 22.5 pounds per hour. [Requested by applicant on October 28, 1993 in order for the emission unit to be considered a minor source (allowable particulate emission rate less than 100 tons per year), Rule 62-4.070(3), F.A.C.]

G.4. Excess emissions resulting from startup, shutdown, or malfunction are permitted providing: (1) best operational practices to minimize emissions are adhered to and; (2) the duration of excess emissions are minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

G.5. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.].

G.6. In case of excess emissions resulting from malfunctions, the permittee shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.].

Test Methods and Procedures
G.7. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department in writing at least 15 days prior to the date on which each formal compliance test

is to begin. The notification will include the date, the time, and the place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted. [Rules 62-297.310(7)(a)9 and 62-209.500(5), F.A.C.].

G.8. Test for visible emissions per Condition G.2. annually. Testing at conditions that are not representative of actual operating conditions may invalidate the test.
[Rules 62-297.310(7), and 62-297.310(8), F.A.C.]

G.9. Test for particulate matter emissions per Condition G.3, on or during the sixty (60) day period prior to expiration date of this permit. Testing at conditions that are not representative of actual operating conditions may invalidate the test.
[Rules 17-297.310(7), and 17-297.310(8), F.A.C.]

G.10. Compliance with the emission limitations of Conditions G.2 and G.3, shall be demonstrated using EPA Methods 1, 2, 4, 5 and 9, contained in 40 CFR 60, Appendix A, adopted by reference in Chapter 62-297, F.A.C. The EPA Method 9 test shall be conducted by a certified observer and be a minimum of 60 minutes in duration.
[Rules 62-297.310(4)(a), F.A.C.]

G.11. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, then the Department of Environmental Protection may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C.]

Monitoring of Operations

G.12. In order to demonstrate compliance with Rule 62-210.650, the permittee shall record the pressure drop across the baghouse daily.
[Rule 62-4.070(3), F.A.C.]

Recordkeeping and Reporting Requirements

G.13. In order to document compliance with the rate limitation of G.1. the permittee shall maintain daily records of the amount of material processed and total hours of process operations.*

NOTE: The transfer rate for the GTSP Rock Hopper Bin is dependent on the GTSP production rate. The recording of the total hours of process operations for the GTSP Plant should suffice for the GTSP Rock Hopper Bin.
*Engineering estimates may be used to estimate these parameters.
[Rule 62-4.070(3), F.A.C.]

G.14. Test Reports

a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Air Compliance Section of Southwest District Office of the Department on the results of each such test.

b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed or with the operating permit application, whichever is earlier.

c. The report shall provide sufficient detail on the emissions unit tested (at a minimum , the "Project", "Facility ID" and "Point ID"), the test procedures used to allow the Department to determine if the test report was properly conducted and the test results

properly computed. Testing procedures shall be consistent with the requirements of Rule 62-297.310(7), F.A.C.

d. The test report, other than for an EPA or DEP Method 9 test, as a minimum, shall provide the following information:
   1. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
   2. The normal operating parameters of air pollution control devices installed on each emission unit (e.g., pressure drop, scrubber liquid flow rate, scrubber liquid pressure, total current, etc.), and the operating parameters of air pollution control devices during each test run.

   Failure to submit the rates and actual operating conditions in the test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rules 62-297.310(8), F.A.C., and 62-4.070(3), F.A.C.]

Subsection 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
-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 w/out Fan
-042	Molten Sulfur Truck Pit - West Vent with Fan
-043	Molten Sulfur Truck Pit - West Vent w/out Fan
-050	Molten Sulfur Transfer Pit with two vents

The molten sulfur storage and handling system comprises of the unloading, transfer and storage of molten sulfur delivered to the plant by trucks. The system is permitted for a throughput of 2,300 tons per day and 725,000 tons per year. The system consists of two 1,050 short ton storage tanks (east and west), a 670 short ton truck unloading pit, and associated transfer pumps and piping. Molten sulfur from the truck receiving pit can be transferred to either the east or west storage tank or to the sulfuric acid plants. Truck unloading into the transfer pit is allowed when the truck receiving pits cannot be used for any reason.

The Molten Sulfur Pit has a capacity of 250 tons. Molten Sulfur is unloaded into pits via truck. The material is either pumped into storage tanks or into the transfer pit. The transfer pit is used to pump molten sulfur to the sulfuric acid plant or back into the storage tanks. The current pit has two sections. The transfer section is being replaced by the new molten sulfur transfer pit. The existing transfer pit will no longer be used once the new pit is in operation. The existing truck unloading section of the pit will continue to be used. The West Vent shall be Emission Point No. 1 and the East vent shall be Emission Point No.2.

{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. CAM does not apply.}

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

Essential Potential to Emit (PTE) Parameters

H.1. Capacity. The maximum molten sulfur throughput rate shall neither exceed 2,300 tons per day (calculated as a 5 day rolling average), nor 725,000 tons per year (based on a combined acid production capacity of 6,000 TPD of 100% sulfuric acid from Sulfuric Acid Plant Nos. 10 and 11).
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE), 1050055-010-AC/PSD-FL-235].

H.2. Hours of Operation. This Molten Sulfur Transfer Pit is permitted to operate 8,760 hours per 12 month consecutive period.
[Requested by permittee in application dated April 15, 2003, Air Construction Permit 1050055-013-AC]

Emission Limitations and Standards

H.3. Visible emissions from any emission point in the molten sulfur handling and storage system shall not exceed 20% opacity (six minute average) and be a minimum of 30 minutes in duration.
[Rule 62-296.411(1)(g), F.A.C.]

H.4. For emission inventory and PSD purposes, the estimated emissions from the sources in the molten sulfur storage and handling system are:

Pollutant	PM/PM_{10}		Sulf. PM		SO_2		TRS/H_2S		VOC	
Source	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
East Tank	0.56	1.55	0.28	0.78	0.72	1.99	0.42	1.18	0.51	1.42
West Tank	0.56	1.55	0.28	0.78	0.72	1.99	0.42	1.18	0.51	1.42
Truck Pit	1.02	4.51	0.51	2.25	1.32	5.79	0.78	3.41	0.94	4.12

[Construction Permit 1050055-010-AC/PSD-FL-235].

H.5. Excess emissions resulting from startup, shutdown, or malfunction are permitted providing: (1) best operational practices to minimize emissions are adhered to and; (2) the duration of excess emissions are minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

H.6. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C. and Air Construction Permit 1050055-013-AC]].

H.7. In case of excess emissions resulting from malfunctions, the permittee shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.].

H.8. All molten sulfur transfer shall be through enclosed piping systems where feasible and practical. In user facilities, molten sulfur may be transferred by covered trench or a movable spout which is positioned over a receiving pit. Contact surfaces between moveable unloading arms and stationary pipes shall seat effectively around the entire circumference to minimize spillage.
[Rule 62-296.411(1)(a), F.A.C., Air Construction Permit 1050055-013-AC]

H.9. All areas surrounding points where molten sulfur pipes are routinely disconnected and areas where molten sulfur is transferred to trucks shall be paved and curbed within 20 feet of the point of disconnection or transfer to contain any spilled molten sulfur, or shall be provided with noncorrosible drip pans or other secondary containment, positioned to collect spills, that are adequate to contain amounts of sulfur that may escape during routine disconnect, reconnection or operation of the piping system.
[Rule 62-296.411(1)(b), F.A.C., Air Construction Permit 1050055-013-AC]

H.10. All spilled molten sulfur shall be collected and properly disposed of whenever the containment area is filled to one-half its containment capacity, or monthly, whichever is more frequent. Spills of molten sulfur outside of a containment area, or where subject to vehicular traffic, shall be collected and disposed of as soon as possible, but no later than 24 hours after the spill occurs. Drip pans or other secondary containment shall be cleaned as needed to prevent exceedance of capacity, but at least weekly.
[Rule 62-296.411(1)(d), F.A.C., Air Construction Permit 1050055-013-AC]

H.11. All vent surfaces shall be cleaned monthly to remove captured particulates.
[Rule 62-296.411(1)(e), F.A.C., Air Construction Permit 1050055-013-AC]

H.12. Objectionable Odor. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants from this plant which cause or contribute to an objectionable odor. Objectionable odor is defined as "Any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance."
[Rules 62-296.320(2) and 62-210.200, Definitions-(Objectionable Odor), F.A.C., Air Construction Permit 1050055-013-AC]

Test Methods and Procedures
H.13. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department in writing at least 15 days prior to the date on which each formal compliance test is to begin. The notification will include the date, the time, and the place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.
[Rules 62-297.310(7)(a)9, 62-209.500(5), F.A.C., and Air Construction Permit 1050055-013-AC].

H.14. All the emission points in the molten sulfur handling and storage system shall be tested for visible emissions on, or during the 180 day period prior to the expiration date of this permit.
[Rules 62-297.310(7) and 62-297.310(8), F.A.C.].

H.15. Compliance with the visible emission limitation of Condition H.2. shall be determined using DEP Method 9. Compliance shall be conducted by a certified observer and be a minimum of 30 minutes in duration. The visible emissions tests shall be conducted during conditions that would be expected to produce the highest opacity. The tests for the vents of the storage tanks and sulfur pits shall be conducted while the tanks are being filled (filling does not have to be continuous during the entire test. Visible emissions tests shall be conducted at each vent of the two sulfur receiving pits and at each vent of the two sulfur storage tanks. The unloading/transfer rates and a description of the unloading operations during the test shall be included with the test results. Failure to submit the actual operating conditions may invalidate the test and fail to provide reasonable assurance of compliance. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62- 297, F.A.C.
[Construction Permit No. AC53-201152, Air Construction Permit 1050055-013-AC, Rules 62-4.070(3), and 62-297.310, 62-297.401, 62-296.411, F.A.C.]

H.16. Test Requirement-Production Rate. Testing of emissions to show compliance shall be conducted under normal operating conditions while the pit is transferring sulfur. The actual throughput rate (in tons/hour) for the test period and an explanation how the rate was determined shall be included in the test report. Failure to submit the actual transfer rate for the test period

and a copy of the daily log for the test day in the test report may invalidate the test and fail to provide reasonable assurance of compliance.
[Rule 62-297.310(2), and 62-4.070(3), F.A.C., Air Construction Permit 1050055-013-AC]

H.16. Other Tests. If the Department of Environmental Protection has reason to believe that any applicable emission standard is being violated, the Department may require the permittee to conduct compliance tests which identify the nature and quantity of emissions and to provide a report on the results of the tests.
[Rule 62-297.310(7)(b), F.A.C., Air Construction Permit 1050055-013-AC]

Monitoring and Recordkeeping Requirements

H.17. Recordkeeping. In order to document compliance with Specific Conditions H.1., H.2., and H.6., the permittee shall keep the following records at a minimum:

Facility ID number.
Month, Day, and Year.
Throughput rate for the Molten Sulfur System (as measured by the amount received) in tons/day. This will be calculated by the total amount of molten sulfur received in a day.
A consecutive 5 day average (most recent 5 days) of the throughput rate (as measured by the amount received) in tons/day will be maintained for compliance with the annual limit.
Monthly total sulfur received (tons/month).
A consecutive 12 month period (most recent 12 months) of the throughput rate (as measured by the amount received) in tons/year will be maintained for compliance with the annual limit.
The date the vent surfaces were cleaned.

The daily recordkeeping log shall be completed by the end of the following week. The monthly recordkeeping log shall be completed by the end of the week following the end of the preceding month. The above records shall be maintained for a minimum of the most recent five (5) year period and made available to the Department upon request.
[Rules 62-213.440(1) and 62-4.070(3), F.A.C., Air Construction Permit 1050055-013-AC]

H.18. Test Reports

a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Air Compliance Section of Southwest District Office of the Department on the results of each such test.
b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed or with the operating permit application, whichever is earlier.
c. The report shall provide sufficient detail on the emissions unit tested (at a minimum , the "Project", "Facility ID" and "Point ID"), the test procedures used to allow the Department to determine if the test report was properly conducted and the test results properly computed. Testing procedures shall be consistent with the requirements of Rule 62-297.310(7), F.A.C.
d. The test report, other than for an EPA or DEP Method 9 test, as a minimum, shall provide the following information:
   1. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
   2. The normal operating parameters of air pollution control devices installed on each emission unit (e.g., pressure drop, scrubber liquid flow rate, scrubber liquid

pressure, total current, etc.), and the operating parameters of air pollution control devices during each test run.

Failure to submit the rates and actual operating conditions in the test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rules 62-297.310(8), F.A.C., and 62-4.070(3), F.A.C.]

Recordkeeping-Spilled Molten Sulfur.

H.19. Records of spills outside of the containment areas and of collection and disposal of spilled sulfur.
[Rule 62-296.411(1)(f), F.A.C., Air Construction Permit 1050055-013-AC]

H.20. Records of collection and disposal of spilled molten sulfur inside of the containment area including records of weekly and monthly cleaning.
[Rule 62-296.411(1)(d), F.A.C., Air Construction Permit 1050055-013-AC]

H.21. Such records shall be retained for a minimum of five (5) years and shall be available for inspection by the Department upon request.
[Rules 62-213.440(1), and 62-4.070(3), F.A.C., Air Construction Permit 1050055-013-AC]

Reasonable Assurances

H.22. The permittee shall implement the necessary recordkeeping, maintenance, and operational procedures to minimize emissions from the molten sulfur system pursuant to the applicable requirements of Rule 62-296.411(1), F.A.C., "Molten Sulfur Storage and Handling Facilities".

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

E.U. ID No.	Brief Description
-048	Phosphogypsum Stack

Phosphogypsum stack.

{Permitting note(s): This emissions unit is regulated under Rule 40 CFR 61 Subpart A and R (National Emission Standards for Hazardous Air Pollutants -- General Provisions; and National Emission Standards for Radon Emissions from Phosphogypsum Stacks.) CAM does not apply.}

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

I.1. The permittee shall comply with 40 CFR 61 Subpart A and R (National Emission Standards for Hazardous Air Pollutants -- General Provisions; and National Emission Standards for Radon Emissions from Phosphogypsum Stacks).

APPENDIX CAM

Compliance Assurance Monitoring Requirements

Mosaic Fertilizer, LLC
South Pierce Facility

Facility ID No: 1050055

Compliance Assurance Monitoring Requirements

Pursuant to Rule 62-213.440(1)(b)1.a., F.A.C., the CAM plans that are included in this appendix contain the monitoring requirements necessary to satisfy 40 CFR 64. Conditions 1. – 17. are generic conditions applicable to all emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the attached tables, as submitted by the applicant and approved by the Department.

40 CFR 64.6 Approval of Monitoring.

1. The attached CAM plan(s), as submitted by the applicant, is/are approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a)]

2. The attached CAM plan(s) include the following information:
   (i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
   (ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
   (iii) The performance requirements established to satisfy 40 CFR 64.3(b) or (d), as applicable.
[40 CFR 64.6(c)(1)]

3. The attached CAM plan(s) describe the means by which the owner or operator will define an exceedance of the permitted limits or an excursion from the stated indicator ranges and averaging periods for purposes of responding to (see **CAM Conditions 5. - 9.**) and reporting exceedances or excursions (see **CAM Conditions 10. – 14.**).
[40 CFR 64.6(c)(2)]

4. The permittee is required to conduct the monitoring specified in the attached CAM plan(s) and shall fulfill the obligations specified in the conditions below (see **CAM Conditions 5. - 17.**).
[40 CFR 64.6(c)(3)]

40 CFR 64.7 Operation of Approved Monitoring.

5. Commencement of operation. The owner or operator shall conduct the monitoring required under this appendix upon the effective date of this Title V permit.
[40 CFR 64.7(a)]

6. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR 64.7(b)]

7. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times

that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[40 CFR 64.7(c)]

8. Response to excursions or exceedances.

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions, if allowed by this permit). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(1) & (2)]

9. Documentation of need for improved monitoring. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data; or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[40 CFR 64.7(e)]

40 CFR 64.8 Quality Improvement Plan (QIP) Requirements.

10. Based on the results of a determination made under **CAM Condition 8.a.**, above, the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with **CAM Condition 4.**, an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may require the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a

pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.
[40 CFR 64.8(a)]

11. Elements of a QIP:
   a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.
   b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:
      (i) Improved preventive maintenance practices.
      (ii) Process operation changes.
      (iii) Appropriate improvements to control methods.
      (iv) Other steps appropriate to correct control performance.
      (v) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(i)** through **(iv)**, above).
[40 CFR 64.8(b)]

12. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
[40 CFR 64.8(c)]

13. Following implementation of a QIP, upon any subsequent determination pursuant to **CAM Condition 8.b.**, the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:
   a. Failed to address the cause of the control device performance problems; or
   b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
[40 CFR 64.8(d)]

14. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
[40 CFR 64.8(e)]

40 CFR 64.9 Reporting And Recordkeeping Requirements.

15. General reporting requirements.
   a. On and after the date specified in **CAM Condition 5.** by which the owner or operator must use monitoring that meets the requirements of this appendix, the owner or operator shall submit monitoring reports semi-annually to the permitting authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C.
   b. A report for monitoring under this part shall include, at a minimum, the information required under Rule 62-213.440(1)(b)3.a., F.A.C., and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a QIP during the reporting period as specified in **CAM Conditions 10.** through **14.** Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 CFR 64.9(a)]

16. General recordkeeping requirements.

a. The owner or operator shall comply with the recordkeeping requirements specified in Rule 62-213.440(1)(b)2., F.A.C. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to **CAM Conditions 10.** through **14.** and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b)]

40 CFR 64.10 Savings Provisions.

17. It should be noted that nothing in this appendix shall:

a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this appendix shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.

b. Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.

c. Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

[40 CFR 64.10]

Emissions Unit 023

GTSP Production Plant
Particulate Matter Controlled by Tailgas Scrubber

Monitoring Approach

	Indicator 1	Indicator 2
1. Indicator	Max and Min Pressure Drop	Max and Min Liquid Flow Rate
Measuring Approach	Pressure drop is measured across the scrubber	Liquid Flow is measured with an installed Flow Meter
2. Indicator Range	An excursion is defined as any 1 hour average excluding those events defined as startup, shutdown and malfunctions, pressure drop outside of the following range: Tailgas Scrubber: 4.6 – 10.2 in H_2O An exceedance is defined as any 3hr average pressure drop outside the above noted range.	An excursion is defined as any 1 hour average excluding those events defined as startup, shutdown and malfunctions, flow rate outside of the following range: Tailgas Scrubber: 4195 - 5064 gpm An exceedance is defined as any 3hr average flow rate outside the above noted range.
	Excursions trigger an inspection, corrective action, and reporting requirement. The corrective action must be conducted to restore the pressure drop to within the permitted range and assist in preventing future scrubber malfunctions from occurring.	Excursions trigger an inspection, corrective action, and reporting requirement. The corrective action must be conducted to restore the flow rate to within the permitted range and assist in preventing future scrubber malfunctions from occurring.
A. Representative Data	All CAM-required instrumentation meets or exceeds the accuracy required by the regulations for this plant. The monitoring points are located per the manufacturers recommendations and/or best engineering practices guidelines.	All CAM-required instrumentation meets or exceeds the accuracy required by the regulations for this plant. The monitoring points are located per the manufacturers recommendations and/or best engineering practices guidelines.
B. QA/QC Practices and Criteria	Calibration and maintenance are performed annually or on an as-needed basis. Instrument readings are observed on a continuing basis and any reading outside the normal operating range for this plant is investigated. This includes verification that the proper signal is being produced and that the instrumentation is working properly. Any necessary maintenance is performed and the instrument re-calibrated, as necessary.	Calibration and maintenance are performed annually or on an as-needed basis. Instrument readings are observed on a continuing basis and any reading outside the normal operating range for this plant is investigated. This includes verification that the proper signal is being produced and that the instrumentation is working properly. Any necessary maintenance is performed and the instrument re-calibrated, as necessary.
C. Monitoring Frequency	All parameters are monitored continuously.	All parameters are monitored continuously.
4. Data Collection Procedures	All parameters are averaged in 15-minute blocks based on data collected across the scrubber.	All parameters are averaged in 15-minute blocks based on data collected by the Flow Meter.
5. Averaging Period	All parameters are averaged in 15-minute blocks. These 15-minute blocks are then averaged to produce a 1hr average.	All parameters are averaged in 15-minute blocks. These 15-minute blocks are then averaged to produce a 1hr average.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

MOSAIC FERTILIZER, LLC
SOUTH PIERCE FACILITY
Facility No. 1050055

COMPLIANCE PLAN CP-1

1. The facility is in compliance with all emission limits contained in 40 CFR 63 Subparts A, AA and BB ("Phosphate MACTs") except as provided in this compliance plan for the GTSP Storage Building.

2. The Department has determined the facility is a major source of hazardous air pollutants ("HAPs") and is subject to the provisions of the Phosphate MACTs. Testing conducted at the facility in May 2005 confirmed the facility is a major source of HAPs. The facility must comply with the requirements of this compliance plan and 40 CFR 63 Subpart A, AA, and BB.

   a. Mosaic shall submit a construction permit application to upgrade the affected scrubbers located at the facility's GTSP Storage Building to comply with the Phosphate MACT, 40 CFR 63 Subpart BB.

   b. Within 30 days of Mosaic completing construction on the GTSP storage building to meet requirements of the Phosphate MACT, Mosaic shall conduct initial performance testing to establish ranges of acceptable scrubber operation and to show compliance for the upgraded GTSP Storage system, as specified in 40 CFR 63 Subpart BB.

   c. Within 45 days of Mosaic conducting initial performance testing to establish ranges of acceptable scrubber operation according to the MACT monitoring requirements specified in 40 CFR 63 Subpart BB for the GTSP storage building, Mosaic shall submit a report of the initial performance testing to the Department and EPA.

3 The following deadlines will apply:

   a. Mosaic shall install the monitoring devices on all emissions units subject to the MACT monitoring specified in 40 CFR 63 Subparts AA and BB. Mosaic shall provide written notice to the Department confirming such installations by February 28, 2006;

   b. Mosaic shall initiate data collection into electronic storage for all continuous monitoring parameters and have in operation a data management and reporting system for all required components of the MACT monitoring in 40 CFR 63 Subparts AA and BB.

Mosaic shall provide written notice to the Department confirming such data collection, management and storage by March 31 2006;

c. Mosaic shall conduct initial performance testing to establish ranges of acceptable scrubber operation and to show compliance for applicable emissions units as required by MACT monitoring specified in 40 CFR 63 Subparts AA and BB by March 31, 2006;

d. Within 45 days of Mosaic conducting initial performance testing to establish ranges for applicable emissions units as required by MACT monitoring specified in 40 CFR 63 Subparts AA and BB, Mosaic shall submit a report of the initial performance testing to the Department and EPA as required by 40 CFR 63 Subparts A, AA, and BB. Thereafter, Mosaic shall submit semiannual reports required by the Phosphate MACTs, 40 CFR 63 Subparts A, AA, and BB.

4. Mosaic shall notify the Department in writing, within 15 days after the date specified for requirements not met, corrective measures adopted and an explanation of any measures not met by the completion date for the milestone or for compliance. All reports shall be accompanied by a certification, signed by a responsible official, in accordance with subsection 62-213.420(4), F.A.C.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:	)	South Pierce Plant
	)	
Mosaic Phosphates Company	)	
	)	
Petitioner.	)	File No.: 05-L-AP

ORDER ON REQUEST
FOR
ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), and Title 40 of the Code of Federal Regulations Part 63, section 63.8 (40 CFR 63.8), Mosaic Phosphates Company, located in Polk County, has petitioned for approval of alternate monitoring requirements for scrubbers at its South Pierce facility. Petitioner has requested approval to monitor fan amperage in lieu of establishing an upper limit on pressure drop across each scrubber. The basis for this request is Petitioner's assertion that fan amperage will provide a better indicator of scrubber performance and prevent frequent and unnecessary plant monitoring excursions. Petitioner agreed to continue to monitor pressure drop, liquid flow rate, and fan amperage for each scrubber. Petitioner also agreed to establish allowable ranges for liquid flow rate and fan amperage and to establish minimum allowable pressure drops for the scrubber systems.

Having considered Petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. 40 CFR 63, Subparts AA and BB require all phosphate fertilizer and phosphoric acid manufacturing plants that are major sources of hazardous air pollutants to monitor liquid flow rate to each scrubber and pressure drop across each scrubber used to control hydrogen fluoride emissions. Additionally, each affected facility must establish allowable ranges for these parameters as specified in Subparts AA and BB and submit those values to the Department for approval. Mosaic Phosphates Company's South Pierce facility is considered a major source of hazardous air pollutants. Therefore, this facility is subject to these requirements.

2. On December 2, 2005, the Department received Petitioner's request for approval of an alternate monitoring plan for Mosaic's South Pierce facility. The alternate monitoring plan was requested for scrubbers subject to 40 CFR 63, Subparts AA and BB: the phosphoric acid manufacturing plants (Emission Units (EU) 008, 009), the GTSP plant (EU 023), and the GTSP East Storage Building North and South scrubbers (EUs 024, 025).

3. Petitioner stated, "Fan amps provide an accurate indication of air movement through the evacuation system and can be a reliable indicator of system upsets. Air flow outside normal ranges could indicate short-circuiting of air through scrubbers, excess tramp air being drawn into the system, scrubber fouling, or inadequate evacuation of process equipment."

4. Petitioner also stated "fan amperage is a better indicator of emissions than pressure drop in the cases when scrubber pressure drop may be relatively small (less than 5 inches.) The result is that for a maximum limit, small deviations in the pressure drop can cause a plant monitoring exception. Requiring a maximum pressure drop as a limit may result in frequent and unnecessary plant monitoring exceptions, while scrubbing efficiency was still maintained."

5. Petitioner further asserted, "...use of fan amps as an alternative parameter meets the intent of the monitoring requirement to assure proper operation of the pollution control system."

6. Petitioner has proposed to perform the necessary baseline emissions testing to establish the minimum pressure drop, minimum and maximum scrubbing liquid flow rates, and minimum and maximum system fan amperage limits for all scrubbers subject to the monitoring provisions of 40 CFR 63, Subparts AA and BB.

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider Petitioner's request pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Petitioner has provided reasonable justification that establishing an upper limit on pressure drop in scrubbers at this facility is impractical.

3. Petitioner has provided reasonable justification that monitoring fan amperage in lieu of establishing a maximum pressure drop is no less than an effective indicator of scrubber operation than that achieved by monitoring pursuant to 40 CFR 63, Subparts AA and BB.

ORDER

Having considered Petitioner's written request and supporting documentation, it is hereby ordered that:

1. Petitioner shall not be required to continue to establish an upper limit on the pressure drop across each scrubber.

2. Petitioner shall establish a minimum allowable pressure drop across each scrubber or scrubber system pursuant to the requirements in 40 CFR 63, Subparts AA and BB and shall submit such values to the Department for approval.

3. Petitioner shall establish minimum and maximum acceptable fan amperages for each fan in the scrubbing systems pursuant to the requirements in 40 CFR 63, Subparts AA and BB and shall submit such values to the Department for approval.

4. Petitioner shall establish minimum and maximum acceptable values for liquid flow rate to each scrubber pursuant to the requirements in 40 CFR 63, Subparts AA and BB and shall submit such values to the Department for approval.

5. Petitioner shall continuously monitor pressure drop and liquid flow rate for each scrubber and shall continuously monitor fan amperage for each fan in the scrubbing systems.

6. Except as provided by this order, Petitioner shall comply with all applicable provisions of 40 CFR 63, Subparts AA and BB.

7. This Order shall expire on December 30, 2015.

PETITION FOR ADMINISTRATIVE REVIEW

The Department's proposed agency action will become final upon expiration of the petition period described below unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed agency action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within twenty-one days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within twenty-one days of publication of the public notice or within twenty-one days of receipt of this notice, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within twenty-one days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

NOTICE OF APPEAL RIGHTS

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 days after this order is filed with the clerk of the Department.

DONE AND ORDERED this 20th day of December, 2005, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Michael G. Cooke

MICHAEL G. COOKE, Director
Division of Air Resource Management
Mail Station 5500
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(850) 488-0114

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.

Martha Haynie Wise 12/20/05
(Clerk) (Date)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:	)	Permit No.: 1050055-013-AC
	)	
Mosaic Fertilizer, LLC	)	
	)	
Petitioner.	)	File No.: 05-J-AP

ORDER ON REQUEST
FOR
ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), Mosaic Fertilizer located in Polk County, has petitioned for approval of an alternate sampling procedure for monitoring the deposition of sulfur particulate at its South Pierce facility. The Petitioner requested approval to transfer the sample from the copper collection jar of the Nipher Gauge into a polypropylene or HDPE container to be sent offsite for analysis. The basis for this request is the Petitioner's assertion that shipping the Nipher Gauge collection jar to a laboratory is not practical. In addition, Petitioner requests permission to use an alternate collection jar if the copper jar is unavailable.

Having considered Petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. On October 4, 2005, the Department received Petitioner's request for approval to alter the sample collection requirement of Rule 62-212.600(2)(c), F.A.C., to allow the transfer of the water and solid particulate contents from the copper collection jar of the Nipher Gauge into a polypropylene or HDPE container for shipping, and to allow the use of a glass collection jar in lieu of the copper collection jar.

2. Petitioner requested "approval of an alternate procedure under provisions of Rule 62-297.620, FAC, for collecting and conveying a sample from a modified Nipher Gauge to a laboratory for analysis."

3. In addition, Petitioner requested approval for "the use of a glass collection jar of the same dimensions if the copper jar is unavailable due to any unforeseen circumstances."

4. Petitioner stated that, "The alternate procedure would involve the transfer of the water and solid particulate contents from the copper collection jar of the Nipher Gauge into a plastic (polypropylene or HDPE) container by using a triple distilled water rinse. The container will be sealed, the liquid level marked and sent off for analysis."

5. Further, Petitioner stated that, "As suggested by FDEP, a pH measurement and a measurement of the volume of water in the Nipher Gauge (to the nearest milliliter) will be conducted prior to the distilled water rinse."

6. Petitioner also stated, "Only qualified laboratory-trained personnel will conduct the sample transfer. A record will be kept of the sample pH value, the volume of distilled water rinse along with a Chain of Custody form."

7. As justification for the use of the proposed alternate sampling procedure, Petitioner stated, "The Nipher Gauge, available only by custom order from the Canadian government, has a single copper collection jar. Shipping the jar to a laboratory is not practical in this instance as the jar has no fitting lid; it is extremely heavy; and, it would be very difficult to replace if lost or damaged in transit."

8. Rule 62-212.600(2)(c), F.A.C., states, "No attempt shall be made to remove collected particulate sample from the modified Nipher Gauge jar at the field site. The modified Nipher Gauge deposition collection jar shall be covered and taken to the laboratory for analysis of the contents."

9. It is standard laboratory practice to use specialized shipping containers in order to protect the integrity of a sample during storage and handling. Shipping samples in glass containers risks breakage of the container and loss of the sample. Plastic containers are less prone to breakage and decrease this risk. The type of plastic selected is dictated by the need for the container to remain inert when exposed to the sample to minimize contamination of the sample.

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider Petitioner's request pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Petitioner has provided reasonable justification that it may not be practical to ship the Nipher Gauge copper collection jar to an offsite lab for analysis of the contents, and that an alternate method is acceptable. The use of plastic (polypropylene or HDPE) shipping containers to minimize contamination of the sample is practical. The Department's conclusion is based upon review of standard laboratory procedures and dialogue with established laboratory professionals.

3. Petitioner has provided reasonable justification that the use of an alternate glass collection jar of the same dimensions is adequate for determining sulfur particulate deposition. The Department's conclusion is based upon the design of the copper collection jar, and review of standard laboratory procedures and dialogue with established laboratory professionals.

4. Pursuant to Rule 62-297.310(7), F.A.C., the Department may require Petitioner to conduct quality assurance tests that identify inconsistencies with or problematic data, if, after investigation, it is believed that any applicable condition of the applicable permits is being violated.

ORDER

Having considered Petitioner's written request and supporting documentation, it is hereby ordered that:

1. Petitioner shall not be required to ship the copper collection jar of the Nipher Gauge along with the contents to the lab for analysis.

2. The copper collection jar of the Nipher Gauge shall be covered and taken to a room at the facility, which shall be assigned to function as the sample laboratory. This room must be an enclosed, clean environment suitable for sample collection.

3. A pH measurement shall be taken and recorded prior to transfer of the sample from the copper collection jar to the shipping container.

4. Following pH measurement, the sample shall be transferred to the shipping container. The remaining contents of the copper collection jar shall be transferred to the shipping container by rinsing with exactly 100 milliliters of distilled water. After the shipping container is sealed, the sample level shall be marked on the outside of the shipping container.

5. Only qualified laboratory trained personnel shall conduct the pH test and sample transfer.

6. Only polypropylene, high-density polyethylene (HDPE) or Teflon containers shall be used for the shipping container.

7. In the event that the copper collection jar is stolen or damaged beyond repair, the Petitioner may use a glass replacement collection jar of the same dimensions.

8. The Petitioner shall submit the design of the replacement glass jar for approval by the Department's Emissions Monitoring Section prior to use in the field.

9. Only borosilicate glass shall be used for the replacement collection jar.

10. This Order shall not abrogate Petitioner's obligation to comply with any periodic monitoring requirements established pursuant to the provisions of the federal Clean Air Act (42 USC 1857, et seq) as amended in 1990.

11. This Order shall expire on October 1, 2010.

PETITION FOR ADMINISTRATIVE REVIEW

The Department's proposed agency action will become final upon expiration of the petition period described below unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed agency action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within twenty-one days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within twenty-one days of publication of the public notice or within twenty-one days of receipt of this notice, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for

notice of agency action may file a petition within twenty-one days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

NOTICE OF APPEAL RIGHTS

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 days after this order is filed with the clerk of the Department.

DONE AND ORDERED this 19th day of October, 2005, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Michael G. Cooke

MICHAEL G. COOKE, Director
Division of Air Resource Management
Mail Station 5500
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(850) 488-0114

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.

Martha J. Wise (Clerk) October 19, 2005 (Date)

Not federally enforceable. **Attachment A.**

MEMORANDUM OF UNDERSTANDING REGARDING BEST OPERATIONAL START-UP PRACTICES FOR SULFURIC ACID PLANTS

These Sulfuric Acid Plant Best Operation Start-Up Practices will be made available in the control room at all times.

1. Only one sulfuric acid plant at a facility should be started up and burning sulfur at a time, There are times when it will be acceptable for more than one sulfuric acid plant to be in the start-up mode at the same time, provided the following condition is met. It is not acceptable to initiate sulfur burning at one sulfuric acid plant when another plant at the same facility is emitting SO_2 at a rate in excess of the emission limits imposed by the permit or rule, as determined by the CEMs emission rates for the immediately preceding 20 minutes.

2. A plant start-up must be at the lowest practicable operating rate, not to exceed 70 percent of the designated operating rate, until the SO_2 monitor indicates compliance, Because production rate is difficult to measure during start-up, if a more appropriate indicator (such as blower pressure, furnace temperature, gas strength, blower speed, number of sulfur guns operating, etc.) can be documented, tested and validated, the Department will accept this in lieu of directly documenting the operating rate. Implementation requires the development of a suitable list of surrogate parameters to demonstrate and document the reduced operating rate on a plant-by-plant basis. Documentation that the plant is conducting start-up at the reduced rate is the responsibility of the owner or operator.

3. Sulfuric acid plants are authorized to emit excess emissions from start-up for a period of three consecutive hours provided best operational practices, in accordance with this agreement, to minimize emissions are followed. No plant shall be operated (with sulfur as fuel) out of compliance for more than three consecutive hours. Thereafter, the plant shall be shut down. The plant shall be shut down (cease burning sulfur) if, as indicated by the continuous emission monitoring system, the plant is not in compliance within three hours of start-up, Restart may occur as soon as practicable following any needed repairs or adjustments, provided the corrective action is taken and properly documented.

4. Cold Start-Up Procedures.

   a. Converter.

      (1) The inlet and outlet temperature at the first two masses of catalyst shall be sufficiently high to provide immediate ignition when SO_2 enters the masses. In no event shall the inlet temperature to the first mass be less than 800°F or the outlet temperature to the first two masses be less than 700°F. These temperatures are the desired temperatures at the time the use of auxiliary fuel is terminated.

      (2) The gas stream entering the converter shall contain SO_2 at a level less than normal, and sufficiently low to promote catalytic conversion to SO_3.

   b. Absorbing Towers.

The concentration, temperature and flow of circulating acid shall be as near to normal conditions as reasonably can be achieved. In no event shall the concentration be less than 96 percent H_2SO_4.

5. Warm Restart.

a. Converter.

The inlet and outlet temperatures of the first two catalyst masses should be sufficiently high to ensure conversion. One of the following three conditions must be met:

(1) The first two catalyst masses inlet and outlet temperatures must be at a minimum of 700°F; or

(2) Two of the four inlet and outlet temperatures must be greater than or equal to 800°F; or

(3) The inlet temperature of the first catalyst must be greater than or equal to 600°F and the outlet temperature greater than or equal to 800°F. Also, the inlet and outlet temperatures of the second catalyst must be greater than or equal to 700°F.

Failure to meet one of the above conditions requires use of cold start-up procedures.

To allow for technological improvements or individual plant conditions, alternative conditions will be considered by the Department in appropriate cases.

b. Absorbing Towers.

The concentration, temperature and flow of circulating acid shall be as near to normal conditions as reasonably can be achieved. In no event shall the concentration be less than 96 percent H_2SO_4.

6. Shutdown and Restart of Sulfuric Acid Plant #10 (Emissions Unit No. 004) after a Sulfur Pump Trip.

a. The Low Blower Discharge Pressure Interlock, which cannot be bypassed, at approximately 30-40 inches of pressure will be used to trip the sulfur pump.

b. The Distributive Control System (DCS) will be used to read and record sulfur pump amps to alert operators in the event of a sulfur pump trip. The DCS will have an event indication that the Low Blower Discharge Pressure Bypass Switch has been engaged.

c. Utilize the Sulfuric Acid Plant Warning Siren in the event of any plant trip of the blower or sulfur systems.

d. Follow the procedures in the Process Safety Management Procedure entitled "Shutdown and Startup of Sulfuric Acid Plant No. 010 after a Sulfur Pump Trip".

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither 'regulated emissions units' nor 'exempt emissions units'.

E.U. ID No.	Brief Description of Emissions Units and/or Activity
-049	Fugitive PM/PM10 Sources
-049	Fugitive SO2 Sources
-049	Fugitive NOx Sources
-049	Fugitive CO Sources
-049	Fugitive VOC Sources
-049	Fugitive Fluoride (F) Sources

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Mosaic Fertilizer, LLC
South Pierce Plant

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities:

abrasive cleaning - indoors
agricultural related activities
air compressors
air conditioners
air vents in compressed air systems
ammonia bullets, pipeline, pop off valves, flanges, truck/rail unloading, flares and chillers
asbestos, waste and haz-waste removal
automatic oil/lube systems for mechanical equipment and fueling operations
automotive, tractor, locomotives and their repair shops
blueprint copiers
building ventilation systems
caustic tanks/vents
closed containers of maintenance chemicals
cold cleaning degreasers (containing heavier than air solvents)
construction/repair of office, storage and residential units
containers, reservoirs, wax and grease
containers and tanks for oils
cooling towers (no heavy metals used as antiscalants or algaecides)
degassifiers/dearators
diesel pump motors
drain vents
drinking water treatment area and wastewater treatment plant
ducts, chutes, equipment maintenance
dumpsters, other miscellaneous waste collection and handling
electric substation/electric yard
electric-powered vehicles

electrical charging systems
electrically heated equipment for heat treating, drying, annealing, etc.
equipment cleaning, including steam cleaning
equipment for bonding brake shoes
equipment of hydraulic or hydrostatic testing
fire training exercises
food preparation, handling, consumption
fresh water tanks/vents
fuel tanks and dispensors
hand held equipment
handling of baghouse materials
hydroblasting
instrument air systems/vents
laboratories (quality control, analytical, metallurgical)
landscaping and farm equipment
lime silo with baghouse
lime tanks/vents
liming station
liquid sampling systems
maintenance of facilities
maintenance of grounds
maintenance shops
mechanical drives/gearboxes
metal shops
minor fugitive leaks from process equipment
mobile equipment fueling operations (diesel/gasoline)
mobile sources, including internal combustion engines, pumps, compressors, generators, welding , etc.
neutralization tanks/vents
non process mineral spirits use
open containers in use
painting /coating of equipment, tanks and structures (less than 6 gallons per day)
portable kerosene space heaters
pressure/steam relief valves
process water treatment and management systems
pump seals
purchased non-listed chemical tanks/vents (no HAP or VOC content)
railroad flares
railcar/truck/tanker unloading
raw material, reclaim/recycle material and product transfer and storage tanks
reclaimed mined areas
reclaimed water tank vents
refrigeration systems
safety devices
safety kleen solvent cleaners
sandlbasters, welding equipment, compressors, wood shop, metal shop
service of air pollution control devices
space heaters
steam vents/leaks
storage facilities for packaged materials
storage tanks and dispensers

sulfuric acid tanks/vents
sweeping and general cleanup
temporary use of compressors, generators, water pumps with internal combustion engines
transfer of materials on covered belt systems
transformer vault/building
vacuum cleaning systems
valves and flanges (no HAP or VOC content)
washing and cleaning equipment
waste preparation for disposal (in closed drums or other containers, spill cleanup)
wastewater plants, water treatment area
water pumps
water treatment aeration
water treatment chemical tanks/totes/drums
wet limestone transfer, handling, storage
woodworking shops

GRANULATION

choke feeder, covered conveyors, screening tower
chutes, conveyor and hopper
coating oil tanks
cooling tower, slurry pump, scrubber sump
covered conveyor, surge bin, product screens, chute to truck/railcar
material conveyors, elevators and screens
oil coating application systems
pond water sumps
product recovery units
raw material, reclaim material and product storage tanks, bins and buildings
scrubber seal tanks
seal oil tanks

MOLTEN SULFUR HANDLING

molten sulfur storage tank fires
sulfur spill cleanup

PHOSPHATE ROCK HANDLING

railcar unloading and unloading pit
rock and feed hoppers, conveyors
train/truck unloading, hoppers, conveyors, wet rock stacking on pile
wet rock grinding
wet rock pile, stacking and transfer

SULFURIC ACID PRODUCTION

auxiliary power diesel generators
auxiliary power generator diesel tank
cooling towers
economizers
hot water reuse tank
process and product storage tanks
sulfuric acid tanker truck/rail loading/unloading
water reuse, uncontaminated water storage, condensate tanks for evaporators

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No. **1050055-014-AV**

FIGURE 1--SUMMARY REPORT-- GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE (version dated 7/94)

Pollutant *(Circle One)*: SO_2 NO_X TRS H_2S CO Opacity

Reporting period dates: From _____ to _____

Company: _____

Emission Limitation: _____

Address: _____

Monitor Manufacturer: _____

Model No.: _____

Date of Latest CMS Certification or Audit: _____

Process Unit(s) Description: _____

Total source operating time in reporting period [1]: _____

Emission data summary [1]	**CMS performance summary** [1]
1. Duration of excess emissions in reporting period due to:	1. CMS downtime in reporting period due to:
a. Startup/shutdown..... ____	a. Monitor equipment malfunctions ..... ____
b. Control equipment problems ..... ____	b. Non-Monitor equipment malfunctions ____
c. Process problems ..... ____	c. Quality assurance calibration ..... ____
d. Other known causes..... ____	d. Other known causes ..... ____
e. Unknown causes ..... ____	e. Unknown causes..... ____
2. Total duration of excess emissions ..... ____	2. Total CMS Downtime ..... ____
3. Total duration of excess emissions x (100) / [Total source operating time]___ %[2]	3. [Total CMS Downtime] x (100) / [Total source operating time] ..... ____ %[2]

(footnotes on next page)

[1] For opacity, record all times in minutes. For gases, record all times in hours.

[2] For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 60.7(c) shall be submitted.

Note: On a separate page, describe any changes since last quarter in CMS, process or controls.

I certify that the information contained in this report is true, accurate, and complete.

Name: _____

Signature: _____ *Date*: _____

Title: _____

[electronic name: figure1.doc]

Table 1-1, Summary of Air Pollutant Standards and Terms

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
-001	Auxiliary Boiler
-004	Sulfuric Acid Plant #10
-005	Sulfuric Acid Plant #11
-008	Phosphoric Acid Plant - A Train
-009	Phosphoric Acid Plant - B Train

				Allowable Emissions			Equivalent Emissions*		Regulatory	See Permit
E.U. ID No.	Pollutant Name	Fuel(s)	Hours/Yr	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Citation(s)	Condition(s)
-001	SO_2	Oil	8,760	0.5% Sulfur by weight			86.6	379.3	AO53-186772	III. A.2.
	VE	Nat. Gas Fuel Oil	N/A	20% opacity except 27% for 6 min/hr	N/A	N/A	N/A	N/A	62-296.406(1), F.A.C.	III. A.3.
-004, 005	SO_2		8,760	Lesser of 4.0 lbs/ton of 100% acid produced or 500 lb/hr, or 1971 tons/yr	500	2190	500	2190	40 CFR 60.82(a) BACT Determination, 4/17/92 62-204.800(7)(b)10, F.A.C.	III. B.2.
	H_2SO_4 acid mist		8,760	Lesser of 0.15 lbs/ton of 100% acid produced or 18.8 lb/hr, or 82.1 tons/yr	18.8	82.1	18.8	82.1	40 CFR 60.82(a)(1) BACT Determination, 4/17/92 62-204.800(7)(b)10, F.A.C.	III. B.3.
	VE		N/A	10% opacity	N/A	N/A	N/A	N/A	40 CFR 60.83(a)(2) 62-204.800(7)(b)10, F.A.C.	III. B.4.
	NO_x		8,760	0.12 lb/ton of 100% acid, 15.0 lbs/hr, 65.7 TPY	15.0	65.7	15.0	65.7	1050055-010-AC/PSD-FL-235 BACT Determination, 9/15/97	III. B.5.
-008, 009	F (Fluoride)		8,760	0.02 lb/ton of P_2O_5, 1.11 lbs/hr		1.11		4.9	AC53-34868, 40 CFR 60.202	III.C.2.

Notes: *The "Equivalent Emissions" listed are for informational purposes only.

N/A: Not Applicable EBA: Established By Applicant

Table 1-1, Summary of Air Pollutant Standards and Terms

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
-022	No. 2 Ball Mill Grinding System
-023	GTSP Production Plant
-024	GTSP East Storage Building - North Scrubber System
-025	GTSP East Storage Building - South Scrubber System

				Allowable Emissions			Equivalent Emissions*		Regulatory	See Permit
E.U. ID No.	Pollutant Name	Fuel(s)	Hours/Yr	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Citation(s)	Condition(s)
-022	PM		8,760	31.8 lbs/hr, 139.2 tons/yr	31.8	139.2	31.8	139.2	62-296.700(2)(b), F.A.C.	III. D.2.
	VE		N/A	20% opacity	N/A	N/A	N/A	N/A	62-296.320(4)(b), F.A.C.	III. D.3.
-023	PM	Nat. Gas	8,760	35 lbs/hr, 153 tons/yr,	35	153	35	153	EBA / 62-296.320(4)(a), F.A.C.	III. E.3.
		Oil		Process weight					62-296.700(2)(b), F.A.C.	
	F (Fluoride)		8,760	0.15 lb/ton of 100% P_2O_5	5.7	25	5.7	25	62-296.403(1)(d)2, F.A.C.	III. E.4.
				5.7 lbs/hr, 25 tons/yr						
	VE		N/A	20% opacity	N/A	N/A	N/A	N/A	62-296.320(4)(b), F.A.C.	III. E.5.
-024, 025	PM		8,760	40.1 lbs/hr, 175.6 tons/yr	40.1	175.6	40.1	175.6	EBA / 62-296.700(2)(b), F.A.C.	III. F.2.
				(combined), Process weight					62-296.320(4)(a)2, F.A.C.	
	F (Fluoride)		8,760	7.8 lbs/hr, 34.2 tons/yr	7.8	34.2	7.8	34.2	EBA / 62-296.403(2), F.A.C.	III. F.3.
				(combined)						
	VE		N/A	20% opacity	N/A	N/A	N/A	N/A	62-296.320(4)(b), F.A.C.	III. F.4.

Notes: *The "Equivalent Emissions" listed are for informational purposes only.
N/A: Not Applicable EBA: Established by Applicant

Table 1-1, Summary of Air Pollutant Standards and Terms

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
-026	GTSP Rock Hopper Bin
-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
-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 w/out Fan
-042	Molten Sulfur Truck Pit - West Vent with Fan
-043	Molten Sulfur Truck Pit - West Vent w/out Fan
-050	Molten Sulfur Transfer Pit

				Allowable Emissions			Equivalent Emissions*		Regulatory	See Permit
E.U. ID No.	Pollutant Name	Fuel(s)	Hours/Yr	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Citation(s)	Condition(s)
-026	VE		N/A	20% opacity	N/A	N/A	N/A	N/A	62-296.320(4)(b), F.A.C.	III. G.2.
	PM		8,760	22.5 lbs/hr	22.5		22.5	98.6	EBA / 62-296.700(2)(b), F.A.C.	III. G.3.
-030, 031, 032 033, 035, 036, 037, 038, 039, 040, 041, 042 050	VE		N/A	20% opacity	N/A	N/A	N/A	N/A	62-296.411(1)(g), F.A.C.	III. H.2., III.J.7.

Notes: *The "Equivalent Emissions" listed are for informational purposes only.
N/A: Not Applicable EBA: Established by Applicant

Table 2-1, Summary of Compliance Requirements

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

-001 Auxiliary Boiler
-004 Sulfuric Acid Plant #10
-005 Sulfuric Acid Plant #11
-008 Phosphoric Acid Plant - A Train

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-001	VE	Oil	DEP Method 9	180 days after startup, annual	initial startup	1 hour		III. A.4, A.5, A.6, & A.7.
	VE	Oil	DEP Method 9	4 hours		6 min		III. A.8.
	SO_2	Oil	fuel analysis, and sampling	annual	1-April			III. A.12 & A.13.
-004	SO_2		8	annual	1-October	1 hour	yes	III. B.7, B.8, B.10 & B.11.
	H_2SO_4 (SAM)		8	annual	1-October	1 hour		III. B.7. & B.8.
	VE		9	annual	1-October	1 hour		III. B.7., B.8. & B.9.
	NO_x		7E	annual	1-October	1 hour		III. B.7. & B.8.
-005	SO_2		8	annual	3-October	1 hour	yes	III. B.7, B.8, B.10 & B.11.
	H_2SO_4 (SAM)		8	annual	3-October	1 hour		III. B.7. & B.8.
	VE		9	annual	3-October	1 hour		III. B.7., B.8. & B.9.
	NO_x		7E	annual	3-October	1 hour		III. B.7. & B.8.
-008	F (Fluoride)		13A or 13B	annual	16-April	1 hour		III. C.3. & C.4.
	Pressure drop						yes	III. C.6. & C.10.
	Water flow rate							III. C.6.
	Mass flow rate							III. C.9.

Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

Table 2-1, Summary of Compliance Requirements

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

-009 Phosphoric Acid Plant - B Train
-022 No. 2 Ball Mill Grinding System
-023 GTSP Production Plant

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-009	F (Fluoride)		13A or 13B	annual	5-June	1 hour		III. C.3. & C.4.
	Pressure drop						yes	III. C.6. & C.10.
	Water flow rate							III. C.6.
	Mass flow rate							III. C.9.
-022	VE		9	annual	2-March	1 hour		III. D.4, D.5. & D.6.
	PM		5	five years	60 days prior to exp. date	1 hour		III. D.5. & D.6.
	Pressure drop							III. D.7.
-023	PM	Gas, Oil	5	annual	22-April	1 hour		III. E.6. & E.7.
	F (Fluoride)		13A or 13B	annual	22-April	1 hour		III. E.6. & E.7.
	VE		9	annual	22-April	1 hour		III. E.6., E.7. & E.8.
	Pressure drop							III. E.11., & E.13.
	Liquid flow rate							III. E.11., & E.13.

Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

Table 2-1, Summary of Compliance Requirements

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

-024 GTSP East Storage Building - North Scrubber System
-025 GTSP East Storage Building - South Scrubber System
-026 GTSP Rock Hopper Bin

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-024, 025	PM		5	annual	23-August	1 hour		III. F.5. & F.6.
	F (Fluoride)		13A or 13B	annual	23-August	1 hour		III. F.5. & F.6.
	VE		9	annual	23-August	1 hour		III. F.5. & F.6.
	Fan amperages							III. F.7., F.8. & F.9.
-026	VE		9	annual	15-March	30 minutes		III. G.4. & G.6.
	PM		5	five years	60 days prior to exp. date	1 hour		III. G.5. & G.6.
	Pressure drop							III.G.7.

Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

Table 2-1, Summary of Compliance Requirements

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

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
-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 w/out Fan
-042 Molten Sulfur Truck Pit - West Vent with Fan
-043 Molten Sulfur Truck Pit - West Vent w/out Fan
-050 Molten Sulfur Transfer Pit

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-030, 031, 032	VE		DEP Method 9	initial	with 60 days	30 minutes		III. H.4., H.5. & H.6., J.7., J.10., J.11., & J.12.
033, 034, 035					of issuance			
036, 037, 038					of permit			
039, 040, 041				five years	60 days prior	30 minutes		III. H.4., H.5., H.6., H.7., J.7., J.10., J.11., & J.12.
042, 043, 044					to exp. date			
045. 050								

Notes: *Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

Appendix H-1, Permit History/ID Number Changes

Mosaic Fertilizer, LLC
South Pierce Facility

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1, 2]
Revised Date(s)					
- 001	171 MMBtu Auxiliary Boiler	AC53-27465	03/14/80	7/30/80	
		AO53-186772	10/04/90	10/03/95	
		AO53-186772A	12/20/95	08/15/96	
		1050055-001-AC	12/03/98	12/31/2000	
-003	Purified MAP/DAP Plant with Scrubber	AC53-42155	07/17/81	12/15/82	7/15/84
		AO53-166758	12/08/89	12/05/94	
-004	Sulfuric Acid Plant #10	AO53-101764	05/08/85	04/25/90	
		Amendment	05/13/85	04/25/90	
		Amendment	04/14/89	04/25/90	
		AC53-199112/ PSD-FL-179	04/17/92	01/01/94	07/01/95
		Amendment	01/10/96	12/30/96	
		AO53-176685	06/26/90	06/21/95	
		AO53-221846	12/18/92	12/23/97	
		Amendment	04/11/96	12/23/97	
		1050055-010-AC PSD-FL-235	09/17/97	06/30/00	

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}
Not included in this table: Operating permits issued prior to 1988, ownership transfers, and contstruction permit time extensions for expired construction permits.

[electronic file name: 1050055h.doc]

Appendix H-1, Permit History/ID Number Changes

Mosaic Fertilizer, LLC
South Pierce

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1, 2]
Revised Date(s)					
-005	Sulfuric Acid Plant #11	AO53-145510	05/05/88	04/21/93	
		Amendment	04/17/89	04/21/93	
		AC53-199112/ PSD-FL-179	04/17/92	01/01/94	07/01/95
		Amendment	01/10/96	12/30/96	
		AO53-220555	11/23/92	11/20/97	
		Amendment	04/11/96	11/20/97	
		1050055-010-AC PSD-FL-235	09/17/97	06/30/00	
-008	Phosphoric Acid Plant - A Train	AC53-34868	01/30/81	06/30/82	
		AO53-132657	06/23/87	06/18/92	
		Amendment	02/19/88	06/18/92	
		AO53-212236	06/12/92	06/08/97	
		Amendment	06/30/92	06/08/97	
		Amendment	10/15/92	06/08/97	
		Amendment	12/09/93	06/08/97	
		Amendment	08/30/94	06/08/97	
		AO53-212236A	01/12/96	06/08/97	
		1050055-007-AC	07/05/96	06/01/98	
		1050055-009-AO	11/21/96	06/01/98	
-009	Phosphoric Acid Plant - B Train	AO53-132658	06/23/87	06/18/92	
		Amendment	02/19/88	06/18/92	

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}
Not included in this table: Operating permits issued prior to 1988, ownership transfers, and contstruction permit time extensions for expired construction permits.

Appendix H-1, Permit History/ID Number Changes

Mosaic Fertilizer, LLC
South Pierce

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1, 2]
Revised Date(s)					
		AO53-212237	06/30/92	06/08/97	
		Amendment	10/15/92	06/08/97	
		Amendment	12/09/93	06/08/97	
		Amendment	08/30/94	06/08/97	
		Amendment	04/03/95	06/08/97	
		AO53-212237A	01/12/96	06/08/97	
		1050055-007-AC	07/05/96	06/01/98	
		1050055-009-AO	11/21/96	06/01/98	
-012	Purified MAP/DAP Plant	AC53-42155	07/17/81	12/15/82	7/15/84
	Storage Silo No. 3	AO53-167460	12/08/89	12/05/94	
-013	Purified MAP/DAP Plant	AC53-42155	07/17/81	12/15/82	7/15/84
	Bagging Machine	AO53-167665	12/08/89	12/05/94	
-014	Purified MAP/DAP Plant	AC53-42155	07/17/81	12/15/82	7/15/84
	Bulk Truck Loading	AO53-167664	12/08/89	12/05/94	
-022	No. 2 Ball Mill Grinding	AO53-145509	05/05/88	04/21/93	
	System	AO53-226427	05/13/93	05/15/98	
		AO53-226427A	07/01/93	05/15/98	
-023	GTSP Production Plant	AO53-151947	10/14/88	09/26/93	
		Amendment	01/03/89	09/26/93	

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}
Not included in this table: Operating permits issued prior to 1988, ownership transfers, and contstruction permit time extensions for expired construction permits.

Appendix H-1, Permit History/ID Number Changes

Mosaic Fertilizer, LLC
South Pierce

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1, 2]
Revised Date(s)					
		AO53-235041	10/19/93	09/26/98	
		Amendment	07/08/94	09/26/98	
		Amendment	08/22/94	09/26/98	
		Amendment	06/01/95	09/26/98	
		AO53-235041A	07/19/95	09/26/98	
		AO53-235041B	12/20/95	09/26/98	
-024	GTSP East Storage Building	AC53-2184	06/07/73	11/01/74	
	-North Scrubber	AO53-151943	10/14/88	09/26/93	
		Amendment	01/11/89	09/26/93	
		AO53-235039	10/19//93	09/26/98	
		AO53-235039A	03/21/86	09/26/98	
		AO53-235039B	07/19/95	09/26/98	
-025	GTSP East Storage Building	AC53-2184	06/07/73	11/01/74	
	-South Scrubber	AO53-151945	10/14/88	09/26/93	
		Amendment	03/01/89	09/26/93	
		AO53-235039A	03/21/86	09/26/98	
		AO53-235039B	07/19/95	09/26/98	
-026	GTSP Rock Hopper Bin	AO53-151942	09/16/88	09/12/93	
		AO53-234445	10/04/93	10/01/98	
		AO53-234445A	11/08/93	10/01/98	

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}
Not included in this table: Operating permits issued prior to 1988, ownership transfers, and contstruction permit time extensions for expired construction permits.

Appendix H-1, Permit History/ID Number Changes

Mosaic Fertilizer, LLC
South Pierce

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1, 2]
Revised Date(s)					
-027	Purified MAP/DAP Plant Storage Silo No. 2	AC53-42155	07/17/81	12/15/82	7/15/84
		AO53-167459	12/08/89	12/04/94	
-028	Purified MAP/DAP Plant Storage Silo No. 1	AC53-42155	07/17/81	12/15/82	7/15/84
		AO53-166759	12/08/89	12/05/94	
-029	Purified MAP/DAP Plant Bulk Railcar Loading	AC53-42155	07/17/81	12/15/82	7/15/84
		AO53-166760	12/08/89	12/05/94	
-030-045	Molten Sulfur Storage and Handling System	AC53-167779	12/14/89	01/01/91	
		AO53-187290	12/07/90	12/01/95	
		AC53-201152/ PSD-FL-179	04/17/92	01/01/94	
		Amendment	01/10/96	12/30/96	
		AO53-221844	12/18/92	12/18/97	
		Amendment	06/08/95	12/18/97	
		1050055-010-AC PSD-FL-235	09/17/97	06/30/00	
-050	Molten Sulfur Transfer Pit	1050055-013-AC	6/17/2003	12/1/2004	

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}
Not included in this table: Operating permits issued prior to 1988, ownership transfers, and contstruction permit time extensions for expired construction permits.

Appendix H-1, Permit History/ID Number Changes

Mosaic Fertilizer, LLC
South Pierce

PROPOSED Permit No.: 1050055-014-AV
Facility ID No.: 1050055

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1, 2]	Revised Date(s)
-All		1050055-015-AC	10/7/05	1/30/07		

ID Number Changes (for tracking purposes):

From: **Facility ID No.**: 40TPA530055
To: **Facility ID No.**: 1050055

Notes:
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}
Not included in this table: Operating permits issued prior to 1988, ownership transfers, and contstruction permit time extensions for expired construction permits.

Friday, Barbara

To: Dean.Ahrens@mosaicco.com; Waters, Jason; jkoogler@kooglerassociates.com; praval@kooglerassociates.com; David.Turley@mosaicco.com

Cc: Bull, Robert

Subject: PROPOSED Title V Permit Renewal No.: 1050055-014-AV - Mosaic Fertilizer, LLC - South Pierce Facility

Attachments: 1050055.014.AV.P[1].zip

Attached for your records is a zip file for the subject PROPOSED Title V Permit Renewal.

If I may be of further assistance, please feel free to contact me.

Barbara J. Friday
Planner II
Bureau of Air Regulation
(850)921-9524
Barbara.Friday@dep.state.fl.us

Friday, Barbara

From: Exchange Administrator
Sent: Thursday, May 18, 2006 10:31 AM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT22490.txt; PROPOSED Title V Permit Renewal No.: 1050055-014-AV - Mosaic Fertilizer, LLC - South Pierce Facility


ATT22490.txt (376 B)


PROPOSED Title V Permit Renewa...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

Dean.Ahrens@mosaicco.com
David.Turley@mosaicco.com

Friday, Barbara

From: System Administrator
To: Bull, Robert; Waters, Jason
Sent: Thursday, May 18, 2006 10:31 AM
Subject: Delivered:PROPOSED Title V Permit Renewal No.: 1050055-014-AV - Mosaic Fertilizer, LLC - South Pierce Facility

Your message

To:	'Dean.Ahrens@mosaicco.com'; Waters, Jason; 'jkoogler@kooglerassociates.com'; 'praval@kooglerassociates.com'; 'David.Turley@mosaicco.com'
Cc:	Bull, Robert
Subject:	PROPOSED Title V Permit Renewal No.: 1050055-014-AV - Mosaic Fertilizer, LLC - South Pierce Facility
Sent:	5/18/2006 10:31 AM

was delivered to the following recipient(s):

Bull, Robert on 5/18/2006 10:31 AM
Waters, Jason on 5/18/2006 10:31 AM

Friday, Barbara

From: System Administrator
To: praval@kooglerassociates.com; jkoogler@kooglerassociates.com
Sent: Thursday, May 18, 2006 10:33 AM
Subject: Delivered:Mail System Delivery Report

Your message

To:	Dean.Ahrens@mosaicco.com; Waters, Jason; jkoogler@kooglerassociates.com; praval@kooglerassociates.com; David.Turley@mosaicco.com
Cc:	Bull, Robert
Subject:	PROPOSED Title V Permit Renewal No.: 1050055-014-AV - Mosaic Fertilizer, LLC - South Pierce Facility
Sent:	5/18/2006 10:31 AM

was delivered to the following recipient(s):

praval@kooglerassociates.com on 5/18/2006 10:33 AM
jkoogler@kooglerassociates.com on 5/18/2006 10:33 AM