

DATE: _____

PLANT: _____

**VISUAL VERIFICATION THAT FURNACE FIRE IS OUT W/BLOWER AT 1800 rpm BY
_____ (COMMUNICATE WITH CHIEF) TIME _____**

**PURGE FOR AT LEAST TWO MINUTES AFTER VERIFICATION OF FURNACE FIRE WITH
BLOWER AT MINIMUM GOVERNOR. TRIP BLOWER WHEN STACK OXYGEN IS OBSERVED
TO BE INCREASING. Leave all the sulfur valves open until the blower is shut down.**

**IF PLANT TRIPS AND SULFUR REMAINS IN THE FURNACE AFTER THE BLOWER IS SHUT-
DOWN, NOTIFY THE SUPERINTENDENT, PRODUCTION MGR, OR OPERATIONS MANAGER.**

- | | | | |
|-----|--------------------------------------|--------------|------------|
| 1. | BLOWER DISCHARGE BYPASS | ON _____ | OFF _____ |
| 2. | HRS DILUTER CONCENTRATION BYPASS | ON _____ | OFF _____ |
| 3. | HRS CORROSION MONITOR BYPASS | ON _____ | OFF _____ |
| 4. | BLOWER/TURBINE DSH VALVED | IN _____ | OUT _____ |
| 5. | SULFUR GUNS | CLOSED _____ | OPEN _____ |
| 6. | BOILER CONTINUOUS AND SAMPLE LINE | CLOSED _____ | OPEN _____ |
| 7. | CHEMICAL FEED PUMPS | OFF _____ | ON _____ |
| 8. | 93% PRODUCT VALVE | CLOSED _____ | OPEN _____ |
| 9. | DILUTION WATER VALVES | CLOSED _____ | OPEN _____ |
| 10. | C.I.L. COOLER WATER VALVES | CLOSED _____ | OPEN _____ |
| 11. | HRS PRE-HEATER WATER DISCHARGE VALVE | CLOSED _____ | OPEN _____ |
| 12. | BLOWER DISCHARGE GATE VALVE | CLOSED _____ | OPEN _____ |
| 13. | FURNACE INLET DAMPER | CLOSED _____ | OPEN _____ |
| 14. | WHB EXIT DAMPER | CLOSED _____ | OPEN _____ |
| 15. | ECONOMIZER DAMPERS | CLOSED _____ | OPEN _____ |
| 16. | HX HOT GAS DAMPERS | CLOSED _____ | OPEN _____ |
| 17. | HX COLD GAS DAMPERS | CLOSED _____ | OPEN _____ |

rev 9/16/2003

* Manual bypass of auto trip for sulfur pumps

19. HRS STEAM TO MP HEADER VALVE CLOSED _____ OPEN _____
20. HRS BOILER CONDENSATE DRAINS OPEN _____ CLOSED _____
21. MAB TURBINE CASE DRAINS OPEN _____ CLOSED _____
22. C.I.L. ANITROL OFF _____ ON _____
23. TG#2 EXTRACTION DSH VALVED OUT _____ IN _____
24. DESUPERHEATER OPEN _____ CLOSED _____

STARTUP SEQUENCE: RECHECK ALL DAMPERS & VALVES

1. START-UP CALLS (NOTIFY LAB) _____
2. START-UP SIREN SOUNDED _____
3. START-UP TEMPERATURES PRINTED OUT & CONDITIONS MET (Acid circulation started) _____ (DISPLAYS: 10 OR 11)
4. OPEN TRIP & THROTTLE TO 5" H2O
AFTER ALL INTERLOCKS MET AND DAMPERS OPEN RPMS _____
5. OPEN SLIDE GATE & CHECK FOR FIRE IN FURNACE AT 600 rpms
THROUGH OIL-GUN PORT SIGHT GLASS BY _____
6. IF THERE IS FIRE, CLOSE TRIP & THROTTLE. RENOTIFY ALL AREAS, CARGILL, SULFURIC SUPERINTENDENT, PRODUCTION MGR OR OPERATIONS MGR. IF THERE IS NO FIRE AT 600 rpms, PROCEED WITH NORMAL STARTUP ROUTINE.
7. PUT BLOWER ON GOVERNOR CONTROL.
8. OPEN ONE SULFUR GUN. START PUMP.
9. BRING FURNACE TEMP UP SLOWLY TO 1800°F, NO MORE THAN 50° PER MINUTE. STABILIZE THE PLANT AT 1800° AT LEAST 15 MINUTES (Temp, Blr Level, Blower at 1800RPMS, SO2 Stack in compliance) BEFORE PROCEEDING THROUGH CRITICAL. CONTINUE INCREASING FURN. TEMP 50°/MIN UNTIL PLANT IS AT DESIRED RATE. IN THE EVENT STACK SO2 EXCEEDS 800PPM ADVISE SUPERINTENDENT AND PRODUCTION MGR.

Post-it® Fax Note	7671	Date	2/24	# of pages	2
To	B. Bull	From	Bill Schneider		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	850-921-9533	Fax #			

CHECK LIST FOR SULFURIC PLANT
STARTUP/SHUTDOWN @ SOUTH PIERCE



Mosaic Phosphates Company
P.O. Box 2000
Mulberry, FL 33860
www.mosaicco.com

Tel 863-428-2500

3-4-05
Done.
Bum

Certified Mail 7003 1010 0004 7147 4096
Return Receipt Requested

March 1, 2005

RECEIVED
MAR 03 2005

BUREAU OF AIR REGULATION

Mr. Robert Bull
Florida Department of Environmental Protection
Twin Towers Office Building - MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Re: Mosaic Phosphates Company – South Pierce Plant
Facility No. 1050055
Responsible Official Notification Form**

Dear Mr. Bull:

Enclosed you will find DEP Form No. 62-213.900(8) relating to the Responsible Official Notification regarding our South Pierce plant.

If you have questions regarding this submittal, please contact me at (863) 428-7106.

Sincerely,

P. A. Steadham
Environmental Services
Florida Concentrates

PAS:jp\SP-Bull_Resp Off_030105
enclosure

cc: D. J. Jellerson
J. A. Golwitzer
C. D. Turley
Pradeep Raval, Koogler & Associates



Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: Mosaic Phosphates Company	
2. Site Name: South Pierce	3. County: Polk
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 1050055008AV	

Notification Type (Check one or more)

- ☐ **INITIAL:** Notification of responsible officials for an initial Title V application.
- ☒ **RENEWAL:** Notification of responsible officials for a renewal Title V application.
- ☐ **CHANGE:** Notification of change in responsible official(s).
Effective date of change in responsible official(s) _____

Primary Responsible Official

1. Name and Position Title of Responsible Official: Edgar O. Morris, Vice President, Environmental, Health and Safety		
2. Responsible Official Mailing Address: Organization/Firm: Mosaic Phosphates Company Street Address: 8813 Highway 41 South City: Riverview State: FL Zip Code: 33569		
3. Responsible Official Telephone Numbers: Telephone: (813) 671-6158 Fax: () -		
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.		
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i> <div style="display: flex; justify-content: space-between;"><div>Signature <u><i>Edgar O. Morris</i></u> VP</div><div>Date <u>2-25-05</u></div></div>		

3-4-05
Done!
Bm

Additional Responsible Official

1. Name and Position Title of Responsible Official: Jeffrey A Golwitzer, Plant Manager, South Pierce
2. Responsible Official Mailing Address: Organization/Firm: Mosaic Phosphates Company (South Pierce) Street Address: PO Box 2000 City: Mulberry State: FL Zip Code: 33880
3. Responsible Official Telephone Numbers: Telephone: (863) 428 - 2500 Fax: () -
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

3-4-05

Done.

Bmm

Additional Responsible Official

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.



Mosaic Phosphates Company
P.O. Box 2000
Mulberry, FL 33860
www.mosaicco.com

Tel 863-428-2500

Certified Mail 7003 1010 0004 7147 3723
Return Receipt Requested

RECEIVED

FEB 08 2005

BUREAU OF AIR REGULATION

February 4, 2005

Mr. Robert Bull
Florida Department of Environmental Protection
Twin Towers Office Building - MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Re: Mosaic Phosphates Company – South Pierce Plant
Facility No. 1050055
Draft – Compliance Plan CP-1**

Dear Mr. Bull:

Enclosed you will find our comments on the draft Compliance Plan for South Pierce.

If you have any questions regarding this submittal, please contact me at (863) 428-7106.

Sincerely,

P. A. Steadham
Environmental Services
Florida Concentrates

PAS:jp\SP-compliance plan draft
enclosure

cc: D. J. Jellerson
J. A. Golwitzer
C. D. Turley
Pradeep Raval, Koogler & Associates

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

~~IMC MOSAIC~~ PHOSPHATES COMPANY (~~IMC MOSAIC~~)
SOUTH PIERCE FACILITY
Facility No. 1050055

COMPLIANCE PLAN CP-1

1. ~~Upon issuance of the draft Title V permit renewal (1050055-014-AV), IMC MOSAIC shall be in compliance with all emission limits contained in 40 CFR 63 Subparts A, AA and BB ("Phosphate MACTs").~~

[The GTSP Storage Building Scrubbers will require upgrade or replacement prior to being able to meet the emission limits in 40 CFR 63 Subpart BB. Mosaic may also elect to test the uncontrolled building emissions to demonstrate that fugitive emissions are below the regulatory limits. Further, even if these scrubbers could meet the applicable limits, compliance would be required upon issuance of a final Title V permit and not issuance of a draft Title V permit. All other sources will meet the applicable limits once a final permit becomes effective.]

2. As of the date of issuance of this ~~draft~~ final Title V permit renewal, 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. However, ~~IMC MOSAIC~~ will conduct testing as set forth herein and may request the Department reconsider its major source status. For purposes of reconsideration of major source status as described herein, ~~IMC MOSAIC~~ shall: (1) submit a quantification of all hazardous air pollutants (HAP) reasonably believed, on the basis of either previous testing or process knowledge, to be emitted in significant quantities from the facility and (2) conduct representative pond testing and modeling (if modeling is required for quantification of fugitive emissions) for ~~total fluorides and~~ hydrogen fluorides with sufficient samples to meet a data quality objective that accounts for the variability of test data and provides for confidence in the mean measured value. Although this reconsideration does not require that past testing for ~~fluoride and/or~~ hydrogen fluoride was conducted, the Department reserves its right to request and evaluate the results of any such past testing. As part of this reconsideration, the Department reserves its right to base its determination upon hydrogen fluoride and/or total HAP emissions. ~~IMC MOSAIC~~ shall submit an approvable a test protocol for Hydrogen Fluoride ("HF") pond emissions and qualification for all HAPs to the Department by April 30, 2005. Once the test protocol has been agreed upon by representatives of both the Department and Mosaic, both parties agree to abide by the results with regard to applicability of the HF MACT for South Pierce.

[Pond testing will be performed only for HF. Total fluoride will not be quantified since only HF is the pollutant which MACT applicability is triggered when present above the 10 tpy threshold.]

3. Within 30 days of written approval of the test protocol from the Department or issuance of FINAL permit 1050055014-AV, which ever is earlier, IMC MOSAIC shall conduct the test for HF pond emissions in accordance with the approve test protocol.

4. Within 30 days of completing the pond tests, IMC MOSAIC shall submit results to the Department's Bureau of Air Monitoring and Mobile Sources (BAMMS). IMC MOSAIC also shall submit the last 5 (five) years of stack tests for all permitted emissions units ~~emitting HAPs~~.

[Mosaic has sampled and provided test results to the BAMMS for several representative point sources for HF at several facilities other than South Pierce. Sampling for other HAPs has not been conducted and are not believed to be present.]

5. In the event the data and test results demonstrate and the Department determines that the facility is not Major for HAPs, including HF, the following deadlines will apply:

a. Within 10 days of the Department's written determination, IMC MOSAIC shall request that the Department re-open FINAL Permit 1050055-014-AV to remove all HF MACT language from the permit.

b. Within 30 days of the Department's determination, IMC MOSAIC will begin testing on all units subject to 40 CFR 64, Compliance Assurance Monitoring ("CAM") to establish scrubber operating parameters for Emissions Units No. 008, No. 009, No. 023, No. 024, and No. 025. Mosaic may also elect to utilize an alternative monitoring plan as an option to the parametric monitoring requirements specified in 40 CFR 63, Subpart BB.

c. Within ~~30~~ 45 days of IMC MOSAIC completing testing to establish scrubber operating parameters, IMC MOSAIC shall submit a report of the test results and a revised CAM plan to the Department. The revised CAM plan will include all units subject to CAM for both Particulate Matter and Fluoride (Emissions Units (EU) No. 008, No. 009, No. 023, No. 024, and No. 025).

6. In the event the data and test results demonstrate and the Department determines that the facility is major for HAPs, including HF, the following deadlines will apply:

a. Within ~~30~~ 120 days of the Department's written determination, IMC 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.

[Additional time will be required for selection and design of a new system.]

b. Within 30 days of IMC MOSAIC completing construction on the GTSP storage building to meet the requirements of the Phosphate MACT, IMC 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 ~~30~~ 45 days of ~~IMC~~ 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, ~~IMC~~ MOSAIC shall submit a report of the initial performance testing to the Department and EPA.

[Current rules allow 45 days for submittal of performance test results.]

7. In addition to the requirements in paragraph 6, above, in the event the data and test results demonstrate and the Department determines that the facility is major for HAPs, including HF, the following deadlines will apply:

a. Within 120 days of the Department's decision, ~~IMC~~ MOSAIC shall install the monitoring devices on all emissions units subject to the MACT monitoring specified in 40 CFR 63 Subparts AA and BB. ~~IMC~~ MOSAIC shall provide written notice to the Department confirming such installations;

b. Within 30 days of the installation of the monitoring devices required by the MACT monitoring in 40 CFR 63 Subparts AA and BB, ~~IMC~~ 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. ~~IMC~~ MOSAIC shall provide written notice to the Department confirming such data collection, management and storage;

c. Within 30 days of the installation of the monitoring devices required by 40 CFR 63 Subparts AA and BB, ~~IMC~~ MOSAIC shall conduct initial performance testing to establish ranges of acceptable scrubber operation and to show compliance for the upgraded GTSP Storage system;

d. Within ~~30~~ 45 days of ~~IMC~~ 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, ~~IMC~~ MOSAIC shall submit a report of the initial performance testing to the Department and EPA.

[Current rules allow 45 days for submittal of performance test results.]

8. Thereafter, ~~IMC~~ MOSAIC shall submit semiannual reports required by the Phosphate MACTs, 40 CFR 63 Subparts AA and BB.

9. ~~IMC~~ 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.

December 9, 2004

RECEIVED BY
P.A. STEADHAM

JAN 06 2005

COPIES _____
ROUTE TO file

Phil Steadham
Environmental Superintendent
Mosaic Phosphates MP, Inc.
5000 Old Highway 37 South
Mulberry, FL 33860

Re: Delegation of Authority under Environmental Programs

Dear Phil:

In your capacity as Environmental Superintendent – New Wales and South Pierce Facilities for Mosaic Phosphates MP, Inc., for purposes of applicable environmental statutes and regulations, and in accordance with the By-laws of the Corporations, the resolutions of the Board of Directors, and the Amended and Restated Partnership Agreement of Mosaic Phosphates Company, as amended, I hereby authorize you, for and on behalf of the Company, to execute and submit all routine environmental reports, permit applications and follow-up responses, where the signature of an officer is not otherwise mandated by law, statute or regulation. The authority granted in this letter shall be subject to all necessary corporate approvals having been first obtained, as required by the By-laws, resolutions of the Board of Directors, and the governing documents of the Partnership and is further limited now or in the future by such resolutions, management guides, and actions as may be inconsistent with this delegation.

This delegation, effective since the 22nd day of October 2004, supersedes any previous delegations of similar authority that may have been given either to you or to any predecessor with responsibilities similar to yours.


Edgar O. Morris
Vice President, Environmental, Health and Safety