Department of
Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

August 11, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. M. A. Daigle, Vice President
IMC Phosphates Company
PO Box 2000
Mulberry, FL 33860

Re: Title V Renewal Request for Additional Information for CAM
Reference Permit No. 1050055-014-AV
South Pierce Facility

Dear Mr. Daigle:

On July 12, 2004, the Department received additional information for your Title V air permit application to renew your existing permit. In order to continue processing the application; the Department will need the following additional information, in addition to information that was previously submitted on July 12, 2004:

1. Upon review of the facilities HAP Emissions Estimates (Attachment 1), the Department does not agree with your emission estimates used to determine the total amount of HAPs released at the facility. We believe the estimated HF emissions to be larger than your estimations based on the report prepared by Dr. Arthur L. Fricke, dated December 14, 2002. This would result in the facility being subject to the MACT standards, 40 CFR 63 subparts AA and BB. The department intends to incorporate the MACT standards into the permit. The facility in the future may do testing to show minor status to have Subpart AA and BB standards removed from the permit. The Department will also add this language to the Title V Renewal determination of major source status regarding HF MACT applicability:

If additional testing and modeling demonstrate that the facility is not and has never been a major source of hazardous air pollutants since at least June 10, 2002, the permittee shall have the right to request that the Department revise the permit to remove those requirements and conditions that are applicable because the facility is a major source of hazardous air pollutants as determined by the Department.

The facility may contact the Department's Emissions Monitoring group to discuss Alternative Monitoring options. If an Alternative Monitoring Plan is developed, it will be incorporated into the permit as well.

2. Phosphoric Acid Plant – A and B Train (EU 008 & 009). Being subject to the MACT, this emission unit will no longer be subject to CAM for fluoride.

3. No. 2 Ball Mill Grinding System (EU 022). The choice of pressure drop across the baghouse is an acceptable indicator to monitor PM. Can the emission limit be met with new clean bags, or do the bags

need some material build up to enhance efficiency? Please specify a minimum pressure drop across the baghouse that equates to the condition of the bags following a cleaning cycle that assures compliance with the emissions limit that can be used as an indicator in addition to the 15 inch maximum pressure drop listed. Please provide additional test data for EU 002. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop that will assure compliance with the emission limit.

4. GTSP Production Plant (EU 023). The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor PM. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator ranges are non-specific. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. From your test data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits. Being subject to the MACT, this emission unit will no longer be subject to CAM for fluoride.

5. GTSP East Storage Building (EU 024 and 025). The choice of fan amperage as an indicator range may be acceptable if a specific range is specified that can be justified by test data to monitor PM. If not, scrubber pressure drop and scrubber water flow might be more appropriate. From your test data, provide a justification of your choices and clearly indicate specific indicator ranges that will assure compliance with the emission limits. Being subject to the MACT, this emission unit will no longer be subject to CAM for fluoride.

Additionally, the CAM plan was not submitted in the proper format. Format examples can be found on the EPA Website. Please refer to http://www.epa.gov/ttn/emc/cam.html for format examples (Appendix A), and submit your CAM plan in this manner.

Please submit all requested information, postmarked by October 1, 2004, to Mr. Bobby Bull at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If the Department does not receive a full and complete response postmarked by October 1, 2004, the Department will determine and take appropriate agency action to process your application. If you have any questions regarding this request for additional information, please contact Mr. Bull at robert.bull@dep.state.fl.us or (850) 921-9585. To discuss the specific CAM requirements, please contact Mr. Jonathan Holtom at (850) 921-9531 or jonathan.holtom@dep.state.fl.us.

Sincerely,

Trina L Vielhauer

Trina Vielhauer, Chief
Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD
Pradeep Raval, Consultant, Koogler and Associates
John B. Koogler, PhD., P.E., Koogler and Associates

Request for Additional Information Regarding CAM

IMC – South Pierce
Title V Permit Renewal
Project Number: 1050055-014-AV

To: Jason Waters

From: Jonathan Holtom

Date: November 20, 2003

The following comments/questions are a result of my review of the submitted CAM plans for Subject facility. You may be able to answer them yourself, or you may use these questions in a further request for additional information.

General Comment(s)

1. There are several conditions in the facility-wide section that are unit specific conditions. Placing them in the facility-wide section makes them applicable to all emissions units at the facility, including the unregulated and insignificant sources. Please consider moving them to the appropriate EU subsection.

Phosphoric Acid Plant – A and B Train (EU 008 & 009)

2. CAM is applicable for fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubber are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator range is non-specific and is equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate that will assure compliance with the emission limit.

No. 2 Ball Mill Grinding System (EU 022)

3. CAM is applicable for PM. The choice of pressure drop across the baghouse is an acceptable indicator to monitor. Please identify a minimum pressure drop across the baghouse that can be used as an indicator in addition to the 15" maximum pressure drop listed. Please provide a table of test data that correlates the pressure drop to the tested PM emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop that will assure compliance with the emission limit.

GTSP Production Plant (EU 023)

4. CAM is applicable for PM and fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator ranges are non-specific and are equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM

excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits.

GTSP East Storage Building (EU 024 and 025)

5. CAM is applicable for PM and fluoride. The choice of fan amperage as an indicator range may be acceptable if a specific range is specified that can be justified by test data. If not, scrubber pressure drop and scrubber water flow might be more appropriate. Please provide a table of test data that correlates the chosen indicator range(s) to the tested fluoride and PM emission levels. From this data, provide a justification of your choices and clearly indicate specific indicator ranges that will assure compliance with the emission limits.

6. Based on the information contained in the CAM submittal, CAM does not apply to the rest of the units at this facility.

After you review these comments, please let me know if you have any questions.

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

KA 124-03-07

July 8, 2004

Mr. Bobby Bull
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal
IMC Phosphates Company – South Pierce Plant
File No. 1050055-014-AV

Dear Mr. Bull:

This is a follow up to the Department's letter dated May 20, 2004, requesting additional information on the above referenced Title V renewal project. The responses are in the order of the issues raised by FDEP.

1. **Emission Unit Information. You indicated in your response that Emission Units (EUs) #002, 003, 012-014, 016, 017, 027-029, 034, 044-046 have been shut down and will no longer operate at the facility. However, EUs # 034, 045, and 046 were included in the September 26, 2003 application. Please verify that you no longer want to have these units included in the renewal permit, and provide shutdown dates on each unit. Please also provide the shutdown dates for units EUs # 003, 012, 013, 014, 027, 028, and 029.**

RESPONSE:

The units identified will no longer be operated at the facility. The units were shutdown as indicated below:

EUs. 002, 003, 012, 013, 014, 016, 017, 027, 028, 029 & 046:	in 1995
EUs. 034, 044 & 045:	in or before 1992

2. **Maximum Achievable Control Technology (MACT) applicability. Your facility maintains it is not a major source of hazardous air pollutants. Please provide the annual amount of hazardous air pollutants emissions from the site. In particular, please quantify the annual amount of HF emissions**

coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pond water. If applicable, please also provide information concerning the closure of these ponds.

RESPONSE:

The facility is a minor source of HAP emissions based on the estimates presented in Attachment 1.

3. **Compliance Assurance Monitoring (CAM). In your April 21, 2004 response, you propose CAM as meeting the requirements for Facility Wide Condition 14. This is not acceptable. You will need to specify maximum and minimum pressure drop and flow rate for each of the units that are subject to CAM. Also, in order to satisfy the CAM submittal requirements and to approve the previously submitted CAM plans, please submit the following information that was previously requested in our letter dated November 21, 2003:**

A. Phosphoric Acid Plant- A and B Train (EU 008 & 009). CAM is applicable for fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubber are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator range is non-specific and is equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate that will assure compliance with the emission limit.

RESPONSE:

The requested information for the Phosphoric Acid Plants is presented in Attachment 2. Results of testing conducted in 1996, to establish a scrubber flow rate minimum of 1200 gpm for each of the systems, are also included.

B. No. 2 Ball Mill Grinding System (EU 022). CAM is applicable for PM. The choice of pressure drop across the baghouse is an acceptable indicator to monitor. Please identify a minimum pressure drop across the baghouse that can be used as an indicator in addition to the 15" maximum pressure drop listed. Please provide a table of test data that correlates the pressure drop to the tested

PM emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop that will assure compliance with the emission limit.

RESPONSE:

The compliance testing routinely conducted for the bag collector consisted of Visible Emission Evaluations. A particulate matter emission test was conducted prior to the Title V permit renewal process. Based on past VE observations, it is likely that the mass emissions are low in this application. It can be assumed that if the bag collector is in compliance with the visible emissions limit, it will be in compliance with the mass emission limit. Available compliance testing information is presented in Attachment 3.

C. GTSP Production Plant (EU 023). CAM is applicable for PM and fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator ranges are non-specific and are equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits.

RESPONSE:

A summary of the test data for the GTSP Plant is presented in Attachment 4. The scrubbing system consists of two parallel venturi scrubbers followed by a packed scrubber, in series. The summary of test data includes each of these scrubber systems.

D. GTSP East Storage Building (EU 024 and 025). CAM is applicable for PM and fluoride. The choice of fan amperage as an indicator range may be acceptable if a specific range is specified that can be justified by test data. If not, scrubber pressure drop and scrubber water flow might be more appropriate. Please provide a table of test data that correlates the chosen indicator range(s) to the tested fluoride and PM emission levels. From this data, provide a justification of your choices and clearly indicate specific indicator ranges that will assure compliance with the emission limits.

RESPONSE:

A summary of the test data for the GTSP Storage Building is presented in Attachment 5. The emissions are controlled by two parallel scrubber systems consisting of two wet cyclonic scrubbers each. Thus, there are four scrubbers with two stacks. Although each of the stacks (and associated scrubber systems) are identified as the emission units by the permit, the emission limit is applied to the building which requires that compliance be determined based on the total of the emissions from both systems.

4. **Facility Regulatory Classifications. The application is blank for several items in this section. Each item must be answered yes or no.**

RESPONSE:

All the applicable items in the Facility Regulatory Classification field in the EPSAP application were completed as required. We are unaware of any additional items that would need to be completed.

The RO and PE certifications are presented in Attachment 6.

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:par
Encl.

C: C. D. Turley, IMC

ATTACHMENT 1

HAP EMISSIONS ESTIMATES

POINT SOURCES:

The HF emissions from the A and B phosphoric acid plants can be estimated based on testing conducted on similar units. It is estimated that 3.4 percent of the fluoride emissions are HF. Based on the maximum potential fluoride emissions for each plant of 4.9 tons per year (tpy), the maximum potential HF emissions from each plant would be 0.17 tpy.

Similarly, the HF emissions from the GTSP production and storage units are estimated to be 7.8 percent of the fluoride emissions. Based on the maximum potential fluoride emissions from the GTSP production and storage units of 25.0 tpy and 34.2 tpy, respectively, the maximum potential HF emissions from each unit would be 1.95 and 2.66 tpy, respectively.

Thus, the total HF emissions from the point sources are estimated to be 4.95 tpy.

PLANT FUGITIVE EMISSIONS:

The fugitive HF emissions from the South Pierce plant have been estimated based on emission estimates information for a similar plant. The total HF emissions from the plant fugitives are estimated to be 0.48 tpy.

POND EMISSIONS:

Based on past studies conducted by EPA and others, an HF emission factor of 0.1 lb/acre-day has been applied to gypsum pond and cooling ponds at operating phosphate fertilizer facilities. This factor has been used for pond systems with fluoride concentrations around 10,000 ppm fluoride and a pH around 1 standard units. The total IMC South Pierce facility pond area is 238 acres with a fluoride concentration around 11,400 ppm and pH of around 1.2 standard units. Based on the pond area, the estimated HF emissions using the above emission factor are 4.34 tpy.

The combined total HF emissions from the above areas of the facility are estimated to be 9.77 tpy. This quantity is below the major source individual HAP threshold.

OTHER HAPS:

The emissions of other HAPS, estimated based on miscellaneous material usage at the facility and based on the MSDS information, is about 1.92 tpy.

The total of all HAP emissions at the facility are estimated to be 11.69 tpy. This quantity is below the major source threshold for all HAPS.

ATTACHMENT 2

SUMMARY OF TEST DATA FOR PHOSPHORIC ACID PLANTS

South Pierce Phosphoric Acid Plant
A Train (008) Scrubber
Compliance Test Results

Run	Test Date	P2O5 Input TPH (55.48)	F lb/hr (1.11)	F limit lb/hr (1.11)	Scrubber Total GPM	Scrubber dP
Testing to establish minimum flow rate of 1200 gpm						
3 run average	08/01/96	44.6	0.11	0.89	2442	5.8
3 run average	08/05/96	46.2	0.10	0.92	1014	5.8
2 runs	08/07/96	43.1	0.18	0.86	1251	5.1
1 run	08/08/96	44.6	0.09	0.89	1250	5.1
1	07/20/00	44.8	0.11		1386	5.5
2	07/20/00	44.8	0.12		1385	5.5
3	07/20/00	44.8	0.14		1385	5.5
Test Average	07/20/00	44.8	0.12	0.90	1385	5.5
1	08/09/00	42.5	0.12		1370	4.2
2	08/09/00	42.5	0.16		1383	4.2
3	08/09/00	42.5	0.21		1379	4.3
Test Average	08/09/00	42.5	0.16	0.85	1377	4.2
1	04/18/01	44.0	0.09		1332	2.6
2	04/18/01	44.0	0.12		1298	2.9
3	04/18/01	44.0	0.13		1291	3.3
Test Average	04/18/01	44.0	0.11	0.88	1307	2.9
1	07/26/02	37.8	0.24		2578	2.5
2	07/26/02	37.8	0.20		2570	2.5
3	07/26/02	37.8	0.33		2578	2.5
Test Average	07/26/02	37.8	0.26	0.76	2575	2.5
1	09/04/02	46.6	0.19		1700	7.0
2	09/04/02	46.6	0.13		1725	7.1
3	09/04/02	46.6	0.07		1730	7.2
Test Average	09/04/02	46.6	0.13	0.93	1718	7.1
1	10/11/02	43.2	0.13		1700	4.5
2	10/11/02	43.2	0.14		1700	4.5
3	10/11/02	49.4	0.21		1700	4.5
Test Average	10/11/02	45.3	0.16	0.91	1700	4.5
1	01/15/03	45.4	0.17		1550	4.0
2	01/15/03	45.4	0.17		1550	4.0
3	01/15/03	45.4	0.20		1550	4.0
Test Average	01/15/03	45.4	0.18	0.91	1550	4.0
1	12/03/03	40.9	0.16		2175	1.0
2	12/03/03	40.9	0.12		2200	1.1
3	12/03/03	40.9	0.14		2200	1.1
Test Average	12/03/03	40.9	0.14	0.82	2192	1.1
				min	1014	1.0
				max	2578	7.2

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.

South Pierce Phosphoric Acid Plant
B Train (009) Scrubber
Compliance Test Results

Run	Test Date	P2O5 Input TPH (53.45)	F lb/hr	F limit lb/hr (1.11)	Scrubber Total GPM	Scrubber dP
Testing to establish minimum flow rate of 1200 gpm						
3 run average	08/09/96	44.5	0.12	0.89	2410	8.7
3 run average	08/13/96	42.6	0.22	0.85	1230	7.4
3 run average	08/16/96	45.7	0.22	0.91	1620	7.9
1	05/18/99	40.8	0.34		1674	3.4
2	05/18/99	42.1	0.36		1374	3.4
3	05/18/99	42.1	0.16		1374	3.4
Test Average	05/18/99	41.7	0.29	0.83	1474	3.4
1	07/09/99	41.1	0.05		2240	2.8
2	07/09/99	41.1	0.05		2345	2.8
3	07/09/99	41.1	0.05		2280	2.8
Test Average	07/09/99	41.1	0.05	0.82	2288	2.8
1	03/16/00	49.9	0.13		1933	5.0
2	03/16/00	49.9	0.25		1496	4.9
3	03/16/00	49.9	0.23		1510	4.9
Test Average	03/16/00	49.9	0.20	1.00	1646	4.9
1	08/10/01	48.5	0.27		1462	3.5
2	08/10/01	48.5	0.31		1411	3.9
3	08/10/01	48.5	0.21		1383	3.8
Test Average	08/10/01	48.5	0.26	0.97	1419	3.8
1	07/25/02	43.2	0.16		2184	3.7
2	07/25/02	43.2	0.30		2180	3.5
3	07/25/02	43.2	0.15		2204	3.8
Test Average	07/25/02	43.2	0.20	0.86	2189	3.7
1	01/10/03	43.8	0.06		2100	3.6
2	01/10/03	43.8	0.08		2100	3.6
3	01/10/03	43.8	0.08		2100	3.7
Test Average	01/10/03	43.8	0.08	0.88	2100	3.6
1	04/29/03	42.5	0.19		1683	2.2
2	04/29/03	42.5	0.17		1685	2.2
3	04/29/03	42.5	0.27		1652	2.1
Test Average	04/29/03	42.5	0.20	0.85	1673	2.2
				min	1230	2.1
				max	2410	8.7

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.

ATTACHMENT 3

SUMMARY OF TEST DATA FOR NO. 2 BALL MILL GRINDING SYSTEM

South Pierce No. 2 Ball Mill Grinding System (022)
Compliance Test Results

Run	Test Date	TPH	PM lb/hr	PM limit lb/hr	VE	VE limit	Bag Collector dP
	02/18/99	50			0	20	7.0
	01/25/00	50			0	20	3.0
	03/20/01	50			0	20	1.0
	04/15/02	50			0	20	0.8
1	11/19/03		0.11				
2	11/19/03		0.22				
3	11/19/03		0.28				
Test Average	11/19/03	50	0.20	31.8	5.6	20	3.1
						min	0.8
						max	7.0

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.

ATTACHMENT 4

SUMMARY OF TEST DATA FOR GTSP PRODUCTION PLANT

South Pierce GTSP Production Plant (023)
Compliance Test Results

Run	Test Date	Rate TPH	PM lb/hr	PM limit lb/hr	F lb/hr	F limit lb/hr	RGCV Venturi Total GPM	RGCV Venturi dP	Dryer Venturi Total GPM	Dryer Venturi dP	Tailgas Scrubber Total GPM	Tailgas Scrubber dP
1	02/01/00	103.8	12.8		3.5		926	8.1	910	11.2	4658	6.6
2	02/01/00	103.8	20.1		3.0		926	8.1	910	11.2	4658	6.6
3	02/01/00	105.4	22.8		3.0		926	8.1	910	11.2	4658	6.6
Test	02/01/00	104	18.6	35	3.2	5.7	926	8.1	910	11.2	4658	6.6
1	04/25/00	125.5	32.5		1.6		992	8.5	860	10.7	5018	6.3
2	04/25/00	125.6	23.2		1.7		982	8.5	856	10.9	4892	6.4
3	04/25/00	124.5	23.5		1.7		974	8.7	857	10.8	4910	6.5
Test	04/25/00	125	26.4	35	1.7	5.7	983	8.6	858	10.8	4940	6.4
1	05/22/00	118	16.8		1.2		871	8.3	825	10.7	4650	6.3
2	05/22/00	118	12.9		1.5		817	8.1	824	10.7	4550	6.4
3	05/22/00	120	14.7		1.3		806	8.0	821	10.6	4518	6.4
Test	05/22/00	119	14.8	35	1.3	5.7	831	8.1	823	10.6	4572	6.4
1	07/24/01	117	28.7		1.0		814	9.5	914	11.2	5020	8.2
2	07/24/01	119	32.6		1.6		832	9.6	925	11.2	5035	8.1
3	07/24/01	120	33.2		1.3		812	9.6	930	11.2	4745	7.9
Test	07/24/01	119	31.5	35	1.3	5.7	819	9.6	923	11.2	4933	8.1
1	11/08/01	120	19.3		2.6		729	9.5	827	9.9	4550	6.2
2	11/08/01	120	29.6		2.7		739	9.9	828	10.0	4594	6.5
3	11/08/01	120	28.4		3.2		734	10.0	839	10.0	4594	6.3
Test	11/08/01	120	25.8	35	2.8	5.7	734	9.8	831	10.0	4579	6.3
1	05/02/03	106.7	16.9		2.0		710	7.2	715	9.4	4195	6.1
2	05/02/03	107.7	21.8		1.9		712	7.8	713	9.0	4248	6.2
3	05/02/03	107.7	22.1		1.8		703	7.7	711	8.9	4234	6.3
Test	05/02/03	107	20.3	35	1.9	5.7	708	7.6	713	9.1	4226	6.2
1	02/06/04	126.8	12.6		1.5		705	7.5	721	9.8	5061	8.4
2	02/06/04	126.7	11.5		1.5		702	7.5	717	9.8	5064	7.8
3	02/06/04	126.9	10.7		1.5		735	7.4	725	9.7	5044	8.3
Test	02/06/04	127	11.6	35	1.5	5.7	714	7.5	721	9.8	5056	8.2
1	04/27/04	111.7	18.2		3.7		642	5.4	661	7.5	4663	10.2
2	04/27/04	112.4	16.5		4.2		642	5.4	674	7.4	4675	10.2
3	04/27/04	112.4	15.4		4.1		642	5.4	674	7.4	4675	10.2
Test	04/27/04	112	16.7	35	4.0	5.7	642	5.4	670	7.4	4671	10.2
						min	642	5.4	661	7.4	4195	6.1
						max	992	10.0	930	11.2	5064	10.2

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.

ATTACHMENT 5

SUMMARY OF TEST DATA FOR GTSP EAST STORAGE BUILDING

South Pierce GTSP East Storage Building
North (024) and South (025) Scrubbers
Compliance Test Results

Eu ID	Run	Test Date	Rate TPH	TPD Loaded	PM lb/hr	PM limit lb/hr	F lb/hr	F limit lb/hr	No 1 Fan Amps	No 2 Fan Amps
024	1	09/29/99	70	2880	6.5		2.6		13	22
024	2	09/29/99	102	2880	7.5		2.8		13	22
024	3	09/29/99	105	2880	5.7		3.8		13	22
	Test Average	09/29/99	92	2880	6.6		3.1		13	22
025	1	09/29/99	70	2880	4.0		3.1		20	19
025	2	09/29/99	102	2880	4.6		3.6		20	19
025	3	09/29/99	105	2880	3.0		5.3		20	19
	Test Average	09/29/99	92	2880	3.9		4.0		20	19
	Compliance Result:		92	2880	10.4	40.1	7.1	7.8		
024	1	03/07/00	100	3744	3.6		4.4		17	20
024	2	03/07/00	100	3744	5.4		3.7		17	20
024	3	03/07/00	102	3744	5.4		3.1		17	20
	Test Average	03/07/00	101	3744	4.8		3.7		17	20
025	1	03/10/00	106	3744	5.7		2.0		19	20
025	2	03/10/00	106	5136	4.6		2.0		19	20
025	3	03/10/00	109	5088	5.6		2.2		19	20
	Test Average	03/10/00	107	4656	5.3		2.0		19	20
	Compliance Result:		104	4200	10.2	40.1	5.8	7.8		
024	1	05/01/00	118	5400	4.6		1.2		19	20
024	2	05/01/00	118	5400	6.5		0.9		19	20
024	3	05/01/00	118	4200	3.5		1.5		19	20
	Test Average	05/01/00	118	4992	4.8		1.2		19	20
025	1	05/02/00	118	5400	5.1		5.9		17	19
025	2	05/02/00	118	4200	2.9		5.5		17	19
025	3	05/02/00	118	3600	2.1		4.8		17	19
	Test Average	05/02/00	118	4400	3.4		5.4		17	19
	Compliance Result:		118	4696	8.2	40.1	6.6	7.8		
024	1	09/18/01	105	4152	2.7		1.0		20	22
024	2	09/18/01	105	4704	1.5		0.7		20	22
024	3	09/18/01	105	4944	1.6		0.4		20	22
	Test Average	09/18/01	105	4608	2.0		0.7		20	22
025	1	09/20/01	109	5280	9.1		3.0		22	20
025	2	09/20/01	112	4128	3.0		3.4		22	20
025	3	09/20/01	112	5280	6.2		3.2		22	20
	Test Average	09/20/01	111	4896	6.1		3.2		22	20
	Compliance Result:		108	4752	8.1	40.1	3.9	7.8		
024	1	12/04/01	123	4248	3.2		3.1		23	21
024	2	12/04/01	123	6048	5.9		3.4		23	21
024	3	12/04/01	123	6048	7.3		3.5		23	21
	Test Average	12/04/01	123	5448	5.5		3.3		23	21
025	1	12/04/01	123	4248	6.7		0.7		23	21
025	2	12/04/01	123	6048	3.9		1.0		23	21
025	3	12/04/01	123	5448	2.8		0.7		23	21
	Test Average	12/04/01	123	5248	4.4		0.8		23	21
	Compliance Result:		123	5348	9.9	40.1	4.1	7.8		

South Pierce GTSP East Storage Building
North (024) and South (025) Scrubbers
Compliance Test Results

Eu ID	Run	Test Date	Rate TPH	TPD Loaded	PM lb/hr	PM limit lb/hr	F lb/hr	F limit lb/hr	No 1 Fan Amps	No 2 Fan Amps
024	1	09/18/03	60	6600	1.2		0.9		24	25
024	2	09/18/03	60	3600	1.8		1.1		24	25
024	3	09/18/03	60	6600	0.4		1.8		24	25
	Test Average	09/18/03	60	5592	1.1		1.2		24	25
025	1	09/18/03	60	6600	4.1		1.8		24	25
025	2	09/18/03	60	3600	2.7		1.9		24	25
025	3	09/18/03	60	6600	2.8		3.1		24	25
	Test Average	09/18/03	60	5592	3.2		2.3		24	25
	Compliance Result:		60	5592	4.3	40.1	3.5	7.8		
024	1	11/05/03	112	5160	10.0		2.5		24	23
024	2	11/05/03	108	7368	5.5		2.4		23	24
024	3	11/05/03	112	4608	4.2		2.7		24	24
	Test Average	11/05/03	110	5400	6.6		2.5		24	24
025	1	11/10/03	110	5928	3.8		0.8		24	24
025	2	11/10/03	110	3504	3.3		0.7		24	24
025	3	11/10/03	110	6744	4.1		0.8		24	24
	Test Average	11/10/03	110	5400	3.7		0.8		24	24
	Compliance Result:		110	5400	10.3	40.1	3.3	7.8		
								min	13	19
								max	24	25

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

CERTIFIED MAIL

December 3, 2003

Mr. M.A. Daigle, Vice President
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860

Re: Title V Renewal Application
Reference Permit No's 1050059-045-AV
and 1050055-014-AV

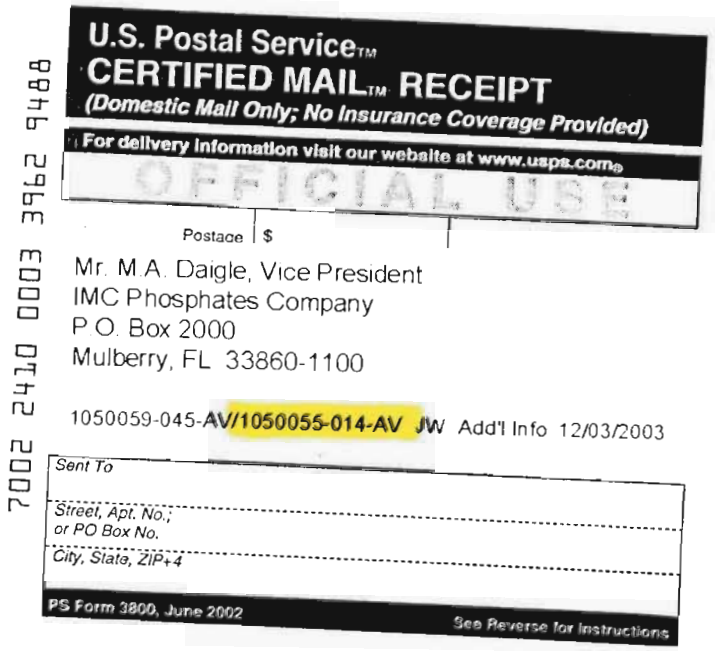
Dear Mr. Daigle:

Due to the fact we have not yet received our certified mail green cards showing proof of delivery, for the above mentioned permits, I am resending the attached letters by certified mail.

I apologize for any inconvenience this may have caused you.

Sincerely,

Patricia A. Prickett
Senior Clerk – FDEP – Air Program



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

CERTIFIED MAIL

November 21, 2003

Mr. M. A. Daigle, Vice President
IMC Phosphates Company
PO Box 2000
Mulberry, FL 33860

Re: Title V Renewal Application dated September 29, 2003
Reference Permit No. 1050055-014-AV
South Pierce Facility

Dear Mr. Daigle:

On September 29, 2003, the Department received your Title V air permit application to renew your existing permit. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Long Form Paper Application and EPSAP Applications. The September 29, 2003 submittal was submitted by using a few pages of the Paper Form DEP 62-210.900(1) and the remainder using the EPSAP Application. Application must be made on either the Paper Long Form OR the EPSAP Application.

2. PE Seal. It is the department's understanding that you and/or your consultant is using EPSAP (Electronic Permit Submittal And Processing system) to submit your application. In this case, the certification will be using a PIN (Personal Identification Number). Please contact the Division of Air Resource Management Help Desk at 850-921-9557 to obtain the necessary PIN. Please obtain the PIN number in advance as the Department cannot waive the processing clock to wait on a PIN. The September 29, 2003 submittal contained a paper copy PE Certification that appears to be a photocopy and the raised seal is illegible. If you choose to use the paper application form, please take necessary steps to insure the signature (i.e., blue ink) and seal are legible and original.

3. Facility Supplemental Information. The application lists "previously submitted" for several items. The application also states a compliance report and plan, a document containing the identification of applicable requirements, and a list of insignificant activities is attached; however, no attachments were included with the application. All information must be submitted at time of renewal application for Title V permit renewal. Please correct the application and all applicable information and/or attachments. (See Note 1)

4. Emission Unit Information. The application did not contain emission unit information (Section III) or Emission Units (including, but not limited to the MAP/DAP Plant(s)) were missing from the application. All information must be submitted at time of renewal application for Title V permit renewal. Please submit the applicable pages with all the applicable information for this facility. If the reason some emission units were missing because they have been removed from service, please note this in the application. (See Note 1)

5. Compliance Assurance Monitoring (CAM). In order to review the CAM plans, please submit the following information:

   A. Phosphoric Acid Plant – A and B Train (EU 008 & 009). CAM is applicable for fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubber are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator range is non-specific and is equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate that will assure compliance with the emission limit.

   B. No. 2 Ball Mill Grinding System (EU 022). CAM is applicable for PM. The choice of pressure drop across the baghouse is an acceptable indicator to monitor. Please identify a minimum pressure drop across the baghouse that can be used as an indicator in addition to the 15" maximum pressure drop listed. Please provide a table of test data that correlates the pressure drop to the tested PM emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop that will assure compliance with the emission limit.

   C. GTSP Production Plant (EU 023). CAM is applicable for PM and fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator ranges are non-specific and are equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits.

D. GTSP East Storage Building (EU 024 and 025). CAM is applicable for PM and fluoride. The choice of fan amperage as an indicator range may be acceptable if a specific range is specified that can be justified by test data. If not, scrubber pressure drop and scrubber water flow might be more appropriate. Please provide a table of test data that correlates the chosen indicator range(s) to the tested fluoride and PM emission levels. From this data, provide a justification of your choices and clearly indicate specific indicator ranges that will assure compliance with the emission limits.

6. Maximum Achievable Control Technology (MACT) applicability. The application did not contain a discussion of MACT applicability for 40 CFR 63 Subparts AA and BB (National Emission Standards for Hazardous Air Pollutants – Phosphoric Acid Manufacturing and Phosphate Fertilizers Production). Please submit a MACT applicability determination.

7. Facility Regulatory Classifications. The application is blank for several items in this section. Each Item must be answered yes or no.

[1]Per Rules 62-213.420(1)(b) and 62-213.430(3), F.A.C., applications for permits that are being renewed shall be submitted on the DEP Form 62-210.900(1) or using EPSAP and contain all the information identified in Rule 62-213.420(3), F.A.C. Please submit the necessary pages or revised EPSAP application to correct your Title V operation permit renewal application with all the required information as well as any supporting calculations, assumptions, and reference material with the completed application form (DEP Form 62-210.900(1) Effective 6/16/03). Include with this application all required attachments and supplemental information, such as, but not limited to, diagrams and compliance assurance monitoring (CAM) plans. Please note that up to date electronic versions of the application form can be down loaded from the Department's webpage:
http://www.dep.state.fl.us/air/forms/application.htm#airpermit

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the DEP Form 62-210.900(1), effective June 16, 2003 or use the EPSAP Application.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to response to Department requests for additional information of an engineering nature. Please complete and submit a new P.E. certification statement page from DEP Form 62-210.900(1), effective June 16, 2003 or use the EPSAP Application.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6, F.A.C. If you have any questions, please call Scott Sheplak at (850) 488-0114.

Sincerely,

Jason W. Waters
Air Permitting Engineer

CC: John B. Koogler, Ph.D., P.E.
Koogler and Associates

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

May 20, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. M. A. Daigle, Vice President
IMC Phosphates Company
PO Box 2000
Mulberry, FL 33860

Re: Title V Renewal Request for Additional information dated April 21, 2004
Reference Permit No. 1050055-014-AV
South Pierce Facility

Dear Mr. Daigle:

On April 22, 2004, the Department received additional information for your Title V air permit application to renew your existing permit. In order to continue processing the application, the Department will need the following additional information, in addition to information that was previously requested in our letter dated November 21, 2003:

1. Emission Unit Information. You indicated in your response that Emission Units (EUs) #002, 003, 012-014, 016, 017, 027-029, 034, 044-046 have been shut down and will no longer operate at the facility. However, EUs # 034, 045, and 046 were included in the September 26, 2003 application. Please verify that you no longer want to have these units included in the renewal permit, and provide shutdown dates on each unit. Please also provide the shutdown dates for units EUs # 003, 012, 013, 014, 027, 028, and 029.

2. Maximum Achievable Control Technology (MACT) applicability. Your facility maintains it is not a major source of hazardous air pollutants. Please provide the annual amount of hazardous air pollutants emissions from the site. In particular, please quantify the annual amount of HF emissions coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pond water. If applicable, please also provide information concerning the closure of these ponds.

3. Compliance Assurance Monitoring (CAM). In your April 21, 2004 response, you propose CAM as meeting the requirements for Facility Wide Condition 14. This is not acceptable. You will need to specify maximum and minimum pressure drop and flow rate for each of the units that are subject to CAM. Also, in order to satisfy the CAM submittal requirements and to approve the previously submitted CAM plans, please submit the following information that was previously requested in our letter dated November 21, 2003:

A. Phosphoric Acid Plant – A and B Train (EU 008 & 009). CAM is applicable for fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubber are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator range is non-specific and is equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate that will assure compliance with the emission limit.

B. No. 2 Ball Mill Grinding System (EU 022). CAM is applicable for PM. The choice of pressure drop across the baghouse is an acceptable indicator to monitor. Please identify a minimum pressure drop across the baghouse that can be used as an indicator in addition to the 15" maximum pressure drop listed. Please provide a table of test data that correlates the pressure drop to the tested PM emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop that will assure compliance with the emission limit.

C. GTSP Production Plant (EU 023). CAM is applicable for PM and fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator ranges are non-specific and are equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits.

D. GTSP East Storage Building (EU 024 and 025). CAM is applicable for PM and fluoride. The choice of fan amperage as an indicator range may be acceptable if a specific range is specified that can be justified by test data. If not, scrubber pressure drop and scrubber water flow might be more appropriate. Please provide a table of test data that correlates the chosen indicator range(s) to the tested fluoride and PM emission levels. From this data, provide a justification of your choices and clearly indicate specific indicator ranges that will assure compliance with the emission limits.

4. Facility Regulatory Classifications. The application is blank for several items in this section. Each item must be answered yes or no.

Please submit your response the Department immediately upon receipt of this letter. If you have any questions, please call me at (850) 921-9585 or email me at robert.bull@dep.state.fl.us .

Sincerely,

Bobby Bull
Engineer II
Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD
Pradeep Raval, Consultant, Kooger and Associates
John B. Koogler, PhD., P.E., Kooger and Associates

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 124-03-07

July 8, 2004

RECEIVED
JUL 12 2004
BUREAU OF AIR REGULATION

Mr. Bobby Bull
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information on Title V Permit Renewal
IMC Phosphates Company – South Pierce Plant
File No. 1050055-014-AV

Dear Mr. Bull:

This is a follow up to the Department's letter dated May 20, 2004, requesting additional information on the above referenced Title V renewal project. The responses are in the order of the issues raised by FDEP.

1. Emission Unit Information. **You indicated in your response that Emission Units (EUs) #002, 003, 012-014, 016, 017, 027-029, 034, 044-046 have been shut down and will no longer operate at the facility. However, EUs # 034, 045, and 046 were included in the September 26, 2003 application. Please verify that you no longer want to have these units included in the renewal permit, and provide shutdown dates on each unit. Please also provide the shutdown dates for units EUs # 003, 012, 013, 014, 027, 028, and 029.**

RESPONSE:

The units identified will no longer be operated at the facility. The units were shutdown as indicated below:

EUs. 002, 003, 012, 013, 014, 016, 017, 027, 028, 029 & 046: in 1995
EUs. 034, 044 & 045: in or before 1992

2. Maximum Achievable Control Technology (MACT) applicability. **Your facility maintains it is not a major source of hazardous air pollutants. Please provide the annual amount of hazardous air pollutants emissions from the site. In particular, please quantify the annual amount of HF emissions**

coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pond water. If applicable, please also provide information concerning the closure of these ponds.

RESPONSE:

The facility is a minor source of HAP emissions based on the estimates presented in Attachment 1.

3. **Compliance Assurance Monitoring (CAM). In your April 21, 2004 response, you propose CAM as meeting the requirements for Facility Wide Condition 14. This is not acceptable. You will need to specify maximum and minimum pressure drop and flow rate for each of the units that are subject to CAM. Also, in order to satisfy the CAM submittal requirements and to approve the previously submitted CAM plans, please submit the following information that was previously requested in our letter dated November 21, 2003:**

A. Phosphoric Acid Plant- A and B Train (EU 008 & 009). CAM is applicable for fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubber are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator range is non-specific and is equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate that will assure compliance with the emission limit.

RESPONSE:

The requested information for the Phosphoric Acid Plants is presented in Attachment 2. Results of testing conducted in 1996, to establish a scrubber flow rate minimum of 1200 gpm for each of the systems, are also included.

B. No. 2 Ball Mill Grinding System (EU 022). CAM is applicable for PM. The choice of pressure drop across the baghouse is an acceptable indicator to monitor. Please identify a minimum pressure drop across the baghouse that can be used as an indicator in addition to the 15" maximum pressure drop listed. Please provide a table of test data that correlates the pressure drop to the tested

PM emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop that will assure compliance with the emission limit.

RESPONSE:

The compliance testing routinely conducted for the bag collector consisted of Visible Emission Evaluations. A particulate matter emission test was conducted prior to the Title V permit renewal process. Based on past VE observations, it is likely that the mass emissions are low in this application. It can be assumed that if the bag collector is in compliance with the visible emissions limit, it will be in compliance with the mass emission limit. Available compliance testing information is presented in Attachment 3.

C. GTSP Production Plant (EU 023). CAM is applicable for PM and fluoride. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. The stated indicator ranges are non-specific and are equivalent to the permit conditions. Using these as CAM indicator ranges will result in a permit violation every time that a CAM excursion is recorded. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits.

RESPONSE:

A summary of the test data for the GTSP Plant is presented in Attachment 4. The scrubbing system consists of two parallel venturi scrubbers followed by a packed scrubber, in series. The summary of test data includes each of these scrubber systems.

D. GTSP East Storage Building (EU 024 and 025). CAM is applicable for PM and fluoride. The choice of fan amperage as an indicator range may be acceptable if a specific range is specified that can be justified by test data. If not, scrubber pressure drop and scrubber water flow might be more appropriate. Please provide a table of test data that correlates the chosen indicator range(s) to the tested fluoride and PM emission levels. From this data, provide a justification of your choices and clearly indicate specific indicator ranges that will assure compliance with the emission limits.

RESPONSE:

A summary of the test data for the GTSP Storage Building is presented in Attachment 5. The emissions are controlled by two parallel scrubber systems consisting of two wet cyclonic scrubbers each. Thus, there are four scrubbers with two stacks. Although each of the stacks (and associated scrubber systems) are identified as the emission units by the permit, the emission limit is applied to the building which requires that compliance be determined based on the total of the emissions from both systems.

4. **Facility Regulatory Classifications. The application is blank for several items in this section. Each item must be answered yes or no.**

RESPONSE:

All the applicable items in the Facility Regulatory Classification field in the EPSAP application were completed as required. We are unaware of any additional items that would need to be completed.

The RO and PE certifications are presented in Attachment 6.

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:par
Encl.

C: C. D. Turley, IMC

ATTACHMENT 1

HAP EMISSIONS ESTIMATES

POINT SOURCES:

The HF emissions from the A and B phosphoric acid plants can be estimated based on testing conducted on similar units. It is estimated that 3.4 percent of the fluoride emissions are HF. Based on the maximum potential fluoride emissions for each plant of 4.9 tons per year (tpy), the maximum potential HF emissions from each plant would be 0.17 tpy.

Similarly, the HF emissions from the GTSP production and storage units are estimated to be 7.8 percent of the fluoride emissions. Based on the maximum potential fluoride emissions from the GTSP production and storage units of 25.0 tpy and 34.2 tpy, respectively, the maximum potential HF emissions from each unit would be 1.95 and 2.66 tpy, respectively.

Thus, the total HF emissions from the point sources are estimated to be 4.95 tpy.

PLANT FUGITIVE EMISSIONS:

The fugitive HF emissions from the South Pierce plant have been estimated based on emission estimates information for a similar plant. The total HF emissions from the plant fugitives are estimated to be 0.48 tpy.

POND EMISSIONS:

Based on past studies conducted by EPA and others, an HF emission factor of 0.1 lb/acre-day has been applied to gypsum pond and cooling ponds at operating phosphate fertilizer facilities. This factor has been used for pond systems with fluoride concentrations around 10,000 ppm fluoride and a pH around 1 standard units. The total IMC South Pierce facility pond area is 238 acres with a fluoride concentration around 11,400 ppm and pH of around 1.2 standard units. Based on the pond area, the estimated HF emissions using the above emission factor are 4.34 tpy.

The combined total HF emissions from the above areas of the facility are estimated to be 9.77 tpy. This quantity is below the major source individual HAP threshold.

OTHER HAPS:

The emissions of other HAPS, estimated based on miscellaneous material usage at the facility and based on the MSDS information, is about 1.92 tpy.

The total of all HAP emissions at the facility are estimated to be 11.69 tpy. This quantity is below the major source threshold for all HAPS.

ATTACHMENT 2

SUMMARY OF TEST DATA FOR PHOSPHORIC ACID PLANTS

South Pierce Phosphoric Acid Plant
A Train (008) Scrubber
Compliance Test Results

Run	Test Date	P2O5 Input TPH	F lb/hr	F limit lb/hr	Scrubber Total GPM	Scrubber dP
Testing to establish minimum flow rate of 1200 gpm						
3 run average	08/01/96	44.6	0.11	0.89	2442	5.8
3 run average	08/05/96	46.2	0.10	0.92	1014	5.8
2 runs	08/07/96	43.1	0.18	0.86	1251	5.1
1 run	08/08/96	44.6	0.09	0.89	1250	5.1
1	07/20/00	44.8	0.11		1386	5.5
2	07/20/00	44.8	0.12		1385	5.5
3	07/20/00	44.8	0.14		1385	5.5
Test Average	07/20/00	44.8	0.12	0.90	1385	5.5
1	08/09/00	42.5	0.12		1370	4.2
2	08/09/00	42.5	0.16		1383	4.2
3	08/09/00	42.5	0.21		1379	4.3
Test Average	08/09/00	42.5	0.16	0.85	1377	4.2
1	04/18/01	44.0	0.09		1332	2.6
2	04/18/01	44.0	0.12		1298	2.9
3	04/18/01	44.0	0.13		1291	3.3
Test Average	04/18/01	44.0	0.11	0.88	1307	2.9
1	07/26/02	37.8	0.24		2578	2.5
2	07/26/02	37.8	0.20		2570	2.5
3	07/26/02	37.8	0.33		2578	2.5
Test Average	07/26/02	37.8	0.26	0.76	2575	2.5
1	09/04/02	46.6	0.19		1700	7.0
2	09/04/02	46.6	0.13		1725	7.1
3	09/04/02	46.6	0.07		1730	7.2
Test Average	09/04/02	46.6	0.13	0.93	1718	7.1
1	10/11/02	43.2	0.13		1700	4.5
2	10/11/02	43.2	0.14		1700	4.5
3	10/11/02	49.4	0.21		1700	4.5
Test Average	10/11/02	45.3	0.16	0.91	1700	4.5
1	01/15/03	45.4	0.17		1550	4.0
2	01/15/03	45.4	0.17		1550	4.0
3	01/15/03	45.4	0.20		1550	4.0
Test Average	01/15/03	45.4	0.18	0.91	1550	4.0
1	12/03/03	40.9	0.16		2175	1.0
2	12/03/03	40.9	0.12		2200	1.1
3	12/03/03	40.9	0.14		2200	1.1
Test Average	12/03/03	40.9	0.14	0.82	2192	1.1
				min	1014	1.0
				max	2578	7.2

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.

56.45

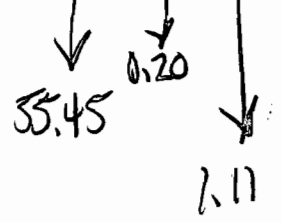
0.2

1.11

South Pierce Phosphoric Acid Plant
B Train (009) Scrubber
Compliance Test Results

Run	Test Date	P2O5 Input TPH	F lb/hr	F limit lb/hr	Scrubber Total GPM	Scrubber dP
Testing to establish minimum flow rate of 1200 gpm						
3 run average	08/09/96	44.5	0.12	0.89	2410	8.7
3 run average	08/13/96	42.6	0.22	0.85	1230	7.4
3 run average	08/16/96	45.7	0.22	0.91	1620	7.9
1	05/18/99	40.8	0.34		1674	3.4
2	05/18/99	42.1	0.36		1374	3.4
3	05/18/99	42.1	0.16		1374	3.4
Test Average	05/18/99	41.7	0.29	0.83	1474	3.4
1	07/09/99	41.1	0.05		2240	2.8
2	07/09/99	41.1	0.05		2345	2.8
3	07/09/99	41.1	0.05		2280	2.8
Test Average	07/09/99	41.1	0.05	0.82	2288	2.8
1	03/16/00	49.9	0.13		1933	5.0
2	03/16/00	49.9	0.25		1496	4.9
3	03/16/00	49.9	0.23		1510	4.9
Test Average	03/16/00	49.9	0.20	1.00	1646	4.9
1	08/10/01	48.5	0.27		1462	3.5
2	08/10/01	48.5	0.31		1411	3.9
3	08/10/01	48.5	0.21		1383	3.8
Test Average	08/10/01	48.5	0.26	0.97	1419	3.8
1	07/25/02	43.2	0.16		2184	3.7
2	07/25/02	43.2	0.30		2180	3.5
3	07/25/02	43.2	0.15		2204	3.8
Test Average	07/25/02	43.2	0.20	0.86	2189	3.7
1	01/10/03	43.8	0.06		2100	3.6
2	01/10/03	43.8	0.08		2100	3.6
3	01/10/03	43.8	0.08		2100	3.7
Test Average	01/10/03	43.8	0.08	0.88	2100	3.6
1	04/29/03	42.5	0.19		1683	2.2
2	04/29/03	42.5	0.17		1685	2.2
3	04/29/03	42.5	0.27		1652	2.1
Test Average	04/29/03	42.5	0.20	0.85	1673	2.2
				min	1230	2.1
				max	2410	8.7

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.



ATTACHMENT 3

SUMMARY OF TEST DATA FOR NO. 2 BALL MILL GRINDING SYSTEM

South Pierce No. 2 Ball Mill Grinding System (022)
Compliance Test Results

Run	Test Date	TPH	PM lb/hr	PM limit lb/hr	VE	VE limit	Bag Collector *dP*
	02/18/99	50			0	20	7.0
	01/25/00	50			0	20	3.0
	03/20/01	50			0	20	1.0
	04/15/02	50			0	20	0.8
1	11/19/03		0.11				
2	11/19/03		0.22				
3	11/19/03		0.28				
Test Average	11/19/03	50	0.20	31.8	5.6	20	3.1
						min	0.8
						max	7.0

10.0 (3)

NOTE: These are the available data, from tests conducted to establish *minimum allowable values for the subject parameters, with reference to* the existing Title V permit provisions.

ATTACHMENT 4

SUMMARY OF TEST DATA FOR GTSP PRODUCTION PLANT

South Pierce GTSP Production Plant (023)
Compliance Test Results

Run	Test Date	Rate TPH	PM lb/hr	PM limit lb/hr	F lb/hr	F limit lb/hr	RGCV Venturi Total GPM	RGCV Venturi dP	Dryer Venturi Total GPM	Dryer Venturi dP	Tailgas Scrubber Total GPM	Tailgas Scrubber dP
1	02/01/00	103.8	12.8		3.5		926	8.1	910	11.2	4658	6.6
2	02/01/00	103.8	20.1		3.0		926	8.1	910	11.2	4658	6.6
3	02/01/00	105.4	22.8		3.0		926	8.1	910	11.2	4658	6.6
Test	02/01/00	104	18.6	35	3.2	5.7	926	8.1	910	11.2	4658	6.6
1	04/25/00	125.5	32.5		1.6		992	8.5	860	10.7	5018	6.3
2	04/25/00	125.6	23.2		1.7		982	8.5	856	10.9	4892	6.4
3	04/25/00	124.5	23.5		1.7		974	8.7	857	10.8	4910	6.5
Test	04/25/00	125	26.4	35	1.7	5.7	983	8.6	858	10.8	4940	6.4
1	05/22/00	118	16.8		1.2		871	8.3	825	10.7	4650	6.3
2	05/22/00	118	12.9		1.5		817	8.1	824	10.7	4550	6.4
3	05/22/00	120	14.7		1.3		806	8.0	821	10.6	4518	6.4
Test	05/22/00	119	14.8	35	1.3	5.7	831	8.1	823	10.6	4572	6.4
1	07/24/01	117	28.7		1.0		814	9.5	914	11.2	5020	8.2
2	07/24/01	119	32.6		1.6		832	9.6	925	11.2	5035	8.1
3	07/24/01	120	33.2		1.3		812	9.6	930	11.2	4745	7.9
Test	07/24/01	119	31.5	35	1.3	5.7	819	9.6	923	11.2	4933	8.1
1	11/08/01	120	19.3		2.6		729	9.5	827	9.9	4550	6.2
2	11/08/01	120	29.6		2.7		739	9.9	828	10.0	4594	6.5
3	11/08/01	120	28.4		3.2		734	10.0	839	10.0	4594	6.3
Test	11/08/01	120	25.8	35	2.8	5.7	734	9.8	831	10.0	4579	6.3
1	05/02/03	106.7	16.9		2.0		710	7.2	715	9.4	4195	6.1
2	05/02/03	107.7	21.8		1.9		712	7.8	713	9.0	4248	6.2
3	05/02/03	107.7	22.1		1.8		703	7.7	711	8.9	4234	6.3
Test	05/02/03	107	20.3	35	1.9	5.7	708	7.6	713	9.1	4226	6.2
1	02/06/04	126.8	12.6		1.5		705	7.5	721	9.8	5061	8.4
2	02/06/04	126.7	11.5		1.5		702	7.5	717	9.8	5064	7.8
3	02/06/04	126.9	10.7		1.5		735	7.4	725	9.7	5044	8.3
Test	02/06/04	127	11.6	35	1.5	5.7	714	7.5	721	9.8	5056	8.2
1	04/27/04	111.7	18.2		3.7		642	5.4	661	7.5	4663	10.2
2	04/27/04	112.4	16.5		4.2		642	5.4	674	7.4	4675	10.2
3	04/27/04	112.4	15.4		4.1		642	5.4	674	7.4	4675	10.2
Test	04/27/04	112	16.7	35	4.0	5.7	642	5.4	670	7.4	4671	10.2
						min	642	5.4	661	7.4	4195	6.1
						max	992	10.0	930	11.2	5064	10.2
							RGCV		Dryer		Tailgas	

140 (126)

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.

ATTACHMENT 5

SUMMARY OF TEST DATA FOR GTSP EAST STORAGE BUILDING

South Pierce GTSP East Storage Building
North (024) and South (025) Scrubbers
Compliance Test Results

Eu ID	Run	Test Date	Rate TPH	TPD Loaded	PM lb/hr	PM limit lb/hr	F lb/hr	F limit lb/hr	No 1 Fan Amps	No 2 Fan Amps
024	1	09/29/99	70	2880	6.5		2.6		13	22
024	2	09/29/99	102	2880	7.5		2.8		13	22
024	3	09/29/99	105	2880	5.7		3.8		13	22
	Test Average	09/29/99	92	2880	6.6		3.1		13	22
025	1	09/29/99	70	2880	4.0		3.1		20	19
025	2	09/29/99	102	2880	4.6		3.6		20	19
025	3	09/29/99	105	2880	3.0		5.3		20	19
	Test Average	09/29/99	92	2880	3.9		4.0		20	19
	Compliance Result:		92	2880	10.4	40.1	7.1	7.8		
024	1	03/07/00	100	3744	3.6		4.4		17	20
024	2	03/07/00	100	3744	5.4		3.7		17	20
024	3	03/07/00	102	3744	5.4		3.1		17	20
	Test Average	03/07/00	101	3744	4.8		3.7		17	20
025	1	03/10/00	106	3744	5.7		2.0		19	20
025	2	03/10/00	106	5136	4.6		2.0		19	20
025	3	03/10/00	109	5088	5.6		2.2		19	20
	Test Average	03/10/00	107	4656	5.3		2.0		19	20
	Compliance Result:		104	4200	10.2	40.1	5.8	7.8		
024	1	05/01/00	118	5400	4.6		1.2		19	20
024	2	05/01/00	118	5400	6.5		0.9		19	20
024	3	05/01/00	118	4200	3.5		1.5		19	20
	Test Average	05/01/00	118	4992	4.8		1.2		19	20
025	1	05/02/00	118	5400	5.1		5.9		17	19
025	2	05/02/00	118	4200	2.9		5.5		17	19
025	3	05/02/00	118	3600	2.1		4.8		17	19
	Test Average	05/02/00	118	4400	3.4		5.4		17	19
	Compliance Result:		118	4696	8.2	40.1	6.6	7.8		
024	1	09/18/01	105	4152	2.7		1.0		20	22
024	2	09/18/01	105	4704	1.5		0.7		20	22
024	3	09/18/01	105	4944	1.6		0.4		20	22
	Test Average	09/18/01	105	4608	2.0		0.7		20	22
025	1	09/20/01	109	5280	9.1		3.0		22	20
025	2	09/20/01	112	4128	3.0		3.4		22	20
025	3	09/20/01	112	5280	6.2		3.2		22	20
	Test Average	09/20/01	111	4896	6.1		3.2		22	20
	Compliance Result:		108	4752	8.1	40.1	3.9	7.8		
024	1	12/04/01	123	4248	3.2		3.1		23	21
024	2	12/04/01	123	6048	5.9		3.4		23	21
024	3	12/04/01	123	6048	7.3		3.5		23	21
	Test Average	12/04/01	123	5448	5.5		3.3		23	21
025	1	12/04/01	123	4248	6.7		0.7		23	21
025	2	12/04/01	123	6048	3.9		1.0		23	21
025	3	12/04/01	123	5448	2.8		0.7		23	21
	Test Average	12/04/01	123	5248	4.4		0.8		23	21
	Compliance Result:		123	5348	9.9	40.1	4.1	7.8		

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South Pierce GTSP East Storage Building
North (024) and South (025) Scrubbers
Compliance Test Results

Eu ID	Run	Test Date	Rate TPH	TPD Loaded	PM lb/hr	PM limit lb/hr	F lb/hr	F limit lb/hr	No 1 Fan Amps	No 2 Fan Amps
024	1	09/18/03	60	6600	1.2		0.9		24	25
024	2	09/18/03	60	3600	1.8		1.1		24	25
024	3	09/18/03	60	6600	0.4		1.8		24	25
	Test Average	09/18/03	60	5592	1.1		1.2		24	25
025	1	09/18/03	60	6600	4.1		1.8		24	25
025	2	09/18/03	60	3600	2.7		1.9		24	25
025	3	09/18/03	60	6600	2.8		3.1		24	25
	Test Average	09/18/03	60	5592	3.2		2.3		24	25
	Compliance Result:		60	5592	4.3	40.1	3.5	7.8		
024	1	11/05/03	112	5160	10.0		2.5		24	23
024	2	11/05/03	108	7368	5.5		2.4		23	24
024	3	11/05/03	112	4608	4.2		2.7		24	24
	Test Average	11/05/03	110	5400	6.6		2.5		24	24
025	1	11/10/03	110	5928	3.8		0.8		24	24
025	2	11/10/03	110	3504	3.3		0.7		24	24
025	3	11/10/03	110	6744	4.1		0.8		24	24
	Test Average	11/10/03	110	5400	3.7		0.8		24	24
	Compliance Result:		110	5400	10.3	40.1	3.3	7.8		
			↓	↓				min	13	19
			140	7500				max	24	25

NOTE: These are the available data, from tests conducted to establish minimum allowable values for the subject parameters, with reference to the existing Title V permit provisions.

6. Please delete the following units as they have been eliminated:

002 – West Loadout 1975
003 – Purified MAP/DAP Plant 1985
012 – Purified MAP/DAP Plant, Silo No. 3 11/23/95
013 – Purified MAP/DAP Plant, Bagging Machine 11/23/95
014 – Purified MAP/DAP Plant, Bulk Truck Loading 11/23/95
016 – Silicofluoride Plant Dryer 7/30/95
017 – Silicofluoride Plant Packaging 7/30/95
027 – Purified MAP/DAP Plant, Silo No. 2 11/23/95
028 – Purified MAP/DAP Plant, Silo No. 1 11/23/95
029 – Purified MAP/DAP Plant, Bulk Railcar Loading 11/23/95
034 – Vent 5, Molten Sulfur Tank 1 A
044 – Molten Sulfur Rail Pit, North Vent A
045 – Molten Sulfur Rail Pit, South Vent A
046 – MAP/DAP Filter Cake Dryer 1/27/95

008-009- AA pm/F
022- N/A
023 - BB pm
024 - BB pm
025 - BB pm

IMC

IMC Phosphates Company
P.O. Box 2000
Mulberry, Florida 33860-1100
863.428.2500

Certified Mail 7001 2510 0003 1849 6841
Return Receipt Requested

November 5, 2003

Mr. Joel A. Smolen
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-1352

RE: Request for Additional Information
SO_2 Release – May 3, 2003
Sulfuric Acid Unit No. 10
South Pierce Plant

Dear Mr. Smolen:

Correspondence regarding the above-referenced matter was received by IMC Phosphates Company on October 15, 2003.

The six original corrective actions developed by IMC and described in my letter dated September 25, 2003 will be completed by November 15, 2003. An additional recommendation proposed by the Department during a meeting on September 23, 2003 will be also completed by November 15, 2003. IMC believes these additional safeguards will minimize the possibility of recurrence of the subject incident.

Two points raised in your letter require clarification. First, the incident on May 3, 2003 resulted in excess SO_2 emissions only. There was no indication that the incident resulted in excess SO_3 emissions. Witnesses reported seeing no visible plume during the incident and the plant SO_3 absorption system continued to operate. Second, IMC does not necessarily agree with Department's conclusion that the incident was solely the result of the presence of pooled sulfur on the furnace floor.

With regard to the Department's request to provide additional recommendations that specifically address the accumulation and detection of pooled sulfur in the furnace, IMC has pursued preventative measures and worked diligently to identify remedies to alleviate the potential of pooled sulfur accumulating in the furnace. Our technical research and benchmarking survey have not identified any additional tools to detect the pooling of sulfur other than those procedures already in place. Following our meeting on September 23 in a subsequent telephone conversation with Gerry Kissel and yourself, we had agreed that completion of the aforementioned corrective

actions would be sufficient to resolve this matter. Consequently, we were somewhat surprised by your October 15, 2003 letter to see that additional recommendations were being sought.

While our previous written communication did not describe a procedure that has been in place for planned shutdown/start-ups, we have also instituted this procedure for unplanned shutdown/start-ups, such as that which occurred on May 3. The procedure consists of having an operator stationed at the sight glass during a "slow roll" of the turbine just prior to start-up to watch for any flame. In the event there is sulfur present in the furnace in an oxygen-deficient atmosphere, the introduction of small amounts of oxygen would allow the sulfur to ignite and provide a visible flame, thus indicating the presence of sulfur. This "slow roll" would continue until all of the sulfur was consumed prior to bringing the plant online. This procedure would be expected to minimize the release of SO_2.

If the Department has specific recommendations regarding the accumulation and detection of pooled sulfur in the furnace, IMC would be receptive to their consideration.

Please contact me if additional information is needed.

Sincerely,

P. A. Steadham, Manager
Environmental Services
Concentrates – Florida

PAS:jp\sp_smolen_110303

cc: M. A. Daigle
J. A. Golwitzer
P. C. Burris
W. C. Tims, Jr.
S. J. Fernandez, P.A.

BEST AVAILABLE COPY

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

October 8, 2003

Mr. Phil Steadham
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860-1100

Re: ID 1050055, South Pierce Plant, Corrective Actions for Sulfuric Acid Unit 10-SO2/SO3 excess emissions from pooled sulfur in the furnace on May 3, 2003.

Dear Mr. Steadham:

The Department is in receipt of your letter dated September 25, 2003 addressing corrective actions proposed by IMC to minimize the possibility of any reoccurrence of the above referenced incident. After review of the proposed corrective actions, the Department believes that the proposed actions listed in your letter as Recommendations No.'s 1-7, are not sufficient to insure a reoccurrence. However, the Department does believe that Recommendation No's 1-7 will be beneficial to help solve or alleviate the problem and should be implemented as soon as possible.

The apparent cause of the excess emissions is pooled sulfur in the furnace and the inability of operators to always detect the pooled sulfur prior to start or re-start of the furnace. The Department would like IMC to provide additional recommendations that specifically address ways to prevent pooled sulfur from accumulating in the furnace, additional methods that will insure that pooled sulfur can always be detected, and specific methods to prevent excess SO2/SO3 emissions from occurring if pooled sulfur still manages to form in the furnace.

Please respond in writing to this request for additional information no later than thirty days from receipt of this letter.

Sincerely,

Joel Smolen

Mr. Joel Smolen
Air Compliance Supervisor

"More Protection, Less Pro

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To

Mr. Phil Stedham
IMC Phosphates Company
P.O. Box 2000
Mulberry, FL 33860-1100

Sent To
Street, Apt. No.; or PO Box No.
City, State, ZIP+4

PS Form 3800, June 2002 See Reverse for Instructions

IMC

IMC Phosphates Company
P.O. Box 2000
Mulberry, Florida 33860-1100
863.428.2500

Certified Mail 7002 0460 0002 8878 6882
Return Receipt Requested

September 25, 2003

Ms. Sheila E. Schneider
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

RE: Status of Corrective Actions
Sulfuric Acid Unit No. 10
May 3, 2003 Incident
South Pierce Plant

Dear Ms. Schneider:

The enclosed information is provided in response to your request at a meeting between representatives of the Department and IMC Phosphates Company on September 23, 2003 relative to the above-referenced incident. IMC would like to thank you as well as Messrs. Kissel, Schroeder, and Smolen for the opportunity to discuss this matter and hopefully alleviate any concerns by Department staff.

As a result of an investigation into this incident, six corrective actions were identified to minimize the possibility of recurrence. A seventh recommendation is being considered as a result of a suggestion by Joe Smolen at our meeting on September 23. These recommendations and current status are provided below:

Recommendation No. 1

Evaluate the existing Low Blower Discharge Pressure Interlock and Bypass System for possible improvements or modifications. Consider an absolute Low Blower Discharge Pressure Interlock that cannot be bypassed. Develop recommendations for management review/decision.

Status: In progress. An absolute Low Blower Discharge Pressure Interlock that cannot be bypassed will be installed at approximately 30-40 inches of pressure that will trip the sulfur pumps. Estimated completion date: November 15, 2003.

Recommendation No. 2

Install parameter on the distributive control system (DCS) to read and record sulfur pump amps to alert operators in the event of a sulfur pump trip.

Status: Complete

Recommendation No. 3

Install an event indication on the DCS that the Low Blower Discharge Pressure Bypass Switch has been engaged.

Status: Complete.

Recommendation No. 4

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

Status: Complete.

Recommendation No. 5

Review emergency evacuation procedures with all employees to include alarms, sheltering in place, and location of emergency escape respirators. The monthly Cascade safety meeting was utilized to complete this recommendation.

Status: Complete.

Recommendation No. 6

Initiate a Process Safety Management Procedure entitled "Restart Sulfuric Plant after a Sulfur Pump Trip" to include the criteria that the plant will restart on one gun.

Status: In progress. Until the procedure is finalized, operators are informed via daily instructions that in the event of a sulfur pump trip, back the blower down to 1800 rpm, engage one sulfur gun, check the furnace for pooled sulfur, sound the SO2 Warning Siren, and restart the plant. Estimated completion date: November 15, 2003.

Recommendation No. 7

Installation of a sulfur pump interlock to the blower overspeed trip is being considered. Although overspeed trips of the turbine are rare, some additional protection may be realized with this interlock.

Status: Under consideration. If a decision is made to proceed with this recommendation, the estimated completion date would be November 15, 2003.

Should you have any questions regarding the status of these recommendations, please contact me at 863.428.7106.

Sincerely,

P.A. Steadham, Manager
Environmental Services
Concentrates - Florida

PAS:jp\sp_schneider_092503
enc.

cc: G. J. Kissel
W. E. Schroeder
J. A. Smolen
W. C. Tims, Jr.
M. A. Daigle
J. A. Golwitzer
P. C. Burris

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

KA 124-05-03
October 17, 2005

Mr. Jason Waters, PE
Air Permitting Supervisor
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

RE: Construction Permit Application to Replace the Scrubbing System at the GTSP Storage Building;
Mosaic Fertilizer LLC, South Pierce Facility

Dear Mr. Waters,

Enclosed please find four (4) copies of an air construction permit application to replace the scrubbing system at the GTSP Storage Building at Mosaic Fertilizer LLC's (Mosaic's) South Pierce facility. This application satisfies the requirements of the DRAFT compliance plan condition 6.a.

If you have any questions regarding this information, please feel free to contact Fawn Bergen, P.E., Koogler & Associates, Inc. at (352) 377-5822 or FBergen@kooglerassociates.com, or C. David Turley, Mosaic New Wales at (863) 428-7153 or david.turley@mosaicco.com.

Very truly yours,

KOOGLER & ASSOCIATES, INC.

Fawn W. Bergen, PE

cc: B. Bull, DEP
D. Turley, Mosaic-New Wales

Diana M. Jagiella
Senior Environmental and
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April 7, 2006

VIA OVERNIGHT DELIVERY
VIA FACSIMILE 850.245.2303

Office of General Counsel
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Mail Station #35
Tallahassee, Florida 32399-3000

Attn: Lea Crandall, Agency Clerk

RE: Mosaic Fertilizer, LLC: Draft Permit No. 1050055-014-AV
South Pierce Plant, 7450 Highway 630, Mulberry, FL

Request for an Extension of the Time in Which to File Petition for Hearing, Mediation or Alternate Remedies, or in the alternative, Petition for an Administrative Hearing

Office of General Counsel:

Mosaic Fertilizer, LLC ("Mosaic") requests from the Florida Department of Environmental Protection ("FDEP") a 45 day extension of the time in which to file a petition for an administrative hearing, mediation or alternate remedies with respect to the above referenced draft permit ("Draft Permit").

Mosaic received the original Draft Permit for the South Pierce Facility and the "Public Notice of Intent to Issue" from the FDEP on or around February 13, 2006. Mosaic subsequently requested an Extension of Time to file a Petition for Hearing on the Draft Permit, which was granted. On February 27, 2006 an Order was entered extending the time to file a Petition for Hearing to April 10, 2006. On March 22, 2006 Mosaic submitted written comments and requested permit revisions to FDEP. (See Exhibit 1 attached hereto and incorporated herein) Mosaic has not had adequate opportunity to discuss and resolve these comments with the FDEP. Mosaic seeks this extension so that it may have additional time to discuss the provisions of the Draft Permit and to resolve with FDEP the issues in the draft Permit.

While Mosaic is confident any issues can be resolved without the need for a formal proceeding, in order to fully protect and reserve its right to a hearing, mediation or other remedy, Mosaic requests this extension. Dean Ahrens, the Environmental Superintendent of the New Wales and South Pierce facilities has discussed this extension with Robert Bull of the FDEP.

This request for extension was requested by Robert Bull of the FDEP. Therefore, Mosaic hereby requests an extension until May 15, 2006, or such other extension period FDEP deems adequate, to provide Mosaic adequate time to provide Mosaic and FDEP a reasonable opportunity to resolve the issues with respect to the Draft Permit.

In the event FDEP declines to grant Mosaic's extension request, Mosaic hereby petitions for an administrative hearing and provides FDEP the following pertinent information:

(a) *The name, address, and telephone number of petitioner; the FDEP's identification number for the Agency action and the county in which the subject matter or activity is located:*

Mosaic Fertilizer, LLC
South Pierce Plant
7450 Highway 630
Mulberry, FL 33860

Draft Title V Air Operation Permit No. 1050055-014-AV
Renewal of Title V Air Operation Permit
Polk County, FL

763-577-2841 – office
309-453-1118 – cell

(b) *A statement of how and when each petitioner received notice of the Agency action*

Mosaic received notice via U.S. Mail on or around February 13, 2006.

(c) *A statement of how each petitioner's substantial interests are affected by the Agency action.*

Mosaic's facility is the subject of the Draft Permit.

(d) *A statement of the material facts disputed by petitioner, if any.*

The Draft Permit contains conditions that are inconsistent with the intended operations and the application as described in Exhibit 1. Therefore, Mosaic desires the extension to resolve any issues and to resolve the material facts in dispute and wishes to work with FDEP on the Draft Permit's conditions accordingly.

(e) A statement of facts which petitioner contends warrant reversal or modification of the Agency action.

As explained in Exhibit 1, the Draft Permit conditions warrant reversal or modification at this time. The Draft Permit contains conditions that are inconsistent with the intended operations and the application. Therefore, Mosaic desires the extension to resolve the issues and wishes to work with FDEP on the Draft Permit's conditions accordingly.

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Agency action.

As explained in Exhibit 1, applicable rules and statutes require reversal or modification of the Draft Permit at this time. The Draft Permit contains conditions that are inconsistent with the intended operations and the application. Therefore, Mosaic desires the extension to resolve the issues and wishes to work with FDEP on the Draft Permit's conditions accordingly.

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Agency action.

As explained in Exhibit 1, Departmental action is required at this time. The Draft Permit contains conditions inconsistent with the intended operations and the application. Therefore, Mosaic desires the extension to resolve these issues and wishes to work with FDEP on the Draft Permit's conditions accordingly.

Mosaic thanks you for your consideration and continued cooperation. Please contact me with any questions or concerns.

Sincerely,

Diana M. Jagiella

DMJ/aml

cc: Mr. Michael Cooke
Mr. Jeffery Koerner
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ms. Trina Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-3000

Mr. Robert Bull
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, Mail Code 5505
Tallahassee, Florida 32399-3000

David Jellerson/Fert/Pierce, FL
Jeffrey Golwitzer/Fert/South Pierce, FL
Dean Ahrens/Fert/New Wales, FL
Dave Turley/Fert/New Wales, FL
Pradeep Raval, Koogler and Associates
Patricia Comer, Assistant General Counsel, Florida DEP

No.	Page, Section, Condition	Description of Permit Condition	Comment/Requested Revision
1	ii, toc	Table of contents	Does not list all attachments. All attachments should be listed as reflected on Exhibit 1 attached hereto.
2	1, c1	Cover Letter	Does not list all attachments. All attachments that are part of the permit should be listed. All documents on Exhibit 1 should be listed except those noted "for reference only".
3	5, II, 9	Permitted capacity is defined as 90-100% of operating rate...Once a unit is limited, operation at higher capacity is allowed for no more than 15 days until retest regains permitted capacity.	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.
4	5, II, 13	When appropriate, time specific requirements are based on the permit effective date which is day one. The Permitting note states: quarterly means calendar quarters and monthly means the beginning of each month.	Clarify reporting timeframe. The reference to the permit effective date creates ambiguity. The reporting requirement should be clearly based on calendar reporting for both monthly and quarterly reporting.
5	—	Insignificant Emissions Units and/or Activities	Restore condition 4 from prior permit stating list of Insignificant Emission Units and/or Activities is part of the Permit.
6		The prior permit, (pg. 7, Section II, 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.
7		The prior permit, (pg. 7, Section II, Condition 14) provided, the drop shall not fall below, in the case of delta P < 5 inches of water, a change of 0.5 below the drop reported in the last satisfactory test.	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.
8	13,III,B.2	PTE Sulfuric Acid production	This condition should be stricken; it duplicates H.1.
9	16,III, B.22	Emission Standard testing	Reference B.3 and B.4
10	17, III, C	Phosphoric Acid Plant A and B Trains	The permitting note states that the NESHAP takes precedence over NSPS except for BACT determinations which 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.
11	17, III, C.2	F 0.02 lb/ton P2O5; 1.11 lb/hr	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.
12	18, III, C.5 28, III, E.10 39, III, F.11	Required prior test notification per 40 CFR §63.9	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.
13	18, III, 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. The Sub Part A section reference is unclear. The permit should read "The performance test shall be conducted according to the procedures in C.7."
14	18, III, C.7 29,III,E.13 37,III,F.10	Test for fluorides	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 changre 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:"
15	18, III, C.7(1) 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.
16	19,III,C.7,C.8, C.10,C.12,C.14,C.16	References to Scrubber Flow, Pressure Drop and Amps	References to Scrubber pressure drops, flow and amps should include the options under the ASPs.

	28,III,E.4,E.13,E.17,E.18 36,III,F.7,F.10,F.15,F.19,F.29		
17	19, III, C.7(4) 30,III,E.13(4) 38, III, F.10(4)	Monitor scrubber flow and pressure drop during test	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.
18	19, III, C.8	Rock dryer testing requirements	Strike – no dryer exists
19	20, III, C.9	Calciner testing requirements	Strike – no calciner exists
20	20, III, C.10e	Test report information: scrubber gpm	Strike, see C.7(4)
21	20, III, C.10f	Test report information: scrubber delta P	Strike, see C.7(4)
22	20, III, C.12(2)	Continuous monitor liquid flow in 15 min block average	Change reference to C.13 not 11
23	21, III, C.13 33, III, E.23	12 hr period: gpm	Strike this condition. In Section C it has been superceded by C.12 and in E by E.17 and no longer applies.
24	21, III, C.14 31, III, E.18 40,III,F.19	Establish operating ranges	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.
25	21, III, C.14(1) 31, III, E.18(1)	Scrubber ranges +/- 20% last test	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

	40,III,F.19(1)		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.
26	21, III, C.14(2) 31, III, E.18(2) 40,III, F.19(2)	Scrubber ranges based on previous tests	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.
27	22, III, C.15	Calciner/dryer feed record	Strike – this equipment does not exist.
28	22, III, C.16	Scrubber daily averages	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.
29	22, III, C.17	Calibrate, maintain, and operate a device to monitor feed +/- 5%	Strike "new" and superphosphoric line, rock dryer and rock calciner. No new equipment is present and the other equipment does not exist.
30	22, III, C.18 and C.19	Maintain daily record of p2O5 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. In addition, change the references from regulatory citations to the relevant conditions and cite the regulations in parentheticals. The permit should read "A daily record shall be maintained using a monitoring system that meets the requirements of C.17 and then by proceeding according to C.7(3).
31	22, III, C.20 32, III,E.21 39, III,F.12	Comply with 63.10 recordkeeping requirements	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.
32	23, III,	Performance test report	The reference to initial

	C.21(1) 32, III,E.22(1) 39, III, F.13(1)		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 supercedes the 60 day NESHAP Subpart A. The regulatory citations should be listed at the end in parentheticals.
33	23, III, C.21(2) 32,III,E.22(2) 39,III, F.13(2)	Excess emission report (exceedances)	Strike references to "as required by §63.10." Specific applicable requirements from §63.10 should be listed.
34	23, III, C.22 33,III,E.25 41, III, F.21	Applicable parts of subpart A	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.
35	23, III, C.23	Reference to requirements applicable to Phosphoric Acid plants	Reference made to BB – should be AA.
36	23, III, C.23 33,III, E.27	Subpart AA and appendix A and CP-1 apply, **updates also apply** – restricted to establishing operating parameters	Specify as conditions the applicable requirements: such as ssm plan, etc.

	41, III, F.23		Strike the permit update language. A Permit cannot be modified via regulatory changes absent inclusion in the SIP and modification of the permit.
37	23, III, C.23(2)	Applicable parts of subpart A and AA are applicable	Strike this condition, it is a duplicate specification.
38	23, III, C.23(3) 33,III, E.27(2) 41, III, F.23(3)	Specifically notify dept of testing for establishing ranges	As previously explained, expand this to include provision for operation outside range for the period of test without being an exception.
39	23, III, C.23(5) 33,III,E.27(5) 41,III,23(5)	Test must demonstrate compliance with standards and methods	Strike this condition, it is a duplicate specification. (See C.21(1); E.27(1);F.23(1)).
40	23, III, C.23(6) 33,III,E.27(6) 41,III,F.23(6)	Tests submitted per A and AA	Strike this condition, it is a duplicate specification. (See C.21(1); E.27(1); F.23(1) .
41	23, III, C.23(7) 33,III,E.27(7) 42,III,F.23(5)	Dept has 30 day review of new allowable ranges	See Comment 6. As previously explained, the ability to re-establish ranges needs to be added back here in some form.
42	24, III, C.26	All reasonable precautions shall be taken to minimize and control the generation of fugitive fluoride emissions.	Add "Not federally enforceable" notation back. Also, clarify what FDEP considers reasonable precautions by way of examples.
43	28, III, E.8	Excess Emissions due to malfunction: immediately notify, report in quarterly if requested	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.
44	29, III, E.11	Test for: PM, F, VE annually	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…"
45	32, III, E.19 and E.20	Daily – feed P2O5 (as production and P2O5 analysis)	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.
46	33, III, E.26	Administrator retains approval test plans	Strike this condition. The storage buildings are addressed in Section F. This is an unnecessary and potentially confusing condition.
47	33, III, E.27(2) 41,III,F.23(2)	Applicable parts of subpart A and BB are applicable	Strike – duplicate specification
48	34, III, E.28	Dap/map process line	Strike - not applicable
49	34, III, E.28	Equivalent P2O5 stored	Strike - not applicable
50	34, III, E.28	Fresh GTSP	Strike - not applicable
51	34, III, E.28	Research and development facility	Strike - not applicable
52	34, III, E.29	CAM plan	Add clarification of what events constitute an exceedance versus and an excursion. This information is necessary to properly complete the annual statement of compliance.
53	37, III, F.9	Conduct performance test for a new DAP or MAP line	Strike – performance tests are covered in F.8
54	37, III, F.10(2)	Use 40 CFR Part 60 appendix as performance test methods as per §63.7	(2) can be stricken as it restates the introduction in F.10.
55	39, III, F.15	Install, calibrate, maintain, operate devices to monitor fan amps in lieu of scrubber delta P	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.
56	41, III, F.20a	Weekly – amps for each scrubber	Strike, see F.7. This has been superceded.
57	42, III, F.24	definitions	Strike DAP/MAP reference. Provide basis to include research and development.
58	42, III, F.24	DAP/MAP process line	Strike - not applicable
59	42, III, F.24	Equivalent P2O5 feed	Strike - not applicable
60	42, III, F.24	GTSP process line	Strike - not applicable
61	42, III, F.24	Research and development facility	Strike - not applicable
62	46,III,H	Molten sulfur unloading	Stike reference to rail unloading.
63	47, III, H.2	Molten sulfur transfer op = 8760	Strike – see condition II.11

		hours	
64	47,III,H.9	Areas surrounding Molten sulfur pipes	Delete reference to railcars.
65	48, III, H.12	Objectionable odor prohibited	Strike – condition II.2. This is not federally enforceable. If the condition remains it should be noted as, Non-Federally Enforceable.
66	48, III, H.15	Test Method(s): 9 – 60 min specified	Change 60 back to 30 minutes as in 008 and H.18. Reference H.3 and VE observations should be for 30 minutes same as in H.18.
67	49, III, H.17	Test method 9 for J.7(?)	Strike – same as H.15 or at a minimum change reference to H.3.
68	49, III, H.18	Test method(s): 9 – 30 min specified	Combine H.15, H.17 and H.18. Specify 30 minutes
69	49, III, H.20	Retain spill records for 5 yrs	Strike – condition II.1, TV-1 43. Change reference to H.1,H.2 and H.11.
70	50, III, H.24	Retain spill records for 5 yrs	Strike – condition II.1, TV-1 43
71	50, III, H.25	Minimize emissions per Sulfur Rule	Strike – included in H.8-11 and H.22-24
72	EU023, 6, 1	indicator 1/2: min and max 1=fan amps; 2=liquid flow	This needs to be clarified - is the tailgas to be based on fan amps or pressure drop?
73	EU023, 6, 2	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.
74	EU023, 2	tailgas scrubber - 4.6 to 10.2 in hoh	This should be amp for two fans
75	EU023, 6, 5	averaging period = 1 hour	Based on prior discussions, and the facility request in its original CAM the exceedance averaging period should be 3hrs.

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-1, 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