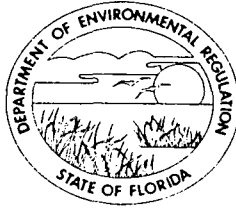


DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

DR. RICHARD D. GARRITY
DISTRICT MANAGER

PERMITTEE:

Mr. John A. Brafford
IMCC, New Wales Operations
P.O. Box 1035
Mulberry, Florida 33860

PERMIT/CERTIFICATION

Permit No.: A053-92685
County: Polk
Expiration Date: 10/15/89
Project: No. 3 Phosphoric Acid
Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of the 1500 TPD P₂O₅ No. 3 Phosphoric Acid Plant with emissions through a cross flow, cooling pond water, scrubber and a cyclonic entrainment separator.

Location: Highway 640 and County Line Road, Mulberry, Polk County

UTM: 17-396.7E 3079.4N NEDS NO: 0059 Point ID: 39

Replaces Permit No.: AC53-19051

AC53-099108 my permit

DER

APR 12 1985

BAQM

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)	Initial
<i>Willard Hanks</i>	Date
2.	Initial
<i>Tally</i>	Date
3.	Initial
	Date
4.	Initial
	Date

REMARKS:

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

DER
 APR 12 1985
BAQM

FROM:

Bill Thomas
Tampa

DATE

PHONE

PERMITTEE:
IMCC, New Wales Operations

Permit/Certification No.: A053-92685
Project: No. 3 Phosphoric Acid Plant

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

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IMCC, New Wales Operations

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6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of;

a. Having access to and copying any records that must be kept under the conditions of the permit:

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

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9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards (Section 401. PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

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14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Test the emissions for the following pollutant(s) at intervals of 6 months from the date 8/9/84 and submit a copy of test data to the Air Section of the Southwest District Office within forty five days of such testing (Section 17-2.700 (2), Florida Administrative Code (F.A.C.)).

- () Particulates
- (X) Fluorides
- () Opacity

- () Sulfur Oxides
- () Nitrogen Oxides
- () Hydrocarbons
- () Total Reduced Sulfur

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Specific Conditions (continued)

2. Approved compliance stack testing of emissions must be conducted within approximately 10% of the permitted capacity of 1613 TPD P_2O_5 input. A compliance test submitted at operating levels less than 90% of permitted capacities will automatically constitute an amended permit at the lesser rate plus 10% until another test (showing compliance) at 90% of a higher capacity is submitted. Failure to submit the input rates or operation at conditions during testing which do not reflect actual operating conditions may invalidate the data (Section 403.161(1)(c), Florida Statutes).

3. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

4. The maximum permitted operating time is 24 hours per day, 7 days per week, 52 weeks per year.

5. The maximum allowable fluoride emissions from the No. 3 Phosphoric Acid facility shall not exceed 0.02 lb./ton of P_2O_5 input (Section 17-2.600(3)(a)1., F.A.C.) or 32.3 lb./day at 1613 ton/day P_2O_5 input. The permittee has allocated 30.3 lb./day to the plant scrubber stack and 2.0 lb./day to the clarifier scrubber stack. At lesser operating rates, fluoride emissions from the plant stack shall not exceed 0.019 lb./ton P_2O_5 input.

6. This facility is subject to the New Source Performance Standards (NSPS) established for phosphoric acid plants (40 CFR 60, Subpart T) which is adopted by reference in Section 17-2.660(2), F.A.C. and shall comply with all the requirements therein.

7. The applicant shall calibrate, maintain, and operate a monitoring device which can be used to determine the mass flow of phosphorus-bearing feed material to the process. The monitoring device shall have an accuracy of ± 5 percent over its operating range.

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SPECIFIC CONDITIONS (con't):

8. The applicant shall maintain a daily record of equivalent P_{2O_5} feed by first determining the total mass rate in tons/hr. of phosphorus bearing feed using a monitoring device for measuring mass flow rate which meets the requirements of the above paragraph (7) and then by proceeding according to 60.204(d)(2), Subpart T, Standard of Performance of the Phosphate Fertilizer Industry: Wet Process Phosphoric Acid Plant.
9. The applicant shall calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the process scrubber system. The monitoring device shall have an accuracy of ± 5 percent over its operating range.
10. The Department of Environmental Regulation shall be notified in writing 15 days prior to any compliance test.
11. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Section 17-2.610 (3), F.A.C.. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

Issued this 21 day of Jan
1985.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



Richard D. Garrity, Ph.D.
District Manager

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Bill Thomas
FROM: Bill Thomas *WCT*
DATE: April 11, 1985
SUBJECT: AC53-99108 IMCC New Wales No. 3 Phos. Acid Plant

I have a copy of the Technical Evaluation, Preliminary Determination and proposed permit for the above subject plant; and have no additional comments.

WCT/js

DER
APR 15 1985
BAQM