



January 5, 1990 ECE, JAN 10 1990 DER. BAO. Mr. Willard Hanks, P. E. Florida Dept. of Environmental Regulation 2600 Blair Stone Road Tallahassee, Florida 32301

Dear Mr. Hanks:

RE: PERMIT TO MODIFY NO. 5 PHOSPHORIC ACID PLANT A053-139168

In reply to your concern regarding incremental atmospheric emission from the modified No. 5 phosphoric acid plant, we are pleased to inform you that the only anticipated increase will be in fluorides, and that will be less than 3 tons per year.

There will actually be an environmental improvement in point source and fugitive emissions of particulate matter since the dry rock grinding and handling system will be substituted by a wet system in No. 5 phosphoric acid plant, which does not emit dust.

There will not be any increase of $S0_2$ or mist emissions from the four sulfuric acid plants, which will continue to operate well within their permitted rates and emission ceilings. We presently dispose of the sulfuric acid produced by converting it into phosphoric acid, or by direct sales to customers. will limit sales if necessary in order to ensure continued operation within the rates restricted by the present permits.

Considering the emissions discussed above from a different point of view, we can safely state that even after the proposed modification of No. 5 plant, atmospheric emissions will still be lower than those experienced, and duly permitted, when all the plants were in operation.

Sincerely

M. Ø. Martinas/ek

Sr. Environmental Engineer

db

K. V. Ford

A. W. Martin

A. F. Vondrasek

A. Hande

B. Homas, sw Dist



Seminole Fertilizer Corporation P.O. Box 471 Highway 60 West Bartow, Florida 33830





MR WILLARD HANKS
DEPT OF ENVIRONMENTAL REGULATION
2600 BLAIR STONE RD
TALLAHASSEE FL 32301

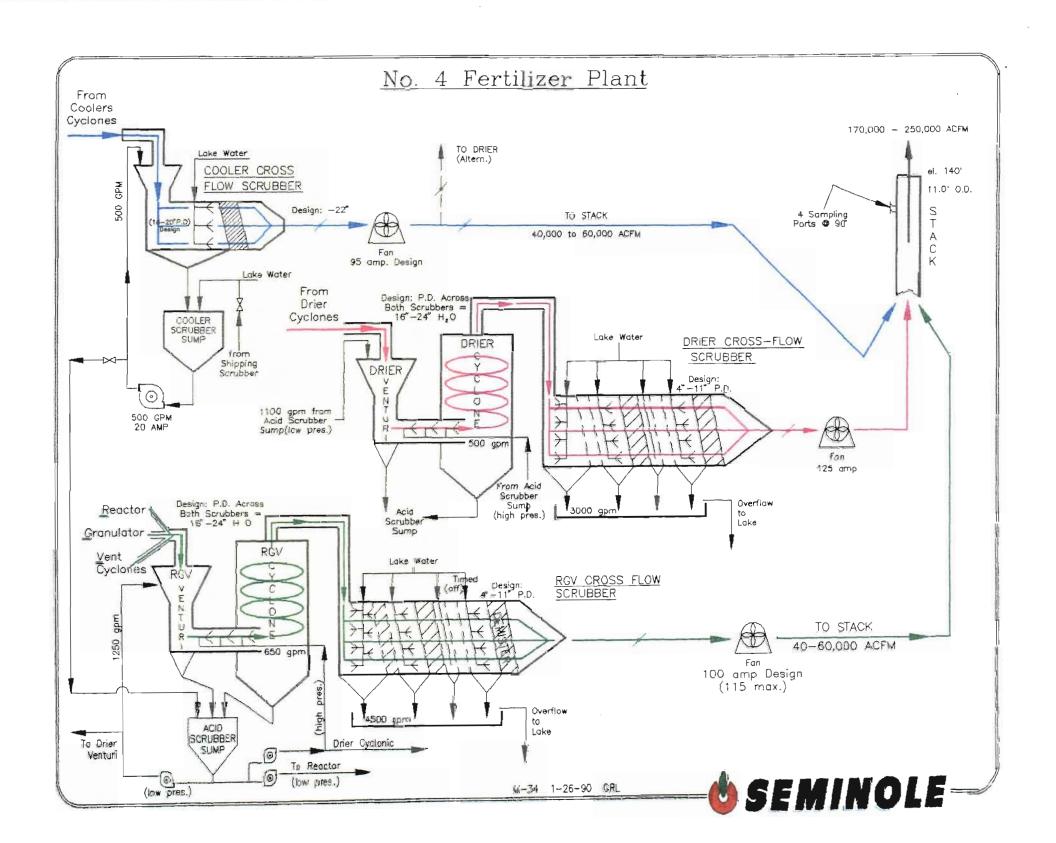
SEMINOLE FERTILIZER CORPORATION Bartow DAP Plant No. 4

JANUARY 16, 1990

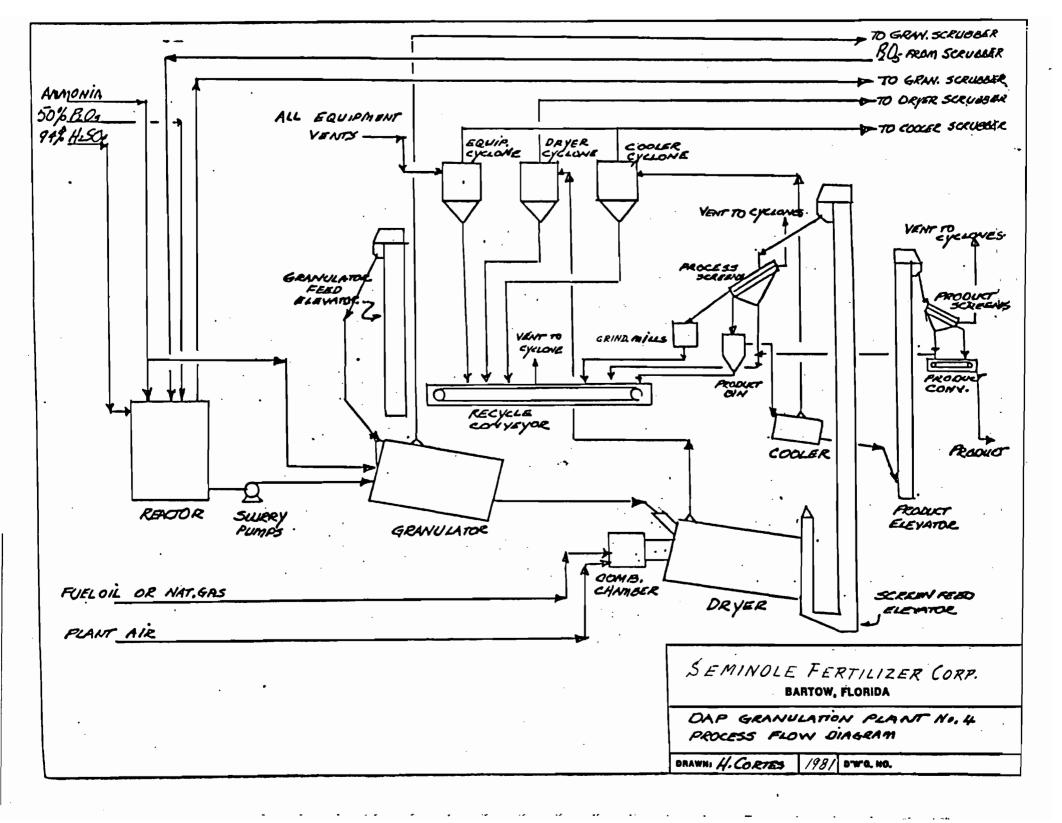
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JAN 25 1990

UCIK - DINK.



Willard, DER-BAQM
please replace the hand made sketch in my Seninov-Paper" on No. 4 FERFILIZER PLANT (DAP) with this "good looking" computer sheet. Best rejesds Michel

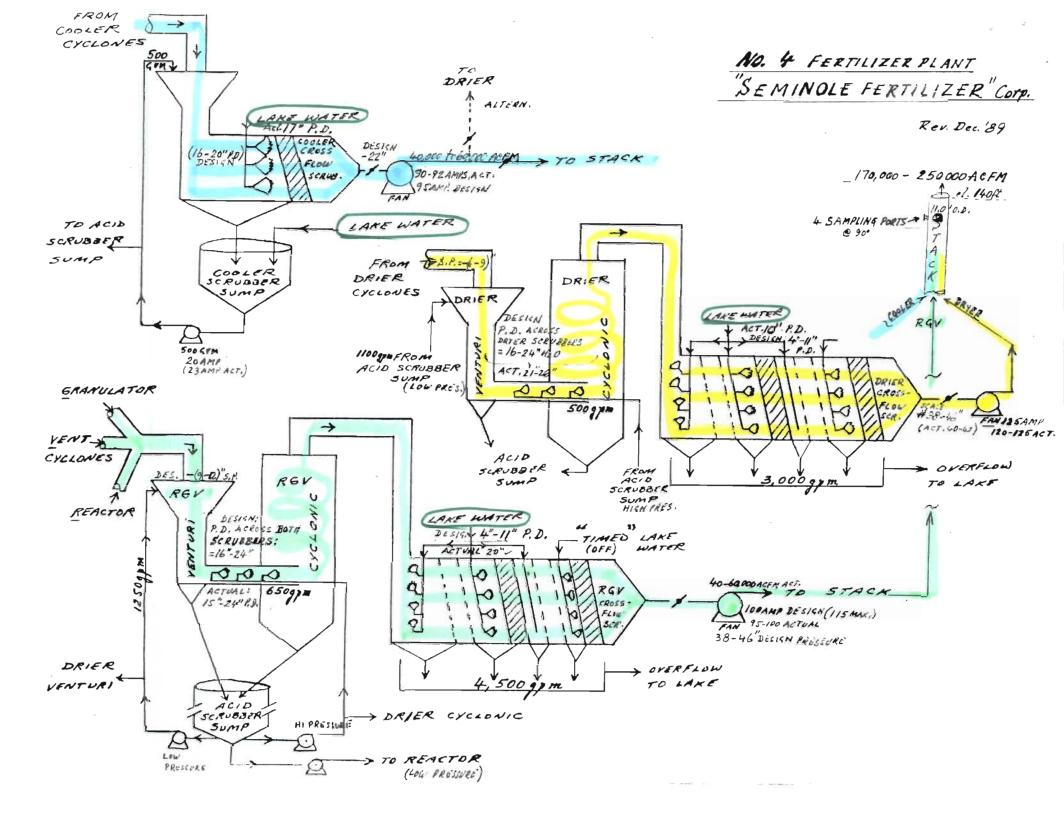


NO. 4 FERTILIZER PLANT

The complex three stage scrubbing system was designed by Bearden & Potter Engineering Company to handle up to 250,000 ACFM of process fumes and dust through three separate banks of scrubbers designed by "Ducon" as follows:

- Dryer Emissions Approximately 150,000 CFM pass first through venturi and cyclonic scrubbers, where 1600 gpm of phosphoric acid is used to remove ammonia and dust. The following cross-flow scrubber removes also fluorides, using recirculated water from DAP lagoon.
- 2. Emissions From the Reactor, Granulator, and Vents
 (& Screens: RGV) Approximately 50,000 ACFM pass
 through a similar, but independent scrubbing system:
 venturi, cyclonic and cross-flow scrubbers. 1900
 gpm of phosphoric acid solution is used in the first
 two stages, and 4,500 gpm of DAP lagoon water in the
 cross-flow scrubber.
- 3. <u>Cooler Emissions</u> Approximately 50,000 CFM pass through venturi and cross-flow scrubbers using 500 gpm of DAP lagoon water.

The three above blowers discharge into a common stack, at a pressure drop of approximately 40" H20.



AIR POLLUTION ABATEMENT

DRY CYCLONES Classify the dust at approximately 10µ;

i.e. they are designed to remove 90% of dust

particles >10 μ at 3 - 4.5" P.D.

Problems: a) choking (plugging)

b) sucking air through product at the bottom of the cone re-entrains the collected dust.

Inspection: the cyclones and the discharge valves should feel warm.

SCRUBBERS will usually remove particles down to lµ, as well as fumes.

Efficiency on P.M. is proportional to the amount of energy used by blowers and pumps.

Efficiency on water soluble gases is determined by:

- a) the area of water droplets exposed to the gas
- b) the relative movement of the spray droplets to the gas flow (counter flow = best but plugs spray nozzles; cross-flow is more practical)
- c) retention time of the droplets in the gas stream; large drops traverse it too quickly, splash on the scrubber wall and drain
- d) momentum of the droplets must be large enough for the droplets to impact the [cyclonic] scrubber walls or those of the packing, i.e. steam-sized droplets would "slalom" through most packings.
- e) efficient mist eliminator: small packing and/or tight weave of the plastic cloth give high efficiency but plug quickly with the Silica from the Silicon Tetrafluoride gases: namely:

 $3 \text{ SiF}_4 + 2 \text{ H}_2\text{O} \longrightarrow 2 \text{ H}_2\text{SiF}_6 + \text{SiO}_2$

All packing and demisters must be designed for easy physical removal of the SiO₂ build-up, i.e. avoid closely spaced zigg-zagg louvers, etc.

SCRUBBER EFFICIENCIES are best expressed in Transfer Units, or Nog, which originated by heat transfer studies and were later generally confirmed by efficiency tests with HCL fumes.

Specifically, if 1 Nog removes 70% of F (old Rain Tower),
then 2 Nog " 85%
and 3 Nog " 95%
4 Nog " 98%
5 Nog " 99.3%

The 5th Nog costs as much to install and operate as the 1st Nog which removes 70% of the fumes, but it removes only an additional 1.3% It is quite possible that the SO₂ emitted by the electric power generation to produce the energy required by the 4th or the 5th Nog (scrubbers) would cause more harm to the environment than the ever diminishing amounts of fluorides, or other contaminants released to the atmosphere, if the 4th and/or 5th stages were not there.

VAPOR PRESSURE of the scrubbing medium, governed by pH, temperature, concentration of any given contaminants dissolved in the scrubbing liquid, and the negative pressure inside the scrubber, affects the selective removal efficiencies. Specifically, venturi scrubber using diluted phosphoric acid in a DAP plant is extremely efficient for the removal of ammonia, but ineffective for fluorides. (Increased

pressure drop across the venturi actually decreased the amount of collected fluorides to the point of reaching a negative efficiency!)

SPRAY NOZZLES range from <u>Vee-jet</u> and <u>solid cone</u> pattern: small openings; frequent plugging, and

Hollow cone pattern: large openings (for the cyclonic action) and infrequent plugging, to

Flattened pipe nipple: large opening & straight flow: no plugging but low efficiency.

TROUBLE SHOOTING:

- a) check the stack for a very light blue-gray haze: F
- b) read <u>opacities</u> at the very <u>outlet</u> of the stack, or several hundred feed down, because of the detached, very wet plume. Choose mid-afternoon, when the humidity is lowest.
- c) Use your fingertips to check for heat and gentle vibration to determine the presence of flow, gas or liquid.

Do not rely too much on Amp-meters, Mag-meters and pressure gauges to ascertain scrubber performance. A combination of plugged and missing/worn out spray nozzles may give you a perfect reading.

Likewise, a higher pressure drop across a scrubber may be either good or bad. See if it is within the operator's operating limits indicated usually at the top of the Log sheet. However, do not expect it to be the same as the number on the original engineering design. (If it is, we haven't learned much...)

Lower than design airflow may also be either good or bad. A well designed scrubbing system calls for the minimum amount of air required to achieve the purpose, such as drying or cooling the product, preventing fugitive fumes from

escaping from tanks, etc. Excessive air usually results in higher emissions. However, engineering companies often overdesign airflows in order to protect themselves (at our expense).

It is much cheaper for them to reduce excessive airflows with dampers than to install larger fans and motors should the system fail to meets the guaranteed emissions.

DAP SCRUBBER HISTORY AT OUR PLANT

- 2. TCA (Turbulent Contact Action) Scrubber came next. Upward gas flow through a two foot bed of hollow plastic spheres nick named ping-pong balls placed on a grating inside a vertical cylindrical tank made them rise to another screen at the top and descend along the scrubber walls in an elliptical patters of continuous motion. The spheres would soon crack or become deformed Problems: by heat, fill up with scrubbing liquid and remain at the bottom. This resulted in caking and eventually in plugging. Some degree of cleaning was possible with a large hose, since the two scrubber in series were under negative pressure, but excessive pond water would cause a chemical imbalance in the scrubbing liquid, which is being constantly added to the reaction tank.
- 3. VENTURI SCRUBBERS are the best scrubbers known today for the first stage of any DAP, MAP, or GTSP process. They do not use sprays, and can operate for a long time before building up and plugging. Venturis remove 98% of ammonia at 10-20" P.D. using 5-10gpm of dilute phosphoric acid solution per 1,000 ACFM.

3a. CYCLONIC SCRUBBER/DEMISTER follows the venturi scrubber. It may be used as a demister only, or as a secondary scrubber and demister by spraying approximately 10 gpm of the acidic solution for every 1,000 ACFM either at the inlet to the scrubber, or in the lower third of it. Pressure drops range between 2.5" to 4.5" H₂O.

Efficiency may often be improved by increasing liquid pressure and flow, provided the centrifugal force on the droplets entering the cyclonic scrubber are increased correspondingly to spin-out the finer mist.

4. PACKED TAIL-GAS SCRUBBER may be used only for low fume concentrations if the latter contains SiF4. The size of the packing and demisting media is the result of a typical compromise between efficiency resulting from small or tight packing, and practicability, i.e. longer periods of operation between plugging when larger packing is used. We wound up using two stages of highly efficient plastic cloth packing followed by one stage of demisting by a similarly woven plastic sheet made by "Kimre", who have worked with us for years to develop the optimum-sized packing media.

Scrubbing water is constantly recirculated from a near-by lagoon constructed for this purpose, and controlled for algae. It does not overflow due to the negative water balance of the DAP process.

Pressure drop depends on the designed gas velocity (8-12)

Pressure drop depends on the designed gas velocity (8-12 feet per second) and by the amount of the packing and its tightness. We operate well above the designed 4-11" P.D. in order to achieve high efficiencies on the very fine P.M. (particulates) created in the process.

We have been successful in maintaining emission below the permitted and the designed levels even at operating rates well above the original design. To my surprise, the rate of production was not the governing factor in stack emissions. By the way, the rate of production may be calculated from the two qualities of incoming phosphoric acid as follows:

TPH gpm of acid %P2Os Sp. Gr. #/gal min/hr. #/ton = 250 0.52 x 1.72 x 8.34560 ÷ 2000 = 56 P205300 0.28 x 1.33 x 8.34528 P205 X 60 ÷ 2000

Total P2Os input = 84 TPH, and the resulting rate of production is 84 TPH ÷ 0.462 (P2Os content) x 96.6%* = 175.6 TPH of DAP product.

Virturally all our scrubbers are somewhat over designed and have therefore no difficulty in complying with DER permits and regulations. This is why we had no second thoughts in accepting Bill's suggestion of holding this seminar and the plant tour.

Prepared by: M.J. Martinasek Date: January 15, 1990

*Conversion efficiency of P20s is usually between 96 and 97%.



Seminole Fertilizer Corporation P.O. Box 471 Bartow, Florida 33830 (813) 533-2171 Fax (813) 533-1319

March 8, 1990

RECEIVED

MAR 9 1990

DER - BAQM

Mr. Willard Hanks, P.E.
Dept. of Environmental Regulation
Bureau of Air Permitting
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Hanks:

RE: PERMIT TO MODIFY NO. 5 PHOS. ACID PLANT A053-139169

Thank you for your phone call this morning.

I am enclosing a second Affidavit of Publication I just obtained at the <u>Polk County Democrat</u> newspaper office. The original, mailed to us last Friday, never reached our office.

Please call me if there is anything else I can do to help you issue the Construction Permit.

Sincerely,

M. J. Martinasek

Sr. Environmental Engineer

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Enclosures

cc: M. A. Castle

K. V. Ford

A. W. Martin

A. F. Vondrasek

or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is or modification of the Depart-

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the

Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., sind to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

State of Florida

State of Florida Department of Environmental Regulation C. H. Fancy, P.E. Chief Bureau of Air Regulation Feb. 15, 1990-467

AFFIDAVIT OF PUBLICATION

The Polk County Democrat

Published Semi-Weekly Bartow, Polk County, Florida

Case No
STATE OF FLORIDA COUNTY OF POLK
Before the undersigned authority personally appeared
S. L. Frisbie, IV , who on oath says that (s)he is
Publisher of The Polk County Democrat, a newspaper pub-
lished at Bartow, in Polk County, Florida; that the attached copy of advertisement, being
a in the
matter of Seminole Fertilizer Corporation
in the Court, was published in said newspaper in the issues of Feb. 15, 1990
Affiant further says that The Polk County Democrat is a newspaper published at Bartow, in said Polk County, Florida, and that said newspaper has heretofore been continuously published in said Polk County, Florida, each Monday and Thursday, and has been entered as second class matter at the post office in Bartow, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission, or refund for the purpose of securing this advertisement for publication is said newspaper. Signed
Sworn to and subscribed before me this 8th day of
Day M Caim! chad
Notary Public

Notary Public

My Commission Expires:
Notary Public, State of Florida at Large My Commission Expires Nov. 18, 1992



Before The State
of Florida Department
of Environmental
Regulation
In the Matter of
Application for Permit by:
Seminole Fertilizer Corp.
Post Office Box 471
Bartow, FL. 33830
DER File No. AC 53-173936
INTENT TO ISSUE
The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in to Issue for the reasons stated in the attached Technical Evalua-tion and Preliminary Determination.

The applicant, Seminole Fertil-The applicant, Seminole Fertilizer Corporation, applied on December 13, 1989, to the Department of Environmental Regulation for a permit to construct (modify) their No. 5 phosphoric acid plant. The modification involves the use of existing process equipment from the inactive No. 3 phosphoric acid plant to increase feed to the No. 5 phosphoric acid plant to 92 TPH P205. This equipment is located 3 miles West of Bartow, Polk County, Florida on U. S. Highway 60.

ty, Florida on U. S. Highway 60.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815.

Pursuant to Section 403.815, F. S. and DER Rule 17-103.150, F. A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F. S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F. S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by other persons must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number o

applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal

Seminole Fertilizer Corporation P.O. Box 471 Bartow, Florida 33830 (813) 533-2171



March 16, 1990

Mr. Willard Hanks, P.E. Dept. of Environmental Regulation 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Dear Willard:

Enclosed is the page from the March 15, 1990, Polk County Democrat containing the Notice of Intent to Issue for the No. 5 phosphoric acid plant fill permit. If everything goes well we hope that you can get the permit filed on the 30th of March. Our current plans call for testing during the first week of April.

We appreciate your efforts in this matter. If you have any questions, please feel free to call.

Sincerely,

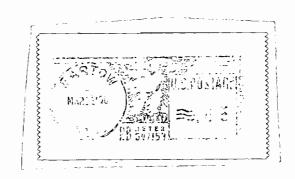
Kenneth V. Ford

Manager, Environmental Affairs

db

Enclosure

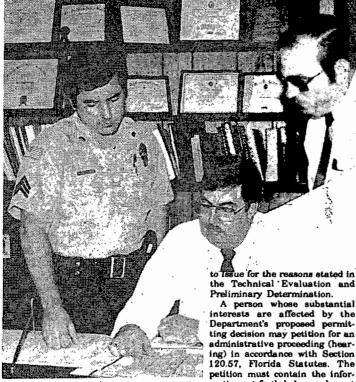
A. F. Vondrasek cc:



SEMINOLE FERTILIZER CORPORATION P.O. BOX 471 • BARTOW, FL 33830 (813) 533-2171

TO:

MR WILLARD HANKS P E DEPT OF ENVIRONMENTAL REGULATION 2600 BLAIR STONE RD TALLAHASSEE FL 32399-2400



CHECKING A MAP of Bar (center) outlines plans for checl addicts from their open air marke tion are Crime Prevention Offi-O'Neal, law enforcement divis'

Pub

State of Florida Department of **Environmental Regulation** NOTICE OF INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Seminole Fertilizer Corporation, P. O. Box 471, Bartow, Florida 33830, to construct (modify) the existing No. 5 phosphoric acid plant located at their chemical plant that is 3 miles West of Bartow, Polk County, Florida on U.S. Highway 60. The modification involves increasing production from 67.5 to 92 TPY P205 input by installing piping so that the filter and evaporation system of the inactive No. 3 phosphoric acid plant can be operated in parallel with the No. 5 plant. Operation of the reactor section of the No. 3 plant will be discontinued. Permitted fluoride emission will increase from 1.18 lbs/hr (4.72 TPY) to 1.8 lbs/hr (7.56 TPY). The increase in fluoride emissions will not violate any ambient air quality standard. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent

ue for the reasons stated in Technical Evaluation and Preliminary Determination.

interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to ille a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed

(b) A statement of how and when each petitioner received notice of the Department's action

or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action:

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

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

If petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F. S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F. A. C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Department of Environmental Regulation, Southwest District, 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347.

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Depart-ment's final determination. Mar. 15, 1990-727



Seminole Fertilizer Corporation
P.O. Box 471
Bartow, Florida 33830
(813) 533-2171
Fax (813) 533-1319

RECEIVED

MAR 2 8 1990

DER - BAQivi

March 23, 1990

Mr. Willard Hanks, P.E.
Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Willard:

RE: DER PERMIT NO. AC53-173936

Enclosed is the Affidavit of Publication for the No. 3/5 phosphoric acid filter permit.

Once again, thank you for your assistance in this matter.

VAMALLA

SiAncerely,

Manager, Environmental Affairs

đb

Enclosure

Best Available Copy

RECEIVED

MR 19 A9:53

MAR 2 8 1990

DER - BAQM

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AFFIDAVIT OF PUBLICATION

The Polk County Democrat

Published Semi-Weekly Bartow, Polk County, Florida

Case No
STATE OF FLORIDA COUNTY OF POLK
Before the undersigned authority personally appeared
S. L. Frisbie, IV, who on oath says that (s)he is
Publisher of The Polk County Democrat, a newspaper pub
lished at Bartow, in Polk County, Florida; that the attached copy of advertisement, being
a Notice of Intent to Issue in th
matter of Permit to Seminole Fertilizer Corporation
in the Court, was published in said newspaper in the issue
of March 15, 1990
Affiant further says that The Polk County Democrat is a newspaper published at Bartow, is said Polk County, Florida, and that said newspaper has heretofore been continuously published is said Polk County, Florida, each Monday and Thursday, and has been entered as second class matter at the post office in Bartow, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission, or refund for the purpose of securing this advertisement for publication in said newspaper. Signed
Sworn to and subscribed before me this 16th day o
Mary M Carmichael
Notary Public

My Commission Expires:

Notary Public, State of Florida at Large My Commission Expires Nov. 18, 1992



The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Department of Environmental Regulation, Southwest District, 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347.

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State of Florida
Department of
Environmental Regulation
NOTICE OF INTENT
TO ISSUE
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State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To	Other Than The Addressee
To:	Location:
To:	Location:
To:	Location:
From:	Oate:

Interoffice Memorandum

TO: Steve Smallwood

FROM: Clair Fancy

DATE: March 30, 1990

SUBJ: Approval of Seminole Fertilizer Corporation's Air

Construction Permit No. AC 53-173936

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to modify their No. 5 Phosphoric Acid Plant.

The plant is located west of Bartow in Polk County, Florida.

No comments were received during the public notice period. Day 90, after which this permit will be issued by default, is May 31, 1990.

I recommend your approval and signature.

CF/WH/plm

Attachment



Seminole Fertilizer Corporation P.O. Box 471 Highway 60 West Bartow, Florida 33830 (813) 533-2171 Fax (813) 533-1319

August 6, 1990

Mr. Willard Hanks, P. E. Dept. of Environmental Regulation 2600 Blair Stone Road Tallahassee, Florida 32301

RECEIV AUG 8 1990
DER-BAQM

Dear Mr. Hanks:

RE: AC53-173936: PHOS ACID PLANT MODIFICATION

We are pleased to inform you that we are ready to perform the required performance test any time at your convenience, or whenever Bill Thomas can spare someone to witness it.

Our preliminary stack tests indicated 0.02 lb. F/hr., which is approximately three to four times lower than the old No. 3 phosphoric acid plant used to emit. This is due partly to the fact that we do not use the old reaction tanks, and partly to an improved mist eliminator.

I am, therefore, confident we can comply with the maximum permitted level of 0.3 lb. F/hr. under any circumstances, and have scheduled a full scale preliminary test for August 9. The final compliance test is presently scheduled for August 23, so as to give you the required 15 days notice, but may be rescheduled either way at your or Bill's convenience, bearing in mind that the construction permit expires on September 1, 1990.

Please advise.

Sincerely,

Sr. Environmental Engineer

đb

Enclosure

M. A. Castle cc:

K. V. Ford

A. W. Martin

W. C. Thomas - DER, Tampa A. F. Vondrasek

FLOWSHEET of NO. 3 PHOSPHORIC ACID PLANT

