

# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

February 6, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

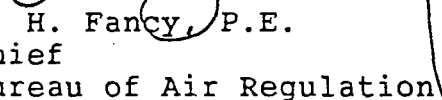
Mr. Kenneth V. Ford, Manager Environmental Affairs  
Seminole Fertilizer Corporation  
P. O. Box 471  
Bartow, Florida 33830

Dear Mr. Ford:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to modify the No. 5 phosphoric acid plant at your phosphate fertilizer chemical plant located 3 miles West of Bartow, Polk County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Regulation.

Sincerely,

  
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/WH/plm

Attachments

c: Bill Thomas, SW District  
Ralph Remmert, P.E.

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

Seminole Fertilizer Corp.  
P. O. Box 471  
Bartow, Florida 33830

DER File No. AC 53-173936

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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 the attached Technical Evaluation and Preliminary Determination.

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 P<sub>2</sub>O<sub>5</sub>. This equipment is located 3 miles West of Bartow, Polk County, 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, 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 the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or 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 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 any;

(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

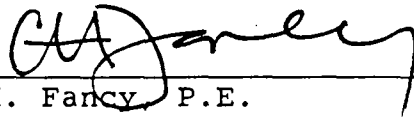
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If 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(s) 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 in 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

Copies furnished to:

Bill Thomas, SW District  
Ralph Remmert, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 2-8-90.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Kyma Ober  
Clerk

2-8-90  
Date

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 P<sub>2</sub>O<sub>5</sub> 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 to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, 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 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 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 any;
- (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 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., 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 Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

Seminole Fertilizer Corporation  
Bartow, Polk County, Florida

No. 5 Phosphoric Acid Plant Modification  
File No. AC 53-173936

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

February 2, 1990



I. General Information

A. Applicant

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

B. Request

Mr. M. J. Martinasek, Senior Environmental Engineer, submitted an application for permit to construct (modify) Seminole Fertilizer Corporation's No. 5 phosphoric acid plant on December 13, 1989. The application was considered complete on January 10, 1990, when additional information was received (January 5, 1990 letter).

The plant is located on U.S. Highway 60 W, Bartow, Polk County, Florida. The UTM coordinates of this site are Zone 17, 409.9 km E and 3,086.8 km N.

C. Project

The applicant is proposing to modify the No. 5 phosphoric acid plant (AO 53-139168) by using process equipment (filter, evaporator, and scrubber systems) from the inactive No. 3 phosphoric acid plant (AO 53-94457) to increase production of phosphoric acid at this facility. New piping will be installed to transport slurry and acid between the No. 5 and inactive No. 3 phosphoric acid plants. The scrubber in the No. 3 phosphoric acid plant will be returned to service.

Wet phosphate rock feed to the reactor of the No. 5 plant will increase from a maximum of 230 to 300 TPH (30-32%  $P_2O_5$ ). Sulfuric acid feed to the reactor will increase to 250 TPH. The increased sulfuric acid consumption by the modified No. 5 phosphoric acid plant will reduce the quantity of sulfuric acid available for sale from this facility. Up to 17 TPH  $P_2O_5$  slurry from the No. 5 plant reactor will be sent to the filtration system (filter feed tank, Prayon 18-B filter, and filtrate acid tank) of the No. 3 plant. The remaining slurry (75 TPH  $P_2O_5$ ) will be filtered in the No. 5 plant. The filtrate (22% phosphoric acid) from the No. 3 plant filter will be transferred in new piping to the No. 5 plant. The Doyle scrubber-demister for the No. 3 plant will be reactivated to control the emissions from the No. 3 plant filtration system.

Up to 10 TPH  $P_2O_5$  of 27% phosphoric acid from the No. 5 plant will be concentrated to 40% phosphoric acid in the reactivated evaporator of the No. 3 plant and then returned to the No. 5 plant.

#### D. Process and Emissions

The reaction of the phosphate rock and sulfuric acid to manufacture phosphoric acid produces gaseous and water soluble fluoride emissions. Fluorides are the primary pollution emitted by phosphoric acid plants that the Department is concerned with. The applicant will increase phosphate rock input to the No. 5 plant's reactor section from 230 to 300 TPH. This will increase fluoride emissions from the packed scrubber serving this plant from 1.18 to 1.5 lbs/hr. As the No. 5 plant uses wet phosphate rock in its process, there will be no increase in fugitive particulate matter emissions.

Approximately 17 TPH of  $P_2O_5$  slurry will be sent in the new 6 inch diameter pipes to the Prayon filter at the reactivated No. 3 phosphoric acid plant filter system. The fluorides emitted during this process will be controlled by the 85% efficient Doyle scrubber-demister that used to serve the No. 3 phosphoric acid plant. Fluoride emissions from this scrubber are estimated to be 0.3 lbs/hr. It was previously permitted to emit 1.28 lbs/hr. The filtrate from the Prayon filter is returned to the No. 5 plant. Up to 10 TPH 27% phosphoric acid is sent from the No. 5 plant to the reactivated evaporator for the No. 3 plant. The evaporators are not considered to be a source of air pollution. The acid is concentrated to 40%  $P_2O_5$  and returned to the No. 5 plant.

Thus, the fluoride emissions will be 1.5 lbs/hr from the No. 5 plant scrubber and 0.3 lbs/hr from the No. 3 plant scrubber for a total of 1.8 lbs/hr or, based on 8400 hrs/yr operation, 7.56 TPY. As a result of this modification, fluoride emissions from the No. 5 plant will increase by 2.84 TPY. This modification will not increase sulfur dioxide, sulfuric acid mist, or particulate matter emissions.

#### II. Rule Applicability

The proposed project, modification of the No. 5 phosphoric acid plant (SIC 2874), is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code (F.A.C.).

The plant is in an area designated unclassifiable for particulate matter (F.A.C. Rule 17-2.430), and attainment for the other criteria pollutants (F.A.C. Rule 17-2.420).

The phosphate fertilizer complex containing the No. 5 phosphoric acid plant is a major facility because allowable emissions of sulfur dioxide exceed 100 TPY. The modification to the No. 5 phosphoric acid plant will not increase fluoride or other pollutant emissions above the significant emission rates listed in Table 500-2 of Chapter 17-2, F.A.C.

The facility is exempt from the Prevention of Significant Deterioration (PSD) regulations (F.A.C. Rule 17-2.500) because the modification does not cause a significant emissions increase of any pollutant. The modified source is subject to F.A.C. Rule 17-2.660, New Source Performance Standards for Phosphoric Acid Plants (40 CFR 60.200).

### III. Technical Evaluation

The applicant proposes to increase the feed to the No. 5 phosphoric acid plant from 67.5 to 92 TPH  $P_2O_5$  input. Fluoride emissions from the 92% efficient packed scrubber serving this plant will increase from 1.18 lbs/hr (4.72 TPY) to 1.5 lbs/hr (6.30 TPY).

A new 6 inch diameter pipe will carry approximately 17 TPH  $P_2O_5$  slurry to the reactivated No. 3 phosphoric acid filter system. The acid from the filter is returned to the No. 5 phosphoric acid plant. Phosphoric acid (27%  $P_2O_5$ ) from the No. 5 plant is pumped to the evaporator for the No. 3 plant, concentrated to 40%  $P_2O_5$ , and returned to the No. 5 plant.

New Source Performance Standards (NSPS) allow fluoride emissions of 0.02 lbs fluoride/ton  $P_2O_5$  input. Thus, the allowable fluoride emissions requested by the applicant of 1.8 lbs/hr and, based on 8400 hrs/yr operation, 7.73 TPY are in compliance with this standard.

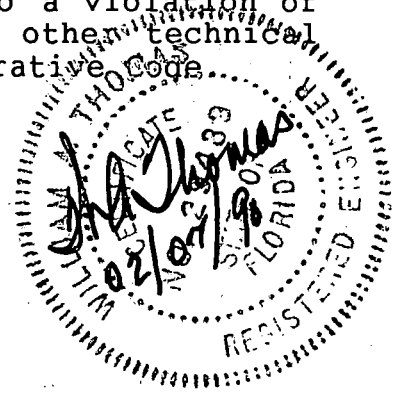
Use of wet phosphate rock in the No. 5 plant and reducing the sale of sulfuric acid from the facility to stay within the permit restrictions will prevent any increase in particulate matter, sulfur dioxide, and sulfuric acid mist emissions.

### IV. Air Quality Analysis

It is the opinion of the Department that the increased emissions resulting from the proposed modification to the No. 5 phosphoric acid plant will not cause a violation of any ambient air quality standard or PSD increment.

### V. Conclusion

Based on the information provided by Seminole Fertilizer Corporation, the Department has reasonable assurance that the proposed modification to the No. 5 phosphoric acid plant, as described in this evaluation and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

Seminole Fertilizer Corp.  
P. O. Box 471  
Bartow, Florida 33830

Permit Number: AC 53-173936

Expiration Date: September 1, 1990

County: Polk

Latitude/Longitude: 27°54'17"N  
81°54'56"W

Project: No. 5 Phosphoric Acid  
Plant Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 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:

Modifications to the No. 5 phosphoric acid plant to increase the feed from 67.5 to 92 TPH P<sub>2</sub>O<sub>5</sub> input by reactivation of the Prayon 18-B filter, evaporator, and Doyle scrubber-demister of the No. 3 phosphoric acid plant and the installation of slurry and phosphoric acid piping between the two phosphoric acid plants. These plants are part of the phosphate fertilizer complex (SIC 2874) located on U.S. Highway 60 W, Bartow, Polk County, Florida. The UTM coordinates of this plant are Zone 17, 409.9 km E and 3,086.8 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received December 13, 1989.
2. Seminole Fertilizer Corp. letter dated January 5, 1990.

PERMITTEE:  
Seminole Fertilizer Corp.

Permit Number: AC 53-173936  
Expiration Date: September 1, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Seminole Fertilizer Corp.

Permit Number: AC 53-173936  
Expiration Date: September 1, 1990

GENERAL CONDITIONS:

6. The permittee shall 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 may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including 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.

PERMITTEE:  
Seminole Fertilizer Corp.

Permit Number: AC 53-173936  
Expiration Date: September 1, 1990

GENERAL CONDITIONS:

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 for revocation of this permit.

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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

PERMITTEE:  
Seminole Fertilizer Corp.

Permit Number: AC 53-173936  
Expiration Date: September 1, 1990

**GENERAL CONDITIONS:**

b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 dates 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 corrected promptly.

**SPECIFIC CONDITIONS:**

1. The modified No. 5 phosphoric acid plant shall comply with all applicable requirements of 40 CFR 60, Subpart T (July 1, 1988), Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants. Applicable requirements include total fluoride emissions from the plant not exceeding 0.02 lbs/TP<sub>2</sub>O<sub>5</sub> input (40 CFR 60.202) and the operation monitoring requirements of 40 CFR 60.203.

2. Input to the attack tank shall not exceed 92 TPH P<sub>2</sub>O<sub>5</sub> (300 TPH of wet phosphate rock).



PERMITTEE:  
Seminole Fertilizer Corp.

Permit Number: AC 53-173936  
Expiration Date: September 1, 1990

SPECIFIC CONDITIONS:

3. The plant may operate for up to 8400 hours per year.
4. The permittee shall maintain records that can be used to determine compliance with Specific Conditions Nos. 2 and 3.
5. Fluoride emissions as determined by EPA Methods 13A or 13B which is described in 40 CFR 60, Appendix A (July 1, 1988) shall not exceed 1.5 lbs/hr from the Welman-Lord packed cross-flow scrubber serving the No. 5 phosphoric acid plant, 0.3 lbs/hr from the Doyle scrubber/demister serving the reactivated filter of the No. 3 phosphoric plant, and a total of 0.02 lbs/TP<sub>2</sub>O<sub>5</sub> input for both scrubbers serving the modified No. 5 phosphoric acid plant.
6. The permittee shall minimize the escape of unconfined emissions by keeping covers on process equipment, prompt clean up of rock spills within the plant, and cleaning or wetting areas used by vehicles.
7. Before this construction permit expires, the permittee shall sample the plant for fluoride emissions while it is operating as near as practical to its permitted capacity.
8. The permittee shall notify the Department's Southwest District at least 15 days prior to any compliance test.
9. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
10. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

PERMITTEE:  
Seminole Fertilizer Corp.

Permit Number: AC 53-173936  
Expiration Date: September 1, 1990

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1990

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources Management