

# 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

## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

Mr. J. E. Parsons  
General Manager  
Central Phosphates, Inc.  
Post Office Drawer L  
Plant City, Florida 33566

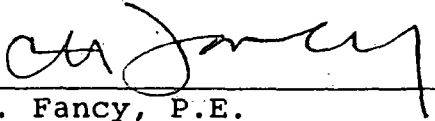
July 10, 1989

Enclosed is construction permit No. AC 29-165420 to construct a product cooler with associated cyclone and scrubber on the Y-train diammonium phosphate plant in Plant City, Hillsborough County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management

Copy furnished to:

B. Thomas, SW District  
J. Campbell, EPCHC  
J. Mulqueen, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 7-11-89.

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.

Martha J. Nise 7-11-89  
Clerk Date

**FINAL DETERMINATION**

**Central Phosphates, Inc.  
Hillsborough County  
Plant City, Florida**

**Product Cooler with Associated Cyclone and Scrubber  
Permit No. AC29-165420**

**Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting**

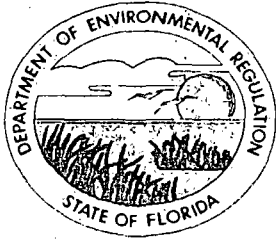
**July 5, 1989**

## FINAL DETERMINATION

The Technical Evaluation and Preliminary Determination for the permit to construct a product cooler with associated cyclone and scrubber on Central Phosphates, Inc.'s Y-train diammonium phosphate plant located north of Plant City, Hillsborough County, Florida, was distributed on June 15, 1989. The Notice of Proposed Agency Action was published in the Tampa Tribune on June 21, 1989. Copies of the evaluation were available for public inspection at the Hillsborough County Environmental Protection Commission's office in Tampa and the Department's offices in Tampa and Tallahassee.

The Southwest District office requested the Bureau add a heat input limit for this source in the permit and, because the current permit to operate this source (permit No. AO29-881512) expires in August, 1989, let the construction permit replace the existing operating permit so as to avoid having to process two applications for permits to operate the same source within a 6 month period. The Bureau has carefully considered these requests. We have restricted the heat input of this source to the maximum actual used to date (49.5 MM Btu/hr). Specific Condition No. 15 requires that all applicable conditions pertaining to the permitted alteration are to be made a part of the future permit to operate the Y-train DAP plant, effective once the cooler begins commercial operation.

The final action of the Department will be to issue construction permit No. AC29-165420 as proposed in the Technical Evaluation and Preliminary Determination except for the changes noted above.



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:  
Central Phosphates, Inc.  
Post Office Drawer L  
Plant City, Florida 33566

Permit Number: AC29-165420  
Expiration Date: February 28, 1990  
County: Hillsborough  
Latitude/Longitude: 28° 09' 55" N  
82° 08' 37" W  
Project: Y-Train DAP/MAP/GTSP Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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:

Installation of a product cooler system consisting of a 100 TPH rotary cooler, 50,000 ACFM fan, 4 cone multiple cyclone, and single-stage cyclonic scrubber that discharges to the existing plant scrubber (AO29-88151) at the Y train DAP/MAP/GTSP granulation plant. This plant is part of the phosphate fertilizer complex located at 10609 Highway 39 North, Plant City, Hillsborough County, Florida. The UTM coordinates of this plant are Zone 17, 358.9 km E and 3092.8 km N.

The source shall be 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 dated May 19, 1989
2. CPI letter dated May 30, 1989

Permit No. AC29-165420  
Date of Issue: June 16, 1989  
Expiration Date: February 28, 1990

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 enforcement action for any violation of the "Permit 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. Nor 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 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 acknowledgment 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 therefor; 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.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related

Permit No. AC29-165420  
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GENERAL CONDITIONS:

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose 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 noncompliance, 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 for revocation of this permit.

Permit No. AC29-165420  
Date of Issue: June 16, 1989  
Expiration Date: February 28, 1990

GENERAL CONDITIONS:

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 17-4.12 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:

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

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,.



Permit No. AC29-165420  
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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 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.

Permit No. AC29-165420  
 Date of Issue: June 16, 1989  
 Expiration Date: February 28, 1990

SPECIFIC CONDITIONS:

1. Maximum raw material consumption and production of the Y-train DAP/MAP/GTSP plant shall not exceed the following:

Product	Max Prod (TPH)	Raw Material Input (TPH)		
		Phos Rock	Acid (H <sub>3</sub> PO <sub>4</sub> )	NH <sub>3</sub>
DAP	100	----	122.3	23.1
MAP	100	----	130.6	14.1
GTSP	55	25.2	52.4	----

The permittee shall maintain logs that can be used to determine compliance with these restrictions. These logs shall include the hourly quantity of phosphoric acid feed to the plant and the P<sub>2</sub>O<sub>5</sub> content of the acid.

2. The Y-train plant may operate continuously, 8760 hrs/yr.
3. Maximum fluoride emissions from this plant shall not exceed any of the following:

Product	lbs/TP <sub>2</sub> O <sub>5</sub>	lbs/hr	TPY
DAP/MAP	0.06	2.2	9.6
GTSP	0.15	3.8	16.6

4. Maximum particulate matter emissions shall not exceed the quantity allowed by F.A.C. Rule 17-2, Table 610-1, Process Weight Table, and:

Product	Max. lbs/hr	TPY
DAP/MAP	15.3	67
GTSP	6.8	30

5. Visible emissions from any part of this plant shall not exceed 20% opacity.

6. Compliance with the emission standards specified in Specific Condition Nos. 3, 4, and 5 shall be determined by EPA Reference Methods 1, 2, 3, 4, 5, 9, 13A or 13B as described in 40 CFR 60, Appendix A, July 1, 1988, and plant production records.

Permit No. AC29-165420  
Date of Issue: June 16, 1989  
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SPECIFIC CONDITIONS:

7. The primary fuel for this plant shall be natural gas. Sulfur content of the standby No. 5 fuel oil shall not exceed 1.6% as determined by the ASTM methods referenced in 40 CFR 60.17 (July 1, 1988). Certification of the sulfur content of the No. 5 fuel oil by the supplier may be used to confirm compliance with this restriction. Heat input to the dryer shall not exceed 49.5 MM Btu/hr. This is equivalent to approximately 350 GPH of No. 5 fuel oil.

8. The plant shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

9. The permittee shall minimize the escape of unconfined emissions by keeping covers on process equipment, prompt clean up of spills within the plant, and cleaning or wetting areas used by vehicles.

10. Before this construction permit expires, the permittee shall sample the plant for particulate matter and fluoride emissions while it is operating as near as practical to its permitted capacity but not below 90% of the permitted capacity and, using the procedures described in 40 CFR 60, Appendix C, determine if the use of the cooler increases the emissions from this plant. The gas pressure drop across the scrubber shall be reported in the compliance test report.

11. The permittee shall notify the Environmental Protection Commission of Hillsborough County at least 15 days prior to any compliance test. Compliance testing shall be conducted within 30 days of a change in product (DAP, MAP or GTSP) or switch to the stand-by fuel (No. 5 oil) for more than a 30 day period.

12. The permittee shall comply with all requirements of 40 CFR 60, Subpart V, Standard of Performance for the Phosphate Fertilizer Industry: Diammonium Phosphate Plant, including the monitoring requirement specified in 40 CFR 60.223 if the use of the cooler system results in an increase in emissions of fluorides, and is not exempted.

13. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

Permit No. AC29-165420  
Date of Issue: June 16, 1989  
Expiration Date: February 28, 1990

SPECIFIC CONDITIONS:

14. An application for an operation permit must be submitted to the Environmental Protection Commission of Hillsborough County 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. 17-4.220).

15. The applicable specific conditions in this construction permit shall be incorporated into the permit to operate that replaces A029-88151 and shall be in effect once the cooler system is placed in commercial service.

Issued this 7 day  
of July, 1989.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary

Best Available Control Technology (BACT) Determination  
Central Phosphates, Inc.  
Hillsborough County

The applicant proposes to install a cooler at their DAP (diammonium phosphate) and GTSP (granular triple superphosphate) manufacturing plant located north of Plant City, Hillsborough County, Florida. This determination is to confirm that the plant is authorized to manufacture MAP (monoammonium phosphate) and specify the applicable emissions standards. The plant, which is scheduled to operate 8,760 hours per year, will emit particulate and fluorides.

Fluorides emitted to the atmosphere are a regulated air pollutant. The maximum amount of fluorides allowed to be emitted from phosphate processing is to be determined by a BACT review as set forth in the Florida Administrative Code Rule 17-2.600(3)(a)9. - Emission Limiting and Performance Standards.

BACT Requested by the Applicant

Fluoride emissions will not exceed 0.06 lb/ton of P<sub>2</sub>O<sub>5</sub> input.

Date of Receipt of an Application:

May 30, 1989.

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 17-2, Air Pollution, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.

BACT Determination  
Hillsborough County  
Page Two

(d) The social and economic impact of the application of such technology.

Review Group Members:

The determination was based upon comments received from the Stationary Source Control Section and the Southwest District Office.

BACT Determined by DER:

Fluoride emissions shall not exceed 0.06 lb/ton of P<sub>2</sub>O<sub>5</sub> input.

BACT Determination Rationale:

The Department agrees with the applicant that a fluoride emission level of 0.06 lb/ton of P<sub>2</sub>O<sub>5</sub> input is justified as representing BACT for the facility. This emission level is equivalent to the New Source Performance Standard (NSPS) for Diammonium Phosphate (DAP) plants. In addition, this level of emissions is further supported by stack tests performed on this and similar plants.

Details of the Analysis may be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended by:



C. H. Fancy, P.E.  
Deputy Bureau Chief, BAQM

July 6, 1989  
Date

Approved by:

  
Dale Twachtmann, Secretary

7 July, 1989  
Date



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Dale Twachtmann

FROM: Steve Smallwood *[Signature]*

DATE: July 6, 1989

SUBJECT: Approval of Construction Permit No. AC 29-165420  
Central Phosphates, Inc.

Attached for your approval and signature is a permit prepared by Central Air Permitting for the above mentioned company to construct a product cooler with associated cyclone and scrubber at their phosphate fertilizer chemical plant located north of Plant City in Hillsborough County, Florida.

The only comments received during the public notice period were from our Southwest District Office. They resulted in minor revisions to the proposed permit.

Day 90, after which the permit will be issued by default, is September 23, 1989.

I recommend your approval and signature.

/gb

Attachment

RECEIVED

JUL 5 1989

Office of the Secretary

RECEIVED

JUL 6 1989

Office of the Secretary

P 938 762 618

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. J. E. Parsons, Central	
Street and No. Phosphates, Inc.	
P.O. Drawer L	
P.O. State and ZIP Code Plant City, FL 33566	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

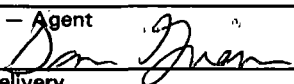
PS Form 3800, June 1985

Postmark or Date  
Mailed: 7-11-89  
Permit: AC 29-165420

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)  
2.  Restricted Delivery (Extra charge)

<b>3. Article Addressed to:</b> Mr. J. E. Parsons General Manager Central Phosphates, Inc. P. O. Drawer L Plant City, FL 33566	<b>4. Article Number</b> P 938 762 618 <b>Type of Service:</b> <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b>
<b>5. Signature - Address</b> X	<b>8. Addressee's Address (ONLY if requested and fee paid)</b>
<b>6. Signature - Agent</b> X 	
<b>7. Date of Delivery</b>	

PS Form 3811, Mar. 1988

\* U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT