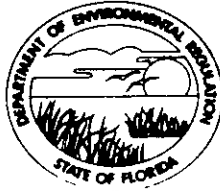


TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: New Wales Chemicals, Inc.
P. O. Box 1035
Mulberry, Florida 33860

PERMIT/CERTIFICATION
NO. AC 53-23546
COUNTY: Polk

PROJECT: Diammonium Phosphate
Plant

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

For the construction of two 70 TPH (140 TPH total) diammonium phosphate plants with a common cooler facility to be located at the permittee's phosphate fertilizer complex in Polk County near the intersection of highway 640 and the Polk/Hillsborough County line. The UTM coordinates of the proposed plant are 396.700E and 3079.400N.

Construction shall be in accordance with the attached permit application, and plans, documents and drawings except as otherwise noted on page 3 through 4 "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER form 17-1.22(16).
2. Table I.
3. Stack Sampling Facilities, Figure 12-1.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such in effect upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby

PERMIT NO.: AC 53-23546

APPLICANT: New Wales Chemicals, Inc.

on notice that the department will review this permit periodically and may initiate court 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 indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. 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.

4. As provided in subsection 403.087(6), 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.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. 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 403.111, F.S.

7. In the case of an operation permit, 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.

8. 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, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.

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)

SPECIFIC CONDITIONS:

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Specific Conditions

1. Maximum production rate of each plant will be 70 TPH DAP (140 TPH DAP for both plants) and the plants will not operate over 7,920 hours per year.
2. The maximum allowable discharge through the 6 foot diameter, 120 foot high stacks serving each train will be:

Pollutant	Maximum Emission Rate	Maximum Emission
Particulate	0.5 lbs/ton P ₂ O ₅ feed and 14.1 lbs/hr	56 TPY
Total Fluoride	0.060 lbs. fluoride/ton P ₂ O ₅ feed and 2.1 lbs/hr.	9 TPY
Sulfur Dioxide	0.7 lbs/ton P ₂ O ₅ feed and 22 lbs/hr.	87 TPY

The maximum allowable discharge of particulate from the bag filter serving the cooler will be 0.01 grains/DSCF and 4.5 lbs./hr. which is 17.8 TPY.

3. Fugitive particulate and fluoride emissions from process, conveying and storage equipment will be controlled by sealing and/or venting all fumes from the equipment to pollution abatement equipment.
4. No. 6 fuel oil for the dryer shall not contain more than 2.5% sulfur.
5. The permittee shall install, calibrate, maintain, operate and record data from flow monitoring devices that can be used to determine total P₂O₅ input to each plant.
6. The permittee will measure and record the pressure drop across each scrubber system. Pressure drop across the venturi scrubber must be at least 12" H₂O during plant operations. These records will be maintained for 2 years and available for inspection by regulatory agency personnel on request.
7. Construction should commence and be completed within a

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APPLICANT: New Wales Chemicals, Inc.

reasonable time based on the schedule given in the application.

8. Reasonable precautions to prevent fugitive emissions during construction, such as coating or spraying roads and construction sites used by contractors with a liquid as needed to control dust, will be taken by the permittee.
9. Semi-annual progress reports showing approximate percent completion of modifications and construction of new and affected existing facilities will be submitted to the Department until construction permit AC 53-23546 expires or is replaced by a permit to operate.
10. Stack sampling facilities will include the eyebolt and angle bracket shown in figures 12-1.
11. The company's ambient air station measuring TSP will be operated on a 6 day schedule established by DER and the data reported to the DER office in Tampa on a quarterly basis.
12. Before construction permit expires, the DAP plant will be sampled for particulate, total fluorides, and sulfur dioxide while operation at permitted capacity (+10%) with the dryer burning oil containing 2.5% sulfur (+10%). Test procedures will be EPA reference methods 1, 2, 3, 5, 6 and 13A or 13B as published in 40 CFR 60, Appendix A, dated July 1, 1978 or other states approved methods. The permittee shall notify the Bureau of Air Quality Management 30 days in advance of the compliance test and shall submit a test plan for approval. P_{205} input, pH of the scrubber solution and pressure drop across the scrubbers will be normally operated and reported, along with test data and results, to the Department.
13. Prior to the testings, the operation permits of all sources listed in Table I will be revised to reduce the allowable emissions from those sources to the values shown. This includes the shut down of three

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facilities; West Phosphate Rock Grinding Plant, West Rock Feed Bin and the Dry Rock Storage Bottom Load Out.

14. Upon demonstration of compliance with the operational limits of this permit and the submission of complete applications for operation permits for each DAP facility and cooler system (3 total), prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of the operation permits.

Expiration Date:

Issued this _____ day of _____, 19 _____.

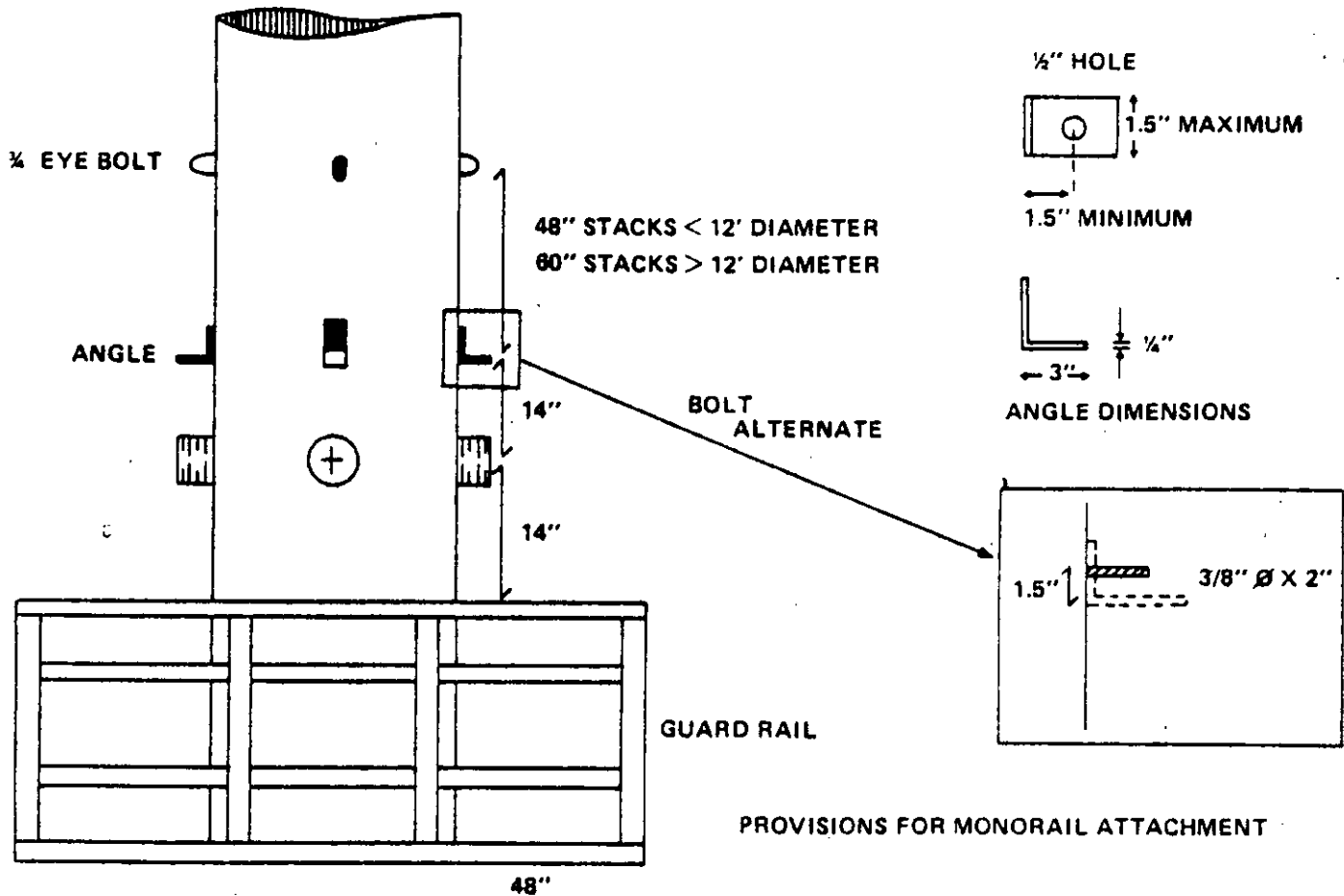
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

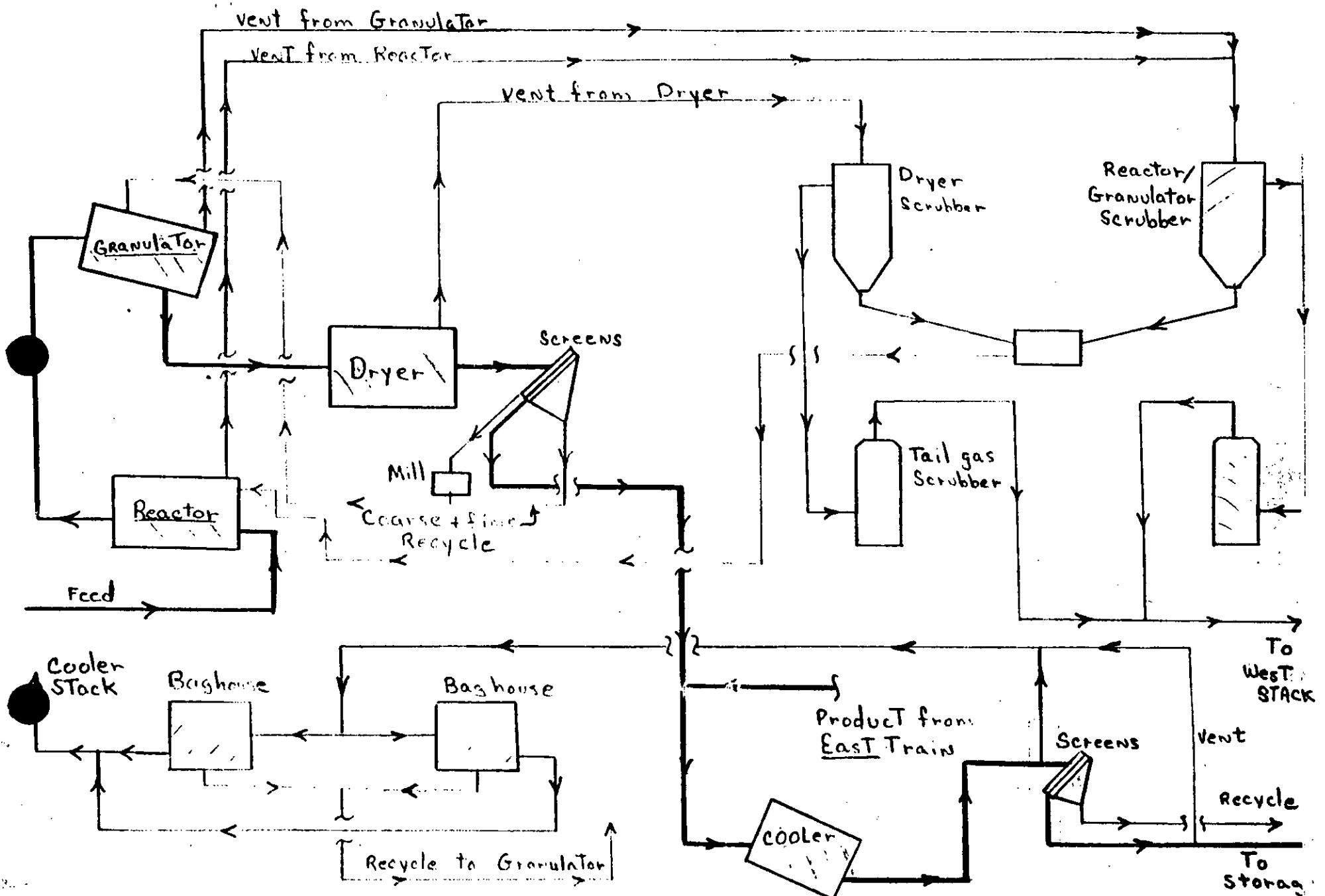
- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK 1.8 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.

FIGURE 12 - 1



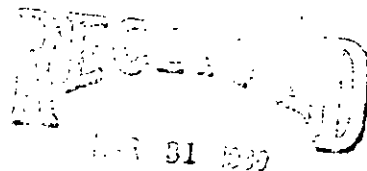
New Wales DAP Plant, West Train & Common Cooler

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

Routing To District Offices And/Or To Other Than The Addressee	
To: _____	Loctn.: _____
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

TO: Jake Varn
 FROM: Steve Smallwood *MK for S.S.*
 DATE: March 28, 1980



Office of the Secretary

SUBJECT: Best Available Control Technology (BACT) Determination
 Diammonium Phosphate Plant, New Wales Chemicals, Inc.
 Polk County

Facility: A 140 ton per hour diammonium phosphate (DAP) plant. The plant will produce DAP fertilizer from anhydrous ammonia, and phosphoric acid using No. 6 oil fired dryer, screens, mills, cooler, reactor and granulator. Estimated potential emission of pollutants subject to the BACT rule are:

Particulate	6,000 tons/year
Sulfur Dioxide	444 tons/year

*NO
WOK*

BACT Determination Requested by the Applicant:

Pollutant	Maximum Allowable Emission
Fluorides	0.060 lbs/ton P ₂ O ₅ Feed

Date of Receipt of a Complete BACT Application:

February 13, 1980

Date of Publication in the Florida Administrative Weekly:

March 28, 1980

Date of Publication in a Newspaper of General Circulation:

April 2, 1980 Tampa Tribune

Study Group Members:

Thomas Davis, DER South Florida District, Ft. Myers;
 Pepe de Castro, DER Bureau of Wastewater Management & Grants,
 Tallahassee;
 Robert Garrett, DER Southwest District, Tampa;
 Willard Hanks, DER Bureau of Air Quality Management, Tallahassee;
 Joseph Griffiths, Hillsborough County Pollution Control, Tampa;
 Johnny Cole, DER St. Johns River Subdistrict, Jacksonville

Study Group Recommendations:

	<u>Particulate</u> <u>#/Ton P₂O₅ Feed</u>	<u>Sulfur Dioxide</u> <u>#/Ton P₂O₅ Feed</u>
Thomas Davis	0.50 (0.015 gr/scf)	0.70 (2.5% S in fuel)
Pepe de Castro	0.62 (0.02 gr/scf)	None given
Robert Garrett	0.33 (.15 lb/ton DAP)	None given
Joseph Griffiths	0.83 (0.03 gr/scf on scrubbers) (0.015 gr/scf on baghouse)	None given
Willard Hanks	0.43 (0.20 lbs/ton DAP)	0.65 (.3 lb/TDAP)

BACT Determination by the Florida Department of Environmental Regulation:

<u>Pollutant</u>	<u>Maximum Emission</u> <u>lb/ton P₂O₅ Feed</u>
Sulfur Dioxide	0.7
Particulate	

NOTE: Particulate emission proportioned to 3 stacks as follows:

<u>Stack</u>	<u>Feed</u>	<u>Emissions</u>	<u>Equivalent</u>
Common Cooler	65.1 TP ₂ O ₅ /Hr.	4.5 lbs/hr.	-
East Train	32.6 "	14.1 "	0.433 lbs/tonP ₂ O ₅ Feed
West Train	32.6 "	14.1 "	0.433 "
Total for facilities		32.7 "	0.5 "

Jacob D. Varn
Page Three
March 28, 1980

Justification of DER Determination

Particulate Matter: The 0.5 lbs/ton P₂O₅ feed emission limitation selected is representative of Best Available Control Technology and can be met with the proposed design.

Sulfur Dioxide: On the basis of the information provided the 0.7 lb/ton P₂O₅ limit is attainable with the 2.5% S fuel proposed by the applicant.

Details of the Analysis May be Obtained by Contacting:

Victoria Martinez, BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32301

Recommendation from: Bureau of Air Quality Management

By: Martin Kahel for
Steve Smallwood

Date: March 31, 1980

Approved by: Jacob D. Varn
Jacob D. Varn

Date: 31st March 1980

SS:jr
attachment