



SEMINOLE

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

December 13, 1989

RECEIVED

DEC 14 1989

DER=BAQM

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

Dear Mr. Hanks:

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

Thank you for your time and courtesy during our visit last Friday.

The referenced permit application will be hand delivered to your office by one of our engineers this afternoon. It has been rewritten on the DER forms supplied by you, and somewhat simplified.

Check No. 24258 for \$1,000.00 is enclosed herewith, as it was not ready in time to be enclosed with the application.

For your convenience, we also enclose a copy of the referenced operating permit. Please call me at (813) 534-9796 if you need any additional information.

Sincerely,


M. J. Martinasek
Sr. Environmental Engineer

db

Enclosure - Check

cc: K. V. Ford
A. W. Martin
A. F. Vondrasek

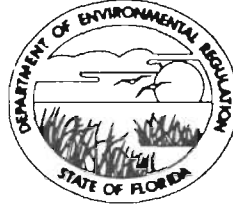
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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.
TAMPA, FLORIDA 33610-7347
813-623-5561
Suncom—552-7612



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
DR. RICHARD D. GARRITY
DISTRICT MANAGER

October 17, 1988

Mr. Kenneth V. Ford
Manager Environmental Affairs
W.R. Grace & Company
Post Office Box 471
Bartow, FL 33830

Dear Mr. Ford:

Re: Polk County - AP
Transfer of Permits

The Department is in receipt of the letter dated September 27, 1988 from your attorney informing us of the closing date of the sale of assets to Seminole and requesting the transfer of the relevant air permits. As per the request, all references regarding the ownership is hereby changed

From: W.R. Grace & Company
Post Office Box 471
Bartow, FL 33830

To: Seminole Fertilizer Corporation
Bartow Chemical Plant
Post Office Box 471
Bartow, FL 33830

for the following permits:

A053-75212	A053-89815	A053-139168
A053-94298	A053-83549	A053-82350
A053-94459	A053-72552	A053-79384
A053-96261	A053-96247	A053-99819
A053-96263	A053-96287	A053-78431
A053-94282	A053-96240	A053-94847
A053-94457	A053-97061	A053-94848
A053-78432	A053-94299	A053-77965
A053-93473	A053-101286	A053-97770
A053-97063	A053-101284	A053-97771
A053-107501	A053-96241	A053-78544
A053-78547	A053-94293	A053-127251
A053-78348	A053-83548	
A053-109240	A053-83547	

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BOB MARTINEZ
GOVERNOR
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SECRETARY
DR. RICHARD D. GARRITY
DISTRICT MANAGER

RECEIVED

MAR 1993
ENVIRONMENTAL AFFAIRS

PERMITTEE:
W. R. Grace & Company
Post Office Box 471
Bartow, FL 33830

PERMIT/CERTIFICATION
Permit No.: A053-139168
County: Polk
Expiration Date: 02/29/93
Project: Phosphoric Acid Plant
No. 5

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

For the operation of Phosphoric Acid Plant No. 5 at a maximum production rate of 62.0 tons/hour of 100% P₂O₅. Emissions from the reaction tank, Prayon filter, filtrate sump, seal tanks hot well and other auxillary equipment are controlled by a cross flow wet scrubber at a measured flow rate of 45,552 ACFM.

Location: One mile north of S.R. 60 between Bartow and Mulberry

UTM: 17-409.9E 3086.8N NEDS NO: 0046 Point ID: 34

Replaces Permit No.: A053-62622

PERMITTEE:
W. R. Grace & Company

Permit No.: A053-139168
Project: Phosphoric Acid
Plant No. 5

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. This source is subject to the New Source Performance Standards contained in 40 CFR 60 Subpart T entitled, "Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants," which were adopted by reference in Section 17-2.660, F.A.C.
3. The maximum allowable fluoride emission rate from this plant shall not exceed 0.020 lbs./hour of 100% P2O5 pursuant to Section 17-2.660, F.A.C. and 1.18 lbs./hour as requested in a December 14, 1987 letter from the Permittee to comply with Subsection 17-2.600(3)(b), F.A.C.
4. This plant shall be tested for fluoride emissions at intervals of 6 months from the date October 6, 1987. The test results shall be submitted to the Air Section of the Southwest District Office within 45 days of such testing pursuant to Subsection 17-2.700(7), F.A.C.
5. Based on the October 14, 1987 stack test, approved compliance stack testing of emissions must be conducted within 10% of the maximum permitted input rate, 67.5 tons/hour of 100% P2O5. A compliance test submitted at operating levels less than 90% of permitted capacities will automatically constitute an amended permit at the lesser rate plus 10% until another test (showing compliance) at 90% of a higher capacity is submitted. Failure to submit the input rates or operation at conditions during testing which do not reflect actual operating conditions may invalidate the data (Subsection 403.161(1)(c), Florida Statutes).
6. Compliance with the emission limitations of Specific Condition No. 3 shall be determined using EPA Methods 1, 2, 3, and 13A or 13B contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.
7. The Southwest District Office of the Department of Environmental Regulation shall be notified in writing 15 days prior to compliance testing.

PERMITTEE:
W. R. Grace & Company

Permit No.: AO53-139168
Project: Phosphoric Acid
Plant No. 5

8. All reasonable precautions shall be taken to prevent and control the generation of fugitive fluoride emissions in order to provide reasonable assurance that the fluoride emission limitation in Specific Condition No. 3 is not exceeded.

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

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

10. An application to renew this operating permit shall be submitted to the Department sixty (60) days prior to the expiration date of this permit.

Issued this 4 day of March
1988.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



Richard D. Garrity, Ph.D.
District Manager

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

GENERAL CONDITIONS (con't):

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

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

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

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

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

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

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department (17-6.130) 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.

GENERAL CONDITIONS (con't):

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

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

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

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

13. This permit also constitutes:

() Determination of Best Available Control Technology (BACT)

() Determination of Prevention of Significant Deterioration (PSD)

() Certification of Compliance with State Water Quality Standards (Section 401. PL 92-500)

(x) Compliance with New Source Performance Standards

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

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

14. (con't):

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

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- 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.

CHECK NO.	CHECK DATE	VENDOR NO.
24258	12/13/89	1000274

CHECK NO. 024258



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

50-937
 213
 NOT VALID FOR PAYMENT AFTER
 90 DAYS FROM DATE HEREON.

ONE THOUSAND AND 007/100 DOLLARS

CHECK AMOUNT
\$*****E,000.00

PAY TO THE ORDER OF DEPT. OF ENVIRONMENTAL REG.
 ORDER OF

BY: PRO

MUST BE COUNTERSIGNED IF \$10,000 OR MORE.

A053-139168

FEDERAL EXPRESS USE THIS AIRBILL FOR DOMESTIC SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII. USE THE INTERNATIONAL AIR WAYBILL FOR SHIPMENTS TO PUERTO RICO. QUESTIONS? CALL 800-238-3353 TOLL FREE.		AIRBILL		PACKAGE TRACKING NUMBER: 2778798655			
Date: 12-13-89		RECIPIENT'S COPY					
From (Your Name) Please Print: M. J. Martinasek		Your Phone Number (Very Important): (813) 533-2171		To (Recipient's Name) Please Print: Mr. Willard Hanks, P. E.			
Company: SEMINOLE FERTILIZER		Department/Floor No.:		Company:			
Street Address: Hwy 60 West		City: Bartow State: FL ZIP Required: 33830		Dept. of Environmental Regulation Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.): 2600 Blair Stone Road			
City: Bartow State: FL ZIP Required: 33830		City: Tallahassee State: FL ZIP Required: 32399-2000		IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address:			
YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)		City: State: ZIP Required:					
PAYMENT <input checked="" type="checkbox"/> Bill Sender <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card		City: State: ZIP Required:					
<input type="checkbox"/> Cash		City: State: ZIP Required:					
SERVICES		DELIVERY AND SPECIAL HANDLING		PACKAGES			
1 <input type="checkbox"/> PRIORITY 1 Overnight Delivery 2 <input type="checkbox"/> COURIER-PAK OVERNIGHT ENVELOPE 3 <input type="checkbox"/> OVERNIGHT BOX 4 <input type="checkbox"/> OVERNIGHT TUBE 5 <input type="checkbox"/> STANDARD AIR Delivery not later than second business day 6 <input checked="" type="checkbox"/> OVERNIGHT LETTER 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/>		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box #) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Release Signature Not Applicable) 6 <input type="checkbox"/> DRY ICE Lbs. 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY STOP-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		WEIGHT IN POUNDS ONLY YOUR DECLARED VALUE DIMENSION Total Total Total		Emp. No. Date <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: X Date/Time Received: FedEx Employee Number	
*Declared Value Limit \$100.		Received At: 1 <input type="checkbox"/> Regular Stop 2 <input type="checkbox"/> On-Call Stop 3 <input type="checkbox"/> Drop Box 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station		Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.			
FEDEX Corp. Employee No.		Date/Time for FEDEX Use		Release Signature:			
PART #111800 REVISION DATE 10/88 PRINTED IN U.S.A. FXEM		009		© 1988 F.E.C.			