



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

June 16, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Parsons:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct a product cooler with associated cyclone and scrubber on the Y-train diammonium phosphate plant.

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 Quality Management.

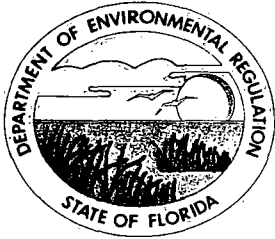
Sincerely,

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

CHF/WH/gb

Attachments

cc: Bill Thomas, SW District
Jerry Campbell, EPCHC
John Mulqueen, P.E.



Florida Department of Environmental Regulation

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

Bob Martínez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

BEFORE THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

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

DER File No. AC29-165420

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 reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Central Phosphates, Inc., applied on May 30, 1989, to the Department of Environmental Regulation for a permit to construct a product cooler with associated cyclone and scrubber on the Y-train diammonium phosphate plant at the phosphate fertilizer facility located at 10609 Highway 39 North, Plant City, Hillsborough County, Florida. Installation of the proposed cooler system will alter an existing facility (Y-train DAP/MAP GTSP plant).

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 50.11 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 deal 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, F.S. 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, F.S.

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 of 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 applicant 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 until 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.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

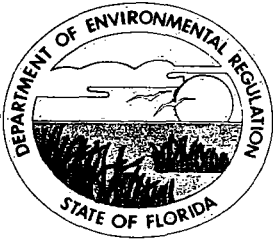
Bill Thomas, SW District
Jerry Campbell, EPCHC
John Mulqueen, P.E.

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 June 15, 1989.

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 Allise June 15, 1989
Clerk Date



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

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 Central Phosphates, Inc., Post Office Drawer L, Plant City, Florida 33566, to construct a product cooler with associated cyclone and scrubber on the Y-train diammonium phosphate plant at the phosphate fertilizer facility located at 10609 Highway 39 North, Plant City, Hillsborough County, Florida. Installation of the proposed cooler system will alter an existing facility (Y-train DAP/MAP/GTSP plant). The installation of the cooler will not increase emissions from the plant. No prevention of significant deterioration increment consumption is expected. A Best Available Control Technology (BACT) determination for the manufacture of monoammonium phosphate was 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 normal 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 Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Hillsborough County Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605

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**

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

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

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

June 16, 1989

I. General Information

A. Applicant

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

B. Request

On May 25, 1989, Central Phosphates, Inc. (CPI) submitted an incomplete application for a permit to construct a product cooler at the existing Y-train diammonium phosphate plant (SIC 2874). Installation of the cooler system will alter an existing facility (Y-train DAP/MAP/GTSP plant). The application was considered complete on May 30, 1989.

C. Project and Location

The applicant is requesting permission to install a product cooler and associated cyclone and scrubber on the existing Y-train diammonium phosphate (DAP) plant located at 10609 Highway 39 North, Plant City, Hillsborough County, Florida. The UTM coordinates of this site are Zone 17, 358.9 km E and 3092.8 km N. The purpose of the cooler is to improve the quality of the DAP product. The applicant states that the cooler will not increase production or emissions from the plant.

D. Background

CPI applied for permits to construct a phosphate fertilizer plant, which included the Y-train DAP plant, in 1974. The DAP plant is based on the TVA process. The plant is also capable of manufacturing granular triple superphosphate (GTSP) and monoammonium phosphate (MAP). The plant converted from GTSP to DAP production in 1976. Construction Permit No. AC29-2471 authorized this conversion. The plant began manufacturing MAP in 1987. This evaluation includes a Best Available Control Technology (BACT) determination to confirm that the plant is authorized to produce MAP and to specify the applicable fluoride emission standards when the plant is manufacturing MAP. Originally, the plant produced GTSP. Although approved by the original construction permit, the installation of the cooler, associated cyclone, and scrubber was not completed. The foundation and final stage scrubber that serves the cooler system and other process equipment in this plant was installed and placed in service. Current practices in shipping the granular products require CPI to cool the DAP. The goal of this application is to obtain permission to install the cooler system proposed in the original application and to clarify that this plant is authorized to produce MAP. The cooler system discharges air to the existing plant scrubber system. The applicant states

that the addition of the cooler system and the manufacture of MAP will not increase production or emissions from the plant.

II. Rule Applicability

A. State Regulations

The proposed project, installation of a product cooler system to an existing DAP/GTSP/MAP phosphate fertilizer plant (SIC 2874), is subject to preconstruction review under the provisions of Chapter 403, F.S., and Chapter 17-2, F.A.C.

The plant site is in an area designated nonattainment for ozone (F.A.C. Rule 17-2.410), in the area of influence of the Hillsborough County TSP Nonattainment Area (F.A.C. Rule 17-2.410), unclassifiable for sulfur dioxide (F.A.C. Rule 17-2.430), and attainment for other criteria pollutants (F.A.C. Rule 17-2.420).

The phosphate fertilizer plant that Y-train is located at is a major source of particulate matter and sulfur dioxide because allowable emissions of these pollutants exceed 100 TPY. The installation and operation of the proposed equipment will not increase emissions.

The facility is exempt from the Prevention of Significant Deterioration (PSD) regulations (F.A.C. Rule 17-2.500) and New Source Review for Nonattainment Areas (F.A.C. Rule 17-2.510) because the alteration to the plant will not increase emissions of any air pollutant.

The proposed project is subject to F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements. Emission standards shall be based on F.A.C. Rules 17-2.600(3), 17-2.610, and 17-2.650(2)(a)2., and actual plant production. If the project would result in an increase of emissions, it would be subject to other regulations.

B. Federal Regulations

This project is not subject to federal PSD regulations (40 CFR 52.21) because it will not cause an increase in actual emissions.

III. Technical Evaluation

The plant was originally designed to produce 75 TPH DAP or MAP and 50 TPH GTSP. Improvements within the process have allowed the plant to increase production to 100 TPH DAP or MAP and 55 TPH GTSP without increasing the original allowable emissions. The cooler system installation will improve product

quality. It will not increase production or emissions from the plant. A statistical evaluation of this plant and a similar plant equipped with a cooler showed no difference in emissions of particulate matter and fluoride. A summary of the plants production and emissions is shown in the following tables:

Product	Design Prod (TPH)	Max Prod (TPH)	Production		
			Phos Rock (TPH)	Acid (TPH)	NH ₃ (TPH)
DAP	75	100	----	122.3	23.1
MAP	75	100	----	130.6	14.1
GTSP	50	55	25.2	52.4	----

Product	Emissions			
	Permitted Emissions lbs/hr (TPY)		Max Actual Emissions lbs/hr (TPY)	
	PM	F	PM	F
DAP/MAP	34.9 (152.9)	2.2 (9.6)	15.3 (7.17)	1.24 (0.67)
GTSP	34.9 (152.9)	3.8 (16.6)	6.8 (7.42)	2.24 (0.98)

The applicant will be required to confirm that the emissions from the plant are not increased by this project using the procedures described in 40 CFR 60, Appendix A and C. Permit restrictions will not allow an increase in production unless approved by the Department.

Natural gas is the primary fuel for this plant. Maximum heat input is 45 mm Btu/hr. Emissions from this fuel will be minimal. No. 5 fuel with up to 1.6% sulfur is burned when natural gas is not available. This fuel causes a small increase in particulate matter emission and has the potential to increase sulfur dioxide emissions by approximately 77 lbs/hr although the Department estimates that the sulfur dioxide emissions will be approximately 35 lbs/hr because of the removal of this pollutant by the plant's scrubber.

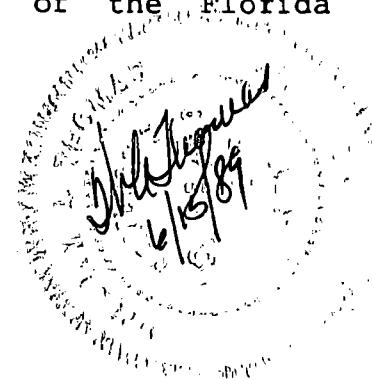
IV. Ambient Air Impact

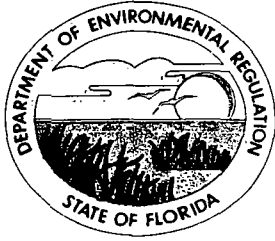
Use of this cooler will not increase emissions. Therefore, this project will not change the existing ambient air impact caused by this plant.

V. Conclusion

Based on the information submitted by Central Phosphates, Inc., the Department has reasonable assurance that the installation of a cooler system on the Y-train DAP plant, as described in this evaluation and subject to the conditions

proposed herein, will not cause or contribute to a violation of any ambient air quality standard or PSD increment, or violate any other technical provisions 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:

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
Date of Issue: June 16, 1989
Expiration Date: February 28, 1990

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
Date of Issue: June 16, 1989
Expiration Date: February 28, 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 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 ₃ PO ₄)	NH ₃
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 phosphate acid feed to the plant and the P₂O₅ 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 ₂ O ₅	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
Expiration Date: February 28, 1990

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.

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
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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).

Issued this _____ day
of _____, 1989.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary

P 938 762 593

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	
Mr. J. E. Parsons, Central Phosphates	
Street and No.	
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	\$
Postmark or Date	
Mailed: 6-15-89	
Permit: AC 29-165420	

PS Form 3800, June 1985

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)

3. Article Addressed to: Mr. J. E. Parsons, Gen. Mgr. Central Phosphates, Inc. P. O. Drawer L Plant City, FL 33566	4. Article Number P 938 762 593
Type of Service: <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 <u>DATE DELIVERED</u> .	
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 6-19-89	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT