

Compliance Plan CP-2
Title V Renewal 0470002-048-AV
And PSD-FL-297
Testing of B Phosphoric Acid Plant

Permit Nos. 0470002-039-AC (PSD-FL-297) and 0470002-053-AC (PSD-FL-297B) are incorporated into the Title V renewal project, 0470002-048-AV. All construction and testing has been completed except for B Phosphoric Acid Plant. All applicable conditions have been incorporated into project 048.

1. Within 45 days of B Phosphoric Acid Plant commencing operation, the permittee shall conduct all testing required by Permit No. 0470002-039-AC PSD-FL-297 for B Phosphoric Acid Plant. A permit modification revises conditions 11 and 20 to account for design changes authorized by 0470002-053-AC (PSD-FL-297B). The permittee shall comply with the following conditions regarding the required testing:

- a. The subject emission units shall be tested for compliance with the above emission limits in accordance with the requirements of Rule 62-297-.310, F.A.C. and methods in this permit. For the duration of all tests the emission unit shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than permitted capacity (i.e., 90% of the maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
- b. Phosphoric Acid Plant B: Phosphoric acid plant B is required to initially test both B and C stacks. The six combined runs will be required to be completed in the 5-day period, and may be performed sequentially, provided that each valid run is within 10% of the previously tested capacity. The combined emissions from both B and C stacks shall not exceed 1.2 lb/hour of fluoride. Until filtering commences at the A Phosphoric Acid Filters, annual compliance will be based on emissions from B and C stacks. Within 45 days of start up of the A phosphoric acid filters, the permittee shall conduct stack tests on stacks A, B, and C. The nine combined runs shall be completed in the 5-day period, and may be performed sequentially, provided that each valid run is within 10% of the previously tested capacity. The sum total of emissions from stacks A, B, and C shall not exceed the 1.2 lb/hour of fluoride. Upon startup of the A phosphoric acid filter, the permittee shall conduct annual testing of all three stacks during each federal fiscal year (October 1- September 30) to demonstrate compliance with the emissions standards.

[Rule 62-4.070(3) and 62-297.310, F.A.C.]

2. Stacks A, B, and C shall be subject to all process requirements of Phosphoric Acid Plant B. Phosphoric Acid Plants A and C will no longer produce phosphoric acid independently, however integral portions of both Phosphoric Acid Plants A and C will assist Phosphoric Acid Plant B to filter the phosphoric acid and control fluoride emissions. The Phosphoric Acid Plant A filter system, scrubber and stack will be used with B Phosphoric Acid Plant when additional filtering is required. Phosphoric Acid Plant A components will not operate independently or when Phosphoric Acid Plant B is not operating. Phosphoric Acid Plant C scrubber and stack will be used continuously with Phosphoric Acid Plant B to control emissions from the Phosphoric Acid Plant B production. Phosphoric Acid Plant C components will not operate independently or when Phosphoric Acid Plant B is not operating. The sum total of emissions from all three stacks (A, B,

and C) shall comply with the maximum daily average and annual operating rates in condition 3 and fluoride emission rate of 1.2 lb/hr and 3.6 tpy in condition 5 of this permit. Initial and annual testing must be in compliance with this permit. [Application No. 0470002-053-AC (PSD-FL-297B) and Rules 62-4.070(3) and 62-210.200, F.A.C. (Definitions - Potential Emissions)]

3. The permittee shall meet all the notification, testing and reporting requirements of Rule 62-297, F.A.C., 40 CFR 63 Subparts A (General Provisions) and AA (NESHAP for Phosphoric Acid Plants), and Alternate Sampling Plan 04-I-AP.

4. Once the permittee satisfactorily demonstrates compliance with the conditions of this Compliance Plan, compliance demonstrations shall resume in accordance with the specific conditions of the Title V permit.