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State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Madison County
Application No: 01-6617
TOXIC REVIEW

CERTIFIED MAIL

January 15, 1997

IMC AGRIBUSINESS, INC.
JEFF LAFUSE
249 CHESTNUT STREET
MT. STERLING, OH 43143

RECEIVED
JAN 27 1997
OHIO EPA/CDO

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CENTRAL DISTRICT OFFICE, DAPC

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 01-6617
APS Premise No. 0149000081
Permit Fee: \$200.00

Name of Facility: IMC AGRIBUSINESS, INC.

Person to Contact: JEFF LAFUSE

Address: 249 CHESTNUT STREET
MT. STERLING, OH 43143

Location of proposed source(s): 249 CHESTNUT STREET
MT. STERLING, OHIO

Description of proposed source(s):
AMMONIUM PHOSPHATE TEE REACTOR.

Date of Issuance: January 15, 1997

Effective Date: January 15, 1997

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

IMC AGRIBUSINESS, INC.
Application No. 01-6617
Page 3 of 7
January 15, 1997

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for IMC AGRIBUSINESS, INC. located in Madison County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P001 Modi- fication	Ammonium phosphate TEE reactor	Compliance with permitted limits and applicable rules	3745-31-05 3745-15-06 3745-15-07 3745-17-07 3745-17-11	8.32 lbs NH ₃ /hr 4.16 tons NH ₃ /yr 2.98 lbs P ₂ O ₅ /hr 1.49 tons P ₂ O ₅ /yr 9.28 lbs PM/hr 4.64 tons PM/yr

See Additional
 Special Terms
 and Conditions

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
NH ₃	4.16
P ₂ O ₅	1.49
PM	4.64

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Central District Office - DAPC, 3232 Alum Creek Drive, P. O. Box 1049, Columbus, Ohio 43216-1049.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Central District Office - DAPC, 3232 Alum Creek Drive, P. O. Box 1049, Columbus, Ohio 43216-1049.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Performance Testing Requirements:

Performance testing was conducted on the Ammonium Phosphate Tee-Reactor, air contaminant source P001, prior to the issuance of this PTI. This testing was conducted for ammonia using a combination of EPA Method 26 and NIOSH method 6701, a method approved by the Ohio EPA for monitoring this source. Future testing of this source shall be established in the Permit to Operate.

2. Preventive Maintenance and Malfunction Abatement Plan:

The owner and operator of this facility shall comply with the Preventive Maintenance and Malfunction Abatement Plan (PM&MAP), titled "Process Safety Management: Mechanical Integrity Program" for source P001 and the associated emission

control system. Compliance with the plan's maintenance and inspection schedule for all pumps and compressors associated with the process will be documented. Documentation and records of maintenance and inspections will be retained at the facility for a period of at least 3 years.

3. Allowable Emissions and Hours of Operation for the Ammonium Phosphate Tee Reactor:

The ammonium phosphate tee reactor (source P001) shall not discharge more than 8.32 pounds of ammonia or 2.98 pounds of phosphorous pentoxide into the atmosphere in any one hour. Ammonia emissions from this source shall not exceed 4.16 tons per year; phosphorous pentoxide emissions shall not exceed 1.49 tons per year. Hours of operation will not exceed 12 hours per day.

4. Recordkeeping Requirements for Ammonium Phosphate Tee-Reactor:

The permittee shall maintain monthly records of the following information for emissions unit, P001:

- a. the throughput (in gallons) of anhydrous ammonia and the calculated throughput of superphosphoric acid;
- b. the total operating hours;
- c. the average calculated emissions of ammonia and phosphorous pentoxide, in pounds per hour (monthly production times emission factor divided by total hours of operation); and
- d. the accumulated total of ammonia and phosphorous pentoxide emissions, in pounds or tons per current year.

These records, as well as, any supporting information and computations, shall be retained at the facility for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review, upon verbal or written request.

5. Reporting Requirements for Ammonium Phosphate Tee-Reactor:

Within 45 days of any exceedance of a permitted limit (as measured or calculated), IMC AgriBusiness shall submit a deviation (excursion) report which identifies:

- a. each hour during which the average calculated hourly particulate, ammonia, and/or phosphorous pentoxide emissions exceeded permitted limits of:

9.28 pounds of particulate
8.32 pounds of ammonia;
2.98 pounds of phosphorous pentoxide; and

- b. the actual estimated (calculated) emissions from each of the pollutants;
- c. the probable cause of such excursion; and
- d. any corrective actions or preventive measures which have been or will be taken to assure compliance with the permitted limits.

This report shall not be required if no deviations have occurred during the month. (These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

6. Operational Practices:

The permittee shall not permit any volatile or hazardous chemical to be spilled, discarded in sewers, stored in open containers, or handled in any other manner that would result in evaporation.