



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

St. Marks Powder, Inc.  
Post Office Box 222  
St. Marks, Florida 32355

St. Marks Powder  
Facility ID No. 1290003

**PROJECT**

Project No. 1290003-020-AC  
Application for Title V Air Construction Permit  
Project Name: Re-establish NSB Baseline Emissions

**COUNTY**

Wakulla County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Waste Management/Air Resources Program  
Northwest District Office  
160 W. Government Street, Suite 308  
Pensacola, Florida 32502-5740

Date

## 1. GENERAL PROJECT INFORMATION

### Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U.S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

### Facility Description and Location

St. Marks Powder (SMP) is an existing propellant manufacturing plant, which is categorized under Standard Industrial Classification Code No. 2892. The facility is located in Wakulla County at the intersection of U.S. 98 and S.R. 36 in Crawfordville, Florida. The UTM coordinates of the existing facility are Zone 16, 767.6 km East and 3342.1 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### Project Description

This Project modifies air construction permit No. 1290003-016-AC, issued January 13, 2011, and authorizes St. Marks Powder to re-establish baseline emissions for the North Sweetie Barrel (NSB) propellant surface coating project, based on *actual* emissions instead of potential to emit, and removes the non-rule based visible emissions test requirement for the coaters (EU 012). This air construction permit is being processed concurrently with the Title V air operation permit revision No. 1290003-021-AV, which revises the existing Title V air operation permit 1290003-018-AV for this facility.

There are no physical changes associated with this Project. Because the application to reactivate surface coating at the North Sweetie Barrel only included potential emissions, and actual emissions were not calculated, actual emissions for North Sweetie Barrel could not be shown on the annual project emissions increase (PEI) report. Re-establishing baseline emissions for the NSB project based on actual emissions will allow actual emissions to be shown on the annual PEI report.

## Project History

On February 19, 2013, URS sent an e-mail request regarding the project emissions increase (PEI) report calculation method for the St. Marks Powder (SMP) facility located in Crawfordville, Wakulla County. The request was to use actual emissions instead of potential-to-emit (PTE) for the baseline emissions calculations associated with the permit application 1290003-016-AC. The revisions to these baseline calculations will allow the annual PEI report to compare future actual emissions to the baseline actual emissions.

A letter in response to this email was received on March 14, 2013, requesting SMP to submit a permit minor modification to air construction permit 1290003-016-AC, showing calculations and supporting data comparing baseline actual emissions and future actual emissions for the North Sweetie Barrel Project.

A re-evaluation of the NSB baseline emission calculations has been completed and was submitted with this application.

## Summary of Changes Associated with the NSB Re-Evaluation Project

- 1) This Project re-establishes baseline emissions calculations for the NSB Project based on actual emissions.

This change affects post project emissions monitoring for the NSB Project as noted below:

- a. SMP recalculated baseline emissions for the NSB Project, using actual emissions instead of potential to emit, and these revised baseline emissions calculations are used as the basis for the North Sweetie Barrel PSD analysis.
  - b. SMP updated the facility-wide potential-to-emit (PTE) to more accurately reflect actual amount of Nitrocellulose in each process stream. Changes to the PTE values are not Project related, but are a result of reconciliation of process flow streams as noted below:
    1. Corrected equation for Nitrocellulose in Stream 8.
    2. Minimized the recycle rate of NC in Stream 7 to 15% of Stream 6.
    3. Updated Stream 12 calculation to show NC in Stream 12 is equal to NC in Stream 8.
  - c. Pilot Surface Coating (EU 024) is not included in this analysis. EU 024 was part of the original NSB Project; however, changes to EU 024 were not implemented and were not included in the revision application for the Project.
- 2) This Project removes the non-rule based visible emissions (VE) test requirement from the Title V air operation permit for the coaters (EU 012).

This change affects compliance testing for EU 012 as noted below:

- a. A compliance test for VOC shall be performed once during the permit cycle (every five years) to validate the treatment system VOC removal efficiencies. The visible emissions test requirement is removed from the Title V permit for the coaters because the propellant surface coating operations are not subject to any unit specific emissions limitation or standard.

The Title V air permit renewal application No. 1290003-018-AV, received October 4, 2013, included a request to reinstate the compliance test requirements contained in Title V air operation permit No. 1290003-015-AV when the Title V air operation permit was renewed. The Department concurred, and the compliance testing requirements for EU 012 were changed to once during the permit cycle. (See letter regarding St. Marks Powder 1290003 Testing Requirements, dated August 3, 2012).

## Processing Schedule

February 13, 2014 Received Application for Title V Air Construction Permit and Revised Air Operation Permit.

February 26, 2014 Requested additional information.

March 4, 2014 Received additional information; application complete.

## 2. PSD APPLICABILITY

### General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS), including H<sub>2</sub>S; reduced sulfur compounds, including H<sub>2</sub>S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO<sub>2</sub> and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m<sup>3</sup>, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

**PSD Applicability for Project**

The baseline period is based on the average of the worst case 24 month period prior to the incorporation of the project changes. The NSB Project was constructed in 2011, therefore, the 10 year baseline period was considered to be 2000-2010.

Worst case emissions are driven by production at St. Marks Powder. As production has increased steadily over the 10 year baseline period, the worst case emissions resulted during 2009 and 2010.

‘Capable of being accommodated’ values are typically based on the worst case month, annualized. Monthly data was not available for this analysis; therefore, annual data was used and emissions that could have been accommodated during the baseline period are represented by 2010 values.

Re-evaluation of the NSB Project was completed using the following steps:

1. Develop baseline actual emissions from the highest average production in a 24-month period for the 10 years prior to Project construction (2000-2010).
2. Develop emissions during the baseline period that could have been accommodated (Note: for this analysis SMP has chosen the highest calendar year production: 2010).
3. Develop the future actual emission calculations. Future actual emissions are based on a 25% increase from 2010 values in the number of nitrocellulose lacquer batches through the process. As the NSB was considered a new source for the Project, potential emissions from the NSB were included in the future actual emissions.
4. Re-evaluate PSD. Emission increases are the future actual emissions in step 3 minus the emissions the source is capable of accommodating in step 2.
5. Utilize baseline actual and future actual emissions in the PEI report for the next 10 years.

**Detailed Description of PSD Analysis**

The calculations for the analysis include emissions for sources, or components of sources, that are affected by the Project. The Propellant Surface Coating Operations (EU 012) include 3 components: the North Coater, South Coater, and the North Sweetie Barrel. The North and South Coaters were not affected by the NSB project. However, the NSB VOC mode was added as part of the Project. Therefore, the NSB is the only component of EU 012 that was evaluated. The sources affected by the Project are as follows:

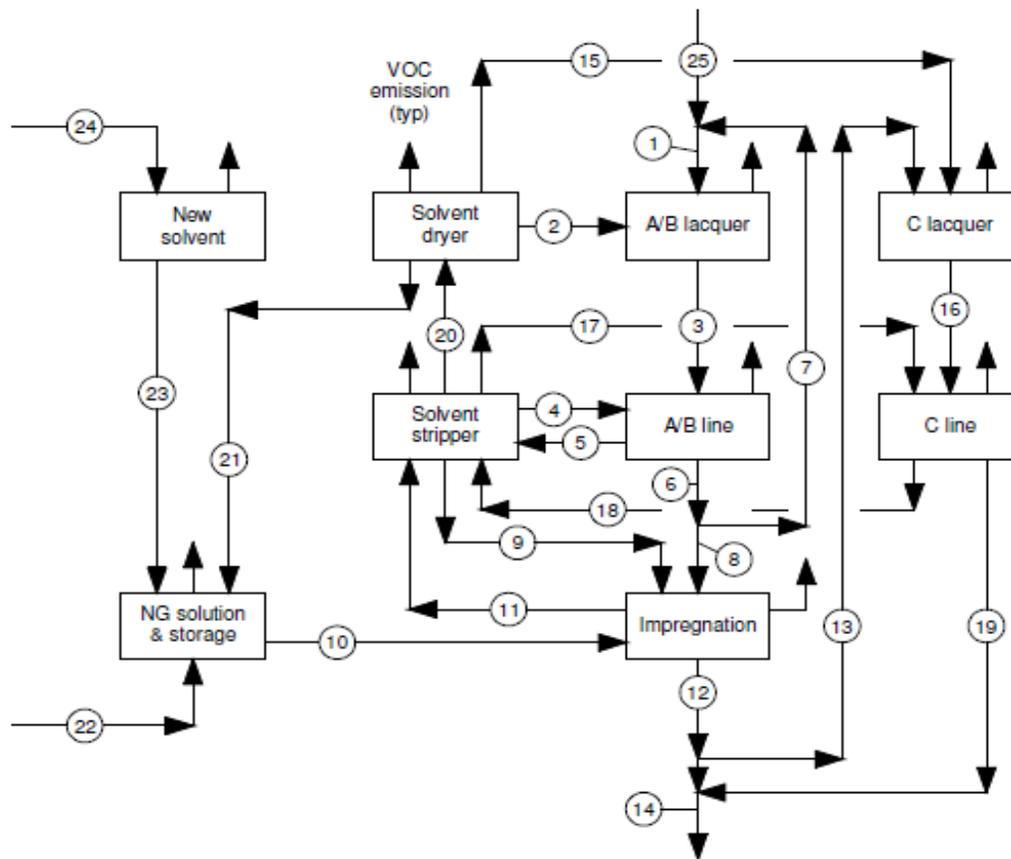
<b>EU ID</b>	<b>EU Description</b>	<b>Affected Component</b>
012	Propellant Surface Coating Operations	North Sweetie Barrel Only
013	Vacuum Pump Exhaust	E. Evaporator and Propellant Recovery Losses
014	Fugitive Emissions	Waste Water Treatment Plant Only
015	Process Vessel Loading Losses	Evaluated All
017	Propellant Dryer Exhaust	Evaluated All
018	Lacquer Preparation Kettle Loading Losses	Evaluated All
019	Solvent Storage Tanks	Evaluated All
021	Pilot and Batch Dry Propellant Operations	Evaluated All
022	Pneumatic Conveyors	Evaluated All
023	Propellant Grinder	Evaluated All
Insig	Acid Mist (Insignificant Activity)	Evaluated All

### NSB Project Re-Evaluation - Changes and Corrections

The following changes/corrections have been made to the NSB analysis originally presented in application 1290003-016-AC (See process flow streams diagrams, Figures 1 & 2):

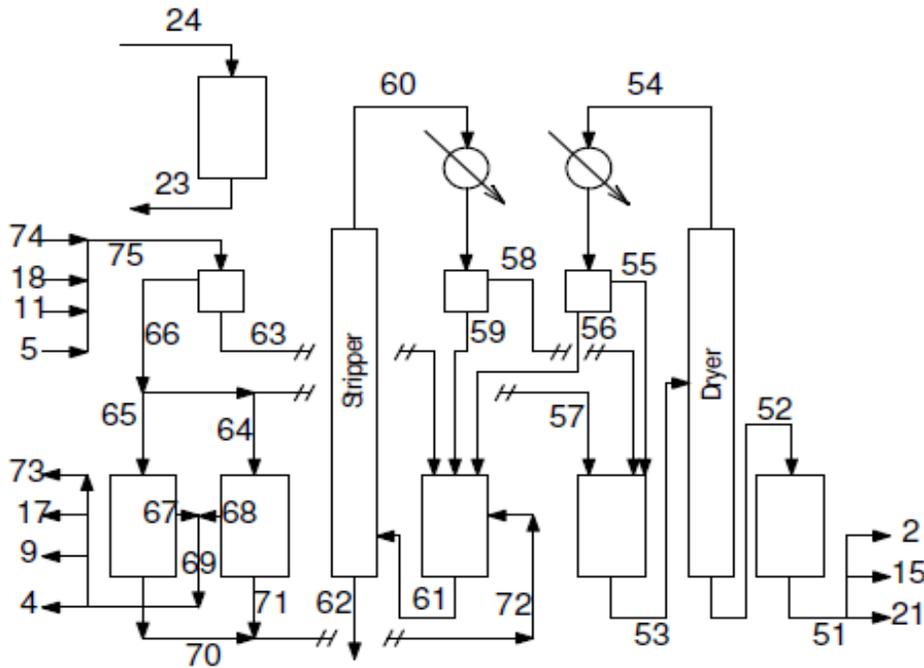
1. Future actual emissions are based on 25% increase to the emissions that could have been accommodated during the baseline period (2010 values) for the Nitrocellulose (NC) lacquer batches through the process.
2. For baseline calculations, corrected equation for NC in Stream 8: NC in Stream 8 = NC in Stream 6 – NC in Stream 7.
3. For future actual emissions, minimized the recycle rate of NC in Stream 7 to 15% of Stream 6 (conservative).
4. For future actual emissions, based Stream 12 calculation to show NC in Stream 12 = NC in Stream 8. Total Stream 12 weight is now based on NC weight over the fraction of NC in Stream 12. Low density (LD) and high density (HD) throughput values are based on 40% LD and 60% HD. This is considered worst case for future actual emissions.
5. For baseline emissions, Stream 14 = Stream 12 - Stream 13 + Stream 19 (total weights). For future actual emissions, Stream 19 is no longer routed back to Stream 14 (post NSB project). Stream 19 now routes to the batch drying process: Stream 14 = Stream 12 – Stream 13 (total weight).
6. Addition of the E. Evaporator was part of the NSB project, however, the E. Evaporator does not increase emissions, and therefore, it is not included in the baseline or future actual emissions.
7. For baseline actual emissions, updated lacquer hold tank calculations in EU 015 to reflect the most representative emission calculation methodology for both baseline and future actual emissions.
8. Particulate Matter with aerodynamic diameter of less than 10 microns (PM10) was previously shown as being emitted from the Lacquer Preparation Kettle Loading Losses (EU 018). This has been removed since only large particulate is emitted from this process.
9. Acid mists were included in the NSB Project analysis; however, the project change is insignificant.

FIGURE 1: PROCESS FLOW DIAGRAM FOR STREAM FLOWS 1 – 25



Note: To determine the maximum throughput of the process area, VOC losses are ignored. They will be estimated in the detailed emission estimates or the emission units. Nitrocellulose input is based on maximum operating capability of the lacquer mixing areas. This sets the input to A & B lines and C line.

FIGURE 2: PROCESS FLOW DIAGRAM FOR STREAM FLOWS 52 - 75



North Sweetie Barrel PSD Analysis - Tables 1 Through 4

Tables 1 and 2 present a summary of the 2009 and 2010 baseline emissions, respectively. Table 3 presents a summary of the future actual emission calculations. Table 4 shows the revised PSD analysis. Baseline emissions are based on the average of 2009 and 2010 emissions. Emissions that could have been accommodated during the baseline period are based on 2010 values. Project emission increases are based on the difference between the future actual emissions and emissions that could have been accommodated during the baseline period.

TABLE 1: 2009 BASELINE EMISSIONS SUMMARY

EU ID	Source	Emissions (TPY)		
		PM	PM <sub>10</sub>	VOC
012	Propellant Surface Coating Operations (NSB Only)			0.00
013	Vacuum Pump Exhaust (Propellant Recovery Only)			0.70
014	Fugitive Emissions (WWT and Propellant Recovery Only)			27.20
015	Process Vessel Loading Losses			3.80
017	Propellant Dryer Exhaust	26.65	8.26	27.76
018	Lacquer Preparation Kettle Loading Losses	5.47		21.71
019	Solvent Storage Tanks			23.32
021	Pilot and Batch Dry Propellant Operations	0.47	0.47	0.90
022	Pneumatic Conveyors	3.34	3.34	
023	Propellant Grinder*			1.00
Insignificant	Acid Mist (Insignificant Activity)	0.72	0.72	
	Total	36.65	12.79	106.39

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

\*Note: SMP recovers obsolete propellant that can be used to displace purchased nitrocellulose. Propellant is received in packs and emissions of VOC occur when the packs are opened and dumped into water for grinding and reprocessing.

TABLE 2: 2010 BASELINE EMISSIONS SUMMARY

EU ID	Source	Emissions (TPY)		
		PM	PM <sub>10</sub>	VOC
012	Propellant Surface Coating Operations (NSB Only)			0.00
013	Vacuum Pump Exhaust (Propellant Recovery Only)			0.97
014	Fugitive Emissions (WWT and Propellant Recovery Only)			33.35
015	Process Vessel Loading Losses			4.11
017	Propellant Dryer Exhaust	28.69	8.89	29.89
018	Lacquer Preparation Kettle Loading Losses	5.79		22.85
019	Solvent Storage Tanks			24.22
021	Pilot and Batch Dry Propellant Operations	0.47	0.47	0.90
022	Pneumatic Conveyors	3.50	3.50	
023	Propellant Grinder			1.39
Insignificant	Acid Mist (Insignificant Activity)	0.77	0.77	
	Total	39.21	13.63	117.68

TABLE 3: FUTURE ACTUAL EMISSION SUMMARY

EU ID	Source	Emissions (TPY)		
		PM	PM <sub>10</sub>	VOC
012	Propellant Surface Coating Operations (NSB Only)			1.14
013	Vacuum Pump Exhaust (Propellant Recovery losses only)			1.32
014	Fugitive Emissions (WWTP and Propellant Recovery Losses Only)			33.84
015	Process Vessel Loading Losses			4.67
017	Propellant Dryer Exhaust	37.32	11.57	38.88
018	Lacquer Preparation Kettle Loading Losses	8.37		31.11
019	Solvent Storage Tanks			30.05
021	Pilot and Batch Dry Propellant Operations	0.48	0.48	0.90
022	Pneumatic Conveyors	4.42	4.42	
023	Propellant Grinder			1.89
Insignificant	Acid Mist (Insignificant Activity)	0.77	0.77	
	Total	51.36	17.24	143.79

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

TABLE 4: PSD ANALYSIS (COMPARISON BASELINE ACTUAL TO FUTURE ACTUAL EMISSIONS)

Unit or Emission Description	Emissions (TPY)		
	VOC	PM	PM <sub>10</sub>
Baseline Actual Emissions (Average of 2009 and 2010)			
Propellant Surface Coating Operations (EU 012) - NSB Only	0.0	--	--
Vacuum Pump Exhaust (EU 013) - Propellant Recovery Only	0.8	--	--
Fugitive Emissions (EU 014) - Propellant Recovery and WWTP Only	30.3	--	--
Process Vessel Loading Losses (EU 015)	4.0	--	--
Propellant Dryer Exhaust (EU 017)	28.8	27.7	8.6
Lacquer Preparation Kettle Loading Losses (EU 018)	22.3	5.6	--
Solvent Storage Tanks (EU 019)	23.8	--	--
Pilot and Batch Dry Propellant Operations (EU 021)	0.9	0.5	0.5
Propellant Pneumatic Conveyors (EU 022)	--	3.4	3.4
Propellant Grinding (EU 023)	1.2	--	--
Acid Mist (Insignificant Activity)	--	0.7	0.7
<b>Total Baseline Emissions (Average 2009-2010)</b>	<b>112.0</b>	<b>37.9</b>	<b>13.2</b>
Capable of Accommodating During Baseline Period (2010)	117.7	39.2	13.6
<b>Future Actual Emissions</b>	<b>143.8</b>	<b>51.4</b>	<b>17.2</b>
Project Emissions Change	26.1	12.1	3.6
PSD Significance Levels	40.0	25.0	15.0
PSD Review Required	NO	NO	NO
Reasonable Possibility (Increases)	26.1	12.1	3.6
PSD Emissions Tracking & Recordkeeping Required?	Yes	No	No
Reasonable Possibility (Increases)	26.1	12.1	3.6
Pre-construction Recordkeeping Required?	Yes	No	No

**Summary of PSD Analysis**

The table below shows the actual baseline and projected emissions, demand growth exclusion, and project emissions increases for the NSB Project.

Table A. PSD Applicability

Pollutant (TPY)	Baseline Actual Emissions (BAE)	Projected Actual Emissions (PAE)	Demand Growth Exclusion (DG)	Project Emissions Increases (PEI)	Significant Emissions Rate (SER)	Subject to PSD
<b>CO</b>					100	<b>NO</b>
<b>NO<sub>x</sub></b>					40	<b>NO</b>
<b>PM</b>	37.9	51.4	39.2	12.1	25	<b>NO</b>
<b>PM<sub>10</sub></b>	13.2	17.2	13.6	3.6	15	<b>NO</b>
<b>PM<sub>2.5</sub></b>					10	<b>NO</b>
<b>SO<sub>2</sub></b>					40	<b>NO</b>
<b>VOC</b>	112.0	143.8	117.7	26.1	40	<b>NO</b>
<b>Pb</b>						
<b>Max HAP</b>						
<b>Total HAP</b>						

The facility is considered a major stationary source with respect to PSD, because it is a chemical process plant that has the potential to emit 100 tons per year or more of the regulated air pollutants VOC and SO<sub>2</sub>. However, as shown in the above table, this Project is not a major modification under PSD regulations, since the differences between the baseline actual emissions and projected actual emissions do not reach or exceed the significant emissions rates.

### **3. APPLICATION REVIEW**

#### **Application Fee**

This is a Title V facility. No fee is due.

#### **Discussion of Emissions**

There are no physical changes associated with this project.

Emissions from the coaters are controlled by venturi scrubbers and packed columns. The compliance assurance monitoring (CAM) plan has set parameters for the scrubbers which ensure compliance. Continuous monitoring of the air flow differential pressure and scrubbing water flow rate for the three scrubbers (one each for the North Coater, South Coater, and North Sweetie Barrel) will ensure continuous compliance with VOC emissions limits. Both the venturi scrubber and packed bed scrubber are operated whenever VOC based coatings are being applied to the propellant. A VOC removal efficiency of 80% (or more) is needed to demonstrate compliance, and can be expected at all allowed operating conditions.

#### **Changes to Facility-Wide Potential to Emit (PTE)**

The following process stream flow reconciliations have been made to the current PTE calculations which were submitted with the 2013 Title V air operation permit renewal application:

1. Nitrocellulose entering the process is based on 25% increase to the emissions that could have been accommodated during the baseline period (2010 values) for the Nitrocellulose lacquer batches through the process.
2. Corrected equation for NC in Stream 8.  $NC \text{ in Stream 8} = NC \text{ in Stream 6} - NC \text{ in Stream 7}$ .
3. Minimized the recycle rate of NC in Stream 7 to 15% of Stream 6 (conservative).
4. Updated Stream 12 calculation to show  $NC \text{ in Stream 12} = NC \text{ in Stream 8}$ . Total Stream 12 weight is now based on NC weight over the fraction of NC in Stream 12. LD and HD throughput values are based on 40% LD and 60% HD. This is considered worst case.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

### Changes in Facility-Wide Potential-to-Emit (tons/year) Due to Reconciliation of Process Stream Flows:

Regulated Air Pollutant	2013 Title V Renewal PTE Emissions	2014 Title V Revision PTE Emissions	Change in PTE Due to Reconciliation of Process Stream Flows
CO	20.3	20.3	0.0
NOx	55.0	55.0	0.0
PM	89.9	95.3	5.4
PM <sub>10</sub>	48.7	50.4	1.7
PM <sub>2.5</sub>	25.9	25.9	0.0
SO <sub>2</sub>	245.0	245.0	0.0
VOC	593.7	604.7	11.0
Pb	14.6 lbs/yr	14.6 lbs/yr	0.0
Max Individual HAP (Hexane)	666 lbs/yr	666 lbs/yr	0.0
Total HAP	910 lbs/yr	910 lbs/yr	0.0

#### State Requirements

This Title V source is not subject to any unit specific rules. A compliance assurance monitoring (CAM) plan is required for the South Coater and the North Sweetie Barrel. The North Coater operates under an approved O&M Plan.

#### Federal NSPS Provisions

None.

#### Federal NESHAP Provisions

None.

#### Other Draft Permit Requirements

N/A

#### 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Howard Ard is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at 850.595.0622 or [howard.ard@dep.state.fl.us](mailto:howard.ard@dep.state.fl.us).