

Florida Department of Environmental Protection

Northeast District
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Jacksonville, Florida 32256

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Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Interim Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

White Springs Agricultural Chemicals, Inc.
dba PCS Phosphate, White Springs
P. O. Box 300
White Springs, Florida 32096

Authorized Representative:
William L. Donohue, General Manager

Air Permit No. 0470002-096-AC
Permit Expires: July 6, 2016

Suwannee River/Swift Creek Complex
Air Construction Permit
“E” and “F” Cooler replacements

This is the final air construction permit, which authorizes the routine replacement for coolers (with an equivalent unit) in the EU066 “E” and EU067 “F” Sulfuric Acid Plants (SAP) as needed for maintenance purposes on a temporary or on a long term/permanent basis. The proposed work will be conducted at the Suwannee River/Swift Creek Complex, which is a phosphate mining and chemical production facility (Standard Industrial Classification No. 2874). The facility is located in Hamilton County at 15843 SE 78th Street, White Springs, Florida. UTM Coordinates are: Zone 17, 328.3 km East and 3368.8 km North; and, Latitude: 30° 26’ 27” North and Longitude: 82° 47’ 16” West.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

AIR CONSTRUCTION PERMIT

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

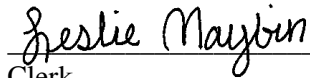
Executed in Jacksonville, Florida



Richard S. Rachal III, P.G.
Permitting Program Administrator

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this Construction permit and all copies were sent before the close of business on June 6, 2015 to the listed persons.



Clerk

June 6, 2015
Date

Mr. William L. Donohue, White Springs Agricultural Chemicals, Inc. (bdonohue@pcsphosphate.com)

Mr. Pradeep Raval, Koogler and Associates, Inc. (praval@kooglerassociates.com)

Mr. David Still, Manager Environmental Affairs - White Springs Agricultural Chemicals, Inc.
(DaStill@potashcorp.com)

Mr. John Koogler, P.E., Koogler and Associates, Inc. (jkoogler@kooglerassociates.com)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility processes phosphate rock to produce several products at the Suwannee River/Swift Creek Complex (two plants). The facility consists of one rock grinder, two phosphoric acid plants, two defluorinated phosphate (DFP) plants, one monocal/dical process, two monoammonium/diammonium phosphate (MAP/DAP) plants, one Storage and Shipping building, one screening/shipping building, two sulfuric acid plants, two phosphoric acid filters, three superphosphoric acid plants, one green superphosphoric plant, the Swift Creek Mine (SCM) rock dryer, and one acid clarification plant. The facility also has storage silos associated with the Swift Creek Mine and the DFP plant.

Facility ID No. 0470002	
ID No.	Emission Unit Description
001	#2 Phosphate Rock Grinder
003	"A" Defluorinated Phosphate (DFP) Plant
004	"X"-Train (Monocal/Dical process)
008	"Y" Train-#1 MAP/DAP Plant
010	#1 Storage and Shipping Building
015	Granular Product Shipping and Screening Facility
020	"B" Phosphoric Acid Plant
032	"Z"-Train #2 MAP/DAP Plant
034	South Phosphoric Acid Filters
035	North Phosphoric Acid Filters
036	"B" Superphosphoric Acid Plant
038	"B" Defluorinated Phosphate (DFP) Plant
039	"C" Auxiliary Boiler
040	"D" Auxiliary Boiler
042	Defluorinated Phosphate (DFP) Feed Prep
044	"A" and "B" DFP Coolers
054	Molten Sulfur System
061	Green Superphosphoric Acid Plant
062	Defluorinated Phosphate (DFP) Silos
064	Swift Creek Mine (SCM) Rock Dryer
065	Swift Creek Mine Silos Mineral Storage and Conveyor System
066	"E" Sulfuric Acid Plant
067	"F" Sulfuric Acid Plant
068	"E" Auxiliary Boiler
069	"D" Phosphoric Acid Plant

SECTION 1. GENERAL INFORMATION

ID No.	Emission Unit Description
070	“C” and “D” Superphosphoric Acid Plants
071	Acid Clarification Plant
072	Molten Sulfur System
075	Relocatable Concrete Batch Plant
076	15 Emergency Engines
077	Emergency Rental Boiler

Proposed Project

Air construction permit, which authorizes the routine replacement for coolers (with an equivalent unit) in the EU066 “E” and EU067 “F” Sulfuric Acid Plants (SAP) as needed for maintenance purposes on a temporary or on a long term/permanent basis. This project will modify the following emissions units. There are two existing sulfuric acid plants at White Springs Agricultural Chemicals, Inc. dba PCS Phosphate. These sulfuric acid plants utilize acid coolers in the process. The coolers are essentially heat exchangers. The primary purpose of an acid cooler is to maintain acid temperatures below levels that cause excessive corrosion of the equipment. The gas temperatures, which affect conversion and air emissions, are maintained by different heat exchangers. Consequently, the replacement acid coolers can vary somewhat and still maintain acid temperatures below the required thresholds.

Facility ID No. 0470002	
ID No.	Emission Unit Description
066	“E” Sulfuric Acid Plant <ol style="list-style-type: none">1. Drying Tower Acid Cooler2. Interpass Tower Acid Cooler3. Final Tower Acid Cooler4. Product Acid Cooler (96/98 Dilution)5. 93% Dilution Acid Cooler

Facility ID No. 0470002	
ID No.	Emission Unit Description
067	“F” Sulfuric Acid Plant <ol style="list-style-type: none">1. Drying Tower Acid Cooler2. Interpass Tower Acid Cooler3. Final Tower Acid Cooler4. Product Acid Cooler (96/98 Dilution)5. Boiler Feedwater Preheater Plant

SECTION 1. GENERAL INFORMATION

FACILITY REGULATORY CLASSIFICATION

- The facility **is** a major source of hazardous air pollutants (HAP).
- The facility **has no** units subject to the acid rain provisions of the Clean Air Act (CAA).
- 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(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Permitting Program, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, (904) 256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, (904) 256-1700.
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation:
 - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]
9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - 1) The name, address and telephone number of the owner or operator of the major stationary source;
 - 2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - 4) Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the Department requires the annual reporting of actual Sulfuric Acid Mist (SAM), and Sulfur Dioxide (SO₂) emissions for the following units: EUs 066 and 067 as stated in **Specific Condition No. A.2., of this permit**.

Unless otherwise approved by the Department, the permittee shall use the same emissions factors for reporting the actual annual emissions of **SO₂ and SAM**, as used in the application to establish baseline emissions.

[Application 0470002-096-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU066 “E” Sulfuric Acid Plant and EU067 “F” Sulfuric Acid Plant

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
066	<p>“E” Sulfuric Acid Plant is a double absorption process that produces sulfuric acid and controls sulfur dioxide (SO₂) emissions.</p> <p>{Permitting note(s): This emissions unit is regulated under NSPS - 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid, adopted and incorporated by reference in Rule 62-204.800(7)(b)10., F.A.C.; Rule 62-212.300, F.A.C., General Preconstruction Review Requirements; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); Permit No. PSD-FL-082; and Rule 296.402, F.A.C., Sulfuric Acid Plants.}</p>
067	<p>EU067 “F” Sulfuric Acid Plant is a double absorption process that produces sulfuric acid and controls sulfur dioxide (SO₂) emissions.</p> <p>{Permitting note(s): This emissions unit is regulated under NSPS - 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid, adopted and incorporated by reference in Rule 62-204.800(7)(b)10., F.A.C.; Rule 62-212.300, F.A.C., General Preconstruction Review Requirements; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); and Rule 296.402, F.A.C., Sulfuric Acid Plants.}</p>

The primary purpose of each acid cooler is to maintain acid temperatures below levels that cause excessive corrosion to the process equipment. Due to corrosion and deterioration, periodic repair and replacement of these acid coolers will be necessary and is authorized by this permit.

A.1. Relation to Other Permits. The conditions of this permit supplements all other previously issued air construction and operation permits for these emissions units. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, and the like.

[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

PROPOSED CONSTRUCTION WORK

A.2. The permittee is authorized to replace coolers at EU066 “E” and EU067 “F” Sulfuric Acid Plants (SAP) as needed for maintenance purposes on a temporary or on a long term/permanent basis.

Replacement of acid coolers 1, 4 and 5 in both “E” and “F” SAPs will not affect emissions and therefore are not subject to the monitoring, reporting and recordkeeping requirements of Rule 62-212.300(1)(e), F.A.C. In each plant, these acid coolers handle sulfuric acid streams that do not interact directly with the SO₂ converter and absorber towers.

Replacement of acid coolers 2 and 3 could affect emissions and therefore are subject to the monitoring, reporting and recordkeeping requirements of Rule 62-212.300(1)(e), F.A.C. In each plant, these acid coolers handle sulfuric acid streams that interact directly with the SO₂ converter and absorber towers. SAM and SO₂ emissions are present/generated/or controlled in the SO₂ converter and absorber towers.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU066 “E” Sulfuric Acid Plant and EU067 “F” Sulfuric Acid Plant

A.2. continued:

EU066 “E”

The following acid cooler replacements are authorized for Sulfuric Acid Plant “E”. The 5 year monitoring, reporting and recordkeeping requirements of Rule 62-212.300(1)(e), F.A.C., will become applicable for 2 and 3 cooler replacements:

1. Drying Tower Acid Cooler
2. Interpass Tower Acid Cooler
3. Final Tower Acid Cooler
4. Product Acid Cooler (96/98 Dilution)
5. 93% Dilution Acid Cooler

EU067 “F”

The following acid cooler replacements are authorized for Sulfuric Acid Plant “F”. The 5 year monitoring, reporting and recordkeeping requirements of Rule 62-212.300(1)(e), F.A.C., will become applicable for 2 and 3 cooler replacements:

1. Drying Tower Acid Cooler
2. Interpass Tower Acid Cooler
3. Final Tower Acid Cooler
4. Product Acid Cooler (96/98 Dilution)
5. Boiler Feedwater Preheater Plant

[Air Construction Permit Application No. 0470002-096-AC]

The construction shall be in accordance with the application and associated documents provided to the Permitting Authority for the issuance of this permit. Any changes to the project that are contrary to these documents and permit shall be reported in writing to the Permitting Authority by the P.E. of Record.

[Air Construction Permit Application No. 0470002-096-AC]

PERFORMANCE RESTRICTIONS

A.3. “E” Sulfuric Acid Plant. This permit **does not** authorize any changes to the production rates from the previous permits. The production rate shall not exceed 2500 TPD, expressed as 100 percent H₂SO₄ or 104.20 TPH. The emissions unit uses a Brinks mist eliminator to control sulfuric acid mist (SAM).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. AC24-56211, PSD-FL-082]

A.4. “F” Sulfuric Acid Plant. This permit **does not** authorize any changes to the production rates from the previous permits. The production rate shall not exceed 2500 TPD, expressed as 100 percent H₂SO₄ or 104.20 TPH. The emissions unit uses a Brinks mist eliminator to control sulfuric acid mist (SAM).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. AC24-56209, PSD-FL-082]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU066 “E” Sulfuric Acid Plant and EU067 “F” Sulfuric Acid Plant

A.5. Hours of Operation. The hours of operation for these emissions unit shall not exceed 8760 hours/year, (8784 in any Leap Year).

[Permit No. 0470002-004-AO and Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.6. This permit **does not** authorize any changes to these emissions rates from the previous permits.

Sulfur Dioxide Emissions			
E.U. No.	Plant Name	Allowable Emissions Rate	Annual Allowable Emissions Rate
066	“E” Sulfuric Acid Plant	2 kg per metric ton of acid produced (4 lb per ton), the production being expressed as 100 percent H ₂ SO ₄ , and 416.7 lb per hour	1,820.00 TPY
067	“F” Sulfuric Acid Plant		

EU066 [Rule 62-204.800(8)(b)12, F.A.C.; 40 CFR 60.82(a); Construction Permit No. AC24-56211, PSD-FL-082]

EU067 [Rule 62-204.800(8)(b)12., F.A.C.; 40 CFR 60.82(a); Construction Permit No. AC24-56209, PSD-FL-082]

Sulfuric Acid Mist (SAM)			
E.U. No.	Plant Name	Allowable Emissions Rate	Annual Allowable Emissions Rate
066	“E” Sulfuric Acid Plant	0.075 kg per metric ton of acid produced (0.15 lb per ton), the production being expressed as 100 percent H ₂ SO ₄ , and 15.62 lbs/hr	68.20 TPY
067	“F” Sulfuric Acid Plant		

EU066 [Rule 62-204.800(8)(b)12, F.A.C.; 40 CFR 60.83(a)(1); Construction Permit No. AC24-56211, PSD-FL-082]

EU067 [Rule 62-204.800(8)(b)12, F.A.C.; 40 CFR 60.83(a)(1); Construction Permit No. AC24-56209, PSD-FL-082]

Visible Emissions			
E.U. No.	Plant Name	Allowable Emissions Rate	Annual Allowable Emissions Rate
066	“E” Sulfuric Acid Plant	10% opacity	----
067	“F” Sulfuric Acid Plant		

EU066 [Rule 62-204.800(8)(b)12, F.A.C.; 40 CFR 60.83(a)(2); Construction Permit No. AC24-56211, PSD-FL-082]

EU067 [Rule 62-204.800(8)(b)12., F.A.C.; 40 CFR 60.83(a)(2); Construction Permit No. AC24-56209, PSD-FL-082]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU066 “E” Sulfuric Acid Plant and EU067 “F” Sulfuric Acid Plant

TESTING REQUIREMENTS

A.7. Acid Cooler Replacement Compliance Tests. Each time one of the **acid coolers 2 or 3**, as listed in **Specific Condition No. A.2.** is replaced; the affected sulfuric acid plants (i.e., SAPs “E” or “F”) shall be tested to demonstrate compliance with the emissions standards for Sulfur Dioxide (SO₂), Sulfuric Acid Mist (Acid Mist) and visible emissions (VE). The tests shall be conducted no later than 90 days after initial operation of the unit following the replacement of acid cooler. However, if this date is close to the next scheduled compliance testing date the facility can demonstrate initial compliance at that time.

[Rules 62-4.070(3) and 62-297.310(8)(b)1, F.A.C.]

A.8. Annual Compliance Tests. During every calendar year (January 1 – December 31) the sulfuric acid plants (SAPs “E” and “F”) shall be tested to demonstrate compliance with the emissions standards for Sulfur Dioxide (SO₂), Sulfuric Acid Mist (Acid Mist), and Visible emissions (VE). Testing procedures shall be consistent with the requirements of Chapter 62-297, F.A.C.

[Rules 62-296.402 and 62-297.310(8)(a)1, F.A.C.]

A.9. Test Requirements. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

A.10. Test Methods. Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
8	Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. EPA Method 6C may also be used for determining sulfur dioxide emissions. No other methods may be used unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

RECORDS, REPORTS AND MONITORING REQUIREMENTS

A.11. Comply with recordkeeping and reporting requirements in the applicable conditions of all existing, valid, Department permits.

A.12. Acid Cooler Replacement Records. The permittee shall maintain records listing all acid cooler replacements listed in **Specific Condition No. A.2.** The records should include the emissions unit number, the name of the acid cooler to be replaced, the date the replacement occurs, and general specifications for the old acid cooler and for the replacement acid cooler (i.e., heat transfer area, number of tubes/tube length, and shell diameter). The records shall be kept in a readily accessible location.

[Rule 62-4.070, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU066 “E” Sulfuric Acid Plant and EU067 “F” Sulfuric Acid Plant

A.13. Commencement of Construction. The permittee shall submit to the Air Compliance Authority of this Office written notification of the date of commencement of construction to replace any one of the “E” and “F” SAP Coolers at **EU066 and 067**. This notification shall be submitted or postmarked within as many days prior to the date of construction as practical, but no later than thirty (30) business day following commencement of construction and operation.

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