

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

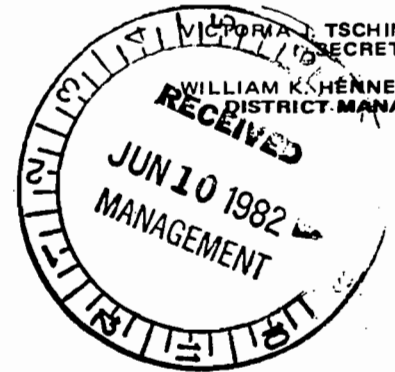
7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610-9544



BOB GRAHAM  
GOVERNOR

LEOPOLD TSCHINKEL  
SECRETARY

WILLIAM K. HENNESSEY  
DISTRICT MANAGER



June 8, 1982

Mr. D.S. Sharpe, Gen. Mgr.  
W. R. Grace & Company  
P.O. Box 471  
Bartow, Fla. 33830

Dear Mr. Sharpe:

RE: Modification of Conditions (DAP SHIPPING  
Permit NO. AC53-36672 (CONSTRUCTION PERMIT))

We are in receipt of your request for a modification of the permit conditions.  
The conditions are changed as follows:

Specific Condition

No. 1	06/01/82	08/15/82	
	07/01/82	09/15/82	
No. 2	10/01/82	01/15/83	← EXTENDED 'till'

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

Dan A. Williams, P.E.  
District Air Engineer

DAW/rkt

DER Form 17-1.122(59)

cc Edna Murray

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



BOB GRAHAM  
GOVERNOR

~~XXXXXXXXXX~~  
SECRETARY

Vicki Tschink  
WILLIAM K. HENNESSEY  
DISTRICT MANAGER

Polk County AP

Mr. D. S. Sharpe, Gen. Mgr.  
W.R. Grace and Company  
P.O. Box 471  
Bartow, Fla. 33830

Dear Mr. Sharpe:



Re:  
DAP  
SHIPPING

Enclosed is Permit Number AC53-36672, dated February 25, 1981 to construct the subject air pollution source issued pursuant to Section 403, Florida Statutes.

Should you object to this permit, including any and all of the conditions contained therein, you may file an appropriate petition for administrative hearing. This petition must be filed within fourteen (14) days of the receipt of this letter. Further, the petition must conform to the requirements of Section 28-5.201, Florida Administrative Code, (see reverse side of this letter). The petition must be filed with the Office of General Counsel, Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301.

If no petition is filed within the prescribed time, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this matter.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement action for violation of the conditions and requirements thereof.

Sincerely,

cc: Record Center  
C.H. Greene, P.E.

W.K. Hennessey  
District Manager

Enclosure

RULES OF THE ADMINISTRATION COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

PART II  
FORMAL PROCEEDINGS

28-5.201 Initiation of Formal Proceedings.

- (1) Initiation of formal proceedings shall be made by petition to the agency responsible for rendering final agency action. The term petition as used herein includes any application or other document which expresses a request for formal proceedings. Each petition should be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double-spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners, and an explanation of how his/her substantial interests will be affected by the agency determination;
  - (c) A statement of when and how petitioner received notice of the agency decision or intent to render a decision;
  - (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
  - (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
  - (f) A demand for relief to which the petitioner deems himself entitled; and
  - (g) Other information which the petitioner contends is material.

\*\*\*\*\*

A petition may be denied if the petitioner does not state adequately a material factual allegation, such as a substantial interest in the agency determination, or if the petition is untimely. (Section 28-5.201 (3) (a), FAC)

DEPARTMENT OF ENVIRONMENTAL REGULATION  
BEST AVAILABLE COPY

BOB GRAHAM  
GOVERNOR

~~XXXXXXXXXX~~  
SECRETARY  
Vicki Tschink  
WILLIAM K. HENNESSEY  
DISTRICT MANAGER

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



APPLICANT:

W.R. Grace & Company  
P.O. Box 471  
Bartow, Fla. 33830

PERMIT/CERTIFICATION  
NO. AC53-36672

COUNTY: Polk

PROJECT: DAP Handling  
Scrubbers

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a car and truck loading, screening, and handling facility with venturi scrubbers and cyclone mist eliminators to control fugitive dust.

Located north of SR 60 and 4 miles west of Bartow, Polk County.

Replaces Permit NO: N/A NEDS NO: 0046 Point ID: 02

Expires: October 1, 1982

PERMIT NO.: AC53-36672  
APPLICANT: W.R. Grace and Company

**SPECIFIC CONDITIONS:**

1. Construction of this installation shall be completed by 6/1/82. Application for Permit to Operate to be submitted by 7/1/82. (Chapter 17-4.07(7), F.A.C.)
2. This construction permit expires on 10/1/82, following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Department of Environmental Regulation. (Chapter 17-4.07(7), F.A.C.)
3. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. (Chapter 17-4.07(1), F.A.C.)
4. A stack test shall be performed per FAC 17-2.08 for TSP and the results submitted with an application for an operating permit. The maximum permitted emissions are 0.03 gr/SCF or 15.5 lbs/hr for a process weight rate of 300 TPH.

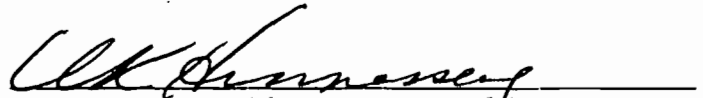
PERMIT NO. AC53-36672  
APPLICANT: W.R. Grace and Company

Expiration Date: October 1, 1982

\_\_\_\_ Pages Attached.

Issued this 25<sup>th</sup> day of February, 19 81.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION



Signature

W.K. Hennessey  
District Manager

PAGE 4 OF 4

GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

June 18, 1982

Mr. Steve Smallwood, P. E.  
Chief, Bureau of Air Quality  
Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Rd.  
Tallahassee, Fl 32301

Dear Mr. Smallwood:

Re Evaluation of Permits for Particulate Emissions

With reference to your letter of May 17, and further to my letter of May 20, I enclose John Koogler's computerized study dated June 16 evaluating the impact of our proposed particulate emissions upon the Non-Attainment Area in Hillsborough County.

I asked John to include every existing stack as well as those still under construction, and to reduce each permitted emission by a specified amount in order to affect the Hillsborough area by less than  $5 \text{ ug/m}^3$ . We have also included DER Operating or Construction Permit number by each source, for easier identification. Said proposed level represents a total reduction of almost 40% and results in  $4.96 \text{ ug/m}^3$  as per EPA diffusion model PTMTP-W under the most unfavorable conditions.

Please let us know if you approve of Dr. Koogler's modeling so that I might ask your Tampa office to modify our permits accordingly.

Sincerely,

  
M. P. Martinasek  
Sr. Project Engineer  
Environmental Control

MJM:bjo

Enclosure

CC: R. Garrett, DER - Tampa  
M. J. Altenburger  
F. L. Applegate

#44  
 ADDITION 6/19/82

TABLE 1-A

PARTICULATE MATTER EMISSION DATA & SOURCE PARAMETERS

W. R. GRACE BARTOW WORKS  
 BARTOW, FLORIDA

PRESENTLY PERMITTED lbs/hr	SOURCE NAME	EMM. RATE (lb/hr)	STACK HT. (M)	STACK TEMP. (DEG-K)	EXIT VEL. (M/SEC)	STACK DIA. (M)	VOL. FLOW (M <sup>3</sup> /SEC)	X-COORD. (KM)	Y-COORD. (KM)
<u>A053:</u>									
92.8	Dry Mill - Rock Dryers 29004	60.0	15.2	330.0	8.60	2.10	0.	409.610	3085.860
46.0	Dry Mill - Rock Storage 13378	46.0	16.8	315.0	13.60	1.10	0.	409.600	3085.900
46.0	Dry Mill - Rock Convey 14740	23.0	15.6	315.0	11.40	0.40	0.	409.620	3085.550
23.7	Dry Mill - Grind Mill 14739	10.0	15.0	315.0	18.30	0.30	0.	409.600	3085.900
7.2	Dry Mill - Rock Ship 51464	7.2	15.3	315.0	9.90	0.90	0.	409.800	3086.600
41.9	Chem PI-Rock Grind 25188	36.0	22.0	315.0	9.60	0.60	0.	409.700	3086.890
31.5	Chem PI-Ball Mill 26977	12.0	25.3	331.0	10.20	0.40	0.	409.810	3086.890
31.0	Chem PI-300X GTSP DAP 25191	27.6	32.8	320.0	12.40	2.20	0.	409.980	3086.810
30.1	Chem PI-300Y GTSP & ROP 13210	25.0	24.4	321.0	12.40	2.20	0.	409.980	3086.830
33.7	Chem PI-GTSP Storage 25192	5.0	32.8	315.0	11.90	2.10	0.	409.670	3086.900
31.8	Chem PI-GTSP Shipping 27026	10.0	28.0	315.0	5.30	0.80	0.	409.900	3086.700
42.0	Chem PI-Fert. Plant DAP 06840	30.0	30.2	333.0	16.00	2.30	0.	409.810	3086.780
29.9	Chem PI-DAP #3 (NEW) 24460	29.9	40.4	322.0	26.50	2.10	0.	409.290	3086.960
31.2	Chem PI-ROP Belt 14475	4.0	14.0	315.0	12.90	0.60	0.	409.810	3086.560
31.2	Chem PI-ROP Storage 14674	6.0	21.3	315.0	12.10	1.20	0.	409.600	3085.900
31.2	Chem PI-ROP Shipping 13449	5.0	27.0	315.0	6.30	1.00	0.	409.600	3055.900
38.6	Chem PI-DAP Shipping 32628	25.0	24.4	315.0	9.50	0.70	0.	409.840	3086.630
15.5	Chem PI-NEW DAP Ship 36672	15.5	30.5	315.0	16.90	1.50	0.	409.410	3086.880

635.3

Total 377.2

According to Final Plan PSD-068, DAP #3 is limited to 28 #/hr and DAP Ship & Storage is limited to 20 #/hr.

FOR YOUR CONVENIENCE  
 7-19-82 M.J.M.

= 40.6% REDUCTION



GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

June 24, 1982

Mr. W. K. Hennessey, P. E.  
District Manager  
Department of Environmental Regulation  
Southwest District Office  
7601 Highway 301, North  
Tampa, Florida 33610

Dear Mr. Hennessey:

Re AC53-42443: DAP to GTSP Conversion  
AC53-24460: No. 3 DAP Plant

Due to very low sales of Triple Super Phosphate, we had to abandon plans to convert No. 2 DAP plant to GTSP and ask you therefore to kindly void Construction Permit No. 42443.

This change of plans forced on us by a soft market makes it necessary to continue operating the two old granular trains called 300-X and 300-Y, which were originally scheduled to be phased out in December 1981 and by mid 1982 respectively.

With a cover letter dated June 18, I sent Steve Smallwood and Bob Garrett a Computerized Study proving that our total permitted impact upon the Non-Attainment Area in Hillsborough County will be less than the allowable 5 ug/m<sup>3</sup> of particulates when we obtain the Department's permission to ask your District Office to reduce the total permitted discharges by the quantities specified in Dr. John Koogler's air dispersion model.

This proposal results in total reduction of permitted particulate emissions by almost 40%. It is based on the assumption that all existing sources will continue operating, including 300-X and 300-Y GTSP trains, and that No. 3 DAP plant and its shipping facility will be completed and will emit the maximum amount of particulates permitted in the construction permits. We therefore ask you to kindly void Specific Condition No. 14 of Construction Permit AC53-24460 requesting that 300-X and Y trains be phased out when No. 3 DAP plant becomes operational.


Mr. W. K. Hennessey  
June 24, 1982  
Page 2

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For your information, I also enclose EPA study dated April 1, 1981, stating that the construction of No. 3 DAP plant meets all applicable requirements of the PSD regulations with 300-X and Y trains in operation.

We would be glad to submit any further data you may require, or to visit you at your convenience.

Sincerely,

  
M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db

Enclosure

cc: F. L. Applegate  
M. J. Altenburger

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

June 25, 1982

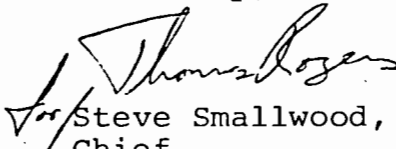
Mr. M. J. Martinasek  
Sr. Project Engineer  
W. R. Grace and Company  
P.O. Box 471  
Bartow, Florida 33830

Re: Evaluation of Refined Modeling Submitted in Support  
of Exemption from Rule 17-2.650(2), Florida Admini-  
strative Code (FAC).

Dear Mr. Martinasek:

The Department has reviewed the dispersion modeling submitted to show compliance with the exemption criteria of Section 17-2.650(2)b.2., FAC, i.e. to demonstrate an insignificant impact on the Tampa particulate matter non-attainment area. The modeling was found to be complete and run within the guidelines set forth by the Department. Since the maximum highest, second-highest 24-hour concentration predicted to occur on the nonattainment area was less than  $5.0 \text{ ug/m}^3$  over a five year period and the maximum annual concentration was less than  $1.0 \text{ ug/m}^3$ , the Department finds that W. R. Grace meets the exemption criteria set forth in the rule given the emission characteristics defined in the modeling.

Sincerely,

  
Steve Smallwood, P.E.  
Chief  
Bureau of Air Quality  
Management

SS:TR:ras

cc: Dan Williams  
Anthony Jones

TABLE 1

## PARTICULATE MATTER EMISSION DATA &amp; SOURCE PARAMETERS

W. R. GRACE BARTOW WORKS  
BARTOW, FLORIDA

SOURCE NAME	EMM. RATE ( <del>g/sec</del> ) g/sec	STACK HT. (M)	STACK TEMP. (DEG-K)	EXIT VEL. (M/SEC)	STACK DIA. (M)	VOL. FLOW (M <sup>3</sup> /SEC)	X-COORD. (KM)	Y-COORD. (KM)	
	<i>see A053:</i>								
<i>RIDGEMOOD</i> Dry Mill - Rock Dryers 29004	7.56 ✓	15.2 ✓	330.0	8.60	2.10	0.	409.610	3085.860	R-1 & 2
Dry Mill - Rock Storage 13378	5.80 ✓	16.8 ✓	315.0	13.60	1.10	0.	409.600	3085.900	No change R-4, 5 & 6
Dry Mill - Rock Convey 14740	2.90 ✓	15.6 ✓	315.0	11.40	0.40	0.	409.620	3085.550	R-8 & 9, R-10-12
Dry Mill - Grind Mill 14739	1.26 ✓	15.0 ✓	315.0	18.30	0.30	0.	409.600	3085.900	R-7
Dry Mill - Rock Ship 51464	0.91 ✓	15.3 ✓	315.0	9.90	0.90	0.	409.800	3086.600	R-13 & 14
Chem P1-Rock Grind 25188	4.54 ✓	22.0 ✓	315.0	9.60	0.60	0.	409.700	3086.890	
Chem P1-Ball Mill 26977	1.51 ✓	25.3 ✓	331.0	10.20	0.40	0.	409.810	3086.890	
Chem P1-300X GTSP DAP 25191	3.48 ✓	32.8 ✓	320.0	12.40	2.20	0.	409.980	3086.810	
Chem P1-300Y GTSP & ROP 13210	3.15 ✓	24.4 ✓	321.0	12.40	2.20	0.	409.980	3086.830	
Chem P1-GTSP Storage 25192	0.63 ✓	32.8 ✓	315.0	11.90	2.10	0.	409.670	3086.900	
Chem P1-GTSP Shipping 27026	1.26 ✓	28.0 ✓	315.0	5.30	0.80	0.	409.900	3086.700	
Chem P1-Fert. Plant DAP 06840	3.78 ✓	30.2 ✓	333.0	16.00	2.30	0.	409.810	3086.780	
Chem P1-DAP #3 24460	3.77 ✓	40.4 ✓	322.0	26.50	2.10	0.	409.290	3086.960	
Chem P1-ROP Belt 14475	0.50 ✓	14.0 ✓	315.0	12.90	0.60	0.	409.810	3086.560	
Chem P1-ROP Storage 14674	0.76 ✓	21.3 ✓	315.0	12.10	1.20	0.	409.600	3085.900	
Chem P1-ROP Shipping 13449	0.63 ✓	27.0 ✓	315.0	6.30	1.00	0.	409.600	3055.900	
Chem P1-DAP Shipping 32628	3.15 ✓	24.4 ✓	315.0	9.50	0.70	0.	409.840	3086.630	
Chem P1-NEW DAP Ship 36672	1.95 ✓	30.5 ✓	315.0	16.90	1.50	0.	409.410	3086.880	
	<u>Total 47.54 g/sec.</u>								

#44  
 ADDITION 6/19/82

TABLE 1-A  
 PARTICULATE MATTER EMISSION DATA & SOURCE PARAMETERS

W. R. GRACE BARTOW WORKS  
 BARTOW, FLORIDA

SOURCE NAME	EMM. RATE (lb/hr)	STACK HT. (M)	STACK TEMP. (DEG-K)	EXIT VEL. (M/SEC)	STACK DIA. (M)	VOL. FLOW (M <sup>3</sup> /SEC)	X-COORD. (KM)	Y-COORD. (KM)
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Dry Mill - Rock Storage 13378	46.0	16.8	315.0	13.60	1.10	0.	409.600	3085.900
Dry Mill - Rock Convey 14740	23.0	15.6	315.0	11.40	0.40	0.	409.620	3085.550
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Dry Mill - Rock Ship 51464	7.2	15.3	315.0	9.90	0.90	0.	409.800	3086.600
Chem PI-Rock Grind 25188	36.0	22.0	315.0	9.60	0.60	0.	409.700	3086.890
Chem PI-Ball Mill 26977	12.0	25.3	331.0	10.20	0.40	0.	409.810	3086.890
Chem PI-300X GTSP DAP 25191	27.6	32.8	320.0	12.40	2.20	0.	409.980	3086.810
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Chem PI-NEW DAP Ship 36672	15.5 ✓	30.5	315.0	16.90	1.50	0.	409.410	3086.880
<u>Total 377.2 ✓</u>								

△ CORRECTION 6/19/82  
(TYPOGRAPHICAL ERROR)

TABLE 2

SUMMARY OF PARTICULATE MATTER IMPACTS AT THE  
BOUNDARY OF THE HILLSBOROUGH COUNTY PARTICULATE MATTER  
NON-ATTAINMENT AREA

W. R. GRACE BARTOW WORKS  
BARTOW, FLORIDA

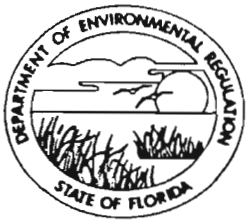
Year	Impact (micrograms per cubic meter)		
	Annual	24-Hour	
		CRSTER	PTMTPW
1970	0.5	5.5 (day 345 @ 270°)	4.96 <sup>△</sup> (day 345 @ 270°)
1971	0.4	4.9	
1972	0.7	5.0 (day 347 @ 270°)	4.79 <sup>△</sup> (day 347 @ 270°)
1973	0.4	4.6	
1974	0.5	3.6	
Significant Impact Level	1.0	5.0	5.0

✓ Mr. W. K. Hennessey  
✓ Willard Hanks (1)

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
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June 25, 1982

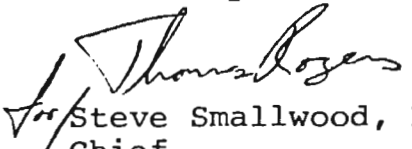
Mr. M. J. Martinasek  
Sr. Project Engineer  
W. R. Grace and Company  
P.O. Box 471  
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of Exemption from Rule 17-2.650(2), Florida Admini-  
strative Code (FAC).

Dear Mr. Martinasek:

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Sincerely,

  
For Steve Smallwood, P.E.  
Chief  
Bureau of Air Quality  
Management

SS:TR:ras

cc: Dan Williams  
Anthony Jones

GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
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June 18, 1982

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Twin Towers Office Building  
2600 Blair Stone Rd.  
Tallahassee, Fl 32301

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Please let us know if you approve of Dr. Koogler's modeling so that I might ask your Tampa office to modify our permits accordingly.

Sincerely,

  
M. J. Martinase  
Sr. Project Engineer  
Environmental Control

MJM:bjo

Enclosure

CC: R. Garrett, DER - Tampa  
M. J. Altenburger  
F. L. Applegate

*file*





SHOLTES & KOOGLER, ENVIRONMENTAL CONSULTANTS  
1213 N.W. 8th Street Gainesville, Florida 32601 (904) 377-5822

SKEC 203-82-01

June 16, 1982

Mr. M. J. Martinasek  
W. R. Grace & Company  
Post Office Box 471  
Bartow, Florida 33830

Subject: Impact of W. R. Grace Particulate Matter Emissions  
on Hillsborough County Non-Attainment Area

Dear Mickey:

In accordance with your letter of May 20, 1982, I have revised the air quality review that I prepared and reported to you in my letter of March 18, 1982 showing the impact of particulate matter emissions from the W. R. Grace Bartow Works on the particulate matter non-attainment area in Hillsborough County. The revised modeling includes the DAP fertilizer plant and the DAP shipping facility, both of which are under construction; the new Ridgewood dry mill dry rock shipping facility and the old ROP plant which is scheduled to be shut-down in December of this year.

The results of the air quality review indicate that the W. R. Grace Bartow Works, with all particulate matter emitting sources emitting at the rates shown in Table 1 and operating at 100 percent of rated capacity, will not have a significant impact on the Hillsborough County non-attainment area for either the annual or the 24-hour period. In evaluating the impact of the particulate matter emitting sources I used both the CRSTER and the PTMTPW air quality models. The CRSTER air quality model was used to assess the annual and 24-hour impacts of the particulate matter emitting sources, using as input hourly meteorological data from Tampa representing the period from 1970 through 1974. When the results of the CRSTER modeling indicated at certain sets of meteorological conditions could potentially result in a significant impact of particulate matter emissions from your facility on the non-attainment area boundary these conditions were input to the PTMTPW model. The PTMTPW model was used for the refined modeling since it accounts for the actual location of the individual sources; something that the single source CRSTER model does not account for. The capability of the PTMTPW to account for actual source locations was considered to be quite important since the chemical plant at the Bartow Works is approximately one kilometer north of the Ridgewood dry mill.

Prior to using the CRSTER air quality model, the meteorological data which were used (Tampa data representing the period from 1970 through 1974), were pre-processed with the program developed by the Florida Department of Environmental Regulation. This program was used to select only days which included a vector which would result in the transport of particulate matter from your facility to the non-attainment area. The process meteorological data from the FDER program and the source emission data from Table 1 were then input to the CRSTER air quality model.

The non-attainment area is in the 260° - 290° direction range from the Bartow Works. The distance from the Bartow Works to the nearest boundary of the non-attainment area is 36.2 kilometers. Receptors used for defining the boundary of the non-attainment area were established for both the CRSTER and the PTMTPW air quality models. These receptors are shown in Figure 1.

The results of the air quality modeling are summarized in Table 2. The output of the CRSTER model shows that there are two 24-hour sets of meteorological conditions which potentially may result in a significant impact of emissions from the Bartow Works at the boundary of the non-attainment area. When these data were analyzed with the PTMTPW, however, the resulting impacts were found to be less than 5.0 micrograms per cubic meter; the significant impact for the 24-hour period. The annual particulate matter impacts at the boundary of the non-attainment area calculated with the CRSTER air quality model are all less than 1.0 micrograms per cubic meter; the significant impact level for the annual period.

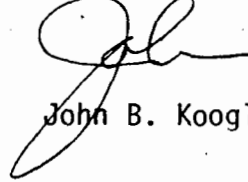
It should be pointed out that the particulate matter impacts calculated with both the CRSTER and the PTMTPW air quality models were calculated using only hours with wind speeds greater than zero. The exclusion of a non-zero impact resulting from periods with calm wind speeds is consistent with FDER and EPA policy. This policy states that concentrations calculated for hours with calm winds should be excluded from averages of 24-hours or less if a concentration during an hour with calm winds contributes to the average concentration for the period. We have modified our version of the CRSTER model to exclude such impacts and manually exclude such meteorological data from the PTMTPW model (See the PTMTPW output for day 345, 1970, for example).

Based on results summarized in Table 2, it can be concluded that the particulate matter emissions from the W. R. Grace Bartow Works, with all sources operating at conditions stated in Table 1 and operating at 100 percent rated capacity, will not have a significant impact on the Hillsborough County non-attainment area for either the annual or the 24-hour period.

If you have any questions regarding the information pertaining herein, please give me a call.

Very truly yours,

SHOLTES & KOGLER  
ENVIRONMENTAL CONSULTANTS



John B. Koogler, Ph.D., P.E.

JBK:ldh  
Attachments

TABLE 1

## PARTICULATE MATTER EMISSION DATA &amp; SOURCE PARAMETERS

W. R. GRACE BARTOW WORKS  
BARTOW, FLORIDA

SOURCE NAME	EMM. RATE ( <del>g/min</del> ) g/sec	STACK HT. (M)	STACK TEMP. (DEG-K)	EXIT VEL. (M/SEC)	STACK DIA. (M)	VOL. FLOW (M <sup>3</sup> /SEC)	X-COORD. (KM)	Y-COORD. (KM)		
<i>per A053:</i>										
<i>RIDGEWOOD</i>	Dry Mill - Rock Dryers 29004	7.56 ✓	15.2 ✓	330.0	8.60	2.10	0.	409.610	3085.860	<i>R-16-2</i>
	Dry Mill - Rock Storage 13378	5.80 ✓	16.8 ✓	315.0	13.60	1.10	0.	409.600	3085.900	<i>No change R-4, 5 &amp; 6</i>
	Dry Mill - Rock Convey 14740	2.90 ✓	15.6 ✓	315.0	11.40	0.40	0.	409.620	3085.550	<i>R-2 &amp; 9, R-10-12</i>
	Dry Mill - Grind Mill 14739	1.26 ✓	15.0 ✓	315.0	18.30	0.30	0.	409.600	3085.900	<i>R-7</i>
	Dry Mill - Rock Ship 51464	0.91 ✓	15.3 ✓	315.0	9.90	0.90	0.	409.800	3086.600	<i>R-13 &amp; 14</i>
Chem PI-Rock Grind 25188	4.54 ✓	22.0 ✓	315.0	9.60	0.60	0.	409.700	3086.890		
Chem PI-Ball Mill 26977	1.51 ✓	25.3 ✓	331.0	10.20	0.40	0.	409.810	3086.890		
Chem PI-300X GTSP DAP 25191	3.48 ✓	32.8 ✓	320.0	12.40	2.20	0.	409.980	3086.810		
Chem PI-300Y GTSP & ROP 13210	3.15 ✓	24.4 ✓	321.0	12.40	2.20	0.	409.980	3086.830		
Chem PI-GTSP Storage 25192	0.63 ✓	32.8 ✓	315.0	11.90	2.10	0.	409.670	3086.900		
Chem PI-GTSP Shipping 27026	1.26 ✓	28.0 ✓	315.0	5.30	0.80	0.	409.900	3086.700		
Chem PI-Fert. Plant DAP06840	3.78 ✓	30.2 ✓	333.0	16.00	2.30	0.	409.810	3086.780		
<i>Under Constr.</i> Chem PI-DAP #3 (NEW) 24460	3.77 ✓	40.4 ✓	322.0	26.50	2.10	0.	409.290	3086.960		
Chem PI-ROP Belt 14475	0.50 ✓	14.0 ✓	315.0	12.90	0.60	0.	409.810	3086.560		
Chem PI-ROP Storage 14674	0.76 ✓	21.3 ✓	315.0	12.10	1.20	0.	409.600	3085.900		
Chem PI-ROP Shipping 13449	0.63 ✓	27.0 ✓	315.0	6.30	1.00	0.	409.600	3055.900		
Chem PI-DAP Shipping 32628	3.15 ✓	24.4 ✓	315.0	9.50	0.70	0.	409.840	3086.630		
<i>- A -</i> Chem PI-NEW DAP Ship 36672	1.95 ✓	30.5 ✓	315.0	16.90	1.50	0.	409.410	3086.880		
<i>Total</i>		<i>47.54 g/sec.</i>								

#144  
 ADDITION 6/19/02

TABLE 1-A

PARTICULATE MATTER EMISSION DATA & SOURCE PARAMETERS

W. R. GRACE BARTOW WORKS  
 BARTOW, FLORIDA

SOURCE NAME	EMM. RATE (lb/hr)	STACK HT. (M)	STACK TEMP. (DEG-K)	EXIT VEL. (M/SEC)	STACK DIA. (M)	VOL. FLOW (M <sup>3</sup> /SEC)	X-COORD. (KM)	Y-COORD. (KM)
<u>A053:</u>								
Dry Mill - Rock Dryers 29004	60.0	15.2	330.0	8.60	2.10	0.	409.610	3085.860
Dry Mill - Rock Storage 13378	46.0	16.8	315.0	13.60	1.10	0.	409.600	3085.900
Dry Mill - Rock Convey 14740	23.0	15.6	315.0	11.40	0.40	0.	409.620	3085.550
Dry Mill - Grind Mill 14739	10.0	15.0	315.0	18.30	0.30	0.	409.600	3085.900
Dry Mill - Rock Ship 51464	7.2	15.3	315.0	9.90	0.90	0.	409.800	3086.600
Chem P1-Rock Grind 25188	36.0	22.0	315.0	9.60	0.60	0.	409.700	3086.890
Chem P1-Ball Mill 26977	12.0	25.3	331.0	10.20	0.40	0.	409.810	3086.890
Chem P1-300X GTSP DAP 25191	27.6	32.8	320.0	12.40	2.20	0.	409.980	3086.810
Chem P1-300Y GTSP & ROP 13210	25.0	24.4	321.0	12.40	2.20	0.	409.980	3086.830
Chem P1-GTSP Storage 25192	5.0	32.8	315.0	11.90	2.10	0.	409.670	3086.900
Chem P1-GTSP Shipping 27026	10.0	28.0	315.0	5.30	0.80	0.	409.900	3086.700
Chem P1-Fert. Plant DAP 06840	30.0	30.2	333.0	16.00	2.30	0.	409.810	3086.780
Chem P1-DAP #3 24460	29.9	40.4	322.0	26.50	2.10	0.	409.290	3086.960
Chem P1-ROP Belt 14475	4.0	14.0	315.0	12.90	0.60	0.	409.810	3086.560
Chem P1-ROP Storage 14674	6.0	21.3	315.0	12.10	1.20	0.	409.600	3085.900
Chem P1-ROP Shipping 13449	5.0	27.0	315.0	6.30	1.00	0.	409.600	3055.900
Chem P1-DAP Shipping 32628	25.0 ✓	24.4	315.0	9.50	0.70	0.	409.840	3086.630
Chem P1-NEW DAP Ship 36672	15.5 ✓	30.5	315.0	16.90	1.50	0.	409.410	3086.980
<u>Total 377.2 ✓</u>								

△ CORRECTION 6/19/82  
(TYPOGRAPHICAL ERROR)

TABLE 2

SUMMARY OF PARTICULATE MATTER IMPACTS AT THE  
BOUNDARY OF THE HILLSBOROUGH COUNTY PARTICULATE MATTER  
NON-ATTAINMENT AREA

W. R. GRACE BARTOW WORKS  
BARTOW, FLORIDA

Year	Impact (micrograms per cubic meter)		
	Annual	24-Hour	
		CRSTER	PTMTPW
1970	0.5	5.5 (day 345 @ 270°)	4.96 <sup>△</sup> (day 345 @ 270°)
1971	0.4	4.9	
1972	0.7	5.0 (day 347 @ 270°)	4.79 <sup>△</sup> (day 347 @ 270°)
1973	0.4	4.6	
1974	0.5	3.6	
Significant Impact Level	1.0	5.0	5.0

## AVERAGE CONCENTRATIONS (UG/M\*\*3) AND PERCENT CONTRIBUTIONS FOR 24 HOURS

RECEPTORS	1.	2.	3.	4.								
SOURCE NAME	PARTIAL CONC.	% CONT.	PARTIAL CONC.	% CONT.	PARTIAL CONC.	% CONT.	PARTIAL CONC.	% CONT.	PARTIAL CONC.	% CONT.	PARTIAL CONC.	% CONT.
Dry Mill - Rock Dryers 29004	0.04	25.91	0.93	19.49	0.00	7.89	0.33	29.24				
Dry Mill - Rock Storage 13378	0.03	18.95	0.75	15.75	0.00	6.25	0.26	22.88				
Dry Mill - Rock Convey 14740	0.02	13.23	0.39	8.21	0.00	2.00	0.19	16.36				
Dry Mill - Grind Mill 14739	0.01	4.33	0.18	3.82	0.00	1.40	0.06	5.53				
Dry Mill - Rock Ship 51464	0.00	1.56	0.12	2.41	0.00	2.34	0.02	1.41				
Chem P1-Rock Grind 25188	0.01	4.89	0.48	9.92	0.01	13.99	0.05	4.01				
Chem P1-Ball Mill 26977	0.00	1.58	0.15	3.12	0.00	4.54	0.01	1.17				
Chem P1-300X GTSP DAP 25191	0.01	3.56	0.25	5.14	0.00	9.13	0.02	2.02				
Chem P1-300Y GTSP & ROP 13210	0.01	3.51	0.26	5.48	0.00	9.10	0.02	2.05				
Chem P1-GTSP Storage 25192	0.00	0.56	0.05	0.95	0.00	1.75	0.00	0.40				
Chem P1-GTSP Shipping 27026	0.00	1.61	0.12	2.58	0.00	3.11	0.01	1.23				
Chem P1-Fert. Plant DAP 06840	0.01	3.96	0.26	5.37	0.01	9.53	0.03	2.47				
Chem P1-DAP #3 24460	0.00	2.62	0.20	4.15	0.01	9.84	0.02	2.07				
Chem P1-ROP Belt 14475	0.00	0.93	0.07	1.40	0.00	1.26	0.01	0.86				
Chem P1-ROP Storage 14674	0.00	2.29	0.09	1.86	0.00	0.77	0.03	2.71				
Chem P1-ROP Shipping 13449	0.01	4.20	0.01	0.17	0.00	4.38	0.00	0.15				
Chem P1-DAP Shipping 32628	0.01	4.52	0.33	6.94	0.00	7.44	0.04	3.81				
Chem P1-NEW DAP Ship 36672	0.00	1.78	0.15	3.22	0.00	5.27	0.02	1.63				

## TOTAL CONCENTRATION (UG/M\*\*3)

0.15	4.79	0.05	1.14
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TCP OUTPUT CHARGE: \$ .04

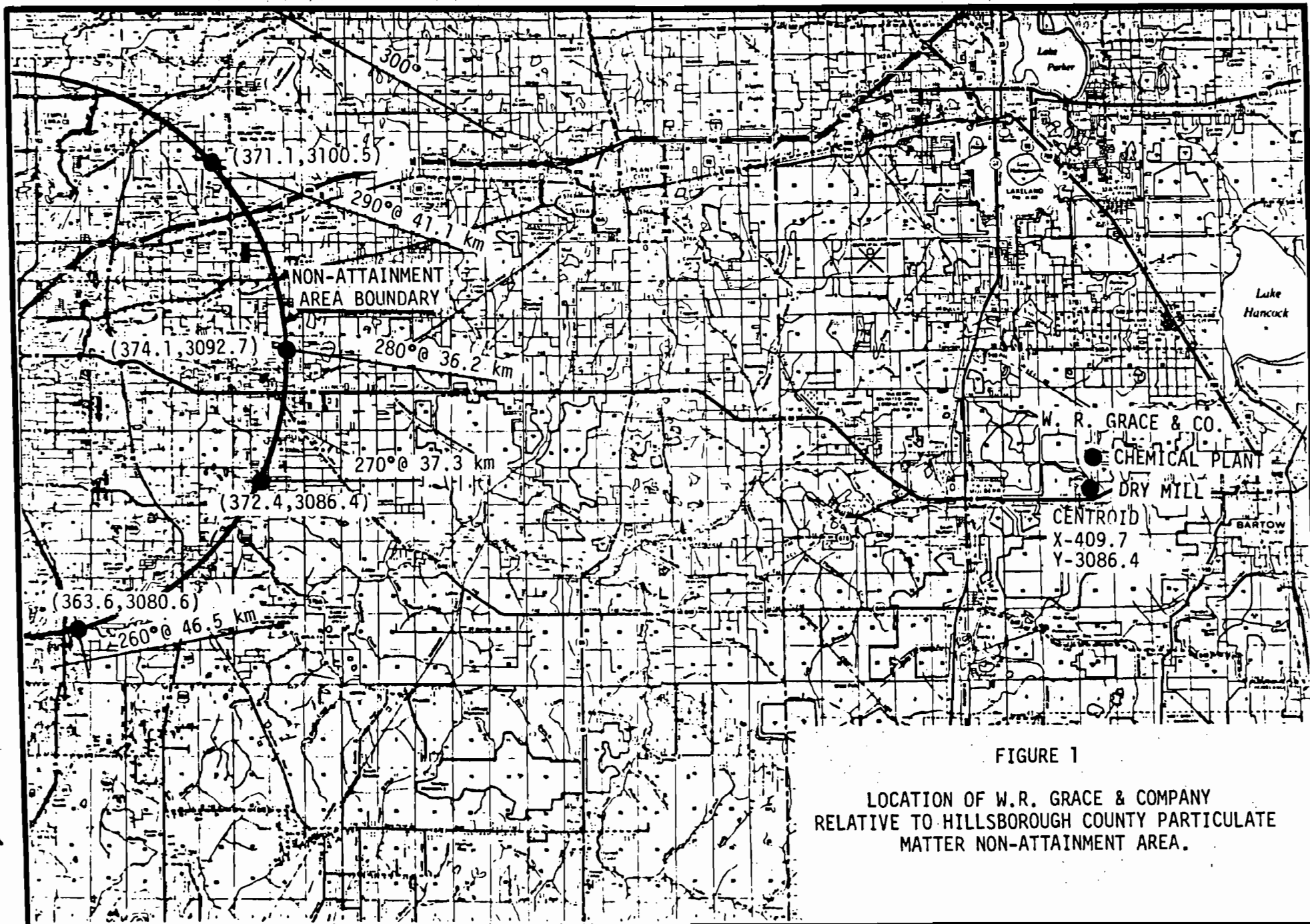


FIGURE 1

LOCATION OF W.R. GRACE & COMPANY  
 RELATIVE TO HILLSBOROUGH COUNTY PARTICULATE  
 MATTER NON-ATTAINMENT AREA.



GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

July 1, 1982

Mr. W. K. Hennessey, P. E.  
District Manager  
Department of Environmental Regulation  
Southwest District Office  
7601 Highway 301, North  
Tampa, Florida 33610

Dear Mr. Hennessey:


Re AC53-42443: DAP to GTSP Conversion  
AC53-24460: No. 3 DAP Plant

With reference to my letter of June 24, I am pleased to enclose a copy of Steve Smallwood's letter dated June 25 stating that "W. R. Grace meets the exemption criteria set forth in the rule given the emission characteristics defined in the modeling."

In other words, particulate emissions from all existing stacks including 300-X and 300-Y GTSP trains, combined with those of plants under construction, such as No. 3 DAP fertilizer plant and DAP shipping facilities, will not exceed the maximum allowable increment in the Hillsborough non-attainment area in Tampa.

We will now proceed to send Bob Garrett a series of requests to revise our operating permits in agreement with the particulate emissions used in the dispersion modeling of Bartow Works.

Sincerely,

  
M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db  
Enclosure

cc: R. Garrett, F. Applegate and M. Altenburger

GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

July 21, 1982

Mr. Steve Smallwood, P. E.  
Chief, Bureau of Air Quality  
Department of Environmental Regulation  
Twin Towers Office Bldg.  
2600 Blair Stone Rd.  
Tallahassee, Fl 32301

Dear Mr. Smallwood:

Re Reduction of Permitted Emissions of Particulates;  
and AC53-24460 Permit for New #3 DAP Plant

With reference to my letter of June 18, I enclose corrected copies of Tables 1, 1-A and 2 to be substituted in Dr. John Koogler's computerized dispersion study dated June 16, 1982. My corrections cover only minor errors which become obvious at a closer inspection of John's study.

We have authorized your Southwest District Office in Tampa to revise our operating permits in conformance with the above study. The total reduction proposed by us represents a decrease of 40.6%, from the presently permitted 635.3 lbs. to the proposed 377.2 lbs. / hr. In other words, total particulate emissions from our Bartow Works complex would affect the Non-Attainment area in Hillsborough County by less than the  $5\mu/m^3$  allowable increment defined as the level of "Significant Impact" even if all the existing plants, as well as those under construction, were emitting maximum allowable quantities of dust. The PTMTPW dispersion model was programed in this study with the most unfavorable atmospheric conditions experienced one day in 1970.

On June 24, 1982, I asked your District Manager, Bill Hennessey to kindly void our construction permit AC53-42443 to convert No. 2 DAP Plant to GTSP, because the unfavorable economic situation of the phosphate industry makes it impossible to obtain capital for this investment. We are therefore forced to continue operating the old 300-X and 300-Y GTSP trains in the near future.

Mr. Steve Smallwood, P. E.  
July 21, 1982  
Page 2

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and ask you to kindly void Specific Condition No. 14 of construction permit AC53-24460 requiring that 300-X and 300-Y GTSP trains be shut down when No. 3 DAP plant becomes operative.

For your information, and in further support of this request, I enclose EPA study PSD-FL-68 dated April 1, 1981, which concludes that the proposed modification to DAP manufacturing, (i.e. No. 3 DAP plant) storage and shipping facilities meet all the applicable requirements of the PSD regulations. Shutting down the 300-X and 300-Y GTSP trains was not considered in this EPA determination.⊗

In view of the above facts, and considering that our allowable future emission with No. 3 DAP plant as well as 300-X and 300-Y trains will still be 40.6% lower than the maximum present emissions; we trust you will grant our request to void said Specific Condition No. 14, especially since said construction permit per se meets also BACT requirements.

Please call us if you require any further information, or give us an appointment to discuss this urgent matter with you at your convenience.

Sincerely,

  
M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db  
Enclosure

cc: W. K. Hennessey, District Manager  
D. S. Sharpe/F. L. Applegate  
M. J. Altenburger

⊗ See "FINAL DETERMINATION", PSD-FL-068, III PROJECT DESCRIPTION:

" SOME EXISTING FERTILIZER PRODUCTION CAPACITY WILL BE SHUT DOWN ABOUT 6 MONTHS AFTER THE  
" PROPOSED CONSTRUCTION IS IN OPERATION. THIS CAPACITY REDUCTION IS NOT A CONCURRENT  
" REDUCTION IN EMISSIONS."

#14  
 ⊕ ADDITION 6/19/82

TABLE 1-A

PARTICULATE MATTER EMISSION DATA & SOURCE PARAMETERS

W. R. GRACE BARTOW WORKS  
 BARTOW, FLORIDA

PRESENTLY PERMITTED 155/HR	SOURCE NAME	EMM. RATE (lb/hr) ⊕	STACK HT. (M)	STACK TEMP. (DEG-K)	EXIT VEL. (M/SEC)	STACK DIA. (M)	VOL. FLOW (M <sup>3</sup> /SEC)	X-COORD. (KM)	Y-COORD. (KM)	
	<u>A053:</u>									
92.8	Dry Mill - Rock Dryers 29004	60.0	15.2	330.0	8.60	2.10	0.	409.610	3085.860	
46.0	Dry Mill - Rock Storage 13378	46.0	16.8	315.0	13.60	1.10	0.	409.600	3085.900	
46.0	Dry Mill - Rock Convey 14740	23.0	15.6	315.0	11.40	0.40	0.	409.620	3085.550	
23.7	Dry Mill - Grind Mill 14739	10.0	15.0	315.0	18.30	0.30	0.	409.600	3085.900	
7.2	Dry Mill - Rock Ship 51464	7.2	15.3	315.0	9.90	0.90	0.	409.800	3086.600	
41.9	Chem PI-Rock Grind 25188	36.0	22.0	315.0	9.60	0.60	0.	409.700	3086.890	
31.5	Chem PI-Ball Mill 26977	12.0	25.3	331.0	10.20	0.40	0.	409.810	3086.890	
31.0	Chem PI-300X GTSP DAP 25191	27.6	32.8	320.0	12.40	2.20	0.	409.980	3086.810	
30.1	Chem PI-300Y GTSP & ROP 13210	25.0	24.4	321.0	12.40	2.20	0.	409.980	3086.830	
33.7	Chem PI-GTSP Storage 25192	5.0	32.8	315.0	11.90	2.10	0.	409.670	3086.900	
31.8	Chem PI-GTSP Shipping 27026	10.0	28.0	315.0	5.30	0.80	0.	409.900	3086.700	
42.0	Chem PI-Fert. Plant DAP06840	30.0	30.2	333.0	16.00	2.30	0.	409.810	3086.780	
29.9	Chem PI-DAP #3 (NEW) 24460	29.9	40.4	322.0	26.50	2.10	0.	409.290	3086.960	
31.2	Chem PI-ROP Belt 14475	4.0	14.0	315.0	12.90	0.60	0.	409.810	3086.560	
31.2	Chem PI-ROP Storage 14674	6.0	21.3	315.0	12.10	1.20	0.	409.600	3085.900	
31.2	Chem PI-ROP Shipping 13449	5.0	27.0	315.0	6.30	1.00	0.	409.600	3055.900	
38.6	Chem PI-DAP Shipping 32628	25.0 ✓	24.4	315.0	9.50	0.70	0.	409.840	3086.630	
15.5	Chem PI-NEW DAP Ship 36672	15.5 ✓	30.5	315.0	16.90	1.50	0.	409.410	3086.880	
<u>635.3 ✓</u>		<u>Total 377.2 ✓</u>								

FOR YOUR CONVENIENCE  
 7-19-82 M.J.M.

= 40.6% REDUCTION

GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

July 21, 1982

Mr. Steve Smallwood, P. E.  
Chief, Bureau of Air Quality  
Department of Environmental Regulation  
Twin Towers Office Bldg.  
2600 Blair Stone Rd.  
Tallahassee, Fl 32301

Dear Mr. Smallwood:

DEAR  
JUL 23 1982  
BAQM

Re Reduction of Permitted Emissions of Particulates;  
and AC53-24460 Permit for New #3 DAP Plant

With reference to my letter of June 18, I enclose corrected copies of Tables 1, 1-A and 2 to be substituted in Dr. John Koogler's computerized dispersion study dated June 16, 1982. My corrections cover only minor errors which become obvious at a closer inspection of John's study.

We have authorized your Southwest District Office in Tampa to revise our operating permits in conformance with the above study. The total reduction proposed by us represents a decrease of 40.6%, from the presently permitted 635.3 lbs. to the proposed 377.2 lbs. / hr. In other words, total particulate emissions from our Bartow Works complex would affect the Non-Attainment area in Hillsborough County by less than the  $5\mu/m^3$  allowable increment defined as the level of "Significant Impact" even if all the existing plants, as well as those under construction, were emitting maximum allowable quantities of dust. The PTMTPW dispersion model was programed in this study with the most unfavorable atmospheric conditions experienced one day in 1970.

On June 24, 1982, I asked your District Manager, Bill Hennessey to kindly void our construction permit AC53-42443 to convert No. 2 DAP Plant to GTSP, because the unfavorable economic situation of the phosphate industry makes it impossible to obtain capital for this investment. We are therefore forced to continue operating the old 300-X and 300-Y GTSP trains in the near future,

Mr. Steve Smallwood, P. E.

July 21, 1982

Page 2

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and ask you to kindly void Specific Condition No. 14 of construction permit AC53-24460 requiring that 300-X and 300-Y GTSP trains be shut down when No. 3 DAP plant becomes operative.

For your information, and in further support of this request, I enclose EPA study PSD-FL-68 dated April 1, 1981, which concludes that the proposed modification to DAP manufacturing, (i. e. No. 3 DAP plant) storage and shipping facilities meet all the applicable requirements of the PSD regulations. Shutting down the 300-X and 300-Y GTSP trains was not considered in this EPA determination.

In view of the above facts, and considering that our allowable future emission with No. 3 DAP plant as well as 300-X and 300-Y trains will still be 40.6% lower than the maximum present emissions; we trust you will grant our request to void said Specific Condition No. 14, especially since said construction permit *per/se* meets also BACT requirements.

Please call us if you require any further information, or give us an appointment to discuss this urgent matter with you at your convenience.

Sincerely,



M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db  
Enclosure

cc: W. K. Hennessey, District Manager  
D. S. Sharpe/F. L. Applegate  
M. J. Altenburger

**GRACE**

**Agricultural Chemicals Group**

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

August 25, 1982

Mr. Steve Smallwood, P. E.  
Chief, Bureau of Air Quality  
Department of Environmental Regulation  
Twin Towers Office Bldg.  
2600 Blair Stone Rd.  
Tallahassee, Fl 32301

Dear Mr. Smallwood:

Re AC53-24460: No. 3 DAP Plant

Further to our letter to you dated July 21, we are pleased to answer the questions raised in your reply of August 17.

Our latest expansion program aimed at modernizing the Chemical Complex included the following phases:

- a. Construction of a 800,000 TPY DAP Plant (#3) and corresponding shipping facilities, as per DER construction permits AC53-24460 and 36672;
- b. Conversion of the present DAP Fertilizer Plant to granular triple super phosphate product (GTSP), AC53-42443;
- c. Consequent phasing out of both existing, small GTSP plants called 300-X and Y, AO53-25191 and 13210;

The very unfavorable economic situation of the phosphate industry forced us to postpone item b. for several years. As a result of this we will have to continue operating the old 300-X and Y fertilizer plants, item c., until a recovered sales market makes it economical to replace them in the future.

Please note from copies of past correspondence attached hereto for your convenience, that:

1. EPA's Letter of Determination confirming that the proposed construction of DAP plant and shipping facilities "do not threaten violation of any PSD Class II increments" (p. 6). It also states on p. 1 that, quote, "Some existing fertilizer production capacity will be shut down about 6 months after the proposed construction is completed. This capacity reduction is not a concurrent reduction in emissions." unquote.
2. Likewise, our construction permit application and its PSD study by Dr. John Koogler did not take any numerical credit for phasing out the two old GTSP trains. (300-X & Y) Emission limits were based strictly on B. A. C. T.
3. The "Public Notification" in local newspapers did therefore not mention closing down any old plants; it merely referred to a new DAP plant and shipping facility. Since there was no comment whatsoever from the general public, we would ask you not to delay this project for some two months by going through this legal process again.
4. We have recently authorized your office, as well as your Tampa S. W. District Office, to reduce our maximum permitted emissions of particulate matter by 40.6% so as to comply with RACT. Our back up study assumed continuous operation of the old 300-X and Y GTSP trains as well as all plants presently under construction. Your letter to me, dated June 25, 1982 confirmed that we meet the exemption criteria.
5. DER and the EPA permits are based on B. A. C. T. and have therefore arrived at identical annual emissions. The small difference in hourly emission levels is due to an assumption of slightly varied operating hours.
6. The numerical values used in my last letter to you, of July 21, originate from DER's "Final Determination" dated July 1, 1980 and Construction Permit AC53-24460 dated July 3, 1980.



Mr. Steve Smallwood, P. E.  
August 25, 1982  
Page 3

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In view of the above, we respectfully ask you to void Specific Condition No. 14 of Construction Permit AC53-24460.

Thank you beforehand for your objective consideration of this matter.

Sincerely,



M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db

cc: W. K. Hennessey, District Manager  
D. S. Sharpe/F. L. Applegate  
M. J. Altenburger

## NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to revise permit AC 53-24460, dated July 3, 1980 that was issued to W. R. Grace and Company for the construction of an 800,000 TPY DAP plant at their chemical complex in Polk County near Mulberry, Florida. The revision will eliminate the requirement that two existing GTSP plants cease operation as a condition to constructing the new DAP plant.

A person who is substantially affected by the Department's proposed permit revision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapter 17-2 and 28-5, Florida Administrative Code. The request for the hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within 14 days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The Company's request and proposed permit revision are available for public inspection during normal state business hours, 8:00 am to 5:00 pm, Monday through Friday, except on legal holidays at:

Department of Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

September 15, 1982

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. David S. Sharp<sup>e</sup>  
W. R. Grace and Company  
P. O. Box 471  
Bartow, Florida 33830

Dear Mr. Sharp:

Pursuant to Section 403.815, Florida Statutes, and Florida Administrative Code Rule 17-1.62, you are required to publish (at your own expense) the attached notice. This notice should be published one time only, as soon as possible, in the legal ad section of a newspaper of general circulation in Polk County.

The Department, in accordance with Rule 17-1.62, is required to have proof that the public notice was given. Therefore, please have the newspaper prepare an affidavit of publication to submit to the Department.

Sincerely,

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

CHF/pa

Attachment

cc: Dan Williams, DER Southwest District

# AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No .....

STATE OF FLORIDA )  
COUNTY OF POLK )

Before the undersigned authority personally appeared Walter  
Carris, who on oath says that he is Controller of The Ledger, a daily  
newspaper published at Lakeland in Polk County, Florida; that the  
attached copy of advertisement, being a .....

Notice  
.....  
.....

in the matter of .....

Proposed Agency Action  
.....  
.....

in the .....

Court, was published in said newspaper in the issues of .....

September 30, 1982  
.....  
.....

Affiant further says that said The Ledger is a newspaper  
published at Lakeland, in said Polk County, Florida, and that the  
said newspaper has heretofore been continuously published in  
said Polk County, Florida, daily, and has been entered as second  
class matter at the postoffice in Lakeland, in said Polk County,  
Florida, for a period of one year next preceding the first  
publication of the attached copy of advertisement; and affiant  
further says that he has neither paid nor promised any person,  
firm or corporation any discount, rebate, commission or refund  
for the purpose of securing this advertisement for publication in  
the said newspaper.

Signed *Walter Carris*  
Controller

4th

Sworn to and subscribed before me this .....

October

82

day of ..... A.D. 19 .....

(Seal)

*Barbara Kupper*  
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES NOV. 11, 1982  
BONDED THRU GENERAL INS. UNDERWRITERS

My Commission Expires .....

**NOTICE OF PROPOSED AGENCY ACTION**  
The Department of Environmental Regulation gives notice of its intent to revise permit AC 53-24460, dated July 3, 1980 that was issued to W.R. Grace and Company for the construction of an 800,000 TPY DAP plant at their chemical complex in Polk County near Mulberry, Florida. The revision will eliminate the requirement that two existing GTSP Plants cease operation as a condition to constructing the new DAP plant.  
A person who is substantially affected by the Department's proposed permit revision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapter 17-2 and 28-5, Florida Administrative Code. The request for the hearing must be filed (received) in the Office of the General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within 14 days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.  
The Company's request and proposed permit revision are available for public inspection during normal state business hours, 8:00 am to 5:00 pm, Monday through Friday, except on legal holidays at:  
Department of Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610  
R514 - 9-30-1982

GRACE

DER

OCT 12 1982

BAQM

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

October 7, 1982

Mr. Dan Williams, P. E.  
Department of Environmental Regulation  
Southwest District Office  
7601 Highway 301, North  
Tampa, Florida 33610


Dear Mr. Williams:

Re No. 3 DAP Plant and Shipping

According to the stipulation in Construction Permits Nos. AC53-24460 and AC53-36672, please be advised that we plan to start up the above DAP Plant on November 15, 1982 and its shipping station as soon as possible afterwards.

Also please note that the "Notice of Proposed Agency Action" covering the revision of Construction Permit AC53-24460 has been published in the legal section of the Ledger on September 30, 1982, and that the Affidavit of Publication has been mailed to us on October 5, 1982. I will forward it to you as soon as we receive it.

Sincerely,

  
M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db

cc: F. L. Applegate  
R. I. Morrell  
Willard Hanks-DER  
M. J. Altenburger

# AFFIDAVIT OF PUBLICATION

## THE LEDGER

Lakeland, Polk County, Florida

Case No. ....

STATE OF FLORIDA )  
COUNTY OF POLK )

ss.

Before the undersigned authority personally appeared Walter  
Garrie, who on oath says that he is Controller of The Ledger, a daily  
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in the matter of .....

Proposed Agency Action  
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Court, was published in said newspaper in the issues of .....

September 30; 1982.....  
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said newspaper has heretofore been continuously published in  
said Polk County, Florida, daily, and has been entered as second  
class matter at the postoffice in Lakeland, in said Polk County,  
Florida, for a period of one year next preceding the first  
publication of the attached copy of advertisement; and affiant  
further says that he has neither paid nor promised any person,  
firm or corporation any discount, rebate, commission or refund  
for the purpose of securing this advertisement for publication in  
the said newspaper.

Signed *Walter Garrie*  
Controller

4th

Sworn to and subscribed before me this .....

October

82

day of ..... A.D. 19.....



*Barbara Kuyper*  
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES NOV. 11, 1982  
BONDED THRU GENERAL INS. UNDERWRITERS

Attach Notice Here

**NOTICE OF PROPOSED AGENCY ACTION**  
The Department of Environmental Regulation gives notice of its intent to revise permit AC 53-24460, dated July 3, 1980 that was issued to W.R. Grace and Company for the construction of an 800,000 TPY DAP plant at their chemical complex in Polk County near Mulberry, Florida. The revision will eliminate the requirement that two existing GTSP Plants cease operation as a condition to constructing the new DAP plant.  
A person who is substantially affected by the Department's proposed permit revision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapter 17-2 and 28-5, Florida Administrative Code. The request for the hearing must be filed (received) in the Office of the General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within 14 days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.  
The Company's request and proposed permit revision are available for public inspection during normal state business hours, 8:00 am to 5:00 pm, Monday through Friday, except on legal holidays at:  
Department of Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610  
R514 - 9:30; 1982



W. R. Grace and Company  
Revised Final Determination

November 3, 1982

W. R. Grace and Company's request to revise their permit to construct (AC 58-24460) a new diammonium phosphate plant (DAP) by deleting a requirement that two existing granular triple superphosphate plants, designated 300 X and 300 Y, be shut down as a condition to construct the new DAP plant has been reviewed by the Bureau of Air Quality Mangement.

Public Notice of the department's intent to revise the construction permit was published in the Ledger on September 30, 1982. A copy of the proposed revision has been available for public inspection at the Southwest District Office in Tampa. No comments from the public on the proposed revision were submitted to the department.

Therefore, the department will revise construction permit AC 58-24460 by deleting the requirement that two existing GTRSP plants be shut down as a condition to construct a new DAP plant.



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

November 3, 1982

Mr. David S. Sharp  
W. R. Grace and Company  
Post Office Box 471  
Bartow, Florida 33830

Dear Mr. Sharp:

Modification of Conditions  
Permit No. AC 53-24460

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

FROM:

14. The fertilizer plant 300-X (AO 53-25191) will be shut down before No. 3 DAP plant starts up. Fertilizer plant 300-Y (AO 53-13210) will cease operation within 6 months after the No. 3 DAP plant start-up. Operation permits will be returned to DER within 10 days of the shut down of each plant.

TO:

14. Fertilizer plants 300-X (AO53-25191) and 300-Y (AO 53-13210) can continue to operate as long as the plants are in compliance with all state and federal regulations and permit conditions.

This letter must be attached to your permit and become a part of that permit.

Sincerely,

Victoria J. Tschinkel  
Secretary

VJT/whm

W. R. Grace and Company

Revised Final Determination

November 3, 1982

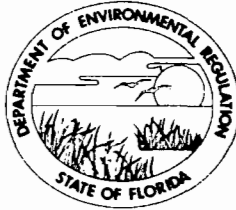
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Public Notice of the department's intent to revise the construction permit was published in the Ledger on September 30, 1982. A copy of the proposed revision has been available for public inspection at the Southwest District Office in Tampa. No comments from the public on the proposed revision were submitted to the department.

Therefore, the department will revise construction permit AC 58-24460 by deleting the requirement that two existing GTRSP plants be shut down as a condition to construct a new DAP plant.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

November 17, 1982

Mr. David S. Sharp  
W. R. Grace and Company  
Post Office Box 471  
Bartow, Florida 33830

Dear Mr. Sharp:

Modification of Conditions  
Permit No. AC 53-24460

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

FROM:

14. The fertilizer plant 300-X (AO 53-25191) will be shut down before No. 3 DAP plant starts up. Fertilizer plant 300-Y (AO 53-13210) will cease operation within 6 months after the No. 3 DAP plant start-up. Operation permits will be returned to DER within 10 days of the shut down of each plant.

TO:

14. Fertilizer plants 300-X (AO53-25191) and 300-Y (AO 53-13210) can continue to operate as long as the plants are in compliance with all state and federal regulations and permit conditions.

This letter must be attached to your permit and become a part of that permit.

Sincerely,

  
Victoria J. Tschinkel  
Secretary

VJT/bm

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

November 17, 1982

Mr. David S. Sharp  
W. R. Grace and Company  
Post Office Box 471  
Bartow, Florida 33830

Dear Mr. Sharp

Modification of Conditions  
Permit No. AC 53-24460

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

FROM:

14. The fertilizer plant 300-X (AO 53-25191) will be shut down before No. 3 DAP plant starts up. Fertilizer plant 300-Y (AO 53-13210) will cease operation within 6 months after the No. 3 DAP plant start-up. Operation permits will be returned to DER within 10 days of the shut down of each plant.

TO:

14. Fertilizer plants 300-X (AO53-25191) and 300-Y (AO 53-13210) can continue to operate as long as the plants are in compliance with all state and federal regulations and permit conditions.

This letter must be attached to your permit and become a part of that permit.

Sincerely,

  
Victoria J. Tschinkel  
Secretary

VJT/bm

W. R. Grace and Company

Revised Final Determination

November 3, 1982

W. R. Grace and Company's request to revise their permit to construct (AC 58-24460) a new diammonium phosphate plant (DAP) by deleting a requirement that two existing granular triple superphosphate plants, designated 300 X and 300 Y, be shut down as a condition to construct the new DAP plant has been reviewed by the Bureau of Air Quality Mangement.

Public Notice of the department's intent to revise the construction permit was published in the Ledger on September 30, 1982. A copy of the proposed revision has been available for public inspection at the Southwest District Office in Tampa. No comments from the public on the proposed revision were submitted to the department.

Therefore, the department will revise construction permit AC 58-24460 by deleting the requirement that two existing GTRSP plants be shut down as a condition to construct a new DAP plant.

# AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No .....

STATE OF FLORIDA )  
COUNTY OF POLK )

Before the undersigned authority personally appeared Walter  
Carris, who on oath says that he is Controller of The Ledger, a daily  
newspaper published at Lakeland in Polk County, Florida; that the  
attached copy of advertisement, being a .....

Notice  
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in the matter of .....

Proposed Agency Action  
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September 30, 1982  
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publication of the attached copy of advertisement; and affiant  
further says that he has neither paid nor promised any person,  
firm or corporation any discount, rebate, commission or refund  
for the purpose of securing this advertisement for publication in  
the said newspaper.

Signed *Walter Carris*  
Controller

4th

Sworn to and subscribed before me this .....

October

82

day of ..... A.D. 19 .....

(Seal)

*Barbara Stupper*  
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES NOV. 11, 1982  
BONDED THROUGH GENERAL INS. UNDERWRITERS

My Commission Expires .....

**NOTICE OF PROPOSED AGENCY ACTION**  
The Department of Environmental Regulation gives notice of its intent to revise permit AC 5324460, dated July 3, 1980 that was issued to W.R. Grace and Company for the construction of an 800,000 TPY DAP plant at their chemical complex in Polk County near Mulberry, Florida. The revision will eliminate the requirement that two existing GTSP Plants cease operation as a condition to constructing the new DAP plant.  
A person who is substantially affected by the Department's proposed permit revision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapter 172 and 285, Florida Administrative Code. The request for the hearing must be filed (received) in the Office of the General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32304, within 14 days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.  
The Company's request and proposed permit revision are available for public inspection during normal state business hours, 8:00 am to 5:00 pm, Monday through Friday, except on legal holidays at:  
Department of Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610  
R814 - 9/30/1982

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel  
FROM: Clair H. Fancy *Clair H. Fancy*  
DATE: November 17, 1982  
SUBJ: Modification of W. R. Grace and Company's Air Construction Permit Condition (Specific Condition 14. of AC 53-24460)

**RECEIVED**  
NOV 18 1982  
Office of the Secretary

Attached is a letter from W. R. Grace and Company requesting that specific condition 14. of their air construction permit be changed to allow continuing operation of the <sup>TAP</sup>~~DAP~~ plants. Due to the economic situation of the phosphate industry, the plant that was to replace those plants is no longer economically feasible and its construction permit has been withdrawn. The production capacity of the older <sup>DAP</sup>~~DAP~~ plants is still needed.

The permit package was replaced upcn, thirty days public notice due to this significant change. Attached is a revised final determination summarizing the results of the renotification.

Therefore, the Bureau respectfully requests that the air construction permit modification be issued as requested.

JS/ks



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

Willard  
file:  
W. R. GRACE

DER

DEC 13 1982

BAQM

DEC 10 1982

4AW-AM

Mr. Bill Thomas  
Bureau of Air Quality Management  
Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Re: PSD-FL-068-W. R. Grace and Company, Polk County  
Modification of Condition to State Permit No. AC53-24460

Dear Mr. Thomas:

This is to acknowledge receipt of your agency's September 17, 1982, submittal containing a copy of the draft revised State of Florida final determination and construction permit for the above company. The revised State final determination and construction permit allows W. R. Grace and Company to continue operation of the existing Granular Triple Superphosphate (GTSP) Plants 300-x and 300-y after the new No. 3 Diammonium Phosphate (DAP) Plant commences operation.

This office has reviewed the draft revised final determination and construction permit. The operation of all three plants simultaneously was considered when the preliminary and final determinations were made by EPA. The federal PSD Permit No. PSD-FL-068 issued to the company did not require the cessation of GTSP Plants 300-x and 300-y and accounted for the emissions from the continued operation of these plants. Therefore, we will concur with the revised State final determination and construction permit.

If you have any questions, please feel free to contact me or Mr. Dave Holroyd at (404) 881-7654.

Sincerely yours,

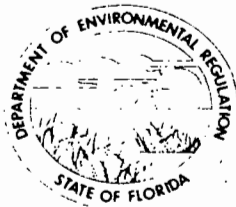
James T. Wilburn, Chief  
Air Management Branch  
Air and Waste Management Division



W.R. Grace

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

December 13, 1982

Mr. David S. Sharp  
W. R. Grace and Company  
Post Office Box 471  
Bartow, Florida 33830

Dear Mr. Sharp:

Modification of Conditions  
Permit No. AC 53-36672

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

<u>Condition</u>	<u>From</u>	<u>To</u>
Date of Expiration	January 15, 1983	July 15, 1983

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

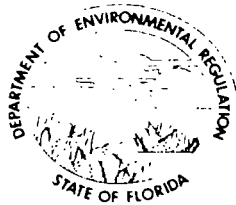
Victoria J. Tschinkel  
Secretary

WH/ks

cc Su Paul

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

December 13, 1982

Mr. David S. Sharp  
W. R. Grace and Company  
Post Office Box 471  
Bartow, Florida 33830

Dear Mr. Sharp:

Modification of Conditions  
Permit No. AC 53-24460

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

<u>Condition</u>	<u>From</u>	<u>To</u>
Date of Expiration	December 31, 1982	June 30, 1983

- NEW 15. Test the emissions from the DAP plant each month for particulate matter and fluoroide. Report the results, along with the maximum production rate achieved by the plant, the total DAP production for the month and any modifications of the DAP plant air pollution control equipment, to the Southwest District Office until an application for the permit to operate this source is filed with the Department.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Victoria J. Tschinkel".

Victoria J. Tschinkel  
Secretary

WH/ks

CC SW Dist

GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

December 10, 1982

Mr. Willard Hanks, P. E.  
Air Permitting Department  
Department of Environmental Regulation  
Twin Towers Office Bldg.  
2600 Blair Stone Rd.  
Tallahassee, Florida 32301

DER  
DEC 13 1982  
BAQM

Dear Mr. Hanks:

Re New DAP Plant & Shipping  
AC53-24460 and 36672

You will see from the attached copy of my letter to your Tampa Office, that the construction of DAP and its shipping facilities has run into mechanical problems. I do not expect the plant to operate near its designed capacity for several months, at which time we will start collecting the stack data required for application for operating permits.

We have asked your Tampa Office to kindly extend the above two construction permits by six months. It has been suggested, however, that our request concerning permit No. AC 53-24460 be directed to you for faster processing, since it originated in your office.

In view of the above, please approve the routine extension of these construction permits by six months, at unchanged conditions.

Sincerely,



M. J. Martinasek  
Project Engineer  
Environmental Control

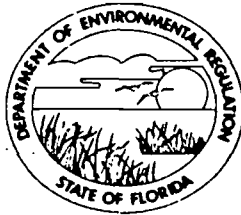
MJM:db  
Attachment

cc: F. L. Applegate  
M. J. Altenburger

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

*THIRTEEN A; FILED has the ORIGINAL  
2) M J M's file  
cc Robert M.  
Bob D.  
(some expir. date!)*

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

November 17, 1982

Mr. David S. Sharpe  
W. R. Grace and Company  
Post Office Box 471  
Bartow, Florida 33830

Dear Mr. Sharp:

Modification of Conditions  
Permit No. AC 53-24460

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

FROM:

14. The fertilizer plant 300-X (AO 53-25191) will be shut down before No. 3 DAP plant starts up. Fertilizer plant 300-Y (AO 53-13210) will cease operation within 6 months after the No. 3 DAP plant start-up. Operation permits will be returned to DER within 10 days of the shut down of each plant.

TO:

14. Fertilizer plants 300-X (AO53-25191) and 300-Y (AO 53-13210) can continue to operate as long as the plants are in compliance with all state and federal regulations and permit conditions.

This letter must be attached to your permit and become a part of that permit.

Sincerely,

*Victoria J. Tschinkel*  
Victoria J. Tschinkel  
Secretary

VJT/bm

GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

October 8, 1982

Mr. Thomas W. Devine, Director  
Air & Hazardous Materials Division  
Environmental Protection Agency  
Region IV  
345 Courtland Street, N. E.  
Atlanta, Georgia 30308

Dear Mr. Devine:

Re PSD-F1-068: DAP Plant and Shipping  
DER Permits AC53-24460 & 36672

We wish to inform you that the DAP plant presently under construction is scheduled for start-up on November 15, 1982, and its adjacent shipping section will be tried out as soon afterwards as practical.

It will probably then take a couple of months before we are able to sustain operation at the designed level of production required for a new plant acceptance test.

We have just informed DER about the proposed start-up, and will phone you as soon as we are ready for the acceptance test.

Sincerely,

  
M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db

cc: F. L. Applegate  
M. J. Altenburger

GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

October 7, 1982

Mr. Dan Williams, P. E.  
Department of Environmental Regulation  
Southwest District Office  
7601 Highway 301, North  
Tampa, Florida 33610


Dear Mr. Williams:

Re No. 3 DAP Plant and Shipping

According to the stipulation in Construction Permits Nos. AC53-24460 and AC53-36672, please be advised that we plan to start up the above DAP Plant on November 15, 1982 and its shipping station as soon as possible afterwards.

Also please note that the "Notice of Proposed Agency Action" covering the revision of Construction Permit AC53-24460 has been published in the legal section of the Ledger on September 30, 1982, and that the Affidavit of Publication has been mailed to us on October 5, 1982. I will forward it to you as soon as we receive it.

Sincerely,

  
M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db

cc: F. L. Applegate  
R. I. Morrell  
Willard Hanks-DER  
M. J. Altenburger

GRACE

Agricultural Chemicals Group

W. R. Grace & Co.  
P.O. Box 471  
Bartow, Florida 33830

(813) 533-2171

December 10, 1982

Mr. William C. Thomas, P. E.  
Environmental Permitting  
Department of Environmental Regulation  
Southwest District Office  
7601 Highway 301, North  
Tampa, Florida 33610

Dear Mr. Thomas:

Re New DAP Plant & Shipping  
AC53-24460 and 36672

Thank you for reminding us that construction permit 36672 will expire on January 15, 1983.

Unfortunately the new DAP shipping section is still under construction. We don't expect to test the stack until sometime in January, assuming we'll have a client for DAP.

The new DAP plant is still in the process of starting up, and is presently operating at less than half of its maximum capacity due to an unforeseen bottleneck. We may not be able to test the stack anywhere near the designed capacity for several months.

In view of the above, we have to ask you again to kindly extend both construction permits by six months, at unchanged conditions.

Thank you for your kind cooperation.

Sincerely,



M. J. Martinasek  
Project Engineer  
Environmental Control

MJM:db

cc: William K. Hennessey  
Willard Hanks  
M. J. Altenburger  
F. L. Applegate