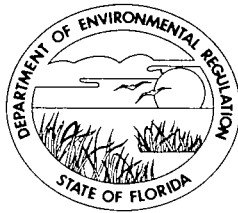


STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

MEMORANDUM

TO: Mr. David S. Sharp, W. R. Grace and Company
Mr. M. J. Martinasek, W. R. Grace and Company
Mr. Dan Williams, DER Southwest District

FROM: C. H. Fancy, Deputy Chief, Bureau of Air
Quality Management *CHF*

DATE: September 17, 1982

SUBJ: W. R. Grace and Company, Polk County
Modification of Condition to Permit No. AC 53-24460

Attached is one copy of the draft revised Final Determination, proposed permit revision and applicant's request for W. R. Grace and Company to eliminate the requirement that two existing GTSP plants cease operation as a condition to constructing the new DAP plant.

Please submit any comments which you wish to have considered concerning this action, in writing, to Bill Thomas of the Bureau of Air Quality Management.

CHF/bjm

Attachment

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

Final Determination Revision

DRAFT

W. R. Grace and Company

Polk County, Florida

No. 3 Diammonium Phosphate Plant

Construction Permit

AC 53-24460

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

September 13, 1982

DRAFT

Revised Final Determination

I. History

The Department of Environmental Regulation received an application for permit to construct a 800,000 TPY diammonium phosphate (DAP) plant from W. R. Grace and Company at their Polk County Chemical Complex on October 9, 1979. Construction permit number AC 53-24460 dated July 3, 1980 was issued for the new No. 3 DAP plant. The applicant stated the new No. 3 DAP plant would replace two existing granular triple superphosphate (GTSP) plants, 300-X and 300-Y. Because of this statement specific condition 14 was included in the permit for the new DAP plant. This condition was:

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.

Their expansion plans included converting an existing DAP plant to GTSP (AC 53-42443). Shutting down 300-X and 300-Y GTSP plants was contingent on converting the existing DAP plant.

II. Company Request

On July 21, 1982 the Company requested that specific condition 14, requiring 300-X and 300-Y GTSP plants be shut down when No. 3 DAP plant begins operation, be voided because unfavorable economic conditions have caused the company to change its expansion and operation plans. The Company wants to continue to operate the two GTSP plants and has canceled other plant modifications (conversion of an existing DAP plant to GTSP) at this complex that were part of their expansion plan.

III. Department Recommendation

The Department proposed to revise specific condition 14 in permit AC 53-24460 that requires the two GTSP plants be shut down. The revised condition will be as follows.

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.

DRAFT

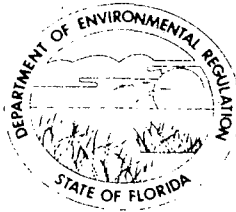
IV. Justification

The revised specific Condition 14 will allow W. R. Grace and Company to operate the two existing GTSP plants after the new No. 3 DAP plant begins production. The revised specific condition 14 will require the GTSP plants to be in compliance with all applicable air pollution regulations and specific conditions in existing permits for these sources.

Studies on the effect of emission from the new and existing air pollution sources at this plant on the ambient air quality in the vicinity of the complex shows there would be no violation of the standards in the regulations. These studies included the emissions from 300-X and 300-Y GTSP plants. Thus, the emissions from the two GTSP plants will not cause a violation of any state or federal regulations and the Department does not have a legal basis to prohibit the operation of these two plants.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

September 14, 1982

DRAFT

Mr. David S. Sharp
W. R. Grace and Company
P. O. 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