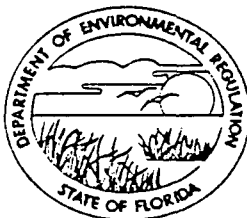


TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

May 2, 1980

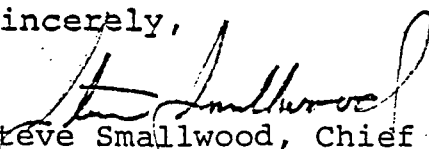
Mr. Rudy J. Cabina, Vice President
Gardinier, Inc.
Post Office Box 3269
Tampa, Florida 32601

Dear Mr. Cabina:

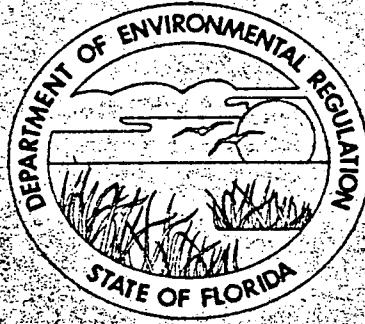
Enclosed is Permit Number AC 29-27760, dated May 2, 1980
to construct a 50 TPH Diammonium Phosphate Plant
issued pursuant to Section Chapter 403, Florida Statutes.

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 actions for violation of the conditions and requirements thereof.

Sincerely,


Steve Smallwood, Chief
Bureau of Air Quality Management

SS:caa



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 29-27760

GARDINIER INC.,
HILLSBOROUGH COUNTY

DATE OF ISSUANCE

MAY 6, 1980

DATE OF EXPIRATION

NOVEMBER 1, 1982

JACOB D. VARN,
SECRETARY

Gardinier, Inc. Construction Permit
AC 29-27760
Final Determination

Gardinier, Inc.'s application for permit to construct a diammonium phosphate plant in Hillsborough County has been reviewed by the Bureau of Air Quality Management. Public notice of the Department's Intent to Issue the construction permit was published in the Tampa Tribune on April 2, 1980. Copies of the preliminary determination have been available for public inspection at the Department's Southwest District Office in Tampa, Hillsborough County Pollution Control Commission's Office in Tampa and the Bureau of Air Quality Management Office in Tallahassee.

Comments on the proposed construction permit were received from Mr. Louis Schuchert, an interested citizen, and from Gardinier, Inc.

Mr. Schuchert expressed concern for the Department allowing a new source in the area of the proposed plant which will contribute to the existing air pollution of that area. The Bureau had considered this matter in the original review of the application and recommended the permit be issued because plant modifications associated with the new source will result in a net reduction of air pollutant emissions from Gardinier's chemical complex. Thus, the existing air pollution situation will be improved as a result of the new plant and associated plant modifications.

Gardinier, Inc. stated that the special condition limitations on plant operation hours, sulfur content of fuel and production rate are too restrictive. They had no objection to the maximum allowable pollution emission rate. They requested the limitations be relaxed.

The Department has considered their request and made the changes described below to the special conditions of the permit.

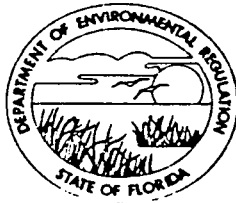
Restriction on the maximum production rate from the plant have been removed but the maximum allowable emission rate remains the same. Maximum allowable emissions from this source will not exceed 10 lbs. particulate/hr., 16 lbs. sulfur dioxide/hr., and 1.4 lbs. fluoride/hr. at any production rate. A new condition has been added requiring the company to test their emissions when a new maximum production rate is achieved to confirm the emissions are in compliance with the permit conditions. As the air quality is affected by the emission rate, not the production rate, there will be no adverse effect from this change.

Restriction on the maximum plant operation hours have been removed. This could result in an increase in the total emissions of pollutant for the year. With these changes, the total emissions of particulate will be less than 50 tons per year. As the particulate emission does not exceed 50

TPY with these changes, no additional regulations or permitting procedures are involved in processing the application. Total sulfur dioxide emissions from the complex will decrease by over 200 TPY even with the limitation removed because of the planned modifications to the number seven sulfuric acid plants. These modifications are added to the permit as a condition to construct the new DAP plant.

Restriction on the sulfur content of the fuel oil was increased from a maximum of 2.0% to 2.5%. The allowable emission rate for sulfur dioxide remained the same. Thus, this change will have no affect on the ambient air quality.

The attached copy of the revised construction permit AC 29-27760 includes the revisions discussed above.



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Gardinier, Inc.
P. O. Box 3269
Tampa, Florida

PERMIT/CERTIFICATION
NO. AC 29-27760

COUNTY: Hillsborough

PROJECT: No. 5 Ammonium
Phosphate Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, 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 diammonium phosphate plant to be located at the permittee's phosphate fertilizer complex near the intersection on U.S. Highway 41 and Riverview Drive in Hillsborough County, Florida. The latitude, and longitude and UTM coordinates are 27°51'36"N by 82°23'44"W and 362.600E, 3082.300N respectively.

Construction shall be in accordance with the attached permit application, plans, documents and drawings except as otherwise noted under the "Specific Conditions".

Attachments* are as follows:

1. Application to Construct Air Pollution Sources, DER form 17-1.122(16).
2. Figure on stack sampling facilities.

*Previously distributed.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed

PERMIT NO.: AC 29-27760
APPLICANT: Gardinier, Inc.

on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

SPECIFIC CONDITIONS:

PERMIT NO.: AC 29-27760
APPLICANT: Gardinier, Inc.

Specific Conditions

1. Maximum permitted production rate for this plant will be the rate that existed during the most recent compliance test for particulate, fluoride or sulfur dioxide - whichever rate was lowest. Anytime the production rate exceeds the maximum permitted rate by 10%, another compliance test must be conducted with the Department's knowledge and the results of this test, along with other information listed in Specific Condition 9, submitted to the Department within 10 working days. Any emissions in excess of those listed in Specific Condition 2 is violation of this permit. The plant may operate 8,760 hours per year if permitted emissions are not exceeded.
2. The emissions from the 7 foot diameter, 132.5 foot high stack for the no. 5 plant will not exceed:

Pollutant	Standard	Maximum Allowable Emissions	
		lb/hr	T/yr
Particulate	0.5 lb/T P ₂ O ₅ feed	10	43.8
SO ₂	0.7 lb/T P ₂ O ₅ feed	16	70.1
Fluoride	0.06 lb/T P ₂ O ₅ feed	1.4	6.1

3. Fugitive emissions from the process, conveying and storage equipment will be controlled by sealing and/or venting all particulate and fumes from the equipment to pollution abatement equipment.
4. No. 6 fuel oil used by the dryer shall contain no more than 2.5% sulfur.
5. The permittee will install, calibrate, maintain, operate and record data from flow monitoring devices used to determine total P₂O₅ input to the plant. A daily record on the P₂O₅ input to the plant will be maintained.
6. The permittee will measure and record the total pressure drop across each scrubber system. Pressure drop across the venturi scrubbers must be at least 12 inches of water during plant operations. These records will be maintained for 2 years and available for inspection by regulatory agency personnel on request.
7. Construction should commence and be completed within a reasonable time based on the projections in the November 26, 1979 PSD study referred to in the application.

PERMIT NO.: AC 29-27760
APPLICANT: Gardinier, Inc.

8. Reasonable precautions to prevent fugitive particulate emissions during construction, such as coating or spraying roads and construction sites used by contractors, will be taken by the Permittee.
9. Before the construction permit expires, the DAP plant will be sampled for particulate, sulfur dioxide and fluoride emissions. Test procedures will be EPA reference methods 1, 2, 3, 5, 6, and 13A or 13B as published in 40 CFR 60, Appendix A, dated July 1, 1978, or by any other state approved methods. DER will be notified 30 days in advance of the compliance test. The test will be conducted at permitted production capacity (+10%). $P_{2}O_{5}$ input, pH of scrubber solution, pressure drop across the scrubbers, will be as normally operated and reported, along with the test data and results, to DER.

The applicant will demonstrate compliance with the conditions of this permit and submit a complete application for an operating permit to the S.W. DER office at least 90 days before the expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this permit until the expiration date or issuance of an operating permit.

10. Periodic emission tests or tests on request by DER at the source's expense will be a condition to any permit to operate. If the source can furnish a study on the permitted DAP plant showing a correlation between the emissions of any pollutant and plant operation parameters, the periodic emission test for that pollutant may be waived by the Department.
11. No. 10 Rock Grinding Mill will be converted to handle wet in lieu of dry rock before the No. 5 DAP plant is placed in operation. Modify permit AO 29-22141.
12. No. 11, and No. 12 Rock Grinding Mills will cease handling dry rock within 2 and 4 months respectively, of the start of operation of the No. 5 DAP plant. Modify permits AO 29-22140 and AO 29-22141 to show changes.

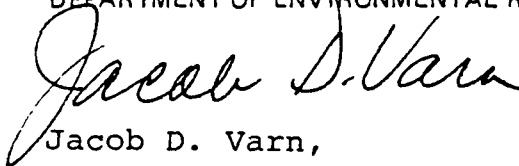
PERMIT NO.: AC 29-27760
APPLICANT: Gardinier, Inc.

13. The following sources will cease operation within 23 months of issue date of this permit or sooner if required to prevent emissions of particulate from exceeding the present permitted rate:
- a. Normal Superphosphate Plant AO 29-13812
 - b. No. 2 Phosphoric Acid Plant AO 29-6865
 - c. No. 6, 7, and 8 Rock Grinding Mills AO 29-22139
 - d. 68 BPL Rock Unloading and Storage Airslides AO 29-22142
 - e. North No. 2, 3 Rock Transfer Airslides AO 29-13212
 - f. South No. 2, 3, Rock Transfer Airslides AO 29-6864
 - g. Center No. 3 Rock Transfer Airslide AO 29-13212
 - h. No. 3 Rock Transfer Airslide Bin AO 29-13212
 - i. No. 2, 3 Filter Buildings AO 29-12609 and AO 29-13544
14. Quarterly progress reports showing approximate per cent completion of modifications and construction of new and affected existing facilities will be submitted to the Department until AC 29-27760 construction permit expires or is replaced by a permit to operate.
15. Stack sampling facilities will include the angle and eyebolt shown in the attached figure.
16. The no. 7 sulfuric acid plant will be modified and meet NSPS as published in 40 CFR 60 within 6 months of completion of construction of the new DAP plant.

Expiration Date: November 1, 1982

Issued this 5TH day of MAY, 19 80.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION


Jacob D. Varn,
Secretary