

No. 0158704

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO			
Mr. John Oskam			
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE			
\$			
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	\$	
	SPECIAL DELIVERY	\$	
	RESTRICTED DELIVERY	\$	
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE	\$
		SHOW TO WHOM AND DATE DELIVERED	\$
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	\$
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY		\$	
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$		
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE			
7/15/85			

PS Form 3800, Apr. 1976

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.

2. Restricted Delivery.

3. Article Addressed to:
Mr. John Oskam
Estech, Inc.
P. O. Box 208
Bartow, FL 33830

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	0158704

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X *John Oskam*

6. Signature - Agent
X

7. Date of Delivery
7/15/85

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

Final Determination

Request to Modify Permits to
Construct Air Pollution Sources

Estech, Inc.
Manatee County

Duette Mine

State Permit Numbers:

AC 41-26542 - Dry Rock Loadout
AC 41-26543 - Dry Rock Storage Silos
AC 41-26544 - Thermal Dryer
AC 41-26545 - 100 HP Boiler

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

July 2, 1985

Final Determination

Estech, Inc.'s request to extend the expiration dates of the construction permits for the air pollution sources at the proposed Duette Mine in Manatee County has been reviewed by the Bureau of Air Quality Management. Public Notice of the department's Intent to Modify Construction Permits was published in The Bradenton Herald on June 3, 1985.

No written comments on the department's Intent were received. The final action of the department will be to modify the construction permits as proposed in the Evaluation of the Request to Modify Permits to Construct Air Pollution Sources.

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

July 2, 1985

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John Oskam
Group Vice President-Phosphate
Estech, Inc.
P.O. Box 208
Bartow, Florida 33830

Dear Mr. Oskam:

Re: MODIFICATION OF CONDITIONS

<u>Permit No.:</u>	<u>Source:</u>
AC41-026542	- Dry Rock Loadout
AC41-026543	- Dry Rock Storage Silos
AC41-026544	- Thermal Dryer
AC41-026545	- 100 HP Boiler

The department is in receipt of your March 8, 1985, letter requesting the expiration dates of the referenced permits be extended. The request is acceptable and the expiration dates of the construction permits are being extended by 18 months. More restrictive visible emissions standards are being specified for some of the air pollution sources at the proposed Duette Mine, as shown below.

Specific Condition Revisions

Permit No. AC41-26542 - Dry Rock Loading Stations 1 and 2.

From: 1. Maximum particulate emission from stack no. 3 shall be 6 lb/hr and 12 tons/year. Opacity shall not exceed 10 percent.

To: 1. Maximum allowable emissions from stack no. 3 shall be 6 lb/hr and 12 tons/year particulate matter and no visible emissions.

Mr. John Oskam
Page Two
July 2, 1985

Permit No. AC41-26543 - Dry rock Storage Silos 1-8.

From: 1. Maximum allowable emissions from stack no. 2 shall be 9 lb/hr and 29 tons/year particulate matter. Visible emissions shall not exceed 10 percent opacity.

To: 1. Maximum allowable emissions from stack no. 2 shall be 9 lb/hr and 29 tons/year particulate matter and no visible emissions.

Permit No. AC41-26545 - 100 Horsepower Boiler.

From: 1. Visible emissions from stack no. 4 shall not exceed 20 percent opacity at any one time.

To: 1. Visible emissions from stack no. 4 shall not exceed 15 percent opacity.

Permit No. AC41-26542 through AC41-26545.

From: Expiration Date - May 18, 1985.

To: Expiration Date - November 18, 1986.

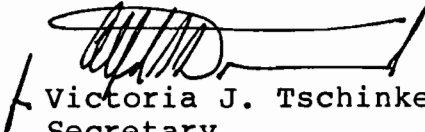
Attachments to be Incorporated

1. Estech, Inc. letter, dated March 8, 1985.
2. DER letter, dated April 9, 1985.
3. Estech, Inc. letter, dated April 17, 1985.

Mr. John Oskam
Page Three
July 2, 1985

A copy of this letter must be attached to each of the referenced construction permits and shall become a condition of those permits. Before the Duette mine can be built, Estech, Inc. will also have to obtain an extension of federal permit No. PSD-FL-036.

Sincerely,


Victoria J. Tschinkel
Secretary

VJT/WH/ks

cc: Bill Thomas
Bill Priesmeyer
James T. Wilburn

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: _____	

DER

JUL 3 1985

RECEIVED
JUL 2

TO: Victoria J. Tschinke
FROM: Clair Fancy *Clair*

BAOM

Office of the Secretary

DATE: July 2, 1985

SUBJ: Modification of Construction Permit Conditions

Attached for your approval and signature is a letter that will modify the air pollution source construction permits that were issued to Estech, Inc. for the proposed Duette Mine in Manatee County. The modifications are to extend the expiration date by 18 months and lower several of the visible emission standards that were specified in the permits.

Because of the public interest in this project, Estech, Inc. was required to publish a Public Notice of the department's intent to modify the permits. No written comments on the department's intent were received.

The bureau recommends these modifications be approved.

CHF/WH/s

→ P 4/19

Check Sheet

Company Name: *Eotech General Atm Chen. Corp*
Permit Number:
PSD Number: *AC 41-26542, -43, -44, -45*
County:
Permit Engineer:
Others involved:

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Final Application (if applicable)
- Waiver of Department Action
- Department Response

Intent:

- Intent to Issue
- Notice to Public
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Attachments:

-
-
-
- Correspondence with:
 - EPA
 - Park Services
 - County
 - Other
- Proof of Publication *Extension*
- Petitions - (Related to extensions, hearings, etc.)

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination *see TE&PD*

Post Permit Correspondence:

- Extensions
- Amendments/Modifications
- Response from EPA
- Response from County
- Response from Park Services

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. Those documents can be found in the supplementary documents file drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: Estech General Chemicals Corporation
AC 41-26542
AC 41-26543
AC 41-26544
AC 41-26545

Period During Which
DOCUMENT WAS
SUBMITTED
(APPLICATION, PD & TE,
FINAL DETERMINATION,
POST PERMIT)

APP 10/79

Detailed Description

1. BOOK: EPA ENVIRONMENTAL
IMPACT STATEMENT RESOURCE
DOCUMENT



Interoffice Memorandum

TO: Margaret Elligett
THRU: Dan Williams *DW*
FROM: Bill Thomas *BT*
DATE: May 6, 1987
SUBJECT: Request for Variance
File No. VE-53-314
Estech Inc.

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____	Locn: _____
To: _____	Locn: _____
To: _____	Locn: _____
From: _____	Date: _____

DER
MAY 11 1987
BAQM

Estech has petitioned for a variance from the opacity rule, Subsection 17-2.610(2), F.A.C. The rule itself provides that a variance will be granted to sources that meet certain criteria, Subsection 17-2.610(2)(a)1. thru 3., F.A.C. None of the three premises for a variance has been properly addressed to consider a variance. The first subsection requires a measurement of particulate emissions. The second and third subsections concern controlled sources and are not applicable.

Estech has petitioned pursuant to Subsection 403.201(1)(c), F.S., which relates to hardship provisions. Two key arguments are a projected, short facility life and insignificant impact on the environment. Accordingly, please request the following information from Estech.

- (1) A copy of records that quantify the tons of recoverable phosphate rock reserves at Estech's Polk County mining operations.
- (2) A copy of records that quantify the tons of recoverable phosphate rock reserves at any other Estech holdings in Florida.
- (3) A copy of records showing the tons of wet phosphate rock in storage at Agricola.
- (4) Estech's forecasted mining, drying and shipping schedule for phosphate rock, 1987 forward.
- (5) Provide a historical record of total rock shipments each year, 1982-1986.

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Bruce Mitchell, BAQM

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

DER
MAY 11 1987
BAQM

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

DATE

PHONE

MEMORANDUM

Margaret Elligett
Request for Variance
May 6, 1987
Page Two

- (6) Supply information concerning any commitments to dry rock for others; tons, time, type rock, etc.
- (7) Supply information concerning any commitments to purchase wet phosphate rock that could be dried at Agricola.
- (8) What will be the disposition of rock dryers and associated transfer and shipping equipment when existing rock reserves are exhausted?
- (9) Provide a capital cost estimate to install dust removal equipment and control devise(s) at all dry rock transfer points, bins/silos and carloading, in accordance with commonly accepted technology and good engineering practices. The capital cost estimate that was submitted utilized technology that has not been successfully demonstrated in the phosphate industry.
- (10) If the environmental impact study is to be a consideration, all sources of particulate emissions should be quantified and included. Also, the impact on the Hillsborough County non-attainment area should be addressed.
- (11) The informational requirements of Subsection 17-103.100(1)(a) thru (g), F.A.C. must be supplied.

WCT/js

cc: Walter Starnes, BAQM
Bruce Mitchell, BAQM ✓
David Thulman, OGC



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
To: _____ LOCTN: _____
To: _____ LOCTN: _____
FROM: _____ DATE: _____

APPLICATION FOR EXEMPTION/VARIANCE
EXPEDITE ROUTING AND REVIEW

DER
APR 20 1987
BAQM

TO: Richard Garrity
Roy Weber
Clair Fancy

FROM: Randall L. Armstrong AMZ for RA

DATE: April 17, 1987

SUBJECT: Request for Variance
File No. VE-53-314
Estech Inc.

The subject application for variance submitted by Estech Inc. has been mailed to your office. The variance which is sought would allow relief from the provisions of Section 403.201, Florida Statutes.

This variance is submitted in conjunction with permit application nos. A053-66846 and A053-69787 (copies attached).

Margaret Elligett is the contact person and will be coordinating the processing of the application.

Please review this application for completeness in accordance with Section 3.3.1.4 of IMM 3.3.1. Return your comments to Margaret by May 7, along with notification of the staff member in your office who will be responsible for this variance.

Please use the subject file number in any communications dealing with this review. Should you have any questions, please call Margaret at 488-0130 (Suncom 278-0130).

RLA/AME/jk

Attachment

cc: Walter Starnes
Bruce Mitchell copies?
David Thulman

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND
TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Bruce Mitchell 310

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

DATE

PHONE

Certified Mail -
Return Receipt Requested

June 4, 1985

DER

JUN 7 1985

BAQM

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: Estech, Inc. - Duette Mine - Permit Modifications

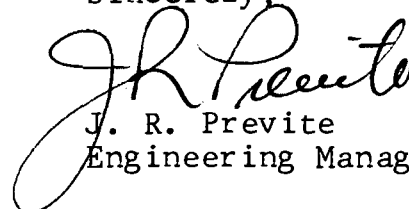
Dear Mr. Fancy:

Attached is proof of publication of the Notice of Proposed Agency Action sent by you to Mr. John Oskam on May 21, 1985.

Publication of this Notice completes Estech's actions in its request for DER to modify and extend the four air permits for Duette Mine.

Please let me know if anything further is required.

Sincerely,


J. R. Previte
Engineering Manager

/nj
Attachment



The Bradenton Herald

102 MANATEE AVE. WEST, P.O. BOX 921
BRADENTON, FLORIDA 33506
TELEPHONE (813) 748-0411

PUBLISHED DAILY
BRADENTON, MANATEE COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF MANATEE:

Before the undersigned authority personally appeared Sandy Riley, who on oath says that she is the Legal Advertising Clerk and the official representative of the Publisher of The Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida, with the express, limited authority to execute this affidavit for the purpose of establishing proof of publication of the public or legal notice and advertisement in the form attached hereto; that the attached copy of advertisement, being a legal advertisement in the matter of
Proposed Agency Action

_____ in the _____ Court,
was published in said newspaper in the issues of _____
6/3/85

Affiant further says that the said The Bradenton Herald is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Bradenton, Manatee County, Florida, each day and has been entered as second class mail matter at the post office in Bradenton, in said Manatee County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and the affiant further says that she 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.

Sandy Riley

Sworn to and subscribed before me this

3rd day of June
A.D. 19 85
Joanne Tucker

(SEAL) Notary Public

Notary Public, State of Florida at Large
My Commission Expires May 30, 1987

State of Florida Department of Environmental Regulation Notice of Proposed Agency Action on Request to Modify Permits

The Department of Environmental Regulation gives notice of its intent to modify the permits to construct air pollution sources that were issued to Estech, Inc. for the proposed Duette Mine that will be located in Manatee County, Florida. The modifications will extend the state permits to construct by 18 months.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and 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 fourteen (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 an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to model rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental
Regulation
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Dept. of Environmental
Regulation
7601 Highway 301 North
Tampa, Florida 33610

Manatee County Pollution
Control Board
202 Sixth Avenue East
Bradenton, Florida 33505

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

6/3/85

No. 0155560

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		Mr. John Oskam	
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	SPECIAL DELIVERY	¢	
	RESTRICTED DELIVERY	¢	
	OPTIONAL SERVICES, RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	\$		
POSTMARK OR DATE		5/21/85	

PS Form 3800, Apr. 1976

PS Form 3811, July 1983

DOMESTIC RETURN RECEIPT

1. ● **SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.

2. Restricted Delivery.

3. Article Addressed to:
Mr. John Oskam
Estech, Inc.
P. O. Box 208
Bartow, Florida 33830

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	0155560

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X *John Oskam*

6. Signature - Agent
X

7. Date of Delivery
5-24-85

8. Addressee's Address (ONLY if requested and fee paid)

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

May 21, 1985

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John Oskam
Group Vice President-Phosphate
Estech, Inc.
P.O. Box 208
Bartow, Florida 33830

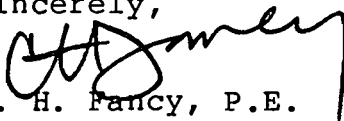
Dear Mr. Oskam:

Attached is one copy of the Evaluation of the Request to modify the Permits to Construct Air Pollution Sources at the Duette Mine in Manatee County.

Before final action can be taken on your proposed permit modifications, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Manatee County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permit modification. Also, you should submit to EPA a written request to modify and extend your federal permit (PSD-FL-036). Please send a copy of that request to this office.

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

Sincerely,


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

CHF/rw
Attachments
cc: James T. Wilburn
Bill Priesmeyer
Bill Thomas

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action
on Request to Modify Permits

The Department of Environmental Regulation gives notice of its intent to modify the permits to construct air pollution sources that were issued to Estech, Inc. for the proposed Duette Mine that will be located in Manatee County, Florida. The modifications will extend the state permits to construct by 18 months.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and 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 fourteen (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 an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Dept. of Environmental Regulation
7601 Highway 301 North
Tampa, Florida 33610

Manatee County Pollution Control Board
202 Sixth Avenue East
Bradenton, Florida 33505

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

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

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall 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;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of Request)	
to Modify Permits by)	
)	
Estech, Inc.)	DER File No. AC 41-026542
P.O. Box 208)	AC 41-026543
Bartow, Florida 33830)	AC 41-026544
)	AC 41-026545

INTENT TO MODIFY CONSTRUCTION PERMITS

The Department of Environmental Regulation hereby gives notice of its Intent to Modify, and proposed order for modification of construction permits that were issued pursuant to Chapter 403, Florida Statutes, for the proposed project as detailed in the files specified above. The Department is issuing this Intent to Modify Construction permits for the reasons stated in the attached Evaluation of the Request to Modify Permits to Construct Air Pollution Sources.

The applicant, Estech, Inc., applied on March 8, 1985, to the Department of Environmental Regulation for an extension to construction permits that were issued for the air pollution sources at the Duette Mine to be located in Manatee County.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The applicant was officially notified by the Department that air construction permits were required for the proposed work.

This intent to modify construction permits shall be placed before the Secretary for final action unless an appropriate petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes, is filed within fourteen (14) days from receipt of this letter or publication of the public notice (copy

attached) required pursuant to Rule 17-103.150, Florida Administrative Code, whichever occurs first. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code (copy attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301.

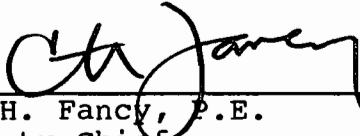
Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department. In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witness and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel. If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition, may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of

Administrative Hearings, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

Executed the 21 day of MAY, 1985, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

cc: Mr. John Oskam, Estech, Inc.
Mr. James T. Wilburn, USEPA
Mr. Bill Priesmeyer, Manatee County
Mr. Bill Thomas, Southwest District Office

CERTIFICATION

This is to certify that the foregoing Intent to Issue and all copies were mailed before the close of business on 21 MAY, 1985.



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to §120.52(9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Patricia H. Adams May 21, 1985
Clerk Date

Evaluation of the Request to Modify Permits to
Construct Air Pollution Sources

Estech, Inc.
Manatee County

Duette Mine

State Permit Numbers:

AC 41-26542 - Dry Rock Loadout
AC 41-26543 - Dry Rock Storage Silos
AC 41-26544 - Thermal Dryer
AC 41-26545 - 100 HP Boiler

Federal Permit Number
PSD-FL-036

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

May 17, 1985

I. PROJECT DESCRIPTION

A. Applicant

Estech, Inc.
P.O. Box 208
Bartow, Florida 33830

B. Project and Location

Because administrative proceedings have delayed commencement of construction, Estech, Inc. is requesting an extension of the construction permits that were issued for the air pollution sources at the proposed Duette Mine in Manatee County in May, 1980. The affected sources are listed in the following table:

Permit No.	Description	Control
AC41-26542	Dry Rock Loading Stations 1 and 2	Scrubbers
AC41-26543	Dry Rock Storage Silos 1 through 8	Scrubbers
AC41-26544	Phosphate Rock Driers 1 and 4	Scrubbers
AC41-26545	100 Horsepower Boiler	No. 2 fuel oil

C. Emissions

The following table shows the presently permitted emissions and the proposed emissions after the permit modifications:

Source	Pollutant	Present Permitted Emission	Proposed Permitted Emission
Loading Stations	Particulate Matter	6 lb/hr	6 lb/hr
	Opacity	10 percent	No visible emissions
Silos	Particulate Matter	9 lb/hr	9 lb/hr
	Opacity	10 percent	No visible emissions
Driers	Particulate Matter	23 lb/hr	23 lb/hr
	Sulfur Dioxide	0.04 lb/ton	0.04 lb/ton
	Opacity	10 percent	10 percent
	Sulfur Dioxide	9 lb/hr	9 lb/hr
Boiler	Sulfur content of fuel	0.7 percent	0.7 percent
	Opacity	20 percent	15 percent

II. RULE APPLICABILITY

The construction of the air pollution sources at the Duette Mine is subject to preconstruction review under the provisions of Chapter 403, FS, and Chapter 17-2, FAC.

The original construction permits were subject to Prevention of Significant Deterioration Regulations, Rule 17-2.500, FAC.

Emission standards in the original permits were established by Best Available Control Technology (BACT) determinations.

Some of the air pollution sources at the proposed facility are now subject to 40 CFR 60.400, Subpart NN-Standards of Performance for Phosphate Rock Plants (NSPS).

Rule 17-4.07(6), FAC, states that construction permits may be issued for a period of time as necessary. The department may extend permits with good reasons.

III. TECHNICAL EVALUATION

The evaluation of the project was discussed in the February 21, 1980, Preliminary Determination and Technical Evaluation which is on file at the department's Southwest District Office. Since the original permits for the proposed air pollution sources at the Duette Mine were issued, EPA has adopted NSPS which is applicable to some of the process equipment at the proposed mine. Similar process equipment that has been constructed since the original permits to construct were issued for this project have demonstrated that they can meet more restrictive visible emission standards. In reviewing the request for an extension of the construction permits for the proposed mine, the company was contacted and acknowledged that the process equipment could meet more restrictive visible emission standards. The department is in agreement with the company on this matter and has proposed to require more restrictive visible emission standards for the boiler and phosphate rock material handling equipment if the permits to construct are extended. The results will be that the emission standards for air pollution sources at the proposed mine are as strict or more strict than the NSPS. Before the Duette Mine can be built, Estech, Inc. will also have to obtain an extension of Federal Permit No. PSD-FL-036.

IV. AIR QUALITY IMPACT

As the revised permits will have more restrictive emission standards, the ambient air quality impact of particulate matter from the sources will remain the same or be reduced over that which would have occurred with the emission standards specified in the May 1980 construction permits for the air pollution sources at the proposed mine.

V. DETERMINATION

A review of the emission standards in the construction permits for the air pollution sources at the Duette Mine shows that the proposed project will comply with current air pollution control rules and regulations. The department proposes to extend the expiration dates of the construction permits AC41-26542 through AC41-26545 by 18 months and require more restrictive visible emissions standards for the boiler and material handling equipment at the proposed mine.

VI. PROPOSED CONSTRUCTION PERMIT REVISIONS

Specific Condition Revisions

Permit No. AC41-26542 - Dry Rock Loading Stations 1 and 2.

From: 1. Maximum particulate emission from stack no. 3 shall be 6 lb/hr and 12 tons/year. Opacity shall not exceed 10 percent.

To: 1. Maximum allowable emissions from stack no. 3 shall be 6 lb/hr and 12 tons/year particulate matter and no visible emissions.

Permit No. AC41-26543 - Dry rock Storage Silos 1-8.

From: 1. Maximum allowable emissions from stack no. 2 shall be 9 lb/hr and 29 tons/year particulate matter. Visible emissions shall not exceed 10 percent opacity.

To: 1. Maximum allowable emissions from stack no. 2 shall be 9 lb/hr and 29 tons/year particulate matter and no visible emissions.

Permit No. AC41-26545 - 100 Horsepower Boiler

From: 1. Visible emissions from the boiler (stack no. 4) shall not exceed 20 percent opacity at any one time.

To: 1. Visible emissions from the boiler, stack no. 4, shall not exceed 15 percent opacity.

Permit No. AC41-26542 through AC41-26545

From: Expiration Date - May 18, 1985.

To: Expiration Date - November 18, 1986.

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

May 17, 1985

DRAFT

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John Oskam
Group Vice President-Phosphate
Estech, Inc.
P.O. Box 208
Bartow, Florida 33830

Dear Mr. Oskam:

Re: MODIFICATION OF CONDITIONS

<u>Permit No.:</u>	<u>Source:</u>
AC41-026542	- Dry Rock Loadout
AC41-026543	- Dry Rock Storage Silos
AC41-026544	- Thermal Dryer
AC41-026545	- 100 HP Boiler

The department is in receipt of your March 8, 1985, letter that request the expiration dates of the reference permits be extended. The request is acceptable and the expiration dates of the construction permits are being extended by 18 months. More restrictive visible emissions standards are being specified for some of the air pollution sources at the proposed Duette Mine, as shown below.

Specific Condition Revisions

Permit No. AC41-26542 - Dry Rock Loading Stations 1 and 2.

From: 1. Maximum particulate emission from stack no. 3 shall be 6 lb/hr and 12 tons/year. Opacity shall not exceed 10 percent.

To: 1. Maximum allowable emissions from stack no. 3 shall be 6 lb/hr and 12 tons/year particulate matter and no visible emissions.

Mr. John Oskam
Page Two
May 17, 1985

DRAFT

Permit No. AC41-26543 - Dry rock Storage Silos 1-8.

From: 1. Maximum allowable emissions from stack no. 2 shall be 9 lb/hr and 29 tons/year particulate matter. Visible emissions shall not exceed 10 percent opacity.

To: 1. Maximum allowable emissions from stack no. 2 shall be 9 lb/hr and 29 tons/year particulate matter and no visible emissions.

Permit No. AC41-26545 - 100 Horsepower Boiler.

From: 1. Visible emissions from the boiler (stack no. 4) shall not exceed 20 percent opacity at any one time.

To: 1. Visible emissions from the boiler, stack no. 4, shall not exceed 15 percent opacity.

Permit No. AC41-26542 through AC41-26545.

From: Expiration Date - May 18, 1985.

To: Expiration Date - November 18, 1986.

Attachments to be Incorporated

1. Estech, Inc. letter, dated March 8, 1985.
2. DER letter, dated April 9, 1985.
3. Estech, Inc. letter, dated April 17, 1985.

A copy of this letter must be attached to each of the referenced construction permits and shall become a condition of those permits.

Sincerely,

Victoria J. Tschinkel
Secretary

VJT/WH/rw

cc: Bill Thomas

PM
4-19-85
Bartow, FL
Estech, Inc.

CM: P-562-700-451

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JOHN OSKAM
Group Vice President
Phosphate

April 17, 1985

DER

APR 22 1985

BAQM

C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality Management
FDER
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: Estech, Inc. - Duette Mine
Permit Numbers: AC 41-26542 Dry Rock Loadout
AC 41-26543 Dry Rock Storage Silos
AC 41-26544 Thermal Dryer
AC 41-26545 100 HP Boiler
PSD-FL-036

Dear Mr. Fancy:

This is in response to your letter of April 9, 1985, asking for additional information relative to Estech's request for permit extensions.

Estech has been unable to obtain all permits necessary before construction of Duette Mine can commence. Still required are the Manatee County Operating Permit and and FDER Groundwater Permit. Permit extensions have been requested so that we may keep our permits current until administrative differences have been resolved.

Estech will meet New Source Performance Standards for Phosphate Rock Plants as specified in 40 CFR 60, Subpart NN. Visible emissions at the dry rock loadout stations and storage silos will comply with applicable V.E. standards.

Visible emissions at the boiler will not exceed the current standard of 15 percent opacity.

Although the Grace-IMCC Big Four Mine has been constructed near the Duette Mine site, Estech's emissions will be lower than stated in the original applications, and it is our opinion that there will be no detrimental impact on ambient air quality.

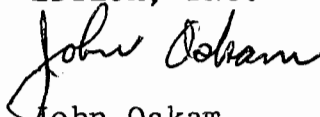
C. H. Fancy, P.E.
FDER
April 17, 1985

Estech agrees to comply with all county, state, and federal air pollution control regulations that have been legally adopted prior to start of construction of the plant.

I trust that this information is sufficient to justify Estech's request for the 18 month extension of the permits in question. If more information is required, please let me know.

Yours truly,

ESTECH, INC.



John Oskam
Group Vice President
Phosphate

/nj

cc: Mr. Winston Smith
Director
Air Pesticides & Toxic
Management Division
EPA
345 Courtland St.
Atlanta, GA 30365

No. 0155543

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO Mr. John Oskam			
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE	\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢	
	SPECIAL DELIVERY	¢	
	RESTRICTED DELIVERY	¢	
	OPTIONAL SERVICES RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	\$ 1.985		
POSTMARK OR DATE 4/9/85 APR 10 1985 BAQM			

PS Form 3800, Apr. 1976

PS Form 3811, July 1983

DOMESTIC RETURN RECEIPT

● **SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
Mr. John Oskam
Estech, Inc.
P. O. Box 208
Bartow, FL 33830

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	0155543

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X *[Signature]*

6. Signature - Agent
X

7. Date of Delivery
4-12-85

8. Addressee's Address (ONLY if requested and fee paid)

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

April 9, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Oskam
Group Vice President - Phosphate
Estech, Inc.
P.O. Box 208
Bartow, Florida 33830

RE: Estech, Inc. - Duette Mine
Permit Numbers : AC 41-26542 Dry Rock Loadout
AC 41-26543 Dry Rock Storage Silos
AC 41-26544 Thermal Dryer
AC 41-26545 100 HP Boiler
PSD-FL-036

Dear Mr. Oskam:

The Department has received your letter of March 8, 1985, requesting that the four referenced permits to construct air pollution sources be extended.

These construction permits were originally issued in 1980. Since then, the air pollution control regulations and technology have changed. The permitted emission standards for the dry rock loadout stations and dry rock silos exceed the applicable visible emissions standard of zero percent opacity specified in 40 CFR 60, Subpart NN - Standards of Performance for Phosphate Rock Plants. Also, the permitted visible emissions standard for the boiler exceeds the visible emissions standard of 15 percent opacity currently being established for these sources as the best available control technology.

Section 52.21 of Title 40 of the Code of Federal Regulations states that a federal permit is invalid if construction is not commenced within 18 months of its approval. The Administrator has the authority to extend the 18 month period upon a satisfactory showing that the extension is justified. To show that the extension is justified, Estech, Inc. needs to supply the data listed below to the Department.

1. Review and modify, if appropriate, the original best available control technology (BACT) determination for all air pollution sources at the proposed mine to reflect any improvements in technology that are available.

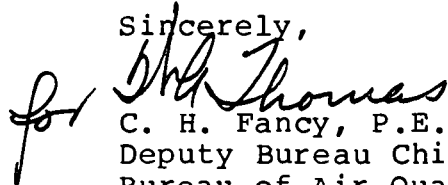
Mr. John Oskam
Page Two
April 9, 1985

2. Update the ambient air quality impact study submitted with the application with any revised BACT emission standards and the most recently available ambient air monitoring data and meteorological data.
3. Agree to comply with all county, state and federal air pollution control regulations that have been legally adopted prior to start of construction of the plant.

Once this information is available, the Department will process your request. As EPA must also extend the federal permit (PSD-FL-036) before the Duette Mine can be construction, they will also need the information this Department is requesting.

Because of the controversy associated with the Duette Mine, any revisions to the permits to construct must have a public notice and an opportunity for any interested party to comment or request a hearing on the Department's intent. Willard Hanks, review engineer, will answer any questions you have on this matter. He can be reached at (904)488-1344.

Sincerely,

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

CHF/WH/ks

cc: Charles Jeter
Bill Priesmeyer
Bill Thomas

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO	
		ACTION DUE DATE	
1. TO: (NAME, OFFICE, LOCATION)	<i>Clay Fancey</i>	Initial	
		Date	
2.	Bill F <i>3/25</i>	Initial	
		Date	
3.	<i>Willard please handle,</i>	Initial	
		Date	
4.	<i>Clay</i>	Initial	
		Date	
REMARKS:		INFORMATION	
		<input type="checkbox"/> Review & Return <input type="checkbox"/> Review & File <input type="checkbox"/> Initial & Forward	
<p style="text-align: center;">DER MAR 22 1985 BAQM</p>		DISPOSITION	
		<input type="checkbox"/> Review & Respond <input type="checkbox"/> Prepare Response <input type="checkbox"/> For My Signature <input type="checkbox"/> For Your Signature <input type="checkbox"/> Let's Discuss <input type="checkbox"/> Set Up Meeting <input type="checkbox"/> Investigate & Report <input type="checkbox"/> Initial & Forward <input type="checkbox"/> Distribute <input type="checkbox"/> Concurrence <input type="checkbox"/> For Processing <input type="checkbox"/> Initial & Return	
FROM: <i>WCT - Tampa</i>		DATE	
		PHONE	

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: Clair Fancy

FROM: Bill Thomas *WCT*

DATE: March 18, 1985

SUBJECT: Estech Request to Extend Permits AC41-26542, 26543, 26544 & 26545 Until May 18, 1985

The attached request is for handling at BAQM.

WCT/js

DER
MAR 22 1985
BAQM

Estech, Inc.

JOHN OSKAM
Group Vice President
Phosphate

CERTIFIED - RETURN RECEIPT REQUESTED

D. E. R.

MAR 11 1985

SOUTH WEST DISTRICT
TAMPA.

March 8, 1985

Mr. Bill Thomas
Department of Environmental Regulation
7601 Highway 301 North
Tampa, Florida 33610

Re: ESTECH, INC. - DUETTE MINE
PERMIT NUMBERS: AC41-26542 Construction Dry Rock Loadout
AC41-26543 Construction Dry Rock Storage Silos
AC41-26544 Construction Thermal Dryer
AC41-26545 Construction 100 HP Boiler

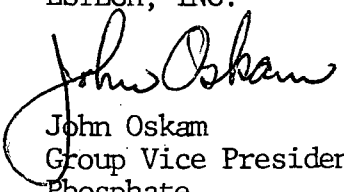
Dear Mr. Thomas:

As you may be aware, continuing ongoing administrative proceedings have made it impossible for Estech, Inc. to proceed with any construction activities at its proposed Duette Mine in Manatee County as of this time. Accordingly, we hereby request an extension of the above-referenced construction permits to build dry rock loading, dry rock storage, thermal dryer and boiler facilities, until May 18, 1987.

If you have any questions concerning this matter, please contact me.

Regards,

ESTECH, INC.


John Oskam
Group Vice President
Phosphate

/nj

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 Tschinkel, Secretary
FROM: C. H. Fancy, P. E. *C. H. Fancy*
DATE: November 10, 1982
SUBJ: Extension of Estech, Inc. Air Construction Permit
Numbers, AC 41-26542, AC 41-26543, AC 41-26544
AC 41-26545

RECEIVED
NOV 10 1982
Office of the Secretary

The Bureau has received a request from Estech, Inc. for an extension of the Duette phosphate rock beneficiation facility air construction permits. This action is needed because of the time consumed in obtaining all federal, state and local permits. The federal PSD permits have already been extended by EPA.

Therefore, we respectfully request that the extensions be granted.

JS/ks

November 10, 1982

Mr. John Oskam
Vice President Mining
Estech, Inc.
Post Office Box 208
Bartow, Florida 33830

Dear Mr. Oskam:

Modification of Conditions
Permit No. AC 41-26543

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>
Expiration Date	December 31, 1982	May 18, 1985

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

Sincerely,

Victoria J. Tschinkel,
Secretary

VJT/jss

November 10, 1982

Mr. John Oskam
Vice President Mining
Estech, Inc.
Post Office Box 208
Bartow, Florida 33830

Dear Mr. Oskam:

Modification of Conditions
Permit No. AC 41-26542

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>
Expiration Date	December 31, 1982	May 18, 1985

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

Sincerely,

Victoria J. Tschinkel,
Secretary

VJT/jss

November 10, 1982

Mr. John Oskam
Vice President Mining
Estech, Inc.
Post Office Box 208
Bartow, Florida 33830

Dear Mr. Oskam:

Modification of Conditions
Permit No. AC 41-26544

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>
Expiration Date	December 31, 1982	May 18, 1985

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

Sincerely,

Victoria J. Tschinkel,
Secretary

VJT/jss

November 10, 1982

Mr. John Oskam
Vice President Mining
Estech, Inc.
Post Office Box 208
Bartow, Florida 33830

Dear Mr. Oskam:

Modification of Conditions
Permit No. AC 41-26545

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>
Expiration Date	December 31, 1982	May 18, 1985

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

Sincerely,

Victoria J. Tschinkel,
Secretary

VJT/jss

Estech, Inc.

November 8, 1982

*Pathy
pkase handle
ASAB*

Clare Fancy
Bureau of Air Quality
Management
Department of Environmental
Regulation
Twin Tower Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Clare:

Per our telephone conversation of today, I am submitting herewith a copy of our request to extend the air pollution control permits for the Duette Mine. Your prompt processing of this request will be greatly appreciated.

Please let me know if there are any questions.

Very truly yours,

ESTECH, INC.

Ronald J. McGregor

Ronald J. McGregor
Environmental Engineer

RJM/nj

xc: Dan Williams - DER, Tampa
J. Oskam (without attachment)
R. Rhodes (without attachment)
William Deane, Esquire
File 3.6.9

Estech, Inc.

D.E.R.

OCT 15 1982

JOHN OSKAM
Vice President Mining

*Thomas,
The one check
with C. Farney
to see if she
want to handle
this -
Thank
Don*

October 13, 1982

SOUTHWEST DISTRICT
TAMPA

Mr. William K. Hennessey
District Manager-Southwest District
Department of Environmental
Regulation
7601 Highway 301 North
Tampa, Florida 33610

see files

RE: Estech, Inc. Permits AC41-26542, AC41-26543,
AC41-26544, & AC41-26545 - Request for Extension

Dear Bill:

The Department construction permits referenced above were issued on May 19, 1980. They expire on December 31, 1982. They authorize the construction of certain facilities to be located at the Estech, Inc. (formerly Estech General Chemicals Corporation) proposed Duette phosphate rock mine and beneficiation facility in Manatee County, Florida (Duette Mine).

As you are well aware, federal, state, and local permitting processes for this project have been quite complex and time-consuming. Administrative proceedings, as well as project revisions resulting from such administrative proceedings have led to significant time delays.

At the federal level, completion of the environmental impact statement process and issuance of the NPDES permit will not likely occur until the first or second quarter of 1983. At the state level, Secretary Tschinkel's Final Order of May 28, 1982, called for the issuance of Department permits for the construction of industrial waste water facilities at the Duette Mine, dredge and fill permits necessary for initial construction activities, and state certification of the federal NPDES permit. The issuance of these permits has been stayed pending judicial review which will not likely culminate until some time in 1983.

continued.....

Mr. William K. Hennessey
October 13, 1982
Page Two

At the local level, Manatee County has only recently agreed to accept an application for an operating permit for the Duette Mine. The final action on the application will probably not occur until after the expiration date of the construction permits referenced above.

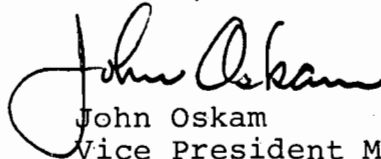
Accordingly, although Estech has been exercising its best efforts to obtain all necessary pre-construction permits and approvals, it has been unable to do so. Estech requests that the expiration date of the construction permits referenced above be extended until May 18, 1985, to allow necessary time for the completion of construction following acquisition of all other necessary prior approvals. The information set forth in the report titled "Technical Evaluation and Preliminary Determination" (February 21, 1980) prepared by the Department in connection with the Duette project continues to be accurate.

As noted above, we are in the process of submitting an operating permit application to Manatee County. In connection with this submittal, the county has requested copies of all permits previously issued for this project. It would be helpful if we could have the permit extension process completed as soon as possible so that we could include this information in our submittal to the county.

Thank you very much for your cooperation. Should you have any questions concerning this matter, please contact Mr. Ron McGregor at area code 813-758-4684.

Sincerely,

ESTECH, INC.


John Oskam
Vice President Mining

JO/nlj

cc: William Deane, Esquire
Robert L. Rhodes, Jr., Esquire

Meeting: 5/6/81 1:00 PM

Estech General Chemicals

Ref. Submittals of Additional Information
for proposed Project Modifications.

Attending:

Phone #

1. Mickey D. Bryant 904 - 487-4620
2. Scott McClelland 904 - 488-0780
3. Landon Ross 904 - 487-2245
4. JOE DALLIS 813 155-8055
5. GEORGE T. BARAGONA 904/488-0130
6. Dave Lewis DER Legal 904/488-9730
7. Jim Sullivan 904/372-1500
8. Bill ZEGEL 904/372-1500
9. John Garlanger 305 - 556 3561
10. Robert L. Rhodes, Jr 813 - 682 - 1161
11. Colin J. Livingston 904 - 222 - 2500
12. JOE L. HOFFMAN 904 - 222 - 1500
13. Al Clark 904 - 488 - 9730
14. GEORGE WILLSON 904 - 487 - 1855
15. Harry Kerue 813 - 982 - 7402



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 10 1980

REF: 4AH-AF



Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Division of Environmental Programs
FL Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Smallwood:

Enclosed is the Public Notice for the Estech General Chemicals Corporation's proposed new phosphate rock mining facilities in the town of Duette in Manatee County, Florida. The public notice will appear in a local newspaper, Bradenton Herald, in the near future. This is renotification of the availability of the Preliminary PSD Determination.

Please let my office know if you have comments or questions. You may contact Kent Williams of my staff at 404/881-4552 or Bob Bakshi of TRW Inc. at 213/535-1544. TRW Inc. is under contract to EPA, and TRW personnel are acting as authorized representatives of the Agency in providing aid to the Region IV PSD review program.

Sincerely yours,

A handwritten signature in cursive script that reads "Tommie A. Gibbs".

Tommie A. Gibbs
Chief
Air Facilities Branch

Enclosure

PUBLIC NOTICE

A new air pollution source is proposed for construction by the Estech General Chemicals Corporation in the town of Duette in Manatee County, Florida. Emitting facilities include a boiler, phosphate rock dryers, storage silos and product loading stations.

The proposed construction has been reviewed by the U.S. Environmental Protection Agency (EPA) under Federal Prevention of Significant Deterioration (PSD) Regulations (40 CFR 52.21), and EPA has made a Preliminary Determination that the construction can be approved provided certain conditions are met. A summary of the basis for this determination and the application for a permit submitted by Estech are available for public review in the office of the clerk of Circuit Courts in the Manatee County Courthouse located in Bradenton, Florida.

The allowable emissions of particulate, nitrogen oxides and sulfur dioxide are 149 tons per year, 266 tons per year and 44.4 tons per year, respectively. Increment analysis for particulates indicated increment consumption of 8 percent of the allowable 19 micrograms per cubic meter annual mean and 35 percent of the 37 micrograms per cubic meter 24-hour allowable limit. Since the allowable emissions of sulfur dioxide are less than 50 tons per year, 1000 pounds per day and 100 pounds per hour, no increment analysis was required for sulfur dioxide. Dispersion modeling performed by Estech General Chemicals Corporation showed "insignificant" impacts as defined in the Federal PSD Regulations.

Any person may submit written comments to EPA regarding the proposed construction. All comments, postmarked not later than 30 days from the date of this notice, will be considered by EPA in making a Final Determination regarding approval for construction of this source. These comments will be made available for public review at the above location. Furthermore, a public hearing can be requested by any person. Such requests should be submitted within 15 days of the date of this notice. Letters should be addressed to:

Mr. Tommie A. Gibbs, Chief
Air Facilities Branch
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30308



STATE OF FLORIDA
 Office of the Governor
 THE CAPITOL
 TALLAHASSEE 32301

RECEIVED
 SEP 8 1980

Marked by TRW
 Replaced by
 me dated
 9/10/80

BOB GRAHAM
 GOVERNOR

Department of Environmental Regulation
 Twin Towers
 2600 Blairstone Road
 Tallahassee, Florida 32301
 Attn: A-95 Coordinator

DIV. ENVIRONMENTAL
 PERMITTING
 Governor
 Office of Correspondence

Date: 8-27-80
 Due Date: 9-10-80
 SAI: # 810273

FROM: Ron Fahs, Director
 Intergovernmental Coordination

The attached "424 Preapplication", serving as notification of intent to apply for federal assistance, is being referred to your agency for review and comment. Your review and comments should address themselves to the extent to which the project(s) is/are consistent with or contributes to the fulfillment of your agency's plans or the achievement of your projects, programs, and objectives.

If further information is required, you are urged to telephone the contact person named on the preapplication form. If a conference seems necessary, or if you wish to review the entire application, contact this office by telephone as soon as possible. Please check the appropriate box, attach any comments on your agency's stationery and return to the State Clearinghouse or telephone by the due date. If we do not receive a response by the due date, we will assume your agency has no adverse comments. In both telephone conversation and written correspondence, please refer to the SAI Number.

Please forward all correspondence to the following address:

State Planning and Development Clearinghouse
 Office of Planning and Budgeting
 Executive Office of the Governor
 The Capitol
 Tallahassee, Florida 32301
 (904) 488-8114

Enclosure

TO: STATE CLEARINGHOUSE
 Executive Office of the Governor

FROM:

No Comment

SUBJECT SAI: 810273

Division/Bureau Programs/Air Quality

Comments Attached

Reviewer Bill Thomas

Date: 9/26/80



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

JUL 31 1980

GOVERNOR'S OFFICE
Planning and Budgeting
Interagency Environmental Coord.

AUG 5 1980

RECEIVED

REF: 4AH-AF

Ms. June Noel
State A-95 Coordinator
Florida State Planning and
Development Clearinghouse
Office of Planning and Budget
The Capitol
Tallahassee, Florida 32301

Dear Ms. Noel:

I wish to bring to your attention that the Estech General Chemicals Corporation proposes to construct new phosphate rock mining facilities in the town of Duette in Manatee County, Florida, and that emissions of air pollutants will thereby be increased. The U.S. Environmental Protection Agency has reviewed the proposed construction under the authority of Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21) and reached a preliminary determination of approval with conditions for this construction. This approval applies only to federal regulatory requirements and has no bearing on State or local functions.

Please also be aware that the attached public notice announcing the Agency's preliminary determination, the availability of pertinent information for public scrutiny and the opportunity for public comment will be published in a local newspaper, Bradenton Herald. This notice has been mailed to you for your information and in accordance with regulatory requirements. You need take no action unless you wish to comment on the proposed construction.

If you have questions, please feel free to call Mr. Kent Williams of my staff at 404/881-4552 or Mr. Bob Bakshi of TRW Inc. at 213/535-1544. TRW is under contract to EPA and its personnel are acting as authorized representatives of the Agency in providing aid to the Region IV PSD review program.

Sincerely yours,

Tommie A. Gibbs, Chief
Air Facilities Branch

Attachment:

PUBLIC NOTICE

A new air pollution source is proposed for construction by the Estech General Chemicals Corporation in the town of Duette in Manatee County, Florida. Emitting facilities include a boiler, phosphate rock dryers, storage silos and product loading stations.

The proposed construction has been reviewed by the U.S. Environmental Protection Agency (EPA) under Federal Prevention of Significant Deterioration (PSD) Regulations (40 CFR 52.21), and EPA has made a Preliminary Determination that the construction can be approved provided certain conditions are met. A summary of the basis for this determination and the application for a permit submitted by Estech are available for public review in the office of the clerk of Circuit Courts in the Manatee County Courthouse located in Bradenton, Florida.

The allowable emissions of particulate, nitrogen oxides and sulfur dioxide are 125.95 tons per year, 284.73 tons per year and 44.4 tons per year, respectively. Increment analysis for particulates indicated increment consumption of 8 percent of the allowable 19 micrograms per cubic meter annual mean and 35 percent of the 37 micrograms per cubic meter 24-hour allowable limit. Since the allowable emissions of sulfur dioxide are less than 50 tons per year, 1000 pounds per day and 100 pounds per hour, no increment analysis was required for sulfur dioxide. Dispersion modeling performed by Estech General Chemicals Corporation showed "insignificant" impacts as defined in the Federal PSD Regulations.

Any person may submit written comments to EPA regarding the proposed construction. All comments, postmarked not later than 30 days from the date of this notice, will be considered by EPA in making a Final Determination regarding approval for construction of this source. These comments will be made available for public review at the above location. Furthermore, a public hearing can be requested by any person. Such requests should be submitted within 15 days of the date of this notice. Letters should be addressed to:

Mr. Tommie A. Gibbs, Chief
Air Facilities Branch
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30308



BOB GRAHAM
GOVERNOR

STATE OF FLORIDA
Office of the Governor
THE CAPITOL
TALLAHASSEE 32301

RECEIVED
SEP 22 1980
Converted
mailed
by EPA

DIVISION OF
ENVIRONMENTAL PERMITTING

Department of Environmental Regulation
Twin Towers
2600 Blairstone Road
Tallahassee, Florida 32301
Attn: A-95 Coordinator

Date: 9-18-80
Due Date: 10-2-80
SAI: # 810401

FROM: Ron Fahs, Director
Intergovernmental Coordination

The attached "424 Preapplication", serving as notification of intent to apply for federal assistance, is being referred to your agency for review and comment. Your review and comments should address themselves to the extent to which the project(s) is/are consistent with or contributes to the fulfillment of your agency's plans or the achievement of your projects, programs, and objectives.

If further information is required, you are urged to telephone the contact person named on the preapplication form. If a conference seems necessary, or if you wish to review the entire application, contact this office by telephone as soon as possible. Please check the appropriate box, attach any comments on your agency's stationery and return to the State Clearinghouse or telephone by the due date. If we do not receive a response by the due date, we will assume your agency has no adverse comments. In both telephone conversation and written correspondence, please refer to the SAI Number.

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State Planning and Development Clearinghouse
Office of Planning and Budgeting
Executive Office of the Governor
The Capitol
Tallahassee, Florida 32301
(904) 488-8114

Enclosure

TO: STATE CLEARINGHOUSE
Executive Office of the Governor

FROM:

No Comment

SUBJECT SAI: 810401

Division/Bureau Programs/Air Quality

Comments Attached

Reviewer William Thomas BT

Date: September 26, 1980



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

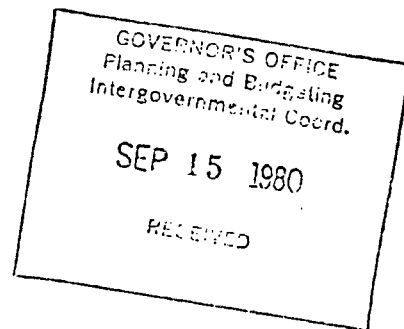
REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 10 1980

REF: 4AH-AF

Ms. June Noel
State A-95 Coordinator
Florida State Planning and
Development Clearinghouse
Office of Planning and Budget
The Capitol
Tallahassee, FL 32301



Dear Ms. Noel:

I wish to bring to your attention that the Estech General Chemicals Corporation proposes to construct new phosphate rock mining facilities in the town of Duette in Manatee County, Florida, and that emissions of air pollutants will thereby be increased. The U. S. Environmental Protection Agency has reviewed the proposed construction under the authority of Federal Prevention of Significant Deterioration Regulations (40 CFR §52.21) and reached a preliminary determination of approval with conditions for this construction. This approval applies only to federal regulatory requirements and has no bearing on State or local functions.

Please also be aware that the attached public notice announcing the Agency's preliminary determination, the availability of pertinent information for public scrutiny and the opportunity for public comment will be published in a local newspaper, Bradenton Herald. This notice has been mailed to you for your information and in accordance with regulatory requirements. You need take no action unless you wish to comment on the proposed construction. This is a renotification of the availability of these materials.

If you have questions, please feel free to call Mr. Kent Williams of my staff at 404/881-4552 or Mr. Bob Bakshi of TRW Inc. at 213/535-1544. TRW is under contract to EPA and its personnel are acting as authorized representatives of the Agency in providing aid to the Region IV PSD review program.

Sincerely yours,

Tommie A. Gibbs
Chief
Air Facilities Branch

Attachment

Approved

PUBLIC NOTICE

A new air pollution source is proposed for construction by the Estech General Chemicals Corporation in the town of Duette in Manatee County, Florida. Emitting facilities include a boiler, phosphate rock dryers, storage silos and product loading stations.

The proposed construction has been reviewed by the U.S. Environmental Protection Agency (EPA) under Federal Prevention of Significant Deterioration (PSD) Regulations (40 CFR 52.21), and EPA has made a Preliminary Determination that the construction can be approved provided certain conditions are met. A summary of the basis for this determination and the application for a permit submitted by Estech are available for public review in the office of the clerk of Circuit Courts in the Manatee County Courthouse located in Bradenton, Florida.

The allowable emissions of particulate, nitrogen oxides, and sulfur dioxide are 149¹⁶⁵ tons per year, 266³³¹ tons per year and 44.4⁵⁷ tons per year, respectively. Increment analysis for particulates indicated increment consumption of 8 percent of the allowable 19 micrograms per cubic meter annual mean and 35 percent of the 37 micrograms per cubic meter 24-hour allowable limit. Since the allowable emissions of sulfur dioxide are less than 50 tons per year, 1000 pounds per day and 100 pounds per hour, no increment analysis was required for sulfur dioxide. Dispersion modeling performed by Estech General Chemicals Corporation showed "insignificant" impacts as defined in the Federal PSD Regulations.

Any person may submit written comments to EPA regarding the proposed construction. All comments, postmarked not later than 30 days from the date of this notice, will be considered by EPA in making a Final Determination regarding approval for construction of this source. These comments will be made available for public review at the above location. Furthermore, a public hearing can be requested by any person. Such requests should be submitted within 15 days of the date of this notice. Letters should be addressed to:

Mr. Tommie A. Gibbs, Chief
Air Facilities Branch
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30308

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

Attachment to SAI #810272 & 810401

The second item was intended by EPA to be a replacement and correction for the first. Subject is public notice of intent to issue a federal air pollution construction permit for the Duelle mine of Estech General Chemicals Corporation.

This facility has been issued a state permit under Chapter 403 F.S. and Chapter 17 FAC. The terms and conditions of the proposed federal permit do not differ to any significant degree from the state permit.

No action is indicated.

May 22, 1980

Mr. Archie Lee
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Mr. Lee:

Attached please find copies of the Air Construct Permits recently issued by the FDER to Estech, of Manatee County, and Seaboard Coast Line Railroad, of Hillsborough County.

Sincerely,

M. G. Hodges
Environmental Scientist,
Bureau of Air Quality Management

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 20, 1980

Mr. Joseph E. Davis, Manager of Projects
First Commercial Bank Building
410 Cortez Road, West
Suite 275
Bradenton, Florida 33507

Dear Mr. Davis:

Enclosed are Permits Number AC 41-26542, AC 41-26543, AC 41-26544 and AC 41-26545 to Estech General Chemicals Corporation issued pursuant to Section 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

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee	
To: _____	Loctn.: _____
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

TO: Jake Varn, Secretary, FDER

FROM: Steve Smallwood, Chief, BAQM

DATE: May 16, 1980

SUBJ: Approval and Signature of Attached Air Construction Permit(s) described below.

MAY 16 1980

Attached please find four Air Construction Permits for which the applicant is Estech General Chemicals Corp. of Bradenton, Florida, the proposed construction is for a Phosphate Mine Beneficiation Plant to be located at the Duette Mine, Manatee County, Florida.

The Bureau recommends your approval and signature.


 _____ Date May 16, 1980
 Steve Smallwood, Chief
 Bureau of Air Quality Management

SS:caa

Final Determination

Estech General Chemicals Corporation

AC 41-26542
AC 41-26543
AC 41-26544
AC 41-26545

Estech General Chemicals Corporations' application for permits (4) to construct a Phosphate Beneficiation Plant at the Proposed Duette Mine, Manatee County, Florida, has been reviewed by the Bureau of Air Quality Management. Best Available Control Technology was also determined by the Bureau and is reflected in the conditions of the permits. Public notice of the Departments' intent to issue the Construction Permits was published in the Tampa Tribune on February 21, 1980, and in the Bradenton Herald on February 19, 1980. Waiver of the 90-day processing clock as specified in FS 120.60(2) was granted, through April 10, 1980, by Mr. R. L. Rhodes, authorized agent for Estech. The waiver facilitated BAQM's compliance with the 30-day public notice requirement of FAC 17-2.091.

Comments on the proposed Construction Permits were received from Ms. Gloria C. Rains, Chairman, ManaSota-88 and Ms. Hilda Quy, Vice-President, Izaak Walton League of America, Incorporated, Manatee Chapter. Both parties filed petition for Administrative Hearings on April 4, 1980, on behalf of their respective organizations. By letter dated April 9, 1980, "Petition for Leave to Intervene" and "Intervenor's" Motion to Dismiss or, In the Alternative, Motion for More Definite Statement" was filed with the DOA Hearing Officer on both petitions by Mr. R. L. Rhodes, on behalf of Estech General Chemicals Corporation. Request for dismissal of petitions was filed by both ManaSota-88 and the Izaak Walton League, with assigned DOA Hearing Officer, by letter dated April 10, 1980.

The Petitions for Hearing were ordered dismissed on April 25, 1980 (cases No. 80-647 and 80-648).

No other comments were received in response to public review. It is requested that the permits be issued as written.



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 41-26542

ESTECH GENERAL CHEMICALS CORPORATION
DRY ROCK LOADING STATIONS 1 AND 2
DUETTE PHOSPHATE MINE
MANATEE COUNTY, FLORIDA

DATE OF ISSUANCE

19th May 1980

DATE OF EXPIRATION

DECEMBER 31, 1982

Jacob D. Varn

JACOB D. VARN,
SECRETARY

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

APPLICANT: Estech General Chemicals Corporation
First Commercial Bank Building
410 Cortez Road West
Suite 275
Bradenton, Florida 33507

PERMIT/CERTIFICATION
NO. AC 41-26542

COUNTY: Manatee

PROJECT: Dry Rock Loading
Stations 1 and 2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 & 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 two phosphate dry-rock railroad loading stations, associated conveyor belts, hoods and wet scrubbing equipment at the Estech Chemical Corporation Manatee County Plant. Particulate emission from the car loading operations are to be controlled with a single Centerfield wet scrubber. Particulate emission from bin loading operations will be controlled by a second Centerfield Wet scrubbers. Emissions from these two scrubbers will exit through Stack No. 3. The plant is located at the Universal Transverse Mercator (UTM) coordinates 388.95 E and 3047.28 N.

Construction shall be in accordance with attached permit application, attached plans, documents and drawings, except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct an Air Pollution Source" DER Form 17-1.122(16).
2. EPA "Draft Environmental Impact Statement", October, 1979.

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.:

APPLICANT: Estech General Chemicals Corp.

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 41-26542
APPLICANT: Estech General Chemicals Corp.

Specific Conditions

1. Maximum particulate emissions from Stack No. 3 shall be 6 lbs./hr. and 12 tons/year. Opacity shall not exceed 10 percent.
2. The hours of operation shall be limited to 4000 hours per year.
3. Maximum material transfer shall be 1200 tons per hour of dry phosphate rock.
4. During the construction phase, quarterly reports on construction progress, commencing three months after initiation of construction shall be submitted to the Bureau of Air Quality Management.
5. The operating permit shall require maintenance of records indicating:
 - operating hours
 - material transfer rates
 - measurement of scrubbers' pressure drop
 - scrubbers' liquid supply pressures under 90% of the average levels maintained during the most recent test showing compliance with permit conditions.

This information shall be submitted annually to the Department in accordance with 17-4.14.

6. Emissions tests for stack no. 3 for particulate, and visible emissions shall be conducted in accordance with Methods 1 through 5, 40 CFR 60, Appendix A and Method 9, 40 CFR 60, Appendix A. The results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emissions and the conditions of this permit.
7. The permittee shall notify the Bureau of Air Quality Management 30 days prior to any compliance testing, and shall submit a test plan for approval. Upon demonstration of compliance with the operational limits of this permit and submission of a complete application for an operation permit to the Southwest District Office, prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.

PERMIT NO.: AC 41-26542
APPLICANT: Estech General Chemicals Corp.

Jacob D. Varn
Jacob D. Varn
Secretary

Expiration Date: December 31, 1982

Issued this 19th day of MOY, 19 80

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 41-26543

ESTECH GENERAL CHEMICALS CORPORATION
DRY ROCK STORAGE SILOS 1-8
DUETTE PHOSPHATE MINE
MANATEE COUNTY, FLORIDA

DATE OF ISSUANCE

19TH MAY 1980

DATE OF EXPIRATION

DECEMBER 31, 1982

Jacob D. Varn
JACOB D. VARN,
SECRETARY

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

APPLICANT: Estech General Chemicals Corporation
First Commercial Bank Building
410 Cortez Road West
Suite 275
Bradenton, Florida 33507

PERMIT/CERTIFICATION
NO. AC 41-26543

COUNTY: Manatee

PROJECT: Dry Rock Storage
Silos No. 1-8

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 & 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 eight dry rock storage facilities, associated conveying systems, and scrubbers. Particulate emissions from silo loading will be controlled with a Centerfield wet scrubber. Reclaim belts emissions will be controlled with 2 Centerfield wet scrubbers. Emissions from the control equipment will vent through Stack No. 2 at the Estech Chemicals Corporation Plant in Manatee County. The Universal Transverse Mercator (UTM) coordinates for this facility are: 388.95 E and 3047.28 N.

Construction shall be in accordance with attached permit application, attached plans, documents and drawings, except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct an Air Pollution Source" DER Form 17-1.122(16).
2. EPA "Draft Environmental Impact Statement", October, 1979.

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.:

APPLICANT: Estech General Chemicals Company

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 41-26543
APPLICANT: Estech General Chemicals Company

Specific Conditions:

1. Maximum allowable emissions from Stack No. 2 shall be 9 lbs./hr., and 29 tons per year of particulate. Visible emission shall not exceed 10% opacity.
2. The hours of operation shall be limited to 8325 for the silo-loading scrubber, and 6500 for the silo-unloading (reclaim) scrubber.
3. The maximum rate for dry phosphate silo loading shall not exceed 524 tons/hr.
4. Maximum allowable dry phosphate reclaim belts' rate shall not exceed 1,200 tons/hr.
5. During the construction phase, quarterly reports on construction progress, commencing three months after initiation of construction shall be submitted to the Bureau of Air Quality Management.
6. The operating permit shall require maintenance of records indicating:
 - operating hours
 - material transfer rates
 - measurement of scrubbers' pressure drop
 - scrubbers' liquid supply pressures under 90% of the average levels maintained during the most recent test showing compliance with permit conditions.

This information shall be submitted annually to the Department in accordance with 17-4.14.

7. Emissions tests for particulate, and visible emissions shall be conducted for Stack No. 2 in accordance with Methods 1 through 5 40 CFR 60, Appendix A and Method 9, 40 CFR 60, Appendix A. The results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emission and the condition of this permit.
8. The permittee shall notify the Bureau of Air Quality Management 30 days prior to any compliance testing, and shall submit a test plan for approval. Upon demonstration of compliance with the

PERMIT NO.: AC 41-26543
APPLICANT: Estech General Chemicals Company

operational limits of this permit and submission of a complete application for an operation permit to the Southeast District Office, prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.

Jacob D. Varn
Jacob D. Varn
Secretary

Expiration Date: December 31, 1982

Issued this 19th day of May, 19 80

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 41-26544

ESTECH GENERAL CHEMICALS CORPORATION
PHOSPHATE ROCK DRIERS 1 AND 4
DUETTE PHOSPHATE MINE
MANATEE COUNTY, FLORIDA

DATE OF ISSUANCE

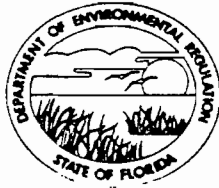
19th May 1980

DATE OF EXPIRATION

DECEMBER 31, 1982

JACOB D. VARN,
SECRETARY

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

APPLICANT: Estech General Chemicals Corporation
First Commercial Bank Building
410 Cortez Road West
Suite 275
Bradenton, Florida 33507

PERMIT/CERTIFICATION
NO. AC 41-26544

COUNTY: Manatee

PROJECT: Phosphate Rock
Dryers No. 1 and 2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 & 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 two phosphate rock dryers, associated conveying system, and scrubbing system at the Estech's General Chemicals Corporation mining plant in Manatee County. Particulate and sulfur dioxide emissions from the dryers are to be controlled by two Ducon Venturi scrubbers preceded by two recovery cyclones. Fugitive emissions from points of discharge at the dryers are to be controlled with a Centerfield wet scrubber. The plant is located at the Universal Transverse Mercator (UTM) coordinates 388.95 E and 3047.28 N.

Construction shall be in accordance with attached permit application, attached plans, documents and drawings, except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct an Air Pollution Source" DER Form 17-1.122(16).
2. EPA "Draft Environmental Impact Statement", October, 1979.

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.:

APPLICANT: Estech General Chemicals Corporation
410 Cortez Road West
Bradenton, Florida 33507

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 41-26544

APPLICANT: Estech General Chemicals Corporation

Specific Conditions:

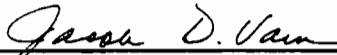
1. Maximum allowable emissions from Dryers No. 1 and No. 2 (stack No. 1) shall be 23 lbs./hr. (0.022 grains/DSCF) and 85 tons per year. In no case shall emissions exceed 0.04 lbs. per ton of dry rock processed. Maximum visible emissions shall be 10% opacity from stack No. 1. Maximum emissions of sulfur dioxide shall be 9 lbs./hr. and 32 tons per year.
2. The hours of operation shall be limited to 7,446 hours per year.
3. The maximum material output from both dryers shall be 3,901,704 tons per year of dry rock, 12,576 tons per day of dry phosphate rock and 524 tons per hour of dry phosphate rock.
4. The maximum fuel consumption shall be 774 gallons per hour of number 6 fuel - - with maximum sulfur content of 1%.
5. During the construction phase, quarterly reports on construction progress, commencing three months after initiation of construction shall be submitted to the Bureau of Air Quality Management.
6. In accordance with 17-4.14, the operating permit shall require maintenance of records indicating:
 - operating hours
 - material input to the dryer
 - amount of fuel consumption
 - percent sulfur content of fuel
 - measurement of scrubbers' pressure drop
 - scrubbers' liquid supply pressures under 90% of the average levels maintained during the most recent test showing compliance with permit conditions.

This information shall be submitted annually to the Department in accordance with 17-4.14.

7. Emissions tests for particulate, sulfur dioxide and visible emissions shall be conducted for stack number 2 in accordance with Methods 1 through 6, 40 CFR 60, Appendix A and Method 9, 40 CFR, Appendix A.* The results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emissions and the conditions of this permit.

PERMIT NO.: AC 41-26544
APPLICANT: Estech General Chemical Corporation

8. The permittee shall notify the Bureau of Air Quality Management 30 days prior to any compliance testing, and shall submit a test plan for approval. Upon demonstration of compliance with the operational limits of this permit and submission of a complete application for an operation permit to the Southwest District Office, prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.



Jacob D. Varn
Secretary

Expiration Date: December 31, 1982

Issued this 19th day of MAY, 19 80

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 41-26545

ESTECH GENERAL CHEMICALS CORPORATION
100 HORSEPOWER BOILER
DUETTE PHOSPHATE MINE
MANATEE COUNTY, FLORIDA

DATE OF ISSUANCE

19th MAY 1980

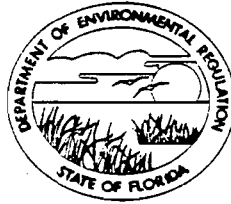
DATE OF EXPIRATION

DECEMBER 31, 1982

Jacob D. Varn

JACOB D. VARN,
SECRETARY

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

APPLICANT: Estech General Chemicals Corporation
First Commercial Bank Building
410 Cortez Road West
Suite Cortez Road West
Bradenton, Florida 33507

PERMIT/CERTIFICATION
NO. AC 41-26545

COUNTY: Manatee

PROJECT: 100 Horsepower
Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 & 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 100 horsepower boiler at Estech General Chemicals Corporation Mining Plant, Manatee County. Sulfur dioxide emissions will be controlled by the use of no. 2 distillate with maximum sulfur content of 0.7%. The plant is located at the Universal Transverse Mercator (UTM) coordinates 388.95 E and 3047.28 N.

Construction shall be in accordance with the attached permit application, attached plans, documents and drawings, except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct Air Pollution Sources", DER Form 17-1.122(16).
2. EPA "Draft Environmental Impact Statement", October 1979.

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.:

APPLICANT: Estech General Chemicals Corporation
410 Commercial Bank Building
Bradenton, Florida 33507

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)

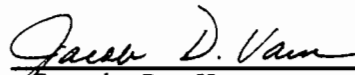
SPECIFIC CONDITIONS:

PERMIT NO.: AC 45-26545

APPLICANT: Estech General Chemicals Corporation

Specific Conditions:

1. Visible emission from boiler (stack No. 4) shall not exceed 20 percent opacity at any one time.
2. The hours of operation shall be limited to 8736 hours per year.
3. Maximum fuel consumption shall be 29 gallons per hour of No. 2 distillate fuel oil with maximum sulfur content of 0.7%.
4. During the construction phase, quarterly reports on construction progress, commencing three months after initiation of construction shall be submitted to the Bureau of Air Quality Management.
5. The operating permit shall require maintenance of records indicating operation hours, sulfur content of fuel and amount of fuel consumed. This information shall be submitted annually to the Department in accordance with 17-4.14.
6. Emissions tests for visible emissions shall be conducted for Stack No. 4 in accordance with Method 9, 40 CFR 60 Appendix A. Results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emission.
7. The permittee shall notify the Bureau of Air Quality Management 30 days prior to any compliance testing, and shall submit a test plan for approval. Upon demonstration of compliance with the operational limits of this permit and submission of a complete application for an operation permit to the Southwest District Office, prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.



Jacob D. Varn
Secretary

Expiration Date: December 31, 1982

Issued this 14TH day of 7/01, 1980

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

June 26, 1980

Mr. Samuel R. Danziger
Royal Palm Beach Colony, Inc.
8080 N.E. 5th Avenue
Miami, Florida 33138

Dear Mr. Danziger:

Attached please find one copy each of the 9 proposed Construction Permits, Applications therefore, Technical Evaluations, Preliminary BACT Determinations and Statements of Department Intent to Issue.

The materials attached are identical to the materials available for Public Inspection at the Florida Department of Environmental Regulation, Southwest District Office, Tampa and at the Bureau of Air Quality Management, Tallahassee.

Should you have any further questions please write or call me at (904) 488-1344.

Sincerely,

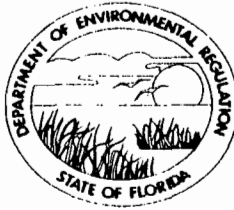
Mark G. Hodges

Mark G. Hodges,
Environmental Scientist
Bureau of Air Quality Management

MGH:caa

Estech file

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

April 7, 1980

Dr. Jeff Linzer,
County Environmental Specialist
Sarasota County Health Department
P. O. Box 8
Sarasota, Florida 33578

Dear Mr. Linzer:

Enclosed please find one copy, as requested, of the BACT Determination for Estech's Proposed Duette Mine which would be located in Manatee County.

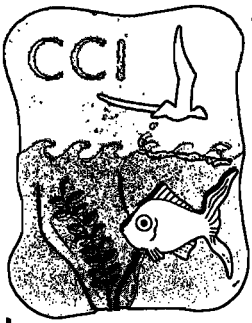
An Administrative Hearing has been requested, so the Air Construction Permit will not be issued on April 10, 1980, as previously scheduled. The date of the aforementioned Administrative Hearing has not been announced. Further information regarding this matter can be obtained by contacting Mary Clark, DER, Office of General Counsel, at (904) 488-9730.

Sincerely,

M. G. Hodges
Env. Scientist
FDER/BAQM

cc: Mary Clark
Steve Smallwood

MGH:caa



Lamy F.Y.I.

CONSERVATION CONSULTANTS, INC.

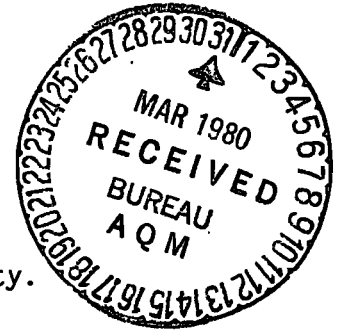
POST OFFICE BOX 35 • PALMETTO, FLORIDA 33561

TELEPHONE 813-722-6668

Consultants in Environmental Biology and Engineering

March 26, 1980

Mr. Jerry Campbell
Bureau of Air Quality Management
DEPARTMENT OF ENVIRONMENTAL REGULATION
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301



Re: Estech Permit Applications - Duette Mine, Manatee County.

Dear Mr. Campbell:

The following is in partial response to your request of mid-January and to advise that your request has not been overlooked, but simply delayed due to several pressing commitments. Status on the three items requested is as follows.

1. SAROAD Site Evaluation/Identification and Data Forms

Most of the data have been transferred to SAROAD input forms, but the Site Evaluation/Identification Forms must still be completed. Completed data forms will be withheld until the entire package can be delivered.

2. AQDM and CRSTER I/O

Most data have been extracted from files for duplication. A relatively small amount of work remains to complete this package.

3. Hillsborough Non-Attainment Area Impact

As indicated in the Draft EIS Air Quality Resource Document, Appendix C, the Hillsborough Non-Attainment Area is located approximately 40 to 60 kilometers northwest of the proposed source. Analysis presented in this same document, pages 65 and 71, for a northwesterly direction indicate that (1) projected annual average TSP concentrations are well below the 1.0 microgram per cubic meter significance level within 2-3 kilometers of the source and (2) the projected 24-hour average is below the 5 micrograms per cubic meter significance level within a 3 kilometer distance of the proposed source. Therefore, impacts at the 40 kilometer

Mr. Jerry Campbell

March 26, 1980

Page Two

distant Hillsborough Non-Attainment Area will also be less than the 1 microgram per cubic meter annual and 5 micrograms per cubic meter 24-hour Levels of Significance.

We appreciate your patience in this matter and will make every effort to supply the remaining information shortly.

Sincerely,



John W. Schatmeyer, Ph.D., P.E.
Vice President, Engineering

JFS/mgc

cc: J. E. Davis, Estech
R. L. Rhodes, Esquire,
Holland and Knight
B. E. Nelson, CCI

Reference No. 0100-509

P. O. Box 1068
245 SOUTH CENTRAL AVENUE
BARTOW, FLORIDA 33830
(813) 533-1151

LAW OFFICES

HOLLAND & KNIGHT

P. O. Box 1669
406 THIRTEENTH STREET WEST
BRADENTON, FLORIDA 33506
(813) 746-7107

P. O. DRAWER B W
92 LAKE WIRE DRIVE
LAKELAND, FLORIDA 33802
(813) 682-1161

NEW WORLD TOWER BLDG.
100 NORTH BISCAYNE BLVD.
MIAMI, FLORIDA 33132
(305) 358-2767

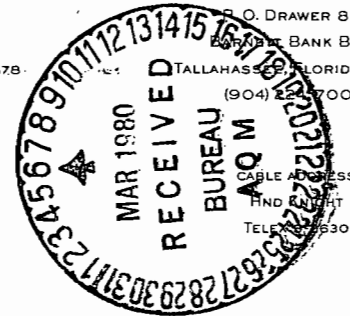
P. O. Bdx 3076
1100 TAMiami TRAIL
SARASOTA, FLORIDA 33578
(813) 365-3321

P. O. DRAWER 810
EXCHANGE BANK BLDG.
TALLAHASSEE, FLORIDA 32302
(904) 223-7000

P. O. Box 1288
EXCHANGE BANK BLDG.
TAMPA, FLORIDA 33601
(813) 223-1621

PLEASE REPLY TO:

Lakeland, Florida
March 4, 1980



Ms. Victoria Martinez
Bureau of Air Quality
Management
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Estech General Chemicals Corporation -
AC41-26542, AC41-26543, AC41-26544,
AC41-26545

Dear Ms. Martinez:

Following up our telephone conversation of February 28, 1980, and in response to your letter of February 29, 1980, I have attached an executed waiver of the 90-day time limit under Section 120.60(2), Florida Statutes, as it relates to the above-referenced applications. This will provide the Department with adequate time to comply with the public notice provisions of the applicable regulations.

Sincerely,

HOLLAND & KNIGHT


Robert L. Rhodes, Jr.

RLRjr/dsl

cc: -57 Mailing List

WAIVER OF 90 DAY TIME LIMIT

UNDER SECTION 120.60(2), FLORIDA STATUTES AC 41-26545

AC 41-26544

AC 41-26543

License (Permit, Certification) ApplicationsNo. AC 41-26542

Applicant's Name: Estech General Chemicals Corporation

The undersigned has read Section 120.60(2), Florida Statutes, and fully understands the Applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the Applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Section 120.60(2), Florida Statutes, waives the right under Section 120.60(2), Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Section 120.60(2), Florida Statutes. Said waiver is made freely and voluntarily by the Applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 10th day of April 1980.

The undersigned is authorized to make this waiver on behalf of the applicant.


Signature

Name of Signee

March 4, 1980

Date

Sworn to and subscribed
before me this _____ day
of _____ 19____.

ROBERT L. RHODES, JR.
Holland & Knight
P.O. Drawer BW
Lakeland, FL 33802
913/682-1161
Attorneys for Estech General
Chemicals Corporation

Section 120.60, Florida Statutes

(2) When an application for a license is made as required by law, the agency shall conduct the proceedings required with reasonable dispatch and with due regard to the rights and privileges of all affected parties or aggrieved persons. Within 30 days after receipt of an application for a license, the agency shall examine the application, notify the applicant of any apparent errors or omissions, and request any additional information the agency is permitted by law to require. Failure to correct an error or omission or to supply additional information shall not be grounds for denial of the license unless the agency timely notified the applicant within this 30 day period. The agency shall notify the applicant if the activity for which he seeks a license is exempt from the licensing requirement and return any tendered application fee within 30 days after receipt of the original application or within 10 days after receipt of the timely requested additional information or correction of errors or omissions. Every application for license shall be approved or denied within 90 days after receipt of the original application or receipt of the timely requested additional information or correction of errors or omissions. Any application for a license not approved or denied within the 90-day period or within 15 days after conclusion of a public hearing held on the application, whichever is latest, shall be deemed approved and, subject to the satisfactory completion of an examination, if required as a prerequisite to licensure, ²(the license) shall be issued. The Public Service Commission, when issuing a license, and any other agency, if specifically exempted by law, shall be exempt from the time limitations within this subsection. Each agency, upon issuing or denying a license, shall state with particularity the grounds or basis for the issuance or denial of same, except where issuance is a ministerial act. On denial of a license application on which there has been no hearing, the denying agency shall inform the applicant of any right to a hearing pursuant to s. 120.57.

TO: Mr. Dave Puchaty, Manager
Southwest District

FROM: Steve Smallwood, Chief
Bureau of Air Quality Management

DATE: March 3, 1980

SUBJ: Proposed Department Action on Estech General Chemicals
Corporations Applications to Construct a Phosphate Rock
Mining, Drying, Storage and Loading Facility in Manatee
County, Florida.

Attached please find one each copy of the five proposed
Construction Permits, Technical Evaluations, BACT Determinations,
and Statements of Department Intent regarding the Application
to Construct as cited above.

Pursuant to 17-2.091 and 40 CFR 51.18 this information
is to be maintained on file for public review for 30 days.

Comments are to be submitted, in writing, to Victoria
Martinez, Bureau of Air Quality Management, (904) 488-1344.

SS:caa

cc: Jim Estler (w/o attachments)

ATTACHMENTS

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

MEMORANDUM

TO: Mr. Joseph E. Davis
Mr. John F. Schatmeyer

FROM: Steve Smallwood, Chief
Bureau of Air Quality Management

DATE: March 3, 1980

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Martinez, Bureau of Air Quality Management, (904) 488-1344.

SS:caa

ATTACHMENTS

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: _____

TO: Mr. Dave Puchaty, Manager
Southwest District

FROM: Steve Smallwood, Chief *JS*
Bureau of Air Quality Management

DATE: March 3, 1980

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Comments are to be submitted, in writing, to Victoria
Martinez, Bureau of Air Quality Management, (904) 488-1344.

SS:caa

cc: Jim Estler (w/o attachments)

ATTACHMENTS

February 29, 1980

Mr. Robert Rhodes
P. O. Drawer B.W.
Lakeland, Florida 33802

Dear Mr. Rhodes:

Thank you for your cooperation in extending until April 10, 1980, the 90-day permitting period for Estech General Chemical Corporation.

Enclosed are waiver forms for the Estech General Chemical Corporation permits. Please return the signed original to this office, to my attention.

Sincerely,

Victoria Martinez
Engineer III
Bureau of Air Quality Management

VM:caa

ATTACHMENTS

ATTENTION: BOB GARRETT

- FOR LEGAL NOTICE IN TAMPA TRIBUNE.

TO APPEAR 21 FEB 1980
TAMPA TRIBUNE

THANK YOU,
M. J. HODGES

Public Notice

The Department of Environmental Regulation (DER) has ^{FOUR} applications from and intends to issue ^{FOUR} Construction Permits to Estech General Chemicals Corporation for the construction of ² Phosphate Rock Dryers, 8 Rock Storage Silos, 1 100 HP oil-fired boiler and 2 Dry Rock Loading Stations at the existing Duette Mine, Manatee Co. A determination of Best Available Control Technology (BACT) was required. Copies of the Application, Technical Evaluation, BACT and Departmental Intent are available for inspection at the following DER offices:

DER Bureau of Air Qual. Mgt.
2600 Blair Stone Road, Tallahassee

DER S. W. District Office
7601 Highway 301 N.
Tampa, Florida

Persons wishing to comment on this action shall submit comments in writing to Victoria Martinez of the Tallahassee office within 30 days of this notice.

DICTATED ON ~ 15 FEB 1980 TO S.W. OFFICE.

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: _____

Technical Evaluation
and
Preliminary Determination

Estech General Chemicals Corporation
Manatee County, Florida

Construction Permit

Application Number:

AC 41-26542
AC 41-26543
AC 41-26544
AC 41-26545

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

February 21, 1980

I. PROPOSED DEPARTMENT ACTION

The Department intends to issue the requested air Pollution Construction Permits to Estech General Chemicals Corporation for construction of a proposed phosphate mine beneficiation plant in Northwestern Manatee County, Florida. The permits to be issued will include two phosphate rock dryers, eight dry rock storage silos, two dry rock loading stations and a one hundred horsepower oil-fired boiler.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

Victoria Martinez
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose interests would be significantly affected by the issuance or denial of the permit may request an administrative hearing by filing a petition for hearing as set forth in Section 28-5.15 (copy attached). Such petition must be filed within 14 days of the date of this notice and is to be filed with:

Mary Clark
Office of General Counsel
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

II. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

a. The proposed mine will be located in Manatee County, which is classified as "attainment" for the criteria pollutant particulate matter. This location is "attainment" as well for the remaining criteria-pollutants. However, the proposed facility is within the "area of influence" of the Hillsborough County Particulate Nonattainment Area.

b. As a result of the rock drying, storage and loading operations three criteria pollutants could potentially be emitted in significant quantities: particulate matter, sulfur oxides, and nitrogen oxides. Estimated potential emissions of these pollutants are:

Emission Point	Annual Emission (tons)		
	Particulate	SO _x	NO _x
Phosphate-Rock Dryer No. 1 and 2	8500	800	281
Dry-Rock Storage Silos No. 1-8	2870	—	—
Dry-Rock Loading Stations 1 and 2	1150	—	—
100 Horsepower Oil-Fired Boiler	0.25	12.35	2.73

III. SYNOPSIS OF APPLICATION

a. Name and Address of Applicant

Estech General Chemicals Corporation
 First Commerical Bank Building
 410 Cortez Road, West, Suite 275
 Bradenton, Florida 33507

b. Description of the Project and Controls

The applicant is proposing to construct and operate a phosphate mine beneficiation plant. The proposed facility encompasses 10,394 acres of which approximately 6,600 are deemed mineable. The mining operation is planned to produce an average 3 million tons per year of phosphate ore for a period of twenty one years. Operating emissions will be primarily related to the phosphate rock drying, storage and loading operations, but also will include fugitive dust contributions from land clearing and reclamation activities.

A small 100 horsepower package industrial boiler will be used in the mining and ore beneficiation process. This boiler will be required to generate steam for heating flotation reagents and fuel oil. Proposed control method for sulfur oxides is the use of low sulfur distillate fuel oil. Proposed control method for nitrogen oxide is the routine maintenance of proper burner combustion conditions. Emissions from the boiler will be discharged to the atmosphere through a 40 foot stack.

Two 262 ton-per-hour (dry basis) fluidized bed rock dryers are planned for drying phosphate rock pebble and concentrate product from the proposed Duette Mine in Manatee County, and also from Watson Mine in Polk County. The dryers will use No. 6 fuel oil to provide the heated gas necessary to dry phosphate rock product from 13 to 2 percent moisture. Exhaust gases from the dryers pass through the product recovery cyclones before entering the pollution control equipment. The proposed control devices are two Duncan wet venturi absorber scrubbing systems designed for removal of both particulate and sulfur dioxide with 99.8 & 96.5% efficiency, respectively. In addition, a fugitive dust collection system will enclose transfer points from both dryer and recovery cyclones to a product conveyor belt. The collection system will be served by a Centrifield wet scrubber to remove capture fugitive dust from the collection system stream, with an efficiency of control of 99.1 percent. Gas streams from all three scrubbers, two Duncan and one Centrifield will discharge to the atmosphere through a stack 60 feet in height.

A dry rock storage facility will consist of eight storage silos each with a load storage capacity of 3,750 tons of dry phosphate rock. The silos will be arranged in two bays of four silos each which will be centered over two enclosed reclaim belt conveyors that supply railroad car loading stations. An enclosed dry product conveyor of 600-ton-per-hour capacity (from rock dryers) will deliver dry rock to a distribution chute and discharge to an enclosed reversible conveyor belt. The reversible belt will supply either one of two tripper conveyors which traverse the length of each bank of four silos. All transfer points in the loading system will be enclosed with exhaust hoods to prevent fugitive dust emissions. Dusty air exhausted from active transfer points will exit to a single Centrifield wet scrubber with 99.8 percent collection efficiency. Collection points from inactive transfer points and silos are closed through an interlocking gate system to economize air handling. Silo discharge gates to the reclaim conveyors that supply railroad car loading stations will be enclosed with fugitive dust collection hoods to prevent escape of particulate matter at the base of the silos. The silos will be served by two reclaim belt wet scrubbers with 99.74% collection efficiency to control emission accompanying discharge of silos. The cleaned air exiting the loading (Centrifield) and two reclaim belt wet scrubbers will be returned to the atmosphere through a stack 125 feet high.

The two dry rock loading stations (1 & 2) will consist of a compartmented 100 ton loading bins on load cells. The bins are loaded with enclosed, variable speed conveyor belts through hooded hoppers and a distribution chute system. Each bin discharges through eight spouts into the hatches of a 100 ton railroad hopper cars. Fugitive dust emissions will be controlled

at all transfer points by dust collection systems. The bin loading collection systems are designed so that dust released at transfer points is drawn to a single Centrifield wet scrubber serving both loading bins and having a design efficiency of 99.72 percent. Rail car loading spouts are designed to enclose the car hatch opening and include necessary air inflow and dust capture features to prevent fugitive dust release during car loading operations. A single Centrifield wet scrubber capable of 99.72 percent removal efficiency will serve the two car loading dust collection operation. The collection system will be fitted with water sprays at necessary intervals, to prevent excessive moisture in the collection system air. The clean air from the two Centrifield scrubbers serving the loading stations will be returned to the atmosphere through a 60 feet stack.

c. Description of the Process, Proposed Process Rates and Emission Rate

Mining Operations - Activities associated with mining operations, such as land clearing, dragline operation and reclamation are significant sources of fugitive emissions. Inasmuch as these activities are comparable to earthmoving associated with plant construction, the AP-42 factors for construction were applied by the applicant to estimate emissions from in-process, exposed ground areas. Fuel combustion values tabulated under mining include emissions from earth-moving equipment. Emission estimates for this equipment were developed from projections of fuel consumption and emission factors in AP-42 (see Table II).

Industrial Boiler - The small 100 horsepower industrial boiler is the only stationary pollution source in the mining and ore beneficiation process. Required to generate steam for heating flotation reagents and to pre-heat No. 6 fuel oil before pumping to the dryers' oil burners, the boiler will consume a maximum of 28 gal/hr of No. 2 fuel oil with .7% sulfur content and will operate a maximum of 8736 hours per year (see Table I with emissions).

Rock Dryer - Wet phosphate rock pebble and concentrate product from the proposed Duette Mine and from Watson Mine in Polk County will be dried in the two fluidized bed rock dryers at a rate of 590 tons per hour. Combustion of No. 6 fuel oil will provide the heated gas necessary to dry rock product from 13 percent to 2 percent moisture. Maximum sulfur content of No. 6 fuel oil will be 1.0%, and maximum consumption and operating time will be 12,059 gallons per hour and 7392 hours per year, respectively. Particulate and combustion pollutants from the rock dryer will enter the venturi scrubbers at an estimated maximum inlet loading of 12 gr/DSCF. Inlet loading to the Centrifield scrubber was estimated at 7.8 gr/DSCF. Proposed maximum emission from the dryer is 0.022 gr/DSCF. Exit concentration is supported by performance data from the scrubbers' manufacturers.

Silo Transfer and Storage - Two enclosed conveyors will deliver dry rock to the silos at a maximum rate of 524 tons per hour, for a maximum yearly operating hours of 8325. Hourly transfer rate from the silos (reclaim system) will be 1,200 tons/hr for 3,250 hrs. a year. Inlet loading to the Centrifield and reclaim scrubbers was estimated at 8.6 and 7.8 gr/DSCF respectively. Maximum emission rate from both silo loading scrubber and reclaim belt scrubbers is 0.022 gr/DSCF. This emission rate is supported by manufacturer's performance data for the control equipment.

Dry Rock Loading Systems 1 and 2 - Minimum input/output rate for dry loading stations 1 and 2 is 1,200 ton/hr for a maximum of 3250 hr/year. Inlet loading for bin loading and car loading scrubbers was estimated at 8.6 and 7.8 gr/DSCF, respectively. Proposed emission rate from bin loading scrubber and car loading scrubber is 0.022 gr/DSCF. This emission rate is supported by manufacturer's performance data for the control equipment.

IV. RULE APPLICABILITY

The proposed project is located in the area of influence of the Hillsborough County Particulate Nonattainment Area. Air quality modeling has been performed to predict the impact on the nonattainment area of the proposed allowable particulate emissions from each new source. No impact above significance levels is predicted. Therefore, none of the proposed sources is subject to the nonattainment provisions of 17-2.17, FAC.

The proposed project is a major emitting facility for the pollutants particulate, sulfur dioxide, and nitrogen oxides. Therefore, with respect to particulate and sulfur dioxide, the facility is subject to the requirements of 17-2.04, Prevention of Significant Deterioration (PSD), and 17-2.03, Best Available Control Technology (BACT). With respect to nitrogen oxides the facility is subject to 17-2.03, BACT. In addition, the 100 horsepower boiler requires a BACT determination under 17-2.05(6)(e)2.

V. FINDINGS

1. The facility is a major emitting facility as defined in 17-2.102(70) Potential emissions of three criteria pollutants: nitrogen oxide, sulfur dioxide and particulate exceed 100 tons per year.
2. The total estimated annual operating emissions are given in Table I below.

Table I. Estimated Annual Operating Emissions (tons per year)

ACTIVITY	TSP ^b	HC ^a	NO	SO ₂ ^b	CO	F _g ^b
Mining	1.3	1.6	20.4	13.5	6.4	---
Wet Rock Storage	---	---	---	---	---	---
Dryer	85.4	5.8 ^c	282.2	32.0	28.8 ^c	0.2
Dry Rock Storage and Transport	40.2	---	---	---	---	---
Transportation (auto/truck/R.R.)	0.4	3.1	6.3	0.8	18.9	---
TOTAL	127.3	10.5 ^c	308.9	46.3	54.1 ^c	0.2

a Potential Emission

b Controlled Emission

c Pollutant loading estimate based on AP-42 industrial boiler emission factors. Reduced generation, conversion and/or removal expected in fluidized bed dryer.

3. Potential and proposed maximum actual emissions of criteria pollutant from specific emission points are:

Emission Point	Stack	Particulate	Potential (Ton/Yr)				Actual (Ton/Yr)				
			SO _x	NO _x	HC	CO	SO _x	NO _x	HC	CO	
Dryers	1	8500	800	281	6	29	85.4	32.0	28.21	5.8	28.8
Silo											
Storage & Reclaim	2	2870	—	—	—	—	28.7	—	—	—	—
Railroad Car Load Out	3	1150	—	—	—	—	11.5	—	—	—	—
Boiler	4	0.25	12.35	2.73	0.12	0.62	0.25	12.35	2.73	0.12	0.62

Table II

4. Fugitive emissions from ancillary equipment (i.e., conveyor belt transfer points, etc.) will be controlled by properly engineered dust collection equipment.

5. Best Available Control Technology has been determined as required. Emission limitations given below are based on the installation of 8 high efficiency wet scrubbers.

Rock Dryers No. 1 & 2

Pollutant	Maximum Emissions
Particulate Matter	23 lb/hr, 0.04 lb per ton of dry input to dryers
Sulfur Dioxide	9 lb/hr.
Nirtogen Oxides	76 lb/hr.
Visible Emissions	10% Opacity

Dry Rock Storage Silos No. 1-8

Pollutant	Maximum Emissions
Particulate Matter	9 lb/hr.
Visible Emissions	10% Opacity

Dry Rock Loading Stations 1 & 2

Pollutant	Maximum Emissions
Particulate Matter	6 lb/hr.
Visible Emission	10% Opacity

100 Horsepower Oil Fired Boiler

Pollutant	Maximum Emission
Visible Emissions	20% Opacity
Sulfur Dioxide	Use of No. 2 fuel oil with max. sulfur content of 0.7%, or 2.8 #/hr.

6. In accordance with Subsection 17-02.04(6)(a), the applicant has provided the Department with reasonable assurance that operation of the facility, as proposed, will not cause or contribute to ground-level particulate concentrations in excess of any Prevention of Significant Deterioration (PSD) increments. Air quality modeling has been performed to predict the impact on the surrounding Class II area of the proposed allowable particulate and sulfur dioxide emissions from the facility. In addition, air quality monitoring data have been collected near the project location to assess background particulate and sulfur dioxide concentrations in the area.

The modeling results and monitoring data provide reasonable assurance that operation of the facility as proposed, will neither cause nor contribute to ground-level particulate and sulfur dioxide concentrations in excess of any applicable ambient air quality standard or Class II PSD increment.

7. There is no Class I area within 100 km of the proposed facility. Therefore, it is reasonably assumed that operation of the facility will not adversely impact any such area.

8. Construction should commence and be completed within a reasonable time based on the projections included in the application.

9. Construction should reasonably conform to the plans submitted.

10. The applicant should submit periodic reports on construction progress.

11. The actual particulate and sulfur dioxide emissions from the scrubber emission points should be verified by tests using standard test methods prior to issuance of an operating permit. As part of the operating permit, periodic tests on the scrubber outlet should be required.

12. Prior to any compliance testing of the facility permittee shall notify the Bureau of Air Quality Management and shall submit a test plan for approval. Upon demonstration of compliance with the operational limits of this permit and submission of a complete application for an operation permit to the Southwest District Office prior to 90 days before expiration of this permit, permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.

13. The applicant should monitor the pressure drop across the scrubbers and the scrubbing fluid supply pressure to the scrubbers. The applicant should submit reports to the Department for all measurements of scrubber pressure drops and liquid supply pressure less than 90% of the average levels maintained during the most recent performance test in which compliance with the permit conditions was demonstrated.

14. Upon obtaining an operating permit, the applicant should submit to the Department periodic reports on the actual operation of the facility.

VI. PROPOSED ALLOWABLE EMISSIONS AND PERMIT CONDITIONS

See Draft Permit

Attachment: Rule 28-5

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

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall 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;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

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

APPLICANT: Estech General Chemicals Corporation
First Commercial Bank Building
410 Cortez Road West
Suite 275
Bradenton, Florida 33507

PERMIT/CERTIFICATION
NO. AC 41-26542
COUNTY: Manatee

PROJECT: Dry Rock Loading
Stations 1 and 2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 & 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 two phosphate dry-rock railroad loading stations, associated conveyor belts, hoods and wet scrubbing equipment at the Estech Chemical Corporation Manatee County Plant. Particulate emission from the car loading operations are to be controlled with a single Centerfield wet scrubber. Particulate emission from bin loading operations will be controlled by a second Centerfield Wet scrubbers. Emissions from these two scrubbers will exit through Stack No. 3. The plant is located at the Universal Transverse Mercator (UTM) coordinates 388.95 E and 3047.28 N.

Construction shall be in accordance with attached permit application, attached plans, documents and drawings, except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct an Air Pollution Source" DER Form 17-1.122(16).
2. EPA "Draft Environmental Impact Statement", October, 1979.

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.:
APPLICANT: Estech General Chemicals Corp.

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.:
APPLICANT: Estech General Chemicals Corp.

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.

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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.

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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 41-26542
APPLICANT: Estech General Chemicals Corp.

Specific Conditions

1. Maximum particulate emissions from Stack No. 3 shall be 6 lbs./hr. and 12 tons/year. Opacity shall not exceed 10 percent.
2. The hours of operation shall be limited to 4000 hours per year.
3. Maximum material transfer shall be 1200 tons per hour of dry phosphate rock.
4. During the construction phase, quarterly reports on construction progress, commencing three months after initiation of construction shall be submitted to the Bureau of Air Quality Management.
5. The operating permit shall require maintenance of records indicating:
 - operating hours
 - material transfer rates
 - measurement of scrubbers' pressure drop
 - scrubbers' liquid supply pressures under 90% of the average levels maintained during the most recent test showing compliance with permit conditions.

This information shall be submitted annually to the Department in accordance with 17-4.14.

6. Emissions tests for stack no. 3 for particulate, and visible emissions shall be conducted in accordance with Methods 1 through 5, 40 CFR 60, Appendix A and Method 9, 40 CFR 60, Appendix A. The results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emissions and the conditions of this permit.
7. The permittee shall notify the Bureau of Air Quality Management 30 days prior to any compliance testing, and shall submit a test plan for approval. Upon demonstration of compliance with the operational limits of this permit and submission of a complete application for an operation permit to the Southwest District Office, prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.

PERMIT NO.: AC 41-26542
APPLICANT: Estech General Chemicals Corp.

Jacob D. Varn
Secretary

Expiration Date: December 31, 1982

Issued this _____ day of _____, 19 _____

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

APPLICANT: Estech General Chemicals Corporation
First Commercial Bank Building
410 Cortez Road West
Suite 275
Bradenton, Florida 33507

PERMIT/CERTIFICATION
NO. AC 41-26543

COUNTY: Manatee

PROJECT: Dry Rock Storage
Silos No. 1-8

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 & 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 eight dry rock storage facilities, associated conveying systems, and scrubbers. Particulate emissions from silo loading will be controlled with a Centerfield wet scrubber. Reclaim belts emissions will be controlled with 2 Centerfield wet scrubbers. Emissions from the control equipment will vent through Stack No. 2 at the Estech Chemicals Corporation Plant in Manatee County. The Universal Transverse Mercator (UTM) coordinates for this facility are: 388.95 E and 3047.28 N.

Construction shall be in accordance with attached permit application, attached plans, documents and drawings, except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct an Air Pollution Source" DER Form 17-1.122(16).
2. EPA "Draft Environmental Impact Statement", October, 1979.

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

BEST AVAILABLE COPY

PERMIT NO.: 123456
APPLICANT: Estech General Chemicals Company

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.:
APPLICANT: Estech General Chemicals Company

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 41-26543

APPLICANT: Estech General Chemicals Company

Specific Conditions:

1. Maximum allowable emissions from Stack No. 2 shall be 9 lbs./hr., and 29 tons per year of particulate. Visible emission shall not exceed 10% opacity.
2. The hours of operation shall be limited to 8325 for the silo-loading scrubber, and 6500 for the silo-unloading (reclaim) scrubber.
3. The maximum rate for dry phosphate silo loading shall not exceed 524 tons/hr.
4. Maximum allowable dry phosphate reclaim belts' rate shall not exceed 1,200 tons/hr.
5. During the construction phase, quarterly reports on construction progress, commencing three months after initiation of construction shall be submitted to the Bureau of Air Quality Management.
6. The operating permit shall require maintenance of records indicating:
 - operating hours
 - material transfer rates
 - measurement of scrubbers' pressure drop
 - scrubbers' liquid supply pressures under 90% of the average levels maintained during the most recent test showing compliance with permit conditions.

This information shall be submitted annually to the Department in accordance with 17-4.14.

7. Emissions tests for particulate, and visible emissions shall be conducted for Stack No. 2 in accordance with Methods 1 through 5 40 CFR 60, Appendix A and Method 9, 40 CFR 60, Appendix A. The results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emission and the condition of this permit.
8. The permittee shall notify the Bureau of Air Quality Management 30 days prior to any compliance testing, and shall submit a test plan for approval. Upon demonstration of compliance with the

PERMIT NO.: AC 41-26543
APPLICANT: Estech General Chemicals Company

operational limits of this permit and submission of a complete application for an operation permit to the Southeast District Office, prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.

Jacob D. Varn
Secretary

Expiration Date: December 31, 1982

Issued this _____ day of _____, 19 _____.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

APPLICANT: Estech General Chemicals Corporation
First Commercial Bank Building
410 Cortez Road West
Suite 275
Bradenton, Florida 33507

PERMIT/CERTIFICATION
NO. AC 41-26544

COUNTY: Manatee

PROJECT: Phosphate Rock
Dryers No. 1 and 2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 & 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 two phosphate rock dryers, associated conveying system, and scrubbing system at the Estech's General Chemicals Corporation mining plant in Manatee County. Particulate and sulfur dioxide emissions from the dryers are to be controlled by two Ducon Venturi scrubbers preceded by two recovery cyclones. Fugitive emissions from points of discharge at the dryers are to be controlled with a Centerfield wet scrubber. The plant is located at the Universal Transverse Mercator (UTM) coordinates 388.95 E and 3047.28 N.

Construction shall be in accordance with attached permit application, attached plans, documents and drawings, except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct an Air Pollution Source" DER Form 17-1.122(16).
2. EPA "Draft Environmental Impact Statement", October, 1979.

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.:

APPLICANT: Estech General Chemicals Corporation
410 Cortez Road West
Bradenton, Florida 33507

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.:

APPLICANT: Estech General Chemicals Corporation
410 Cortez Road West
Bradenton, Florida 33507

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 41-26544

APPLICANT: Estech General Chemicals Corporation

Specific Conditions:

1. Maximum allowable emissions from Dryers No. 1 and No. 2 (stack No. 1) shall be 23 lbs./hr. (0.022 grains/DSCF) and 85 tons per year. In no case shall emissions exceed 0.04 lbs. per ton of dry rock processed. Maximum visible emissions shall be 10% opacity from stack No. 1. Maximum emissions of sulfur dioxide shall be 9 lbs./hr. and 32 tons per year.
2. The hours of operation shall be limited to 7,446 hours per year.
3. The maximum material output from both dryers shall be 3,901,704 tons per year of dry rock, 12,576 tons per day of dry phosphate rock and 524 tons per hour of dry phosphate rock.
4. The maximum fuel consumption shall be 774 gallons per hour of number 6 fuel with maximum sulfur content of 1%.
5. During the construction phase, quarterly reports on construction progress, commencing three months after initiation of construction shall be submitted to the Bureau of Air Quality Management.
6. In accordance with 17-4.14, the operating permit shall require maintenance of records indicating:
 - operating hours
 - material input to the dryer
 - amount of fuel consumption
 - percent sulfur content of fuel
 - measurement of scrubbers' pressure drop
 - scrubbers' liquid supply pressures under 90% of the average levels maintained during the most recent test showing compliance with permit conditions.

This information shall be submitted annually to the Department in accordance with 17-4.14.

7. Emissions tests for particulate, sulfur dioxide and visible emissions shall be conducted for stack number 2 in accordance with Methods 1 through 6, 40 CFR 60, Appendix A and Method 9, 40 CFR, Appendix A.* The results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emissions and the conditions of this permit.

PERMIT NO.: AC 41-26544
APPLICANT: Estech General Chemical Corporation

8. The permittee shall notify the Bureau of Air Quality Management 30 days prior to any compliance testing, and shall submit a test plan for approval. Upon demonstration of compliance with the operational limits of this permit and submission of a complete application for an operation permit to the Southwest District Office, prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.

Jacob D. Varn
Secretary

Expiration Date: December 31, 1982

Issued this _____ day of _____, 19 _____.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Estech General Chemicals Corporation
First Commercial Bank Building
410 Cortez Road West
Suite Cortez Road West
Bradenton, Florida 33507

PERMIT/CERTIFICATION
NO. AC 41-26545

COUNTY: Manatee

PROJECT: 100 Horsepower
Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 & 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 100 horsepower boiler at Estech General Chemicals Corporation Mining Plant, Manatee County. Sulfur dioxide emissions will be controlled by the use of no. 2 distillate with maximum sulfur content of 0.7%. The plant is located at the Universal Transverse Mercator (UTM) coordinates 388.95 E and 3047.28 N.

Construction shall be in accordance with the attached permit application, attached plans, documents and drawings, except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct Air Pollution Sources", DER Form 17-1.122(16).
2. EPA "Draft Environmental Impact Statement", October 1979.

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.:

APPLICANT: Estech General Chemicals Corporation
410 Commercial Bank Building
Bradenton, Florida 33507

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.:

APPLICANT: Estech General Chemicals Corporation
410 Commercial Bank Building
Bradenton, Florida 33507

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 45-26545

APPLICANT: Estech General Chemicals Corporation

Specific Conditions:

1. Visible emission from boiler (stack No. 4) shall not exceed 20 percent opacity at any one time.
2. The hours of operation shall be limited to 8736 hours per year.
3. Maximum fuel consumption shall be 29 gallons per hour of No. 2 distillate fuel oil with maximum sulfur content of 0.7%.
4. During the construction phase, quarterly reports on construction progress, commencing three months after initiation of construction shall be submitted to the Bureau of Air Quality Management.
5. The operating permit shall require maintenance of records indicating operation hours, sulfur content of fuel and amount of fuel consumed. This information shall be submitted annually to the Department in accordance with 17-4.14.
6. Emissions tests for visible emissions shall be conducted for Stack No. 4 in accordance with Method 9, 40 CFR 60 Appendix A. Results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emission.
7. The permittee shall notify the Bureau of Air Quality Management 30 days prior to any compliance testing, and shall submit a test plan for approval. Upon demonstration of compliance with the operational limits of this permit and submission of a complete application for an operation permit to the Southwest District Office, prior to 90 days before expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operating permit.

Jacob D. Varn
Secretary

Expiration Date: December 31, 1982

Issued this _____ day of _____, 19 _____.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

Routing To District Offices And, If Applicable, Other Than The Addressee	
To: _____	Loctn.: _____
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

TO: Jacob D. Varn

FROM: Steve Smallwood *SS*

DATE: February 20, 1980

SUBJECT: BACT Determination - Estech General Chemical Corporation, Manatee County

Facility: A phosphate rock mining facility with emissions primarily related to phosphate rock drying, storage and loading, but also including fugitive dust contributions from land clearing and reclamation activities. Specifically, the applicant proposes to construct two 262 ton-per-hour (dry basis) fluidized bed dryers for drying phosphate rock from 13 to 2 percent moisture; eight silos for storage of dry rock with a total storage capacity of 3,750; and 2 railroad loading stations with a total product transfer capability of 1,200 tons per hour. As a result of the rock drying, storage and loading operation, estimated potential emissions of criteria pollutants are:

Emission Source	Annual Potential Emission (Tons)				
	Particulate	SO _x	NO _x	HC	CO
Phosphate-Rock Dryer No. 1 & 2	8500	860	281	6	29
Dry Rock Storage Silos No. 1 & 8	2870	—	—	—	—
Railroad Dry Rock Loading Station 1 & 2	1150	—	—	—	—
100 Horsepower Oil Fired Boiler	.25	12.35	2.73	0.12	0.62

BACT Determination Requested by the Applicant:

Phosphate Rock Dryer No. 1 & 2

Pollutant	Maximum Emission
Particulate	22.93 lb/hr., 85.4 ton/yr.
Sulfur Dioxide	8.60 lb/hr., 32 ton/hr.
Nitrogen Oxides	75.78 lb/hr., 281.1 ton/yr.
Hydrocarbons	1.55 lb/hr., 5.8 ton/yr.
Carbon Monoxide	7.74 lb/hr., 28.8 ton/yr.
Fluoride (gaseous)	0.04 lb/hr., .15 ton/yr.

Dry Rock Storage Silos No. 1-8

Pollutant	Maximum Emission
Particulate	8.74 lb/hr., 28.7 ton/yr. (0.022 gr/DSCF)

Dry Rock Loading Station 1 and 2

Pollutant	Maximum Emission
	5.77 lb/hr., < 11.55 ton/yr. (0.022 grains/DSCF)

100 Horsepower Oil Fired Boiler

Pollutant	Maximum Emission
Particulate	0.06 lb/hr., 0.25 ton/yr.
Visible Emission	Max. 20% Opacity
Sulfur Dioxide	2.82 lb/hr., 12.35 ton/yr.
Nitrogen Oxides	0.62 lb/hr., 2.73 ton/yr.
Hydrocarbons	0.03 lb/hr., 0.12 ton/yr.
Carbon Monoxide	0.14 lb/hr., 0.62 ton/yr.

Date of Receipt of a Complete BACT Application:

December 27, 1979

Date of Publication in the Florida Administrative Weekly:

February 22, 1980

Date of Publication in a Newspaper of General Circulation:

February 21, 1980, Tampa Tribune

Jacob D. Varn
Page Three
February 20, 1980

Study Group Members:

Willard Hanks, DER Bureau of Air Quality Management, Tallahassee;
John Svec, DER Bureau of Air Quality Management, Tallahassee

Study Group Recommendations:

Phosphate Rock Dryer No. 1 & 2

	Willard Hanks	John Svec
Particulate	23 lb/hr. 0.022 gr/DSCF 0.04 lb/ton rock feed	23 lb/hr (0.022 gr/DSCF)
Sulfur Dioxide	8.6 lb/hr.	9 lb/hr.
Nitrogen Oxides	—	76 lb/hr.
Visible Emission	—	0% Opacity

Dry Rock Silos No. 1-8

	Willard Hanks	John Svec
Particulate	8.74 lb/hr. .022 gr/DSCF	9 lb/hr. (0.022 gr/DSCF)
Visible Emission	—	0% Opacity

Dry Rock Loading Stations 1 & 2

	Willard Hanks	John Svec
Particulate	5.9 lb/hr. (0.022 gr/DSCF)	6 lb/hr 0.022 gr/DSCF)
Visible Emission	—	0% Opacity

100 Horsepower Oil Fired Boiler

	Willard Hanks	John Svec
Particulate	—	0.1 lb/hr.
Sulfur Dioxide	No. 6 fuel oil with max. 1% Sulfur	3 lb/hr.
Nitrogen Oxide	No. 6 fuel oil with max. 0.4% nitrogen	1 lb/hr.
Visible Emission	27% Opacity 6 min. avg.	20% Opacity

Fugitive Dust Emissions

	Willard Hanks	John Svec
Fugitive Dust	Max 10% Opacity and 5% Opacity 6 min. avg.	

BACT Determination by Florida Department of Environmental Regulation:

Rock Dryers No. 1 & 2

Pollutant	Maximum Emissions
Particulate Matter	23 lb/hr., 0.04 lb per ton of dry input to dryers
Sulfur Dioxide	9 lb/hr.
Nitrogen Oxides	76 lb/hr.
Visible Emissions	10% Opacity

Dry Rock Storage Silos No. 1-8

Pollutant	Maximum Emissions
Particulate Matter	9 lb/hr.
Visible Emissions	10% Opacity

Dry Rock Loading Stations 1 and 2

Pollutant	Maximum Emissions
Particulate Matter	6 lbs/hr.
Visible Emissions	10% Opacity

100 Horsepower Oil Fired Boiler

Pollutant	Maximum Emissions
Visible Emissions	20% Opacity
Sulfur Dioxide	Use of No. 2 fuel oil with max. sulfur content of 0.7%, or 2.8 #/hr.

Justification of DER Determination:

In general, the selected means of particulate control with eight high efficiency wet scrubbers is reasonable in view of the problem associated with the operation of baghouses for phosphate rock processing emission control. The need for installation of heating equipment and related fuel requirements make baghouses a non-cost effective option. Furthermore, the extra heat generation to avoid condensation and plugging of baghouses would result in emissions of additional pollutants.

Jacob D. Varn
Page Five
February 20, 1980

Rock Dryers No. 1 & 2 - The proposed particulate control meets the EPA proposed NSPS, and represents a significant control improvement over a previous DER BACT determination for a similar facility-Mobil Chemical BACT, December 21, 1979.

The applicant's proposed control of NO_x emission with excess air burners is considered the state of the art for NO_x control.

In addition, the applicant's modeling provides reasonable assurance that PSD increments will not be violated by this facility.

Storage Silos and Loading Stations - The applicant's emissions to be attained with wet scrubbers eliminating at least 99+% of the potential emission was found adequate BACT.

100 Horsepower Boiler - The small size of this boiler and its limited contribution to the emissions of this plant do not justify a more stringent BACT determination.

Details of the Analysis May Be Obtained by Contacting:

Victoria Martinez, BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32301

Recommendation from: Bureau of Air Quality Management

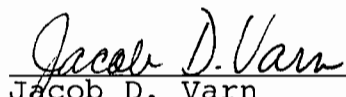
by:


Steve Smallwood

Date:

2-25-80

Approved by:


Jacob D. Varn

Date:

26 FEB 1980

JDV:es
attachment

INTEROFFICE MEMORANDUM

For Routing To District Offices
And/Or To Other Than The Addressee

To: _____	Loctn.: _____
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

To: Vicki Martinez

From: Willard Hanks *W.H.*

Date: February 5, 1980

Subject: BACT Determination
Estech General Chemical Corporation

The proposed plant consist of a 100 HP boiler, 2 phosphate rock dryers, dry storage silos and dry rock loading equipment connected by associated conveying equipment.

The BACT application for the plant shows the emissions from the boiler will be controlled by using clean fuel - no. 2 fuel oil with low sulfur. The emissions from the dryers will be controlled by using no. 6 fuel oil containing a low percentage of sulfur and venturi absorber scrubbers. The emissions from the transfer and storage facilities will be controlled with venturi absorber scrubbers. The control facilities for the lime handling facilities was not specified. This source is relatively easy to control and should be only a minor source of particulate. Estech's consultant said they may use a bag filter on the storage tank or duct any fugitive lime emissions to an existing scrubber.

I recommend the company's BACT proposal be approved. The proposed fuels for the boiler and dryers are satisfactory. The selected means of particulate control seem reasonable considering the company's argument against the use of bag collectors (which may be able to reduce the proposed emissions in half) and considering that a scrubber will have to be used to remove sulfur dioxide from the dryers' emissions.

The results of the models shows no significant effect on the ambient air quality. There may be a problem with the shorter stacks causing local ambient air problems. EPA is investigating this matter. EPA is also concerned with NO_x emissions from this plant. The boiler could possibly use low NO_x burner. However, I consider it an insignificant source of NO_x and have not recommended the use of these controls.

To: Vicki Martinez
February 5, 1980
Page two

A summary of the proposed BACT emissions is shown below.

SOURCE	CONTROLS	MAX. EMISSIONS
Boiler	No. 2 fuel oil with max. 0.7% sulfur	27% Opacity
Dryers	No. 6 fuel oil with max 1% sulfur, 0.4% nitrogen Venturi absorber scrubbers	0.022 grains/DSCF 0.04 lbs/ton phosphate rock feed 23.0 lbs/hr particulate 8.6 lbs/hr SO ₂
Dry Rock Silos	Venturi Absorber Scrubbers	0.022 grains/DSCF 8.74 lbs/hr particulate
Dry Rock Loading	Venturi Absorber Scrubbers	0.022 grains/DSCF 5.8 lbs/hr particulate
Fugitive Emissions		Max 10% opacity and 5% opacity for 6 minutes average

To: Vicki Martinez
February 5, 1980
Page three

The permit to construct should have the usual provisos along with the following ones.

100 H. P. Boiler

1. This boiler must use only no. 2 fuel oil containing a maximum of 0.7% sulfur.
2. Visible emissions must not exceed 27% capacity during any 6 minute period. For the purpose of determining compliance with this standard, reference method 9 as described in 40 CFR 60, Appendix A, dated July 1, 1979 should be used.
3. The boiler must be inspected and adjusted at least once per year by a factory or factory trained service representative.

Scrubbers - General

1. Pressure drops must be measured and recorded across all scrubbers anytime equipment served by the scrubbers are in operation.
2. Pressure drops across the scrubbers must be 16 inches of water or greater when the scrubbers are in operation.
3. Stack sampling facilities similar to the attached sketch must be installed on all scrubber stacks.
4. Test methods to be used to determine compliance of the facilities served by scrubbers are reference methods 1, 2, 3, 4, 5, 6, and 7 as published in 40 CFR 60, Appendix A, dated July 1, 1979.
5. All compliance tests must be conducted with the equipment operating at permitted capacity ($\pm 10\%$) and processing the material anticipated to produce the most pollutants.
6. Test reports must include process weight, ore grade (% pebble and % concentrate), and pressure drops across the scrubbers.
7. DER must be notified 30 days in advance of any scheduled compliance test.

Specific provisos recommended for each plant area are:

Phosphate Rock Dryers

1. No. 6 fuel oil for the dryers must not contain more than 1% sulfur and 0.4% nitrogen.
2. Particulate emission from all scrubbers serving the dryer facilities must not exceed 0.022 grains/SCF, 0.04 lbs/ton phosphate rock feed and 23.0 lbs/hr.
3. The pH of the solution used to remove sulfur dioxide must be measured and recorded during all operations of the dryers. The pH of the solution during any compliance test will be included in the test report.

Dry Rock Storage Silos

1. The emission from the scrubbers serving the silos and reclaim systems must not exceed 0.022 grains/SCF and 8.74 lbs/hr particulate.
2. Fugitive emission must not exceed 10% opacity from any part of the rock storage system at any time or 5% average opacity during any 6 minute period.

Dry Rock Loading Station

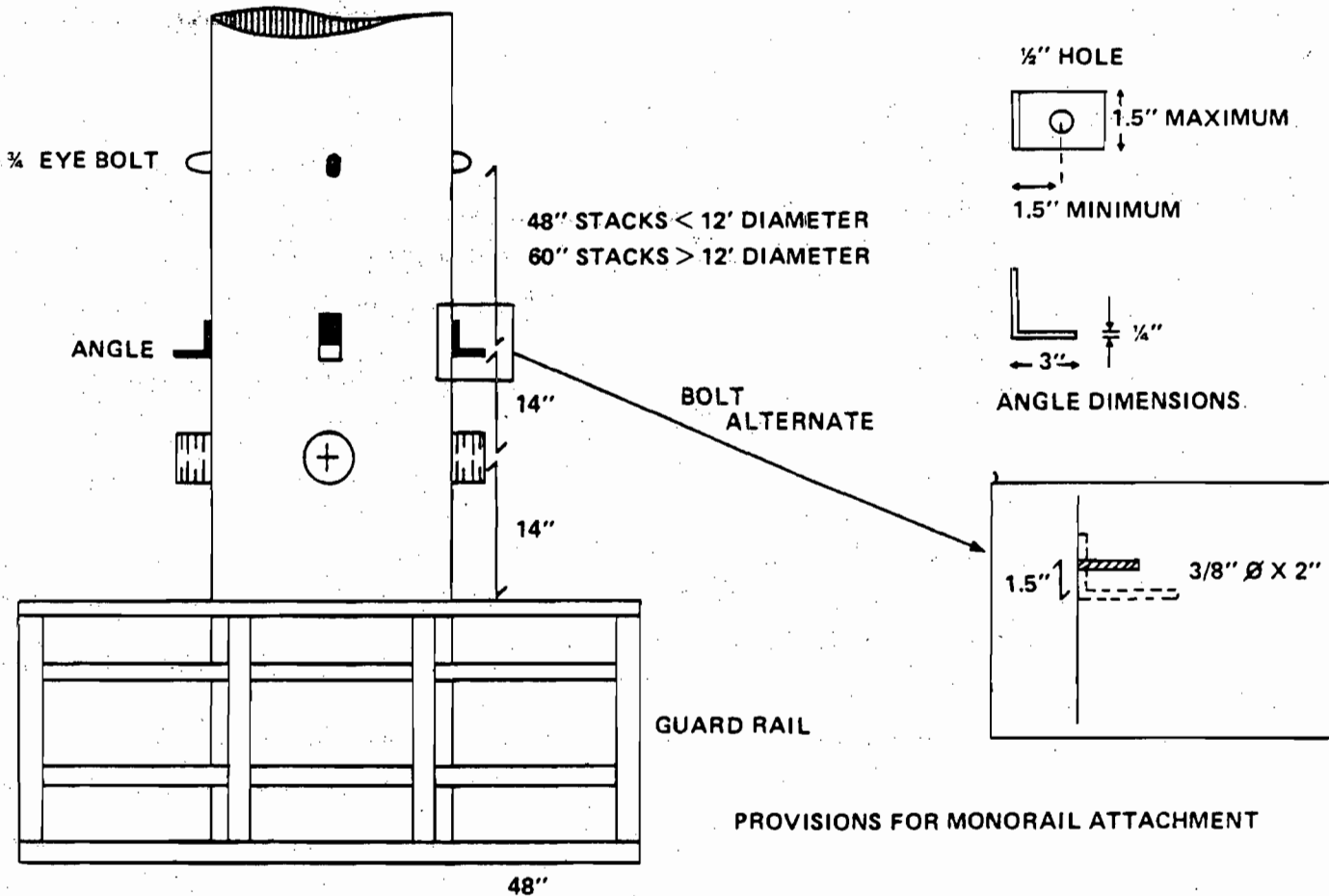
1. The emission from the scrubbers serving the loading station will not exceed 0.022 grains/SCF and 5.8 lbs/hr particulate.
2. Fugitive emissions will not exceed 10% opacity from any part of the loading station at any time or 5% average opacity during any 6 minute period.
3. All openings in a railroad cars must be sealed during loading operations with station loading equipment or by closing the cars' hatches.

Lime Stations

1. No visible emission reading will exceed 10% at any time during transfer of lime to or from this station or 5% average opacity during any 6 minute period.

DRAFT

AN EYEBOLT AND ANGLE SHALL BE ATTACHED DIRECTLY ABOVE EACH PORT OF VERTICAL STACKS AND ABOVE EACH VERTICAL SET OF PORTS FOUND ON THE SIDES OF HORIZONTAL DUCTWORK 1.6 WORKING PLATFORMS. THE DIMENSIONS AND PLACEMENT OF THESE FIXTURES ARE SHOWN IN FIGURE 1-1.



IF EYEBOLT IS MORE THAN 120 INCHES ABOVE THE PLATFORM A PIECE OF CHAIN SHOULD BE ATTACHED TO IT TO BRING THE POINT OF ATTACHMENT WITHIN SAFE REACH. THE EYEBOLT SHOULD BE CAPABLE OF SUPPORTING A 500 POUND WORKING LOAD.

FIGURE 12 - 1

INTEROFFICE MEMORANDUM

Routing To District Offices And/Or To Other Than The Addressee	
To: _____	Loctn.: _____
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

TO: Victoria Martinez

FROM: John P. Svec *APS*

DATE: February 4, 1980

SUBJ: BACT Determination for Estech General Chemicals Corporation -
Duette Mine

The BACT applications of Estech General Chemical Corporation for phosphate rock dryers No. 1 and 2, Dry Rock Storage Silos No. 1-8, Dry Rock Loading Stations 1 and 2, and 100 horsepower oil fired boiler have been reviewed as requested. BACT is being proposed only for the pollutant emissions that total more than 250 tons per year, i.e., particulate, sulfur dioxide and nitrogen oxide emissions. Emissions from the 100 horsepower boiler are de minimus as determined in 17-2.17(3), however a BACT determination is required by 17-2.05(6)E(2) FAC.

The wet scrubbers described in the applications are agreed with as representing BACT. Fabric filters are documented as having problems with plugging and this has been confirmed through information from other companies. The wet scrubbers proposed in the application will eliminate at least 99.7% of the particulate emissions. This corresponds to the same degree of control available from fabric filters. For the phosphate rock dryers, absorber scrubbers, using calcium hydroxide reagent, will help remove some of the gaseous emissions of sulfur dioxide and fluoride. Nitrogen oxide emissions are to be controlled by using optimum operating techniques.

The proposed particulate emissions from the phosphate rock dryers meet the proposed New Source Performance Standards (NSPS) for Phosphate Rock Plants of 0.04 pounds per ton input to the dryer. The 0% opacity limitation for all dryer and transfer stacks also meets the visible emission requirements in the proposed NSPS.

Fugitive emission controls appear to be adequately addressed in the applications. The conveyors are to be fully enclosed. Transfer points between conveyors are to be enclosed with hoods. The storage silos are to be enclosed and loading and unloading operations are to be vented to prevent fugitive emissions. The railroad hopper cars are to be enclosed and the eight spout discharge system from the loading station is to be vented to prevent fugitive emissions.

Victoria Martinez
Page Two

The recommended emission limitations which are proposed as representing BACT for each application are:

Phosphate Rock Dryers No. 1 and 2

<u>Pollutant</u>	<u>Total Maximum Emissions</u>
Particulate Matter	23 lb/hr (0.022 grain/DSCF)
Sulfur Dioxide	9 lb/hr
Nitrogen Oxides	76 lb/hr
Visible emissions	0% opacity

Dry Rock Storage Silos No. 1-8

<u>Pollutant</u>	<u>Maximum</u>
Particulate Matter	9 lb/hr (0.022 grain/DSCF)
Visible Emissions	0% opacity

Dry Rock Loading Stations 1 and 2

<u>Pollutant</u>	<u>Maximum Emissions</u>
Particulate Matter	6 lbs/hr (0.022 grain/DSCF)
Visible Emissions	0% opacity

100 HorsePower Oil Fired Boiler

<u>Pollutant</u>	<u>Maximum Emissions</u>
Particulate	0.1 lb./hr
Sulfur Dioxide	3 lb./hr
Nitrogen Oxides	1 lb./hr
Visible Emissions	20% opacity

Based upon 0.7% Sulfur Distillate Fuel Oil

JS:caa

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

January 14, 1980

Mr. Joseph E. Davis
Manager of Projects
Estech General Chemicals
Corporation
First Commercial Bank Building
410 Cortez Road West, Suite 275
Bradenton, Florida 33507

Dear Mr. Davis:

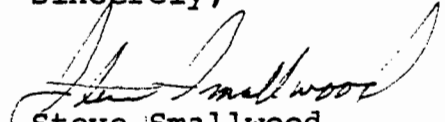
We have reviewed for "completeness" the four construction permit and BACT applications for your proposed phosphate rock drying, storage, and loading facilities at the Duette Mine site in Manatee County, and the Draft EPA Environmental Impact Statement (EIS), Air Quality Resource Document, October 1979. We are satisfied that these materials make the applications complete and ready for more detailed review including formal determination of BACT.

While electing not to hold up the review process for submission of any further information, we do, however, solicit your cooperation in providing us with three additional items, 1) SAROAD site evaluation and site identification forms and data input forms for the preconstruction TSP and SO₂ data; (2) copies of all final AODM and CRSTER model computer printouts showing input emissions and receptor location data as well as principle output tables; and (3) explicit verification that particulate emissions from the proposed sources will not impact the Hillsborough County nonattainment area in excess of any "level of significance". We would like to point out that, while we will be using the Draft EIS as a reference document, we will be reviewing the applications for conformance with Florida regulations as codified in Chapter 17-2, Rules of the Department of Environmental Regulation. These regulations, particularly for Prevention of Significant Deterioration, are somewhat different than EPA's. The above requested items will help us bridge the gap between the two sets of rules.

Mr. Joseph E. Davis
Page Two
January 14, 1980

Jerry Campbell will assist you in obtaining and submitting the SAROAD forms. Larry George will answer any questions you may have on the modeling items. Both may be reached at 904/488-1344.

Sincerely,



Steve Smallwood
Acting Chief
Bureau of Air Quality
Management

SS:jr

cc: Dan Williams
Jim Estler

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000026545 COE# DER PROCESSOR:THOMAS DER OFFICE:TLH
 FILE NAME:ESTECH GEN. CHEMS. CORP. DATE FIRST REC: 12/28/79 APPLICATION TYPE:AC
 APPL NAME:DAVIS, JOSEPH E. APPL PHONE:(813)758-8688 PROJECT COUNTY:41
 ADDR:410 CORTEZ RD. W., SUITE 275 CITY:BRADENTON ST:FLZIP:33507
 AGNT NAME:CHATMEYER, JOHN F. AGNT PHONE:(813)758-6668
 ADDR:P.O. BOX 35 CITY:PALMETTO ST:FLZIP:33564

ADDITIONAL INFO REQ: / / / / / / REC: / / / / / /
 APPL COMPLETE DATE: / / COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
 LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /
 HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /
 HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N

THIS RECORD HAS BEEN SUCCESSFULLY ADDED

FEE PD DATE#1:12/28/79 \$0020 RECEIPT#00033521 REFUND DATE: / / REFUND \$
 FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
 APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:12/28/79
 REMARKS:PHOSPHATE ROCK DRYERS # 1 AND 2, WITH WET VENTURI ABSORBERS. UTM
 388.95 E / 3047.28 N.

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000026542 COE# DER PROCESSOR:THOMAS DER OFFICE:TLH
 FILE NAME:ESTECH GEN. CHEMS. CORP. DATE FIRST REC: 12/28/79 APPLICATION TYPE:AC
 APPL NAME:DAVIS, JOSEPH E. APPL PHONE:(813)758-8688 PROJECT COUNTY:41
 ADDR:410 CORTEZ RD., W., SUITE 275 CITY:BRADENTON ST:FLZIP:33507
 AGNT NAME:SCHATMEYER, JOHN F. AGNT PHONE:(813)722-6668
 ADDR:P.O. BOX 35 CITY:PALMETTO ST:FLZIP:33564

ADDITIONAL INFO REQ: / / / / / / REC: / / / / / /
 APPL COMPLETE DATE: / / COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
 LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /
 HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /
 HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N

THIS RECORD HAS BEEN SUCCESSFULLY ADDED

FEE PD DATE#1:12/28/79 \$0020 RECEIPT#00033524 REFUND DATE: / / REFUND \$
 FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
 APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:12/28/79
 REMARKS:DRY ROCK STORAGE SILOS # 1 - 8, WITH WET SCRUBBERS. UTM 388.72 E
 3047.32 W.

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000026543 COE# DER PROCESSOR:THOMAS DER OFFICE:TLH
 FILE NAME:ESTECH GEN. CHEMS. CORP. DATE FIRST REC: 12/28/79 APPLICATION TYPE:AC
 APPL NAME:DAVIS, JOSEPH E. APPL PHONE:(813)758-8688 PROJECT COUNTY:41
 ADDR:410 CORTEZ RD. W., SUITE 275 CITY:BRADENTON ST:FLZIP:33507
 AGNT NAME:SCHATMEYER, JOHN F. AGNT PHONE:(813)722-6668
 ADDR:P.O. BOX 35 CITY:PALMETTO ST:FLZIP:33564

ADDITIONAL INFO REQ: / / / / / / REC: / / / / / /
 APPL COMPLETE DATE: / / COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
 LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /
 HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /
 HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N

THIS RECORD HAS BEEN SUCCESSFULLY ADDED

FEE PD DATE#1:12/28/79 \$0020 RECEIPT#00033521 REFUND DATE: / / REFUND \$
 FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
 APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:12/28/79
 REMARKS:100 HORSEPOWER BOILER, OIL FIRED. UTM 389.18 E / 3047.63 N.

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000026544 COE# DER PROCESSOR:THOMAS DER OFFICE:TLH
 FILE NAME:ESTECH GEN. CHEMS. CORP. DATE FIRST REC: 12/28/79 APPLICATION TYPE:AC
 APPL NAME:DAVIS, JOSEPH E. APPL PHONE:(813)758-8688 PROJECT COUNTY:41
 ADDR:410 CORTEZ RD. W., SUITE 275 CITY:BRADENTON ST:FLZIP:33507
 AGNT NAME:SCHATHEYER, JOHN F. AGNT PHONE:(813)758-6668
 ADDR:P.O. BOX 35 CITY:PALMETTO ST:FLZIP:33564

ADDITIONAL INFO REQ: / / / / / / REC: / / / / / /
 APPL COMPLETE DATE: / / COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
 LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /
 HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /
 HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N

THIS RECORD HAS BEEN SUCCESSFULLY ADDED

FEE PD DATE#1:12/28/79 \$0020 RECEIPT#00033521 REFUND DATE: / / REFUND \$
 FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
 APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:12/28/79
 REMARKS:DRY ROCK LOADING STATIONS 1 AND 2, WITH WET SCRUBBERS. UTM 398.73 E /
 3047.18 N.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

DEC 28 1979

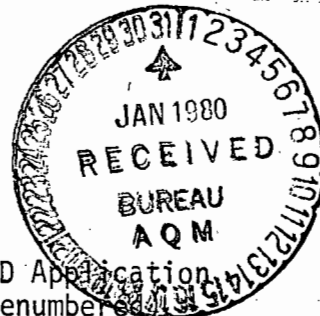
RECEIVED

JAN 2 1980

REF: 4AH-AF

Dept. of Environmental Regulation
Office of General Counsel

Mr. Joseph E. Davis
Manager of Products
Estech General Chemicals Corporation
1st Commercial Bank Building
DeSoto Square
410 Cortez Road West
Bradenton, Florida 33507



Re: Ductte Mine PSD Application
(PSD-FL-036, Renumbered)
Letter from R. L. Rhodes to
J. Shumaker 11/30/79

Dear Mr. Davis:

EPA has reviewed the additional information submitted by your consultants, Holland and Knight and Conservation Consultants Inc., regarding the subject PSD permit application. Contrary to the opinion expressed in Mr. Rhodes' letter of November 30, 1979, the submittal does not fulfill all of the additional information requirements outlined in EPA's letter of August 28, 1979 from Mr. Winston Smith. Therefore, your application remains incomplete.

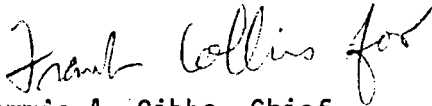
The most significant concern is the air quality impact analysis for nitrogen oxides (NO_x) emissions. Your submittal letter references the air quality analysis discussed in the draft Environmental Impact Statement. This section addresses particulate (TSP) and sulfur dioxide (SO₂) emissions specifically, but does not discuss NO_x. Further, the "BACT Application; Nitrogen Oxides" contained in your latest submittal alludes, on page 5, to an analysis which shows that your BACT controls reduce NO_x ambient concentrations to below significance levels. If this is so, the analysis which demonstrates this must be submitted.

Another additional information requirement outlined in EPA's August 28, 1979 letter is the air quality analysis for carbon monoxide (CO) emissions. The general discussion of insignificant impacts in Section 6 of your application (draft EIS) may be valid for CO emissions, because discharge levels are less than those for TSP. However, a description of the analysis must be included in your application.

A final point has to do with both the air quality analysis for CO and NO_x. The stack heights input to the dispersion models must meet minimum GEP guidelines as published on January 12, 1979. Submit as part of your analysis a demonstration of compliance with this requirement. Credit for dispersion from stacks higher than minimum GEP cannot be claimed and if stacks are lower than GEP a downwash analysis may be required.

You are encouraged to submit these materials as soon as possible. As you know, increment rights are determined by the date on which EPA receives a complete application. Please also be aware that certain sections of the PSD regulations are under revision as a result of a recent court decision ("Alabama Power vs. Douglas M. Costle"). These revisions are expected to make PSD regulations more restrictive in certain respects and less restrictive in others. Because the court has temporarily stayed its order and the final outcome is somewhat uncertain at this time, EPA Region IV is continuing to review applications under the PSD regulations as promulgated June 19, 1978. However, this does not necessarily preclude sources currently under review from the requirements of the revised regulations.

Sincerely yours,



Tommie A. Gibbs, Chief
Air Facilities Branch

TAG:JLS:jt

cc: Mr. R. L. Rhodes
Holland and Knight
P. O. Drawer BW
92 Lake Wire Drive
Lakeland, Florida

P. O. Box 1068
245 SOUTH CENTRAL AVENUE
BARTOW, FLORIDA 33830
(813) 533-1151

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EXCHANGE NATIONAL BANK BLDG.
TAMPA, FLORIDA 33601
(813) 223-1621

PLEASE REPLY TO:

Lakeland, Florida
December 26, 1979

CABLE ADDRESS
HND KNIGHT
TELEX 5-2630

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



RE: Estech General Chemicals Corporation -
Manatee Mine Project

Dear Steve:

Attached for filing and for your appropriate action are construction permit applications and requests for determination of best available control technology for various sources to be constructed in connection with the Estech General Chemicals Corporation proposed phosphate rock mine and processing facility in Manatee County, Florida.

After your staff has had an opportunity to make a preliminary review of these materials, we believe that it would be helpful to have a meeting to answer any questions that may arise.

Please acknowledge the filing of these documents on the attached copy of this letter.

Sincerely,

HOLLAND & KNIGHT

Robert L. Rhodes, Jr.

RLRJr/rm
Attachment

cc: -57 Mailing List

December 20, 1979

Mr. Thomas L. Craig
Vice President and General
Manager
New Wales Chemicals, Inc.
P. O. Box 1035
Mulberry, Florida 33860

Dear Mr. Craig:

RE: Application for Permit to Construct DAP Plant

In our October 4, 1979 letter, the Department served notice that the New Wales Chemicals, Inc. application for permit to construct a diammonium phosphate plant was incomplete. In reviewing the replies received to date from your engineering staff and consultant in response to our notice, the Bureau finds that all information previously requested has not been submitted.

Specifically, the following information is needed to complete your application:

- 1) Under the state PSD rule (17-2.04) you need to recommend BACT for particulate and sulfur dioxide emissions from the source and provide the Department with adequate assurance that allowable emissions, i.e. emissions at the level of recommended BACT, will not cause or contribute to ground-level concentrations in excess of any ambient air quality standard or PSD increment, and that such emission will not result in a significant impact on any particulate or sulfur dioxide nonattainment area. (1st paragraph on 2nd page of 10/4/79 letter).
- 2) Control device information needs to include data on the pollutants (particulate, ammonia, fluoride and sulfur dioxide) material balances. Include quantity of pollutants escaping from the process equipment, removed by control equipment and discharged to the atmosphere. (Technical discrepancy 3 and 7).

Mr. Thomas L. Craig
Page Two
December 20, 1979

- 3) Specify what pollution control equipment is serving the process screens and cage mills. (Technical discrepancy 3).

As soon as the Bureau receives a complete application, we will begin processing your request. Within 55 days of receiving the complete application, the Bureau will notice the Department's intent to issue or deny. Thirty days will be allowed for public comment and final agency action will be taken within 90 days after receipt of your complete application.

If you have any questions concerning your application please contact Willard Hanks, Bill Thomas, or me.

Sincerely,

Steve Smallwood
Acting Chief
Bureau of Air Quality
Management

SS:jr

cc: A. L. Girardin, III
New Wales Plant

John Koogler
Sholtes & Koogler
Environmental Consultants
1213 NW 6th Street
Gainesville, Fl. 32601

Dan Williams
Jim Estler