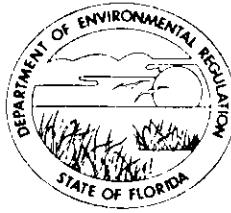


Jie

STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

July 23, 1987

Mr. Miguel Flores  
Chief  
Permit Review and Technical  
Support Branch  
National Park Service-Air  
Post Office Box 25287  
Denver, Colorado 80225

Dear Mr. Flores:

RE: Gardinier, Inc.  
State Construction Permit: AC 29-130371  
PSD Permit: PSD-FL-118

Enclosed is the final determination for Gardinier, Inc. If you have any comments or questions, please contact Bob Daugherty or Tom Rogers at the above address or at (904)488-1344.

Sincerely,

*Maggie Jones for*

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

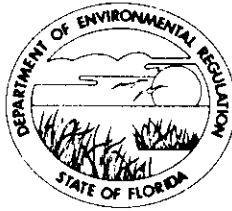
CHF/mj

enclosure

JLL

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

July 23, 1987

Mr. Wayne Aronson  
Chief  
Program Support Section  
U.S. EPA, Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: Gardinier, Inc.  
State Construction Permit: AC 29-130371  
PSD Permit: PSD-FL-118

Enclosed is the final determination for Gardinier, Inc.  
If you have any comments or questions, please contact Bob  
Daugherty or Tom Rogers at the above address or at (904)488-1344.

Sincerely,

*Noggin James for*

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

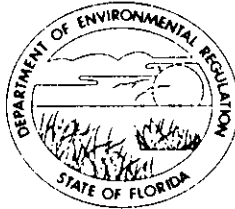
CHF/mj

enclosure

file

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. Rudy J. Cabina, Vice President  
Gardinier, Inc.  
P.O. Box 3269  
Tampa, Florida 33601

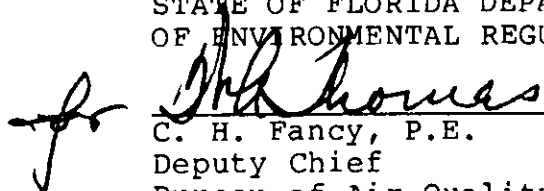
July 23, 1987

Enclosed is construction permit No. AC 29-130371 (PSD-FL-118) for Gardinier, Inc. which authorizes the modification (expand the production capacity) of the No. 8 sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) plant at their phosphate fertilizer complex located in Tampa, Hillsborough County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

- B. Thomas, SW
- J. Campbell, HCEPC
- R. Nettles, P.E.
- W. Aronson, U.S. EPA
- M. Flores, NPS

P 274 007 726

RECEIPT FOR CERTIFIED MAIL

\*NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL.  
(See Reverse)

PS Form 3800, June 1985  
\* U.S.G.P.O. 1985-480-794

Sent to Rudy J. Cabina, V.P. Gardiner, Inc.	
Street and No. P.O. Box 3269	
P.O., State and ZIP Code Tampa, FL 33601	
Postage	5
Certified Fee <sup>1</sup>	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	5
Postmark or Date Mailed: 07/23/87 Permit: AC 29-130371 PSD-FL-118	

PS Form 3811, July 1983 447-845

**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. Rudy J. Cabina, Vice-President  
Gardiner, Inc.  
Post Office Box 3269  
Tampa, Florida 33601

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	P 274 007 726

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

5. Signature - Addressee  
X

6. Signature - Agent  
X *[Signature]*

7. Date of Delivery  
JUL 27 1987

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

DOMESTIC RETURN RECEIPT

Final Determination

Gardinier, Inc.  
Tampa, Florida  
Hillsborough County

No. 8 Sulfur Acid Plant Modification  
Permit Numbers:

State: AC 29-130371  
Federal: PSD-FL-118

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

July 20, 1987

## FINAL DETERMINATION

Gardinier, Inc.'s application for a permit to modify (expand the production capacity) the No. 8 sulfuric acid ( $H_2SO_4$ ) plant at their Tampa phosphate fertilizer complex has been reviewed by the Bureau of Air Quality Management. Public Notice of the Department's intent to issue the permit was published in The Tampa Tribune on June 10, 1987. Copies of the Technical Evaluation and Preliminary Determination were available for public inspection at the Hillsborough County Environmental Protection Commission office in Tampa and the Department's offices in Tampa and Tallahassee.

Comments were submitted by the Hillsborough County Environmental Protection Commission (HCEPC). The issues and the Department's responses are as follows:

1. Issue: Specific Condition No. 4 of the draft permit stipulates visible emissions shall not exceed 5% opacity. Furthermore the BACT determination rationale references Chapter 1-3.03, VI.C. of the Environmental Protection Commission rules as the authority to require such a standard. Since the issuance of AC 29-089696 which set the 5% VE standard for the No. 8  $H_2SO_4$  plant, the County's air rules have been revised. One of the changes was to increase the general opacity standard from 5% to 10%. Opacities up to 40% are still allowed for no greater than 30 minutes during start-up only.

Response: Ten percent (10%) opacity will be allowed in accordance with NSPS rules.

2. Issue: Recommend the performance testing requirements of 40 CFR 60.8 be explicitly described in a separate condition.

Response: Add to Specific Condition No. 5 - all requirements of 40 CFR 60.8 shall be complied with.

3. Issue: Recommend the Federal notification requirements of 40 CFR 60.7 be added as Specific Condition No. 15 (or any number).

Response: This seems inappropriate for an existing, operating plant. The following was added to Specific Condition No. 5. Notify HCEPC when expected to achieve a new production rate within the permitted range.

4. Issue: Recommend the advanced notification of the compliance test date in Specific Condition No. 5 be made 30 days in advance, not 15, pursuant to 40 CFR 60.8(d).

Response: Changes will be made as recommended.

5. Issue: Recommend Specific Condition No. 13 be deleted. This is a condition more appropriately stipulated in an operating permit.

Response: Specific Condition No. 13 will be retained to ensure that minimum data will be submitted in the annual reports.

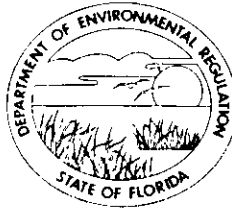
6. Issue: Recommend Specific Condition No. 12 be reworded.

Response: The following will be added - "within 45 days of completion of compliance testing or at least 90 days prior to the expiration of this permit, whichever occurs first".

The final action of the Department will be to issue the permit, which incorporates the changes above and the modifications to expand the capacity of the No. 8 sulfuric acid plant, as proposed in the Preliminary Determination.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

PERMITTEE:  
Gardinier, Inc.  
P. O. Box 3269  
Tampa, Florida 33601

Permit Number: AC 29-130371  
Expiration Date: June 30, 1989  
County: Hillsborough  
Latitude/Longitude: 27° 51' 28" N  
82° 23' 15" W  
Project: No. 8 Sulfuric Acid  
Plant Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4 and 40 CFR 52.21. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Modifications to the No. 8 sulfuric acid plant that will increase production from 2200 to 2500 TPD. The modifications involve installing a superheater in parallel with No. 1 boiler and a new superheater/economizer in the exit of the 3A pass in parallel with the existing one. The applicant will then install additional catalyst in the main converter and will make other major modifications which have been approved by the Department and the Hillsborough County Environmental Protection Commission by prior permitting actions.

The UTM coordinates of the site are 17-363.3 km E and 3082.4 km N.

Construction shall be accordance with the application for a permit to construct/modify the No. 8 sulfuric acid plant that was signed by Mr. Rudy Cabina on February 4, 1987, and the additional information supplied in Gardinier, Inc.'s March 20, 1987 letter except for changes mentioned in the Technical Evaluation and Preliminary Determination and listed as Specific Conditions in the permit to construct.

Attachments:

1. Application signed February 4, 1987.
2. DER letter dated February 27, 1987.
3. Gardinier, Inc.'s letter dated March 20, 1987.
4. Victor San Agustin's (HCEPC) letter dated June 11, 1987.



PERMITTEE:  
Gardinier, Inc.

Permit Number: AC 29-130371  
Expiration Date: June 30, 1989

**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 Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement 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 applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), 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. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use 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.

5. 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, unless specifically authorized by an order from the Department.

PERMITTEE:  
Gardinier, Inc.

Permit Number: AC 29-130371  
Expiration Date: June 30, 1989

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. 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 noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
Gardinier, Inc.

Permit Number: AC 29-130371  
Expiration Date: June 30, 1989

**GENERAL CONDITIONS:**

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.

9. 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 Sections 403.73 and 403.111, Florida Statutes.

10. The 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.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
Gardinier, Inc.

Permit Number: AC 29-130371  
Expiration Date: June 30, 1989

**GENERAL CONDITIONS:**

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. Sulfuric acid production measured as 100% H<sub>2</sub>SO<sub>4</sub>, shall not exceed 2500 TPD or 104.17 TPH.

2. Sulfur dioxide emissions shall not exceed 4.0 lbs/ton of acid produced and shall not exceed 10,000 lbs/day or 416.67 lbs/hr average per 3 hour period.

3. Acid mist emissions shall not exceed 0.15 lb/ton of acid produced and shall not exceed 375 lbs/day or 15.63 lbs/hr average per 3 hour period.

4. Visible emissions shall not exceed 10% opacity, average for any consecutive 6 minute period.

PERMITTEE:  
Gardinier, Inc.

Permit Number: AC 29-130371  
Expiration Date: June 30, 1989

**SPECIFIC CONDITIONS:**

5. Compliance tests will continue and shall be conducted while the plant is operating within 5% of its permitted capacity of 104.17 TPH acid. If the compliance tests are conducted at an operating rate of less than 95% of permitted capacity, then any permit to operate issued for the plant shall restrict its maximum production to not more than 5% above the production rate that existed during the compliance test. Notify HCEPC when expected to achieve a new production rate within the permitted range. The test methods and procedures described in 40 CFR 60.85 shall be used to determine the status of the source with the sulfur dioxide and acid mist standards. Method 9, as described in 40 CFR 60, Appendix A, shall be used to determine the compliance status of the source with the visible emissions standard. Hillsborough County Environmental Protection Commission (HCEPC) shall be notified in writing 30 days prior to any compliance tests and all requirements of 40 CFR 60.8 shall be complied with.

6. A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained and operated on this plant as specified in 40 CFR 60.84. Excess emissions shall be reported to the HCEPC.

7. The applicant shall comply with all requirements of 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants.

8. The plant may operate continuously, 8760 hours per year.

9. This construction permit replaces the current construction permit (AC 29-089696) for this sulfuric acid plant. During the modifications of this plant, the emissions shall not exceed 4 lbs SO<sub>2</sub> per ton of acid produced and 0.15 lb acid mist per ton of acid produced while the plant is operating commercially.

10. Construction shall reasonably conform to the plans and schedule in the application. Bi-annual reports describing the status of the modifications shall be submitted to the state and county regulatory agencies. Gardinier, Inc. shall obtain prior approval from the Department and HCEPC before proceeding with any construction referred to as "third modification" in the October 15, 1984 letter.

11. Gardinier, Inc. shall take precautionary measures to prevent emissions from leaks at the plant. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in FAC Rule 17-2.610(3). These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or industrial related

PERMITTEE:  
Gardinier, Inc.

Permit Number: AC 29-130371  
Expiration Date: June 30, 1989

**SPECIFIC CONDITIONS:**

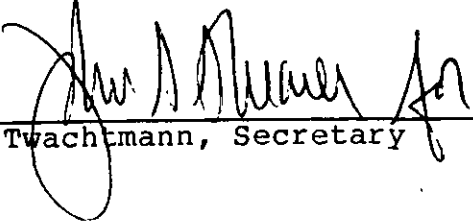
activities such as loading, unloading, storing and handling of materials.

12. Gardinier, Inc. shall submit a complete application for a permit to operate the sulfuric acid plant, which includes an emissions test report, to the Hillsborough County Environmental Protection Commission within 45 days of completion of compliance testing or at least 90 days prior to the expiration of this permit, whichever occurs first. Gardinier, Inc. may continue to operate this sulfuric acid plant, if the source is in compliance with the conditions in this permit, until the expiration date of this construction permit or until the expiration date of any permit to operate that is issued for this source.

13. Upon obtaining a permit to operate, the applicant will be required to submit annual operation reports which shall include, as a minimum, the annual production of the plant and a recent emissions test report.

Issued this 21<sup>st</sup> day of July, 1987

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
Dale Twachtmann, Secretary

Best Available Control Technology (BACT) Determination  
Gardinier, Inc.  
Hillsborough County

Gardinier, Inc. plans to increase the production rate of the No. 8 sulfuric acid plant that is located at their Tampa phosphate fertilizer chemical complex. Production of the No. 8 sulfuric acid plant will be increased from 2200 TPD to 2500 TPD. No restrictions to limit the hours of operation has been requested.

Increased production of the sulfuric acid plant will result in more air pollutants being emitted to the atmosphere. The primary air pollutants emitted from a sulfuric acid plant are sulfur dioxide (SO<sub>2</sub>) and acid mist. The amount of sulfur dioxide emitted to the atmosphere is an inverse function of sulfur conversion efficiency. When sulfur trioxide combines with water vapor at a temperature below the dew point of sulfur trioxide, acid mist is formed. The amount of acid mist is usually dependent upon the type of sulfur feedstock, the strength of acid produced and the operational parameters in the absorber. Based on permitted emissions, the net increase in air pollutant emissions would be 219 tons of sulfur dioxide (SO<sub>2</sub>) and 8.2 tons of acid mist per year.

Under the regulations, in Florida Administrative Code (FAC) Rule 17-2, the increase in sulfur dioxide and acid mist emissions exceed the significant emission rates as listed in Table 500-2. A BACT determination, therefore, is required for the regulated air pollutants sulfur dioxide and acid mist.

BACT Determination Request by the Applicant:

The air pollutant emissions from the No. 8 sulfuric acid plant would be limited to 4.0 pounds of sulfur dioxide (SO<sub>2</sub>) and 0.15 pounds of acid mist per ton of 100% acid produced.

Date of Receipt of a BACT Application:

February 9, 1987

Date of Publication in Florida Administrative Weekly:

May 15, 1987

Review Group Members:

The determination was based upon comments received from the Stationary Source Control Section, Air Modeling and Data Analysis Section, the Southwest District Office, and the Hillsborough County Environmental Protection Commission.

BACT Determined by DER:

Sulfuric Acid Plant No. 8:

Pollutant	Emission Limit
Sulfur Dioxide (SO <sub>2</sub> )	Not to exceed 4 pounds per ton of 100% acid produced
Acid Mist <sup>(1)</sup>	Not to exceed 0.15 pounds per ton of 100% acid produced
Visible Emissions	5% opacity maximum

<sup>(1)</sup> Acid mist means sulfuric acid mist, as measured by EPA Method 8, 40 CFR 60, Appendix A.

Compliance with the emission limits will be in accordance with the test methods and procedures prescribed in subsection 40 CFR 60.85, Subpart H, New Source Performance Standards.

EPA Method 9, 40 CFR 60, Appendix A, will be used to determine compliance with the visible emission limit.

BACT Determination Rationale:

FAC Rule 17-2.100(117) defines "modification" as any physical change in, or change in the method of operation of, or addition to a stationary facility which increase the actual emissions of any air pollutant, regulated under this Chapter, including any not previously emitted, from any source within such facility.

If the increase in emissions as a result of the major source modification are equal to or greater than the significant emission rates listed in Table 500-2, Regulated Air Pollutants - Significant Emission Rates; a Best Available Control Technology (BACT) determination is required, Rule 17-2.500(5)(c). In no event shall application of BACT result in emissions of any pollutant which would exceed the emissions allowed under 40 CFR part 60 - New Source Performance Standards (NSPS), FAC Rule 17-2.630(1)(a).

Sulfuric acid plants are subject to the provisions of the New Source Performance Standards, 40 CFR 60.80, Subpart H. The standards under Subpart H are; 4.0 pounds of SO<sub>2</sub> per ton of acid produced and 0.15 pound of acid mist per ton of acid produced, expressed as 100 percent sulfuric acid. The visible emissions limit is less than 10 percent opacity.



The NSPS standards, Subpart H, were reviewed by EPA in 1979 and EPA concluded that from the standpoint of technology, and considering costs, and the small quantity of emissions in question, that it did not appear necessary to revise the standards. The Department has reviewed the test results obtained from several different sulfuric acid plants and concurs with EPA's conclusion. The provisions of Subpart H are judged to be BACT.

The visible emissions limitation determined as BACT is equal to Hillsborough County's requirement as per Chapter 1-3.03 Vl.C - visible emissions shall not exceed 5% opacity except for 30 minute periods during plant startups when opacity shall be no greater than 40%.

The air quality impact of the proposed emissions has been analyzed. Atmospheric dispersion modeling has been completed and used in conjunction with an analysis of existing air quality to determine maximum ground-level ambient concentrations of the pollutants subject to BACT. Based on these analyses, the Department has reasonable assurance that the proposed sulfuric acid plant modifications, subject to the these BACT emission limitations, will not cause or contribute to a violation of the PSD increment or ambient air quality standard.

Details of the Analysis may be Obtained by Contacting:

Bob E. Daugherty  
Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended by:

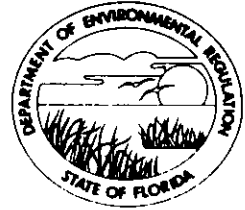
for John C. Brown Jr  
C./H. Fancy, Deputy Bureau Chief

Date: July 20, 1987

Approved by: \_\_\_\_\_

Dale Twachtman  
Dale Twachtmann, Secretary

Date: 7/22/87



# Interoffice Memorandum

For Routing To Other Than The Addressee

To _____	Location _____
To _____	Location _____
To _____	Location _____
From _____	Date _____

TO: Dale Twachtmann  
THRU: Howard Rhodes *mini*  
FROM: *John C. Brown Jr*  
Fair Fancy  
DATE: July 17, 1987  
SUBJ: Approval of Construction Permit No. AC 29-130371  
PSD-FL-118  
Gardinier, Inc.

Attached for your approval and signature is a construction permit to modify (expand the production capacity) the No. 8 sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) plant at their phosphate fertilizer complex located in Tampa, Hillsborough County, Florida. There were comments received during the public notice period.

Day 90 after which this permit will be issued by default is July 24, 1987.

The Bureau recommends approval and signature.

CHF/MJ/s

attachment