

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Clair Jancy

INITIAL

DATE

2.

DER - Zellerbach

INITIAL

DATE

3.

INITIAL

DATE

4.

INITIAL

DATE

REMARKS:

DER
SEP 13 1982
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 & REPT

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

FROM:

Bob Jarrett/ocm

DATE

9-10-82

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
THROUGH: Bill Thomas/Dan Williams *BTW*
FROM: Bob Garrett *RBG*
SUBJECT: Change of Permit Conditions, Gardinier Permit
AC29-27760, Construct No. 5 DAP Plant
AC29-21345, Modify No. 3 Phosphoric Acid Plant

DER
SEP 13 1982
BAQM

As discussed by telephone on September 2, 1982 and agreement with Gardinier, HCEPC, and ourselves on this same date, we are submitting our proposed changes to the involved permits AC29-21345 issued here at the District level and CAPS Permit AC29-27760.

Remove items 11, 12 and 13 from AC29-27760. Add the attached conditions 4, 5, and 6 to Permit AC29-21345.

Condition No. 6 was requested by HCEPC.

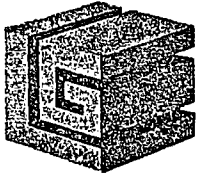
RRG/scm

Attachment: above described changes

Existing Construction Permit

DAP No. 3
PERMIT NO.: AC29-21345
APPLICANT: Gardinier, Inc.

1. Test the scrubber emissions for total fluorides within 30 days after startup. F.A.C. 17-2.05(6)(c)
2. Completion of this project shall be on April 1, 1983 and after appropriate testing, application for an operating permit shall be submitted by May 15, 1983. This permit shall expire on July 1, 1983.
3. The maximum allowable fluoride emission rate shall be .86 lbs F/hour based on a maximum production rate of 42.7 tons P_2O_5 /hour input.
4. The following sources will cease operation and operating permits returned to the DER Tampa Office by the expiration date of this permit.
 - a. Normal Superphosphate Plant AO29-13812
 - b. No. 2 Phosphoric Acid Plant AO29-6865
 - c. No. 6, 7, and 8 Rock Grinding Mills AO29-22139
 - d. 68 BPL Rock Unloading and Storage Airslides AO29-22142
 - e. North No. 2, 3 Rock Transfer Airslides AO29-13212
 - f. South No. 2, 3 Rock Transfer Airslides AO29-6864
 - g. Center No. 3 Rock Transfer Airslides AO29-13212
 - h. No. 3 Rock Transfer Airslide Bin AO29-13212
 - i. No. 2, 3 Filter Buildings AO29-12609 and AO29-13544
 - j. No. 10, 11, 12 Rock Grinding Mills AO29-22141, AO29-22140
5. Quarterly progress reports showing approximate percent completion of modifications and construction of new and affected existing facilities will be submitted to the Department until AC29-21345 construction permit expires or is replaced by a permit to operate.
6. The No. 1 (AO29-7107) and No. 2 (AO29-7108) DAP plants and (AO29-7109) the associated DAP cooler will remain shut down for the duration of this construction permit.



GARDINIER INC.

AUG 30 1982
SOUTH FLORIDA DISTRICT
TAMPA

Thomas _____

Post Office Box 3269 • Tampa, Florida 33601 • Telephone 813-677-9111 • TWX 810-876-0648 • Telex-52666 • Cable - Gardinphos

August 30, 1982

Mr. William Thomas
Air Engineering
Florida Department of Environmental Regulation
7601 Highway 301 North
Tampa, Florida 33610

Subject: Construction Permit No. AC29-27760, Gardinier, Inc., Progress Report

Dear Bill:

Pursuant to our phone conversation of August 26, 1982, the following progress report on Gardinier's project is submitted:

In the original plans for the Phosphoric Acid Plants (#4 is the new wet rock facility and #3 is the modified Prayon Plant) the schedule with Jacobs Engineering was as follows:

Startup of #4 - October 1981
Shutdown of #3 - December 1981

Numerous delays took place with the following revised dates:

<u>Startup of #4</u>	<u>Shutdown of #3</u>
December 1981	February 1982
March 1982	May 1982
July 1982	Undetermined
August 1982	Undetermined
September 1982*	Undetermined

*Most recent probable date.

These continuous delays were the result of the general contractor having problems with sub-contractors and not having control. Piping sub-contractors had considerable problems and had to be replaced. Several pieces of equipment failed on initial testing, requiring time-consuming modifications. Gardinier has continuously been pressuring the prime contractor, however, the results have not been good.

It is to Gardinier's economic advantage to have all new units on line as soon as possible because of increased efficiency and lower operating costs.

However, it appears at present that the modified Prayon Plant (#3) will not be on line before next spring. Gardinier cannot safely ignore all other alternatives such as starting the #2 System, prior to that time.

Gardinier was remiss in not submitting quarterly progress reports. This was my responsibility and this condition of the permit was overlooked. Progress reports will be submitted in the future as often as desired by the agency.

Please advise if further information is needed. The contractor made monthly reports and most of these are available if needed, however completion dates submitted in these reports were continuously in error.

Very truly yours,



A. E. Morrison
Manager, Environmental Services

AEM:rw
cc: Mr. Iwan Choronenko, HCEPC
Mr. Rudy J. Cabina
Mr. Frank Gonzalez
Mr. Roger Fernandez

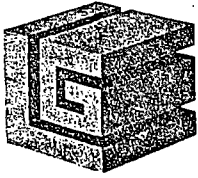
PERMITTED EMISSIONS

<u>Unit</u>	<u>Particulate</u>	<u>Fluoride</u>
No. 2 Phos Acid*	-	1.17
No. 2 Filter Bldg*	-	0.48
No. 3 Filter Bldg*	-	1.17
No. 3 Phos Acid	-	0.94
No. 7 Concentrator*	15.0	1.64
No. 8 Concentrator*	15.0	1.64
72 BPL Mills	3.0	-
No. 3 CTM Belt	5.25	1.89
No. 3 CTM Dryer	8.25	3.46
No. 4 CTM Belt	5.25	1.89
No. 4 CTM Dryer	8.25	3.46
GTSP	19.5	3.45
No. 1 Di-Mon*	5.4	0.59
No. 2 Di-Mon*	5.4	0.59
No. 3 Di-Mon	5.4	0.59
No. 4 Di-Mon	5.4	0.59
North Di-Mon Cooler*	21.6	0.59
South Di-Mon Cooler	21.6	0.59
No. 5 Di-Mon	10.0	1.4
No. 2 Airslide*	1.4	-
No. 3 Airslide	1.4	-
6,7,8, & 10 Mills	4.4	-
KVS 11 Mill*	1.3	-
KVS 12 Mill	2.1	-
Sizing Unit	20.0	0.72
68 BPL Unloading	<u>3.3</u>	-
TOTALS (Less #5 DAP)	<u>172.3</u>	<u>25.45</u> <i>except No 5 DAP</i>
TOTALS (With #5 DAP, less these units not operating)	<u>107.2</u>	<u>17.68</u>
TOTALS (With No. 5 DAP, less #1 & 2 Di-Mon)	<u>149.9</u>	<u>25.08</u>

*Units not operating.

~~Normal separator~~ - shut down 3.5 0.5

Item 11 & 12
 Item 13 - No 1 & 2 DAP to remain shut down + North DAP cooler
 No 7 not to operate if full production



GARDINIER INC.

U.S. Phosphoric Products

Post Office Box 3269 • Tampa, Florida 33601 • Telephone: 813-677-9111 • TWX 810-876-0648

~~876 0648~~

677-9111

August 20, 1982

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

RECEIVED
AUG 23 1982

Subject: Construction Permit AC29-27760, Gardinier, Inc.

AUG 23 1982

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Thomas:

After receiving a copy of the letter on this subject, sent to you by Mr. Iwan Choronenko of the Hillsborough County Environmental Protection Commission on August 4, 1982, I have researched the problem.

First, it was found that the schedule under Specific Condition No. 13 of the Permit was not correct. It was overlooked at the time of issuance and it was Gardinier's error (primarily, mine). The 23-month time schedule was taken from the PSD application and was to start after all permits were received. The subject construction permit was issued in May 1980, stating 23 months from that date for completion, however, Gardinier was not cleared to start until October 1980. The construction permits issued for the two phosphoric acid plants show April 1983 and May 1983, as times of completion with the permits good until July. These two must be completed before all other units can be abandoned, therefore, it is apparent the early 1982 date was never anticipated.

However, Gardinier, by not objecting to the time schedule, did accept the conditions of the subject permit. Even though this was by oversight, the schedule probably could have been met if the construction schedule had been met. The No. 4 Phosphoric Acid Plant (wet rock) was scheduled for completion in October 1981 and all other units would have been on line by now. This schedule was not kept by the contractor. Due to a series of problems, including replacing sub-contractors, the first test with water was in August 1982. Gardinier has had numerous meetings with Jacobs Engineering, the prime contractor, and pressure has been continuously applied.

The water tests revealed some problems in the tanks and pumps that are now being corrected. If all goes well, acid should be started in September. However, we need to run this plant for some time before shutting down No. 3 System for modification to wet rock. Because of the construction delays, it could be the middle of next year before we could safely abandon all other alternatives.

→ However, as soon as the new plant is started, Gardinier will primarily be handling wet rock and the dry rock facilities will be on stand-by for operation problems or a sudden increase in business.

The purpose of putting "shutdown" conditions in the permits was to assure there would be no increase in emissions because of the new diammonium phosphate plant. Gardinier has certainly not increased emissions. In fact, they are greatly reduced. Two of the older diammonium phosphate plants have not been in operation since No. 5 started up and the other two only operated a short time. Either set of two would have more emissions than the new plant. In addition, a number of other units have been down due to the severe economic recession in the phosphate industry.

Gardinier certainly does not want to do anything to worsen the environment and we feel that some procedure can be worked out to allow us to operate and still be environmentally sound. We would like to meet with you (both Florida DER and HCEPC) to go over possible solutions that could be mutually beneficial. This information has also been submitted to Mr. Choronenko.

Please advise if this can be arranged.

Very truly yours,



A. E. Morrison
Manager, Environmental Services

AEM:rw
CC: Mr. Rudy J. Cabina