

NO. 4461 21059

REMITTANCE STATEMENT
GARDINIER, INC.

BOX 3269, TAMPA, FLORIDA 33601

5

VENDOR NUMBER	INVOICE NUMBER	INVOICE DATE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
4259		7 01 87	60000		60000
					19 15
Permit Application for a product conveying system to the dock.					001031
TOTAL			60000		60000

IF CORRECT, DETACH AND RETAIN STATEMENT. IF NOT CORRECT, RETURN WITH STATEMENT.



GARDINIER, INC. TAMPA, FLORIDA

19 15

NO. 446121059

17-1
910

DATE		
MO.	DAY	YR.
7	02	87

PAY EXACTLY *****600 DOLLARS AND 00 CENTS

DOLLARS	CENTS
*****600	00

TO THE ORDER OF
 FLORIDA DEPT. OF ENVIRONMENTAL PROTECTION REGULATION
 7601 HWY 301 SOUTH
 TAMPA FL 33637

GARDINIER, INC.

Gary J. Sample
AUTHORIZED SIGNATURE

NORWEST BANK, N.A.
MINNEAPOLIS, MINNESOTA

Sincerely,

E. O. Morris

E. O. Morris
Manager, Environmental & Development

cc: Jerry Campbell, HCEPC
Bill Thomas, DER, Tampa
Nettles
Pinney
Cabina
Mathot

RECEIVED
DER - MAIL ROOM
1987 JUL 13 AM 11:34

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No 76171

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Gardiner, Inc. Date July 14, 1987

Address P.O. Box 3269, Tampa, FL Dollars \$ 100.00

Applicant Name & Address Same as above

Source of Revenue ✓ # 446121059

Revenue Code 001031 Application Number 787, 790, 791

By Maggie V. Jones

COMMISSION
RODNEY COLSON
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
HAVEN POE
JAMES D. SELVEY
PICKENS C. TALLEY II



PM
16 Sept. 1987
Tampa, FL

File Copy

ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

AC 29-136776

DER
SEP 21 1987
BAQM

MEMORANDUM

Date September 15, 1987

To Bill Thomas, BAQM

From Victor San Agustin thru Jerry Campbell ^{VSA} JC

Subject: BAQM's Proposed Construction Permit for Gardinier's Dock Fertilizer Conveying System.

EPC staff has reviewed the September 2, 1987, technical evaluation and preliminary determination for the above project.

The enclosed recommendations which we mailed on August 25, 1987, are still being recommended. We believe the source description page we sent you should be used. EPC's air compliance staff enforces all the conditions written in CAPS permits. This includes the details of the construction project. BAQM's proposed source description is not detailed. Inspectors will have to read thru the entire file to be able to know what has been constructed. Let us prevent duplication of effort and let us make the work easier for our compliance staff. They will have to inspect this facility at least every year.

The enclosed specific conditions are still being recommended. Items which were not included in your proposed draft are listed below. They should be included in your final determination:

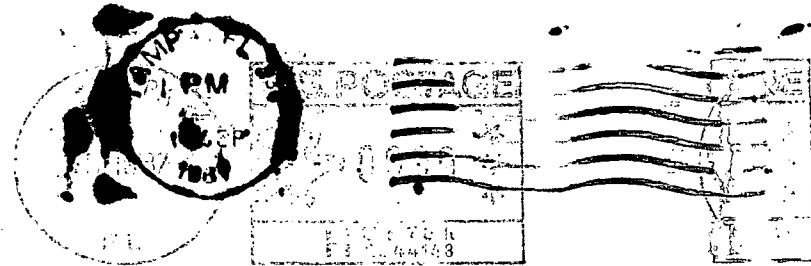
1. BAQM's Specific Condition 2 should list dry standard volumetric flow rate for each baghouse.
2. BAQM's Specific Condition 3 should also limit v.e.'s to 5% from any of buildings 2, 4,5, and 6. One v.e. test should be required on each building.
3. BAQM's Specific Condition 5 should include other precautionary measures which we stipulated in our specific condition 9.
4. Add EPC's condition 6 just in case our inspectors have reason to believe the baghouse exhaust is not meeting the PM standard.
5. BAQM's Specific Condition 8 should require that the compliance test be conducted within 30 days of start-up. Based on our past experience, this condition has avoided avoidable delays. The same condition should require Gardinier to submit 6 operating permit applications and appropriate fees.

Lastly, BAQM's source description page should list Gardinier's facility NEDS number and point numbers for each baghouse exhaust. Inspections of these

Environmental Protection Commission

of
Hillsborough County

1900 9th Avenue
Tampa, Florida 33605



Mr. Bill Thomas
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Bill Thomas, BAQM
September 15, 1987
Page 2

points are reflected in the APIS system by our compliance staff. It should help our inspectors if you listed them in the source description page.

Your consideration of our comments will be appreciated. Please call me if you have any questions.

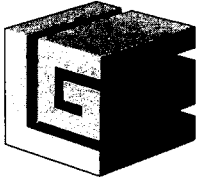
cc: Bill Thomas, SWFDER

VSA/ch

Copied: John Reynolds }
Bill Thomas } 9/22/87 (mg)
Claw Jany }

PM
25 Sept. 1987
Tampa, FL

File Copy



GARDINIER INC.

Post Office Box 3269 Tampa, Florida 33601 Telephone 813-877-9111 TWX 810-876-0648 Telex-52666 Cable - Gardinphos

September 21, 1987

DER
SEP 25 1987
BAQM

Mr. Clair Fancy
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 323-99-2400

Subject: Proof of Publication - Intent to Issue Permit
Dock Conveying System AC 29-136776

Dear Sir:

You will find attached Proof of Publication of Intent to Issue Permit by
the Department of Environmental Regulation.

If there are any questions, please contact me.

Sincerely,

E. O. Morris

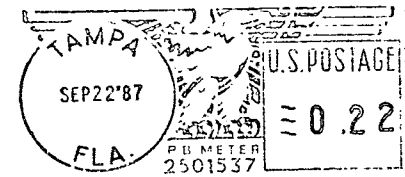
E. O. Morris
Environmental Manager

:gf

cc: D. Williams
J. Campbell/HCEPC
R. Cabina

Copied: Wayne Aronson - EPA
Miguel Flores - NPS
W. Thomas, SW Dist.
J. Reynolds } 9/25/87 *(initials)*


GARDINIER INC.
P. O. BOX 3269 TAMPA, FLORIDA 33601



Mr. Clair Fancy
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 323-99-2400

THE TAMPA TRIBUNE

Published Daily

Tampa, Hillsborough County, Florida

DER

SEP 25 1987

State of Florida }
County of Hillsborough } ss.

Before the undersigned authority personally appeared James L. Connering, who on oath says that he is Assistant Comptroller of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a.....

BAQM

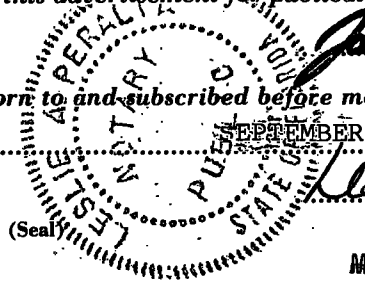
LEGAL NOTICE

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PROPOSED AGENCY ACTION ON PERMIT APPLICATION

was published in said newspaper in the issues of SEPTEMBER 18, 1987

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

Sworn to and subscribed before me, this 18th day of SEPTEMBER, A.D. 19 87



Notary Public, State of Florida
My Commission Expires Nov. 23, 1990
Bonded Thru Troy Faig - Insurance Inc.

State of Florida
Department of
Environmental Regulation
Notice of Proposed Agency
Action on Permit Application
The Department of Environmental
Regulation gives no-

tice of its intent to issue a permit to Gardiner, Inc., to construct a dock conveying system at its East Tampa plant located six and one-half miles southeast of Tampa on U.S. Highway 41 in Hillsborough County. A contemporaneous project at the Gardiner plant involves shutting down the existing run-of-pile triplex superphosphate units and shifting that production capacity over to the No. 5 DAP plant. As a result of the transfer of production and the contemporaneous shutdowns, emissions of all affected criteria air pollutants will be reduced. Consequently, the dock conveying system is exempted from the new source review requirements under FAC Rule 17-2.510.

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 32399-2400, 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 32399-2400. 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 32399-2400. Failure to petition to intervene

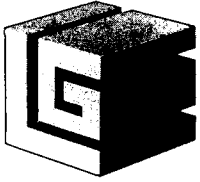
within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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
SW District
4520 Oak Fair Blvd.
Tampa, Florida 33610-7349
Department of
Environmental Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee,
Florida 32399-2400
Hillsborough County
Environmental Protection
Commission
1410 North 21st Street
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
4075 9/18/87

PM
23 Sept. 1987
Tampa, FL
File Copy



GARDINIER INC.

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

September 22, 1987

DER

SEP 25 1987

BAQM

Mr. Bill Thomas
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 323-99-2400

Subject: Dock Conveying System
Draft Permit AC29-136776

Dear Bill:

Gardiner requests that the expiration date of the subject draft permit be modified from March 31, 1988 to September 31, 1988.

Gardiner expects to complete the construction of the subject project by March 31, 1988. However, construction delays do happen and it is felt that an additional 60 day safety factor would be appropriate.

We will require an additional 30 days for sampling the stationary sources and preparation of the permit application as required by Specific Condition 6. In addition, Specific Condition 8 requires submittal of the operating permit application 90 days before expiration of the subject permit.

If we can supply any additional information, please feel free to call.

Very truly yours,

E. O. Morris
Environmental Manger

:gf

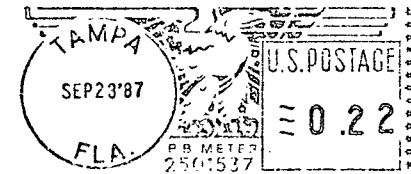
cc: John Reynolds/DER/Tall
Bill Thomas/DER/TPA
Jerry Campbell/HCEPC
Nettles
Pinney
CHF/BT



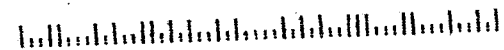
GARDINIER INC.

P. O. BOX 3269 TAMPA, FLORIDA 33601

GIBSONTON
DROP SHIPMENT
AUTHORIZATION 1



Mr. Bill Thomas
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 323-99-2400





PM
30 Sept. '87
Atlanta GA

File Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 30 1987

4APT/APB-aes

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER
OCT 2 1987
BAQM

Re: Gardiner. Inc., Tampa, Florida - Dock Loading System

AC 29-136776

Dear Mr. Fancy:

This is to acknowledge receipt of your September 2, 1987, technical evaluation and preliminary determination for the modification proposed at this facility. It is apparent from the source's submittal that the dock loading facility is at the same location and under the same ownership as the phosphate complex which has PSD permit PSD-FL-026. As there has been a technical evaluation and preliminary determination for a DAP plant modification at this same source dated August 12, 1987, the two modifications appear to be occurring simultaneously. Inasmuch as the dock loading facility and the phosphate chemical complex are the same source, the statement inferring that the dock loading facility is a separate source (i.e., emits less than 100 TPY) is in error. Although the increase in particulate emissions may be less than PSD significant levels (i.e., 25 TPY), the loading dock modification is contemporaneous with the DAP plant modification and they should be evaluated for PSD applicability together.

If you have any questions regarding this letter, please contact Michael Brandon of my staff at (404) 347-2864.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

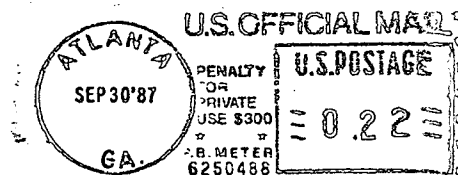
Copied: John Reynolds
CHF/BT
Jerry Campbell, EPCAC
W. Thomas-SW Dist

10/5/87 (m)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

AIR-4



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

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



22 Oct 1987
Gainesville, FL

file copy



October 21, 1987
87030

Mr. Bruce M. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division
U.S. Environmental Protection Agency Region IV
345 Courtland Street
Atlanta, Georgia 30365

DER
OCT 26 1987
BAQM

Re: Gardinier, Inc. - Proposed No. 5 DAP Plant Modification AC 29-135083 (Issued)
- Proposed Dock Conveying System AC29-13677b

Dear Mr. Miller:

KBN Engineering and Applied Sciences, Inc. (KBN) of Gainesville, Florida, prepared the air construction permit application for the above referenced projects. We have received a copy of USEPA's letters dated July 27, 1987, and September 10, 1987, commenting on the Florida Department of Environmental Regulation's (FDER) technical evaluation for the proposed modification. In these letters, USEPA raised several issues, and indicated that the agency felt the proposed modification should be subject to PSD review. On behalf of Gardinier, I would like to offer some comments and points of clarification on these issues which may help to resolve USEPA's concerns.

Three specific comments were presented in the September 10 letter. The first relates to the current allowable SO₂ emissions from the No. 5 DAP plant. The letter was correct in stating that the current allowables are 43.8 tons per year (TPY). This is the figure that Gardinier used in their application. The discrepancy apparently stems from the FDER construction permit which limited SO₂ emissions to a higher level of 70.1 TPY. FDER may have used this limit contained in the construction permit since USEPA does not consider operating permits to be federally enforceable. Based upon the 43.8 TPY current allowable, the increase in SO₂ emissions resulting from the proposed production rate increase would be 95.6 TPY, as correctly stated in your letter.

The second concern raised in the Agency's letter was that allowable emissions for SO₂, TSP and F1 were used in the netting calculations instead of actual emissions. In the case of TSP, the FDER's technical evaluation showed an offset credit of 56.9 TPY based upon actual TSP emissions in 1979 from the sources to be shut down. Thus, actual emissions (not allowables) were used in the netting calculation for TSP.

KBN ENGINEERING AND APPLIED SCIENCES, INC.

P. O. Box 14288 5700 SW 34th Street Gainesville, FL 32604 904/375-8000



B.M. Miller
October 20, 1987
Page 2

For F1, FDER showed in the technical evaluation an offset credit from the sources to be shutdown based upon the allowable F1 emissions "allocated" to these sources. FDER shows this in a netting calculation to demonstrate the modification is not subject to PSD. Although the technical evaluation does not explain the use of the allowables in the netting calculation, there are several facts which indicate this is appropriate.

First, it is noted that the total allowable F1 emissions from the Gardinier plant are not increasing as a result of the proposed production rate increase. In fact, the total allowable F1 is actually decreasing from 24.7 lb/hr to 23.1 lb/hr, for a total decrease of 1.6 lb/hr and 7.0 TPY. Second, USEPA notes in its comments that the use of allowable emissions for PSD source applicability determinations is allowed where: 1) no actual emission data is available, or 2) those emission limits are federally enforceable. The total allowable F1 emission limit for the facility (24.7 lb/hr currently; 23.1 lb/hr after modification) is based upon Florida Administration Code, Chapter 17-2, Section 17-2.600(3), which is part of the approved State Implementation Plan, and therefore this limit is considered to be federally enforceable. In addition, there are several sources regulated under the fluoride allocation that have not been tested for actual emissions (e.g., the three triple superphosphate storage buildings).

The PSD significant emission rate for F1 is 3.0 TPY. The requested increase in allowable F1 emissions due to the No. 5 DAP plant production rate increase itself is 1.91 lb/hr and 8.4 TPY. This results in an increase of 5.4 TPY above the significance level. Actual F1 emissions from the five sources to be shut down for the last nine years are shown in Table 1. The table shows two separate years out of the last nine which experienced F1 emissions from these sources in excess of the 5.4 TPY level. Thus, if either of these two years were considered as representative, sufficient actual emissions from these sources would be available to offset the increase from the No. 5 DAP plant. Because of the historic market conditions of the Florida phosphate industry (discussed in more detail below), the 1978-1979 time period is considered to be more representative of normal source operation in regards to F1 emission from the sources to be shut down. However, the use of allowable F1 emissions from the facility, as described above, and the fact that allowable emissions from the entire facility are decreasing by 7.0 TPY, provides justification for avoiding PSD review.

In the case of SO₂, the allowable emissions from the sources to be shut down are considered creditable because this level of emissions was considered in a recent PSD permit issued for the No. 8 H₂SO₄ plant at Gardinier. This permit was for a production rate increase, and the allowable SO₂ emissions from these sources were utilized in determining compliance with ambient air quality standards and PSD increments.



B.M. Miller
October 20, 1987
Page 3

FDER, in their recently issued (10/16/87) final determination for the No.5 DAP Plant modification, stated their justification for the contemporaneous emission reduction credits for SO₂. We believe FDER's approach to determining the creditable offsets is reasonable, particularly in light of the historic operating conditions of Gardinier (discussed in more detail below).

The third concern raised by USEPA in the September 10 letter concerned the "representative" time period for determining contemporaneous emissions decreases from the sources to be shut down. It was stated that there was no reasonable way to assume that 1979 for TSP and 1981 for SO₂ are representative of actual emissions since the sources under consideration have burned natural gas for the past five years.

An understanding of the state of the phosphate industry in Florida is critical to the determination of what constitutes a "representative" period for emissions. The Florida phosphate industry has been very depressed since late 1981. This depressed state is reflected in the annual phosphate products production at the Gardinier plant. As a result of the depressed market conditions, emissions have been lower than normal since 1982, and the years prior to 1982 are considered to be more representative of "normal" operation of the sources. Gardinier had declared Chapter 11 bankruptcy in 1985.

Another factor which affected SO₂ emissions is that Gardinier had take or pay contracts for natural gas utilized in the production of ammonia. In 1981, ammonia became cheaper to purchase than produce, and ammonia production was cut back. The ammonia plant was finally shut down in 1983. Due to the take or pay contracts, Gardinier was forced to utilize natural gas until October 1986. The present contract is providing Gardinier with economical natural gas, but has a cancellation clause if the price exceeds No.6 fuel oil, at which time Gardinier would utilize fuel oil.

The FDER PSD regulations (federally approved) define "actual emissions" as:

The actual rate of emission of a pollutant from a source as determined in accordance with the following provisions:

- (a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the source actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the source.



B.M. Miller
October 16, 1987
Page 4

The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the source. Actual emissions shall be calculated using the source's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

This definition directly parallels the definition of actual emissions in the federal PSD regulations. The definition clearly states that the reviewing authority (in this case, FDER) may allow the use of a different time period upon a determination that it is more representative of normal operation of the source. There are no limits placed upon when the "different time period" can occur. This is left up to the discretion of the reviewing authority. There are also no prohibitions against using different representative time periods for different pollutants. Clearly, if particular years of operation are more representative of normal emissions of a particular pollutant, because of special conditions, then these can be used to establish the more representative actual emissions of the source.

In USEPA's August 7, 1980, preamble to the final PSD rules, published in the Federal Register, the concept of the "time period representative of normal source operation" is discussed. USEPA states, (FR, Vol. 45, No. 154, pg. 52699):

Under the final PSD regulations, the phrase "actual emissions" means the rate at which an emission unit actually emits a particular pollutant... In general, that rate as of a particular date equals the average rate in tons per year at which the unit actually emitted the pollutant during a two-year period which precedes the particular date and is representative of normal source operation.

Note that references are made to "a particular pollutant," "a particular date," and "the pollutant." This clearly indicates that the representative period can be pollutant specific.

USEPA further discusses the concept of actual emissions in regards to PSD increment consumption (FR, Vol. 45, No. 154, pg. 52718):



B.M. Miller
October 16, 1987
Page 5

The two year period of concern should generally be the two years preceding the date as of which increment consumption is being calculated, provided that the two-year period is representative of normal source operation. The reviewing authority has discretion to use another two-year period if the authority determines that some other period of time is more typical of normal source operation than the two years immediately preceding the date of concern.

Again, this explanation clearly allows discretion to the reviewing authority. No time constraints whatsoever are placed upon when the "some other period of time" can occur. It is acknowledged that the Gardinier situation is special and normally the most recent two-year period of time would be used to establish actual emissions for netting purposes. However, we believe the adverse market conditions the Florida phosphate industry has experienced in recent years, and the special conditions Gardinier was forced to operate under in regards to natural gas usage, is justification for selecting other time periods to determine representative actual emissions for particular pollutants.

We thank you for considering these comments, and hope they are useful in your review. It would be helpful to Gardinier to know if USEPA will be revising the federal PSD permit for the No. 5 DAP plant (PSD-FL-026), or if the state will revise the permit. Please advise Gardinier (call Mr. Ozzie Morris at 813-677-9111) or myself of the status of the situation as soon as possible, either in writing or by telephone. Also, please call if you have any questions concerning this letter.

Sincerely,

David A. Buff

David A. Buff, M.E. P.E.
Principal Engineer

DAB/afb

cc: Ozzie Morris, Gardinier
John Reynolds, FDER
Mike Brandon, USEPA

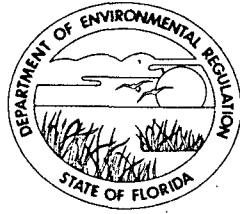
Copies: *John Reynolds*
File AC 29-136776 - Dock Conveying
CITF/BT
Gerry Campbell - EPCAC
Bill Thomas - Tampa

10/26/87 *mm*

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

November 3, 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 29-136776

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

Sincerely,

M. V. Janes

Margaret V. Janes
Planner
Bureau of Air Quality
Management

/mj

Enclosure



United States Department of the Interior
FISH AND WILDLIFE SERVICE

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228



IN REPLY REFER TO:
RW
MAIL STOP 60130

PM
9 Nov. 1987
Denver, Co.

file copy

NOV 9 1987

AC 29-136776

Mr. Bill Thomas
Bureau of Air Quality
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

Thank you for the opportunity to comment on your Preliminary Determination for Gardinier Inc.'s proposal to construct a dock conveying facility at their Tampa phosphate plant. The proposed project will be located approximately 70 km southeast of the Chassahowitzka National Wildlife Refuge, a class I area administered by the U.S. Fish and Wildlife Service.

The proposed project will be a source of particulate matter emissions, and these emissions will be minimized by using covered conveyors and baghouses at the transfer points. With the contemporaneous shutdowns of the numbers 3 and 4 triple superphosphate reactor belts and dryers and the ROP/TSP sizing unit, the proposed project will result in a net decrease in particulate matter emissions of 7.3 tons per year. Based on this decrease in emissions, the proposed project will not cause or contribute to any adverse impacts on the resources of Chassahowitzka National Wildlife Refuge.

If you have any questions regarding this matter, please contact Deborah Mangis at (303) 969-2072.

Sincerely,

Nelson B. Kverno

Assistant Regional Director,
Refuges and Wildlife

NELSON B. KVERNO

Copied: CHF/BT

John Reynolds

Gerry Campbell

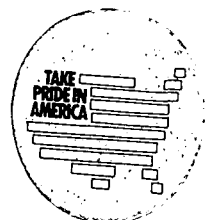
Bill Thomas

11/13/87

DER

NOV 12 1987

BAQM



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
POST OFFICE BOX 25486
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300



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U.S. DEPARTMENT OF
THE INTERIOR
INT-423

Mr. Bill Thomas
Bureau of Air Quality
Florida Dept of Environ. Regulation
Twin Towers office Bldg.
2600 Blair Stone Road
Tallahassee, FL 32399-2400



PM
14 Dec. 87
Atlanta, GA

File Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 11 1987

4APT/APB-am

Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Gardinier, Inc., Dock Loading System

Dear Mr. Fancy:

This is to acknowledge receipt of your November 3, 1987, final determination for the above referenced facility. We will retain this copy for our records.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Copied: CHF/BT
J Reynolds } 12.22.87 (m)

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DEC 18 1987

BAQM

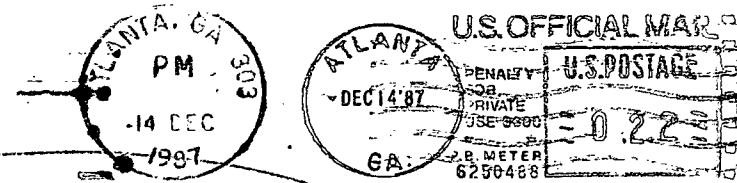
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

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Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
~~2600 Blair Stone Road~~
Tallahassee, FL 32399-2400

