

COMMISSION
PHYLLIS BUSANSKY
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HAVEN POE
JAMES D. SELVEY



ROGER P. STEWART
DIRECTOR
1900 - 9th AVE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

January 10, 1990

RECEIVED

JAN 16 1990

DER - BAQM

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

RE: Gardinier Permit Application

Dear Mr. ^{Bill} Thomas:

The Environmental Protection Commission of Hillsborough County has received an application for a permit to construct a GTSP Truck Loading Station with a baghouse which we are forwarding to your section for review and issuance. The source will be a minor modification to a major facility and will also be RACT exempt (less than 1 ton per year particulate matter).

We would also request that the application be deemed incomplete for the following reasons. The applicant identified is not the person who signed the permit application as the applicant. Additionally, the applicant proposes to use a 0.02 gr./dscf baghouse. They have failed to identify the manufacturer of the baghouse and provide a basis for the baghouse efficiency.

Should you have any further questions or require our assistance, please do not hesitate to call me at Suncom 543-5530.

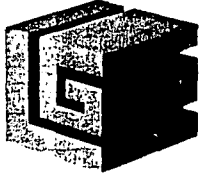
Sincerely,

Edward J. Svec
Chief Environmental Engineer

bb

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RECEIVED
DER - MAIL ROOM
1990 JAN 17 AM 10:43



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JAN 5 1990
E.P.C. OF H.C.
AIR PROGRAM

GARDINIER INC.

5813 Hwy 41 South • Riverview Florida 33560 • Telephone 813 — 677-9111 • DWX 810 — 876-0648 • Telex 52666 • Cable - Gardinbos

January 3, 1990

CERTIFIED MAIL: 296 372 470

Mr. Jerry Campbell
Hillsborough County
Environmental Protection Commission
Air Pollution Control
1410 North 21st Street 33605
TAMPA, FLORIDA

SUBJECT: AIR CONSTRUCTION PERMIT APPLICATION
GTSP TRUCK LOADING

Dear Mr. Campbell:

Enclosed are four certified copies of an air construction permit application for the Gardinier GTSP Truck Loading Station with appropriate state and county fees. This application is submitted in response to the EPC request and as indicated in draft permit AO29-168524 (GTSP Storage Buildings) specific condition 13.

If the EPC has any questions, please feel free to call.

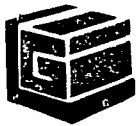
Very truly yours,

E. O. Morris
E. O. Morris
Environmental Manager

cc: P-5

Attachments:

Permit Application
Check FDER \$200.00 (CK. #046190)
Check EPC \$365.00 (CK. #046235)



GARDINIER, INC. TAMPA, FLORIDA

NO.

577046190

64-1278
611

DOLLARS	CENTS
\$*****200	00

DATE		
MO.	DAY	YR.
1	04	90

PAY EXACTLY *****200 DOLLARS AND 00 CENTS

TO THE ORDER OF

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
4520 OAK FAIR BOULEVARD
TAMPA FL 33610

GARDINIER, INC.

Michele E. Townsend
AUTHORIZED SIGNATURE

THE CITIZENS AND SOUTHERN NATIONAL BANK
Atlanta, DeKalb County, Georgia

⑈577046190⑈ ⑆061112788⑆ 011 07 093⑈

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

RE: Gardinier Permit Application

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Sincerely,

Edward J. Svec
Chief Environmental Engineer

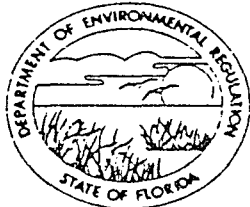
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1031

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DER - MAIL ROOM
1990 JAN 17 AM 10:43

DEPARTMENT OF ENVIRONMENTAL REGULATION

#200pd
1-5-90
Recpt.#117690



RECEIVED

AC 29-175044 JAN 5 1990

E.P.C. OF H.C.
AIR PROGRAM

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: GTSP Truck Loading Station [] New¹ [X] Existing¹

APPLICATION TYPE: [X] Construction [] Operation [] Modification

COMPANY NAME: Gardinier, Inc. COUNTY: Hillsborough

Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Station w/baghouse
GTSP Truck Loading

SOURCE LOCATION: Street 8813 Hwy 41 South City Riverview

UTM: East 363.2 North 3082.3

Latitude 27 ° 51 ' 28 "N Longitude 82 ° 23 ' 15 "W

APPLICANT NAME AND TITLE: Henk Mathot, President

APPLICANT ADDRESS: 8813 Hwy 41 South, Riverview, FL 33569

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Gardinier, Inc.

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permit establishment.

*Attach letter of authorization

Signed: BY E. O. Morris
E. O. MORRIS, ENVIRONMENTAL MANAGER
Name and Title (Please Type)

Date: 1/3/90 Telephone No. (813)677-9111

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed David A. Buff
David A. Buff

Name (Please Type)

KBN Engineering and Applied Sciences, Inc.

Company Name (Please Type)

1034 NW 57th Street, Gainesville, FL 32605

Mailing Address (Please Type)

Florida Registration No. 19011 Date: 1/2/90 Telephone No. (904) 331-9000

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Refer to Attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction 1969 Completion of Construction July 1991

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Baghouse: \$20,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Not Applicable



E. Requested permitted equipment operating time: hrs/day _____; days/wk _____; wks/yr _____
if power plant, hrs/yr _____; if seasonal, describe: _____
Operation is variable-maximum of 550 hr/yr

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? Yes
a. If yes, has "offset" been applied? No
b. If yes, has "Lowest Achievable Emission Rate" been applied? No
c. If yes, list non-attainment pollutants. Ozone

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. No

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No*

a. If yes, for what pollutants? _____

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

* This source has total allowable PM emissions of less than 1 TPY, and therefore,
the source is exempt from the RACT requirements.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt.		
GTSP	Particulate	100	400,000	1

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 400,000
2. Product Weight (lbs/hr): 400,000

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/XX hr	T/yr	
Particulate	3.43	0.94	N/A	N/A	3.43	0.94	2

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

Best Available Copy

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Baghouse (not yet selected)	Particulate	+99%	+1 um	Design

E. Fuels Not Applicable

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____
 Density: _____ lbs/gal Typical Percent Nitrogen: _____
 Heat Capacity: _____ BTU/lb _____ BTU/gal
 Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Dust collected in baghouse is discharged back into No. 4 GTSP Storage Building

Best Available Copy

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 38 ft. Stack Diameter: 2.67 ft
 Gas Flow Rate: 20,000 ACFM 20,000 DSCFM Gas Exit Temperature: Ambient (90) °F
 Water Vapor Content: 5 (Ambient) % Velocity: 59.5 FP

SECTION IV: INCINERATOR INFORMATION

Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Best Available Copy

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

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- 9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
- 10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY Not Applicable

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part applicable to the source?

[] Yes [] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (yes, attach copy)

[] Yes [] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- | | | | |
|---------------|------|-----------------|----|
| a. Height: | ft. | b. Diameter: | ft |
| c. Flow Rate: | ACFM | d. Temperature: | °F |
| e. Velocity: | FPS | | |

E. Describe the control and treatment technology available (As many types as applicable use additional pages if necessary).

1.

- | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------|
| a. Control Device: | b. Operating Principles: |
| c. Efficiency: ¹ | d. Capital Cost: |
| e. Useful Life: | f. Operating Cost: |
| g. Energy: ² | h. Maintenance Cost: |
| i. Availability of construction materials and process chemicals: | |
| j. Applicability to manufacturing processes: | |
| k. Ability to construct with control device, install in available space, and operate within proposed levels: | |

2.

- | | |
|------------------------------------------------------------------|--------------------------|
| a. Control Device: | b. Operating Principles: |
| c. Efficiency: ¹ | d. Capital Cost: |
| e. Useful Life: | f. Operating Cost: |
| g. Energy: ² | h. Maintenance Cost: |
| i. Availability of construction materials and process chemicals: | |

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

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- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
 - a. (1) Company:
 - (2) Mailing Address:
 - (3) City:
 - (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- (5) Environmental Manager:
- (6) Telephone No.:
- (7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

Not Applicable

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
 month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No

b. Was instrumentation calibrated in accordance with Department procedures?
[] Yes [] No [] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT A

Gardinier currently operates a phosphate fertilizer manufacturing plant in Riverview, Florida, just south of Tampa. Gardinier is currently operating a truck loading station for the purpose of loading granular triple superphosphate (GTSP) into trucks for transport off-site. The truck loading station has been operating since the late 1960's. The Hillsborough County Environmental Protection Commission (HCEPC) has requested that Gardinier submit an air construction permit application for this source of particulate matter (PM) emissions.

The maximum loading rate of the truck loading system will be 40,000 tons per year (TPY) and 200 tons per hour (TPH). The system will operate a maximum of 550 hours per year.

Gardinier currently uses de-dusting agents on the truck loadout station to control fugitive dust emissions. Although not required by regulation, Gardinier is willing to implement extra controls, and proposes to enclose the truck loading station and vent the station to a baghouse. Engineering drawings showing the proposed system are attached. The baghouse manufacturer has not yet been selected, but the unit will have the following design parameters:

- Air flow rate - 20,000 acfm
- Air to cloth ratio - 6:1 (maximum)
- Maximum outlet dust loading - 0.02 gr/dscf

Maximum emissions from the baghouse are calculated as follows:

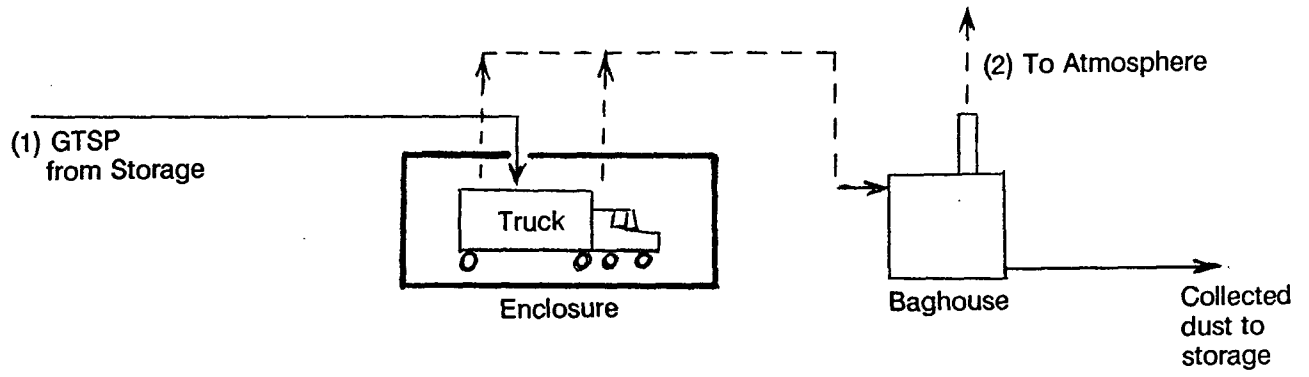
$$\begin{aligned} &\text{Maximum hourly emissions -} \\ &20,000 \text{ dscfm} \times 0.02 \text{ gr/dscf} \times 60 \text{ min/hr} / 7,000 \text{ gr/lb} \\ &= 3.43 \text{ lb/hr} \end{aligned}$$

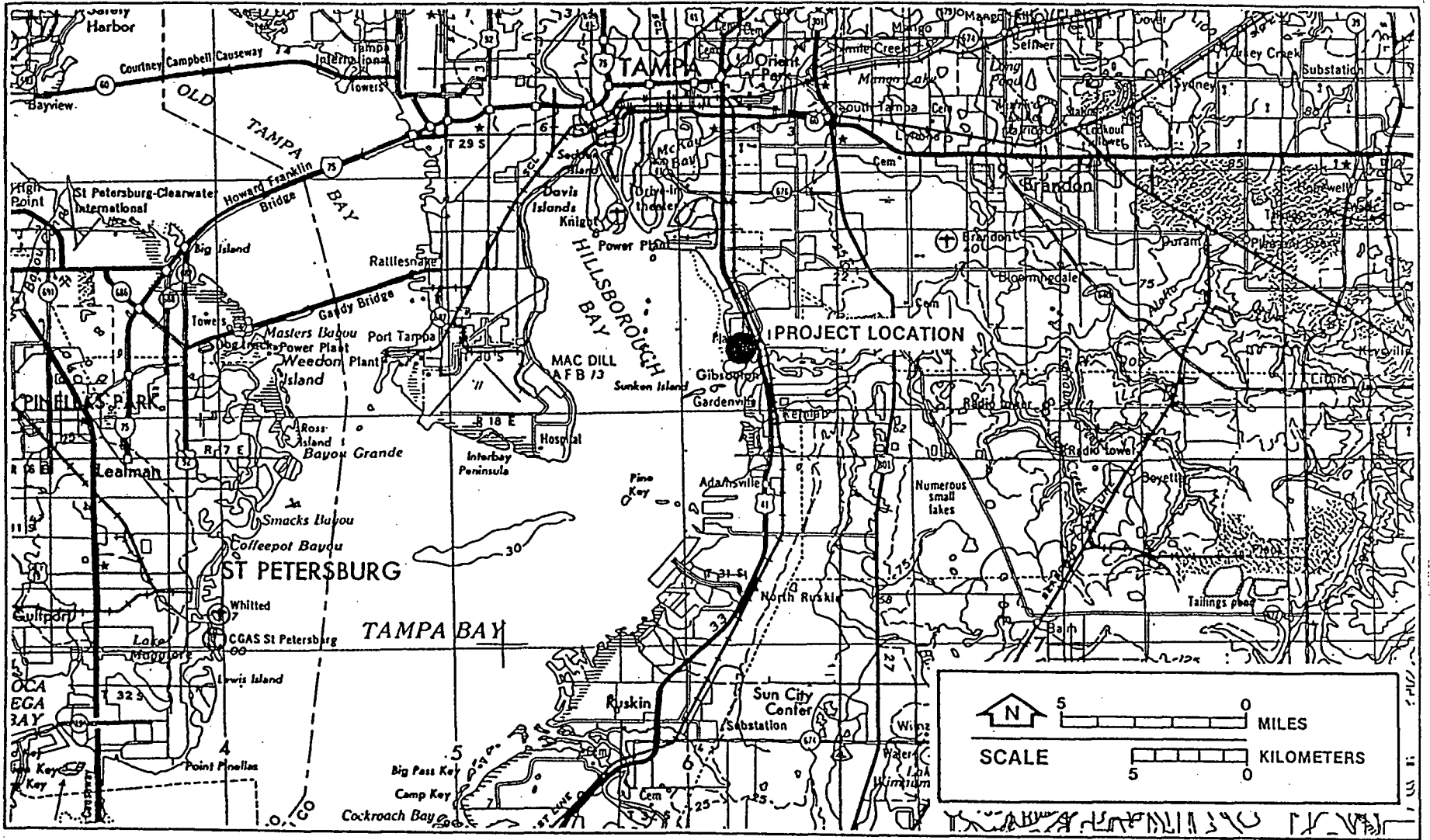
Maximum annual emissions -

$$3.43 \text{ lb/hr} \times 550 \text{ hr/yr} / 2,000 \text{ lb/ton} = 0.94 \text{ TPY}$$

Since the maximum allowable PM emissions from this source are less than 1.0 TPY, the RACT requirements of FAC Rule 17-2.650 do not apply.

Simplified Flow Diagram
GTSP Truck Loading Station

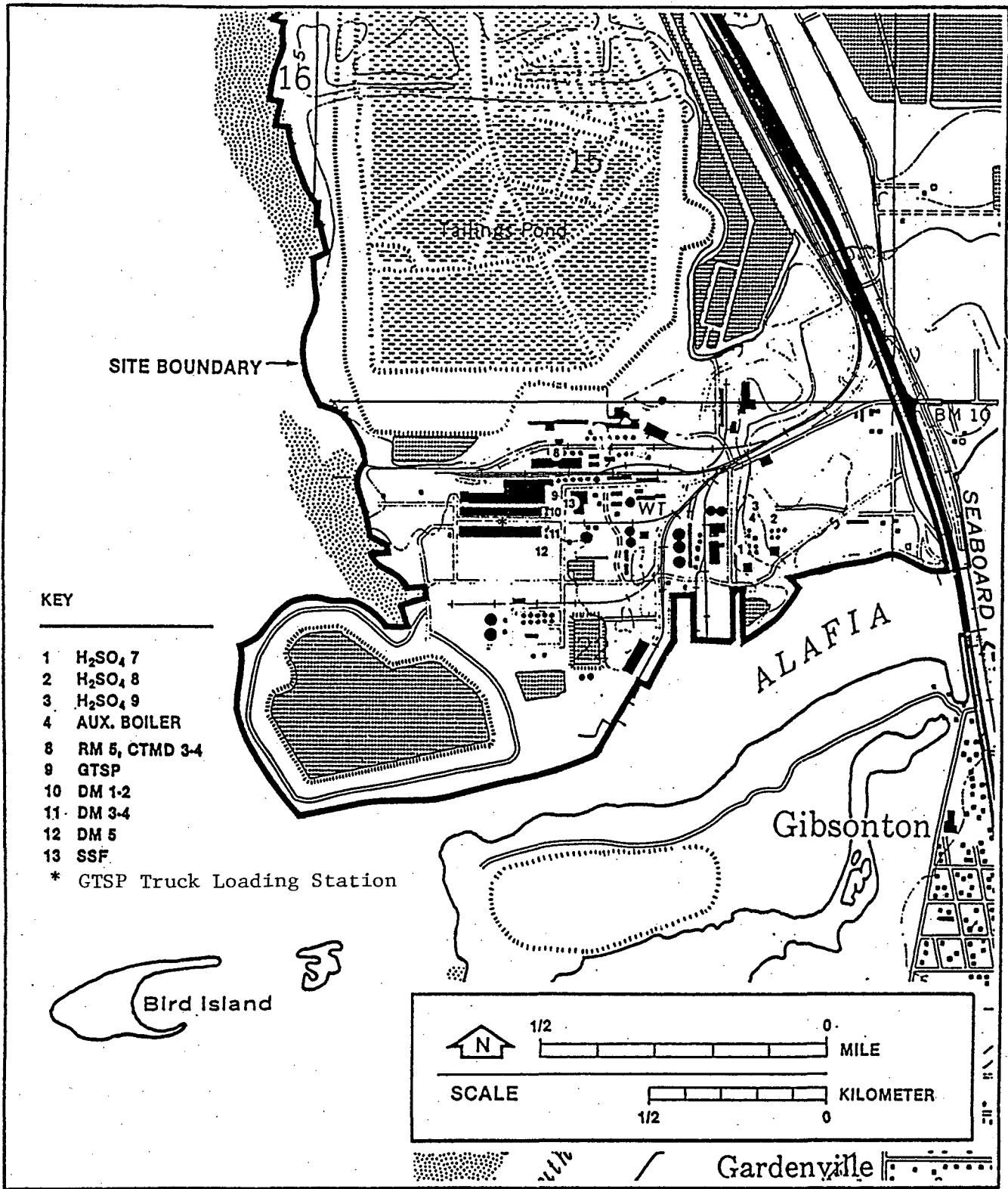




GENERAL LOCATION MAP OF GARDINIER, INC.

SOURCE: USGS, 1972.



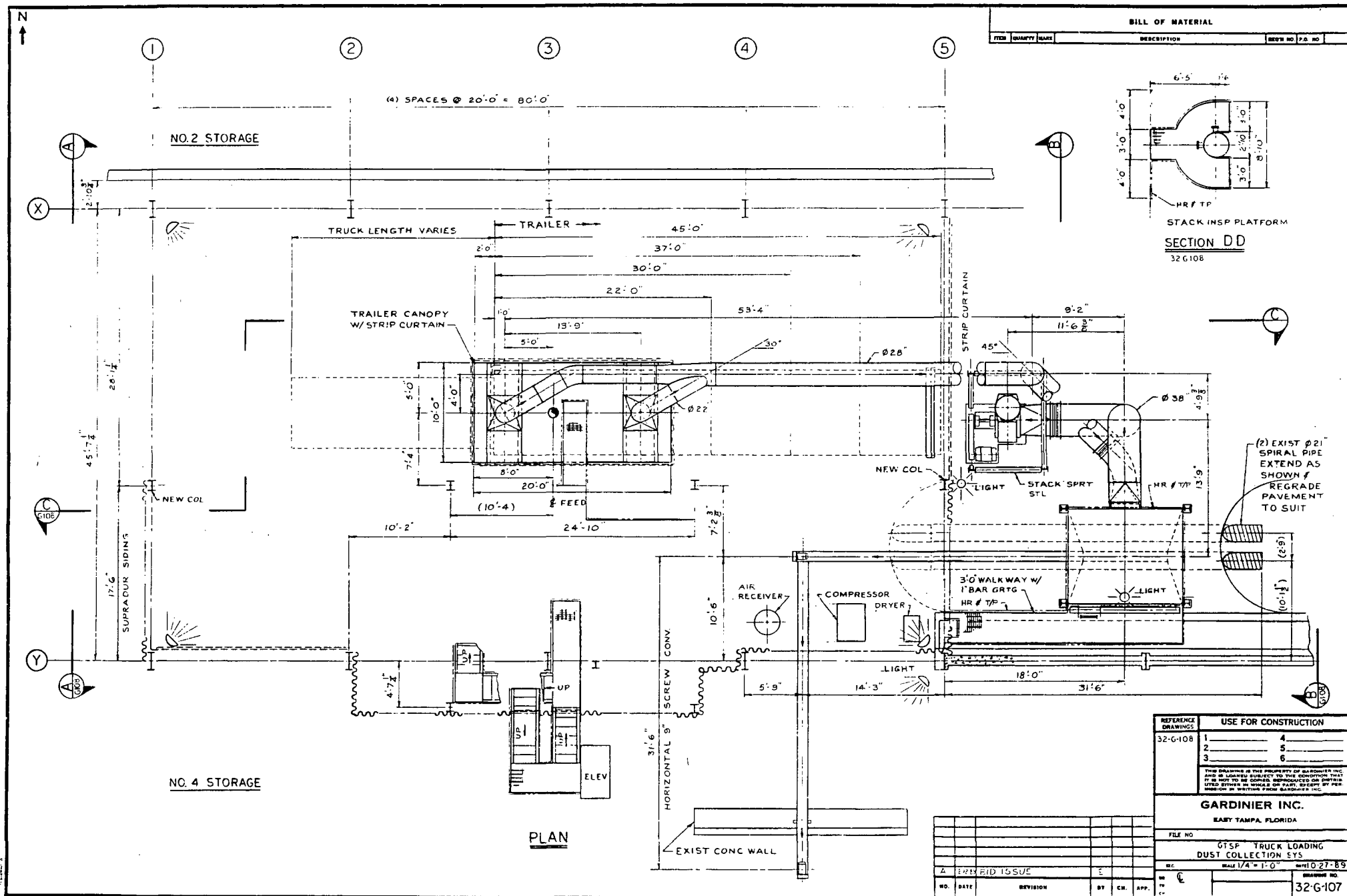


SITE LOCATION MAP OF GARDINIER, INC.

SOURCE: USGS, 1981.

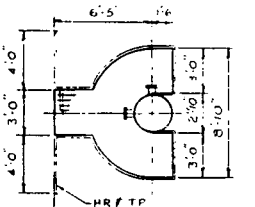


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BILL OF MATERIAL

ITEM	QUANTITY	SIZE	DESCRIPTION	REF. NO.	P.A. NO.
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SECTION DD
32 G.108

REFERENCE DRAWINGS	USE FOR CONSTRUCTION
32-G-108	1 _____ 4 _____
	2 _____ 5 _____
	3 _____ 6 _____

THIS DRAWING IS THE PROPERTY OF GARDINIER INC AND IS LOANED SUBJECT TO THE CONDITION THAT IT IS NOT TO BE COPIED, REPRODUCED OR OTHERWISE USED EITHER IN WHOLE OR PART, EXCEPT BY PERMISSION IN WRITING FROM GARDINIER INC.

GARDINIER INC.
EAST TAMPA, FLORIDA

FILE NO. _____

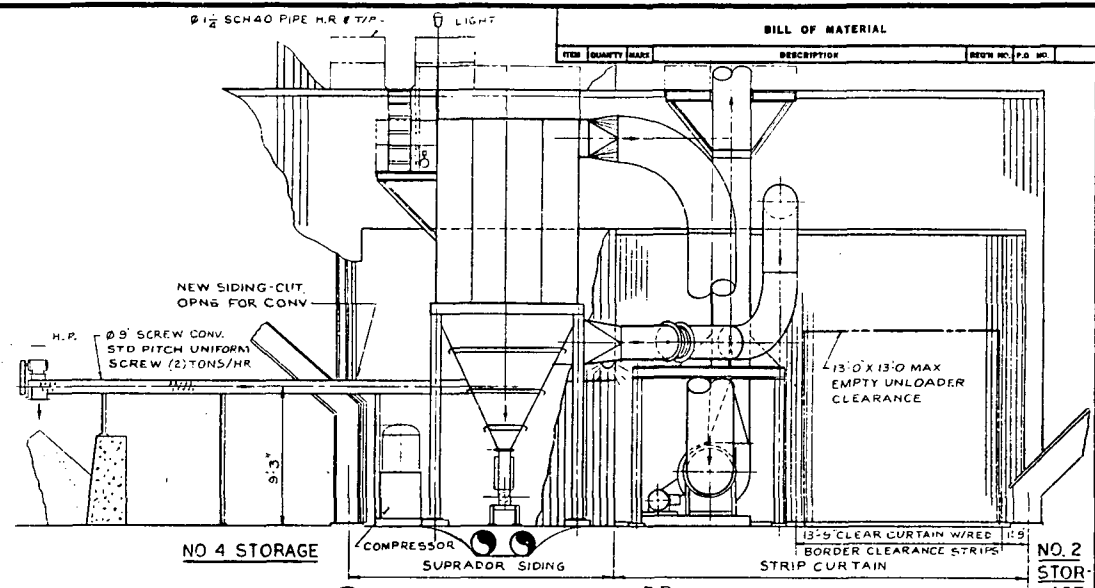
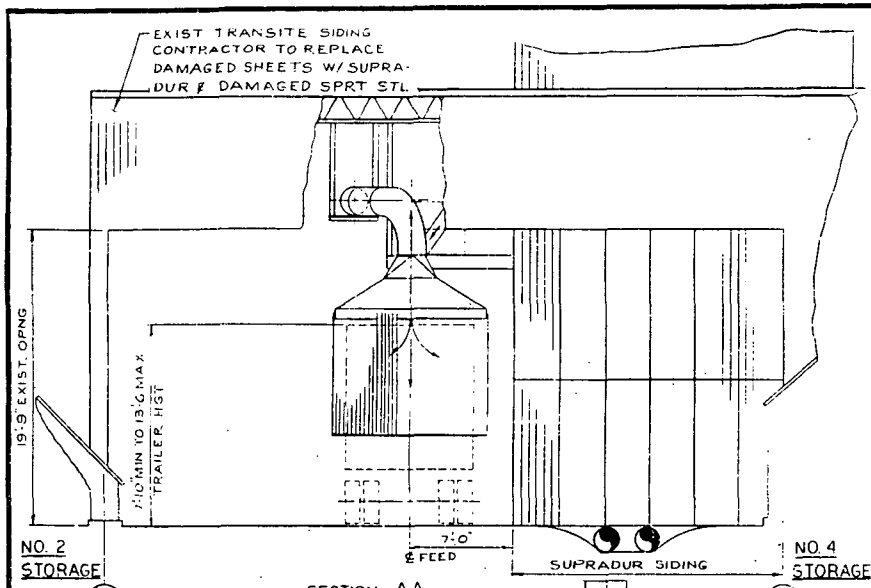
PROJECT: **GTSP TRUCK LOADING DUST COLLECTION SYS**

SCALE: 1/4" = 1'-0"

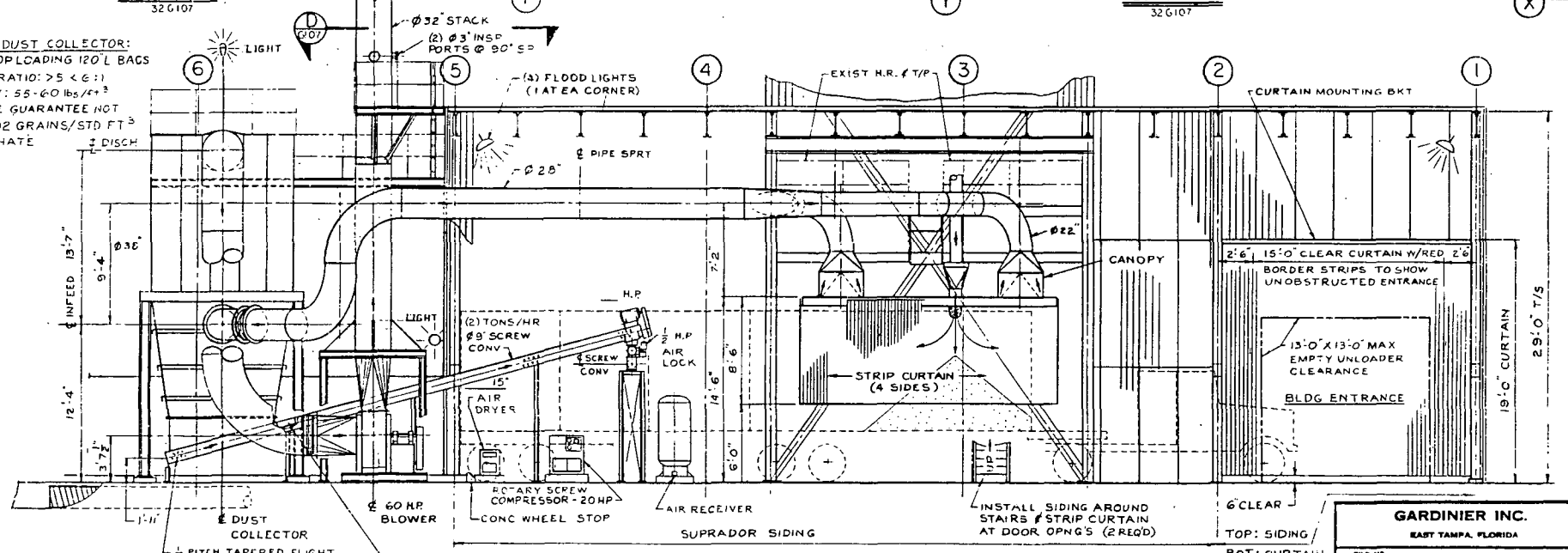
DATE: _____

32-G-107

NO.	DATE	REVISION	BY	CHK.	APP.
A		FINAL ISSUE			



20,000 ACFM DUST COLLECTOR:
 - INSULATED, TOP LOADING 120' L BAGS
 - AIR TO CLOTH RATIO: > 5 < 6 : 1
 - BULK DENSITY: 55-60 lbs/ft³
 - PERFORMANCE GUARANTEE NOT TO EXCEED .02 GRAINS/STD FT³
 - DUST: PHOSPHATE



GARDINIER INC.
EAST TAMPA, FLORIDA

FILE NO. _____

GTSP TRUCK LOADING
DUST COLLECTION SYS-SECTIONS

SCALE 1/4" = 1'-0"

DATE 11-1-89

DRAWING NO. 32-G-108

NO	DATE	REVISION	BY	CK	APP.