

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

October 29, 1984

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Daniel E. Ross
Technical Manager
Nitram, Inc.
Post Office Box 2968
Tampa, Florida 33601

Dear Mr. Ross:

Enclosed is Permit Number AC 29-089405, dated October 26, 1984, to Nitram, Inc. issued pursuant to Section 403, Florida Statutes.

Acceptance of this permit constitutes notice and agreement that the department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

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

CHF/pa

Enclosure

cc: William Thomas, DER Southwest District
Victor San Agustin, Hillsborough County Environmental
Protection Commission

Final Determination

Nitram, Inc.
Tampa, Florida
Hillsborough County

700 TPD Nitric Acid Plant
AC 29-089405

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

October 25, 1984

Final Determination

Nitram, Inc.'s application for a permit to construct a 700 TPD nitric acid plant 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 September 14, 1984.

Nitram, Inc. submitted written comments requesting the department delete Specific Condition Numbers 2 and 13 from the permit to construct.

Specific Condition No. 2 states "Maximum production rate of nitric acid at this facility shall not exceed 33.5 TPH and 700 TPD, expressed as 100 percent HNO_3 ."

Specific Condition No. 13 states "The nitric acid plant shall not be operated without both compressors and absorption towers in service unless prior approval has been obtained from the department."

Nitram, Inc. stated that Specific Condition No. 2 was not needed because Specific Condition No. 4 limited NO_x emissions to 3 lb/ton and 2,100 lb/day. Specific Condition No. 4, in effect, limited emissions above and below the 700 TPD production limit. The department agrees with Nitram's conclusion that the emissions are limited by Specific Condition No. 4 alone. However, there is no inconsistency between these. The production limits in Specific Condition No. 2 are those listed in the application by the applicant. They are needed as an alternate means to confirm compliance during those times that the continuous emission monitor is out of service. If the applicant needs a higher production rate or believes the plant will operate with an emission less than 3 lb NO_x /ton acid, they may submit a revised application for a permit to construct. Any such application submitted will be reviewed on its own merits. The Bureau believes that the production limits of Specific Condition No. 2 should be retained in the permit.

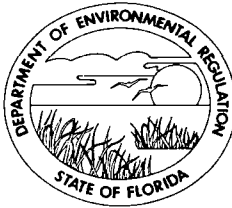
Deleting Specific Condition No. 13 would, in effect, allow Nitram, Inc. to operate one half of the combined plant. While processing this application, the department requested that the company address the possibility of operating the plant without one compressor and absorption tower in service. The Company replied in their July 20, 1984, letter that the plant is being designed as a single unit, operating near design rate or else not operating. They went on to say that it may be possible to operate at half rate (one compressor and one tower down) but major problems would have to be resolved. Because of their reply, the department prohibited operation of the plant with this

process equipment down. The department would have to review more data, primarily engineering design and performance data on various process equipment, before we could remove this condition and be assured the plant will comply with the regulations. When actual performances data and design alternations are available for review, the department will reconsider its position on this if requested to do so by the Company.

The final action of the department will be to issue the construction permit as proposed in the August 27, 1984, Technical Evaluation and Preliminary Determination.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Nitram, Inc.
P. O. Box 2968
Tampa, Florida 33601

Permit Number: AC 29-089405
Date of Issue:
Expiration Date: March 1, 1986
County: Hillsborough
Latitude/Longitude: 27° 54' 40"N/
82° 23' 50"W
Project: Nitric Acid Plant

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

⁰²⁺⁰⁵
Combine and modify two existing nitric acid plants into single 700
TPD nitric acid plant with air pollution controlled by process
design and emissions discharged to the atmosphere through two 55
feet high stacks, 2.5 and 3.25 feet in diameter.

The construction shall be in accordance with the application signed
by Mr. David E. Ross on May 31, 1984, and revised on July 5, 1984,
by Mr. Ross except for the changes mentioned in the Technical
Evaluation and listed as specific conditions in the permit to
construct.

attachment: application

PERMITTEE:
Nitram, Inc.

I. D. Number:
Permit Number: AC 29-089405
Date of Issue:
Expiration Date: March 1, 1986

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:
Nitram, Inc

I. D. Number:
Permit Number: AC 29-089405
Date of Issue:
Expiration Date: March 1, 1986

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:
Nitram, Inc.

I. D. Number:
Permit Number: AC 29-089405
Date of Issue:
Expiration Date: March 1, 1986

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:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () 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:
Nitram, Inc.

I. D. Number:
Permit Number: AC 29-089405
Date of Issue:
Expiration Date: March 1, 1986

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. This permit replaces operating permits AO 29-20570 and AO 29-16201 for the two existing nitric acid plants.
2. Maximum production rate of nitric acid at this facility shall not exceed 33.5 TPH and 700 TPD, expressed as 100 percent HNO_3 .
3. The nitric acid plant may operate continuously, 8760 hr/yr.

PERMITTEE:
Nitram, Inc.

I. D. Number:
Permit Number: AC 29-089405
Date of Issue:
Expiration Date: March 1, 1986

SPECIFIC CONDITIONS:

4. Nitrogen oxides emission expressed as NO₂ shall not exceed 3.0 lb/ton HNO₃ (100%), 101 lb/hr, and 2,100 lb/day. Visible emissions shall not exceed 5 percent opacity (6 minute average).
5. Heat input to the combustor gas boiler shall not exceed 53 million Btu/hr.
6. Compliance with the allowable emission limits of 3 lb NO_x/ton HNO₃ (100%) and 5 percent opacity shall be determined by the procedures specified in 40 CFR 60.74, test methods and procedures for nitric acid plants, and Method 9, visible determination of opacity, as described in 40 CFR 60, Appendix A. The NO_x and visible emissions test shall be conducted concurrently. The emissions from both stacks of the modified plant must be sampled concurrently or immediately after each other. The NO_x emission from the modified plant is the sum of the emission from each stack. The visible emission from the plant is the maximum emission from either stack.
7. Compliance tests will be conducted within 30 days of the completion of construction while the plant is operating within 10 percent of its permitted production rate. Nitram, Inc. shall give the Hillsborough County Environmental Protection Commission at least 15 days written notice prior to the scheduled compliance tests.
8. Nitram, Inc. shall install, operate, and maintain a NO_x continuous emission monitor and report excess NO_x emissions from the modified nitric acid plant as described in 40 CFR 60.73 to the Hillsborough County Environmental Protection Commission.
9. The applicant shall report any delay in modification of the plants to the Hillsborough County Environmental Protection Commission.
10. Nitram, Inc. shall not cause suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
11. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, which includes a certificate of completion and compliance test results, to the Hillsborough County

PERMITTEE:
Nitram, Inc.

Permit Number: AC 29-089405
Date of Issue:
Expiration Date: March 1, 1986

SPECIFIC CONDITIONS:

Environmental Protection Commission prior to 90 days of the expiration date of the construction permit or 45 days after completion of the compliance test, whichever date occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or issuance of an operating permit.

12. The source shall comply with the provisions and requirements of the preceding general conditions.

13. The nitric acid plant shall not be operated without both compressors and absorption towers in service unless prior approval has been obtained from the Department.

14. Any permit to operate issued for the nitric acid plant shall require Nitram, Inc. to submit annual operating reports to the Hillsborough County Environmental Protection Commission, containing, as a minimum, the following:

- a. A description of any physical or operating change to the nitric acid plant that may affect emissions of any air pollutant from it.
- b. The amount of nitric acid produced during the preceding year and the maximum and average production rate of the nitric acid plant.
- c. Recent visible emissions test report for both stacks of the plant.
- d. A report of the nitric oxides emissions from both stacks at the plant.

Issued this 26 day of October 1984

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

| For Routing To District Offices And/Or To Other Than The Addressee | | |
|-----------------------------------------------------------------------|--------------------|----------------|
| To: <i>Clair Fancy</i> | Loctn.: | |
| To: _____ | Loctn.: | |
| To: _____ | Loctn.: | |
| From: <i>Duchi</i> | Date: | <i>10-29</i> |
| Reply Optional [] | Reply Required [] | Info. Only [] |
| Date Due: _____ | Date Due: _____ | |

TO: Victoria J. Tschinkel
FROM: Clair Fancy *Clair Fancy*
DATE: October 25, 1984
SUBJ: Approval of Attached Air Construction Permit

DER
OCT 29 1984
BAQM

Attached for your approval is the Final Determination and Permit to Construct for a 700 TPD nitric acid plant at Nitram, Inc.'s existing plant in Tampa, Hillsborough County, Florida.

The "Notice of Proposed Agency Action on Permit Application" was published in The Tampa Tribune on September 14, 1984. The applicant requested the department remove the restrictions in the permit regarding maximum production rates and operating the plant with part of the process equipment out of service. We propose to deny their request for the reasons stated in the Final Determination.

The Bureau recommends your approval and signature on the attached Permit to Construct, which is identical to the one that appeared in the Technical Evaluation and Preliminary Determination. The ninetieth day, after which this permit would be issued by default, is December 5, 1984.

CHF/WH/s

P16 7682463

RECEIPT FOR CERTIFIED MAIL

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

| | | |
|-----------------------------|---------------------------------------------------------------------|---|
| SENT TO | | |
| Mr. Daniel E. Ross | | |
| STREET AND NO. | | |
| P.O., STATE AND ZIP CODE | | |
| POSTAGE \$ | | |
| CONSULT POSTMASTER FOR FEES | CERTIFIED FEE | c |
| | SPECIAL DELIVERY | c |
| | RESTRICTED DELIVERY | c |
| | OPTIONAL SERVICES | |
| | RETURN RECEIPT SERVICE | |
| | SHOW TO WHOM AND DATE DELIVERED | c |
| | SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY | c |
| | SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY | c |
| | SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY | c |
| TOTAL POSTAGE AND FEES \$ | | |
| POSTMARK OR DATE | | |
| 11/2/84 | | |

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

Ⓢ SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
 Show to whom and date delivered.....¢
 Show to whom, date and address of delivery.....¢
 RESTRICTED DELIVERY
 Show to whom and date delivered.....¢
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery.\$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Daniel E. Ross
P. O. Box 2968
Tampa, FL 33601

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
P16 7682463

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE Addressee Authorized agent

4. *Ronald P. ...*
DATE OF DELIVERY NOV - 6 1984
POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: USPO CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-459