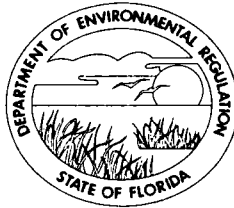


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

August 27, 1984

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Ross:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to construct a 700 TPD nitric acid plant at your facility located in Tampa, Hillsborough County, Florida.

Before final action can be taken on your draft permit, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Hillsborough County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permit.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

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

CHF/pa

Attachments

cc: Dan Williams
Victor San Agustin

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter on an)
Application for Permit by:)
)
Nitram, Inc.) DER File No. AC 29-089405
P. O. Box 2968)
Tampa, Florida 33601)
)

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its Intent to Issue, and proposed order of issuance for, a permit pursuant to Chapter 403, Florida Statutes, for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Nitram, Inc., applied on June 5, 1984, to the Department of Environmental Regulation for a permit to construct a 700 TPD nitric acid plant at their existing facility located at 5321 Hartford Street in Tampa, Hillsborough County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The applicant was officially notified by the Department that an air construction permit was required for the proposed work.

This intent to issue shall be placed before the Secretary for final action unless an appropriate petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes, is filed within fourteen (14) days from receipt of this letter or

publication of the public notice (copy attached) required pursuant to Rule 17-103.150, Florida Administrative Code, whichever occurs first. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code (copy attached), and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301.

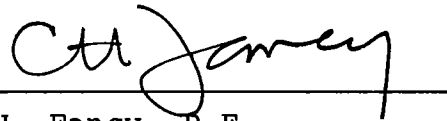
Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department. In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witness and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exception to any order or hearing officer's recommended order, and to be represented by counsel. If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), 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 proposed agency action. Therefore, persons who may not wish to file a petition, 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, 2009 Apalachee Parkway, Tallahassee, Florida 32301. 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 32301. 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.

Executed the 27 day of August, 1984, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Dan Williams
Victor San Agustin

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action on Permit Application

The Department gives notice of its intent to issue a permit to Nitram, Inc. to authorize construction of a 700 TPD nitric acid plant at their facility located at 5321 Hartford Street in Tampa, Hillsborough County, Florida.

Two existing nitric acid plants, having a total production rate of approximately 700 TPD, will be combined and modified into a single, more efficient, nitric acid plant with the same production capacity, 700 TPD. The allowable nitric oxides emissions from nitric acid production will remain at 3 lb NO_x/T acid produced or 383 TPY. A Best Available Control Technology (BACT) determination was not required for this project.

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 32301, 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 32301. 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 32301. 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:

Department of Environmental Regulation
Southwest District
7601 Highway 301 N.
Tampa, Florida 33610

Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Hillsborough County
Environmental Protection Commission
1900 9th Avenue
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 30 days of the publication of this notice will be considered in the Department's final determination.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

Technical Evaluation
and
Preliminary Determination

Nitram, Inc.
Hillsborough County

Proposed Nitric Acid Plant
Permit Number
AC 29-089405

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

August 27, 1984

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action on Permit Application

The Department gives notice of its intent to issue a permit to Nitram, Inc. to authorize construction of a 700 TPD nitric acid plant at their facility located at 5321 Hartford Street in Tampa, Hillsborough County, Florida.

Two existing nitric acid plants, having a total production rate of approximately 700 TPD, will be combined and modified into a single, more efficient, nitric acid plant with the same production capacity, 700 TPD. The allowable nitric oxides emissions from nitric acid production will remain at 3 lb NO_x/T acid produced or 383 TPY. A Best Available Control Technology (BACT) determination was not required for this project.

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 32301, 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 32301. 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 32301. 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:

Department of Environmental Regulation
Southwest District
7601 Highway 301 N.
Tampa, Florida 33610

Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Hillsborough County
Environmental Protection Commission
1900 9th Avenue
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 30 days of the publication of this notice will be considered in the Department's final determination.

I. SYNOPSIS OF APPLICATION

A. Applicant and Address

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

B. Source Location

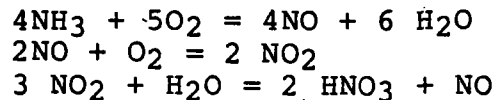
The proposed source is located at the Nitram, Incorporated chemical complex at 5321 Hartford Street in Tampa, Hillsborough County, Florida. The latitude and longitude coordinates are 27° 54' 40" N and 80° 23' 50" W respectively.

C. Project Description

The proposed project consists of replacing a portion of the major processing equipment of two existing nitric acid plants by a single, larger process line. The combined facility is being designed to operate as a single plant. The capacity of the modified plant is the same as the two existing plants. No future modifications at the chemical complex that will affect emissions are expected as a result of combining the two plants into one.

D. Process Description

Nitric acid is produced in a three-stage operation: ammonia is oxidized to nitric oxide, the nitric oxide is then oxidized to nitrogen dioxide, and this gas is absorbed in water to produce nitric acid according to the simplified equation



The nitric oxide formed in the last reaction returns to the gas phase, is reoxidized to nitrogen dioxide, and reabsorbed. These reactions are highly exothermic.

The major components in the plant are compressors, heat exchangers, combustors, and absorbing towers. Nitric oxide emissions are controlled by burning the process stream being discharged to the atmosphere with natural gas. This reaction reduces the nitric oxides, a criteria air pollutant, to nitrogen, which is not an air pollutant.

II. Rule Applicability

A. State Regulations

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

The proposed source will be located in an area designated attainment for nitrogen oxides (NO_x), unclassifiable for sulfur dioxide (SO₂), and nonattainment for particulate matter (PM) and volatile organic compounds (VOC) in accordance with Florida Administrative Code, Rule 17-2.420.

Nitram, Inc. is a major emitting facility for nitrogen oxides, as defined in Rule 17-2.100(95), because emissions of this pollutant exceed 100 TPY.

This facility category is on the list of the 28 Major Facility Category, Rule 17-2, FAC Table 500-1.

No increase in emissions of any criteria pollutant is expected as a result of this modification. Therefore, this project is exempt from provisions of Rule 17-2.500, Prevention of Significant Deterioration.

The proposed project shall be permitted under Rule 17-2.520, FAC, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirement.

The proposed source shall comply with Rule 17-2.600(8), FAC, emission limiting standards for nitric acid plants, and Rule 17-2.660(1), FAC, standards of performances for new nitric acid plants. It must also comply with the Hillsborough County Environmental Protection Commission air pollution control regulations, Chapter 1-3.

B. Federal Regulations

This project is not subject to federal PSD regulations, Section 52.21 to Title 40 of the Code of Federal Regulations (40 CFR 52.21), because the modification to the plant will not cause a significant emission rate increase of any criteria pollutant. It is subject to 40 CFR 60, Subpart G, Standards of Performance for Nitric Acid Plants.

III. Source Impact Analysis

A. Emissions Limitations

The modification to the two existing nitric acid plants will not increase the allowable emissions of nitrogen oxides (NO_x) to the atmosphere.

Table 1 summarizes the potential to emit nitrogen oxides from the existing and new plants. As the table shows, the proposed change of emissions do not exceed the significance levels set in the PSD regulations, Rule 17-2, Table 500-2, FAC.

Best Available Control Technology (BACT) was not determined for any pollutant for this project.

The emission limiting standards that are made a condition of the permit are the new source performance standard of 3 lbs NOx/T acid and Hillsborough County's visible emission standard of 5 percent opacity.

The permitted emissions are in compliance with all applicable requirements of Chapter 17-2, Florida Administrative Code; Chapter 1-3, Hillsborough County Environmental Protection Commission; and 40 CFR 60, Subpart G, Standards of Performance for Nitric Acid Plants.

B. Air Quality Analysis

From a technical review of the application, the Department has determined that the construction of this source will not have an impact on Florida's ambient air quality standards.

Table 1

Summary of Emissions

Source	Nitrogen Oxides Emissions (as NO ₂)	
	lb/hr	TPY
Existing Sources		
Nitric Acid Plant No. 1	45	197
Nitric Acid Plant No. 2	43.74	101
	<u>88.74</u>	<u>388</u>
New Source	lb/hr	TPY
Nitric Acid Plant	87.5*	383

*Daily average of 87.5 lb/hr, 101 lb/hr maximum hourly NOx emissions, expressed as NO₂.

Table 1a

Allowable Emissions

Nitric Acid Plant	3 lb NOx ton 100% HNO ₃
	101 lb NOx/hr maximum
	2100 lb/day maximum
	383 ton NOx/year
	5 percent opacity

* NOx expressed as NO₂

IV. Conclusion

Based on the data submitted in the application for permit to construct, the Department has concluded that the proposed nitric acid plant can be built and operated in compliance with all applicable air pollution control regulations. The Department proposes to issue a construction permit for the facility. The General and Specific Conditions listed in the proposed permit (attached) will assure compliance of the source with the Department's air pollution control regulations.

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, 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:

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 HNO₃.
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 condition of the construction permit and submit a complete application for an operating permit, which includes a certificate of completion and compliance tests 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 _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

COUNTY OF HILLSBOROUGH



AUG 24 1984

MEMORANDUM

BAQM

Date August 21, 1984

To Willard Hanks, DER through Jerry Campbell, EPC

From Victor San Agustin, EPC VSA

Subject: MODIFICATION OF NITRAM'S #1 AND #2 NITRIC ACID PLANTS

First of all, I would like to start by comparing emissions between the existing plants and the modified plant. Below is a table:

	#1	#2	Total	New Plant
Permitted Production Rate (TPH)	15	15	30	33.5
Allowable (lbs/hr)	45	45	90	100.5
Actual Emissions (lbs/hr)	44.1**	20**	64.1	76.2***
Permitted Daily Prod. (TPD)	360	360	720	700.0
Restricted hours as a result of restricted daily production rate (hrs/day)	none	none	none	20.9x21****
Allowable Daily Emissions (lbs/day)	1080	1080	2160	2110.5
Allowable Yearly Emissions (TPY)	197	197	394.2	383.00

* Based on 40CFR60

** Based on recent '84 stack test data

*** Based on engineering calculations $[0.83(2)(1.5333 \frac{NO_2}{NO})(33.5TPH) = 76.2 \text{ lb/hr}]$

****Based on a continuous maximum rate of 33.5 TPH

The table clearly shows that the yearly allowable emissions are not increased. This is mainly due to the fact that the daily production rate was capped at 700TPD which he specified in his response. If the daily production was not restricted, the yearly allowable would be:

$$33.5 \frac{\text{T Acid}}{\text{hr}} \times \frac{24\text{hr}}{\text{day}} \times \frac{365\text{days}}{\text{yr}} \times \frac{31\text{lbNO}_x}{\text{T Acid}} \times \frac{\text{IT}}{2000\text{lb}} = 440.2 \text{ TPY}$$

which is an increase of 46TPY. If such is the case, a PSD permit review may have been necessary pursuant to 17-2.500.

Assuming that Nitram is aware of their operating restrictions and having reviewed the application, I recommend approval that a construction permit be issued to Nitram. I have attached my recommendations in another memo. However, if Nitram chooses to change its maximum hourly and daily production rate or make other modifications, I shall send you another memo after my meeting with Nitram. I should have met with Dan Ross by the time you receive this letter. Please call me at SC571-5960 after you have reviewed this letter.

cc:
Bill Thomas, FDER

No. 0156560

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	¢
	SPECIAL DELIVERY	¢
	RESTRICTED DELIVERY	¢
	OPTIONAL SERVICES	
	RETURN RECEIPT SERVICE	¢
	SHOW TO WHOM AND DATE DELIVERED	¢
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		\$
POSTMARK OR DATE		9/6/84

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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. 3

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Mr. Daniel E. Ross
P. O. Box 2968
Tampa, Florida 33601

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0156560	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY

SEP 10 1984

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK: TAMPA, FL 10 SEP 1984

CLERK'S INITIALS

GPO : 1979-300-459