

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

July 2, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Daniel E. Ross, Technical Manager
Nitram, Inc.
P. O. Box 2968
Tampa, Florida 33601

Re: Application Number AC 29-089405

Dear Mr. Ross:

The Bureau of Air Quality Management has received your application for a permit to modify two nitric acid plants at your facility in Hillsborough County, Florida. Based on our initial review of your proposal, it has been determined that additional information is needed before we can process the application. The information required to complete the application is listed below:

Application Fee:

In accordance with Florida Administrative Code Rule 17-4.05(4)(a)4, the construction permit fee for a source having potential emissions of more than 100 tons per year of any single pollutant in \$1000. If permitted emissions do not exceed 100 TPY, the application fee will be less. Based on this regulation, you need to send a check, payable to the Department of Environmental Regulation, for the appropriate amount to our Tallahassee Office.

DER Form 17-1.122(16), Application to Operate/Construct Air Pollution Sources.

SECTION II. General Project Information

Please submit a general description of the chemical process. What modifications will allow one NOx abatement system to handle the expected production from both plants and maintain nitrogen oxides discharge under the 3 lb/ton NSPS standard? Please provide compliance test data of a similar system. What other modifications are expected at the plant in the future as a result of merging the two existing plants into a single one? Can either

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absorption tower operate by itself and still maintain its absorption efficiency? Explain the emission control function of the proposed catalytic absorber (nitrogen oxides removal and recovery) and attach design specifications. Confidentiality of proprietary information will be maintained by the reviewing committee as requested.

SECTION III: Air Pollution Sources and Compliance Devices

SECTION V: Supplemental Requirements

1. What were the permitted and actual nitric acid production and nitrogen oxides emissions from each existing nitric acid plant? Please show how the actual emissions were calculated.
2. Provide the data and calculations showing derivation of production rate and control efficiency. Include a simplified 8 1/2" x 11" flow diagram showing material balance (raw materials in, production and emissions out).
3. What is the net emissions change of nitrogen oxides caused by the modifications? This is the difference, in TPY, of the allowable emissions being requested for the modified plant and the actual emissions of the two existing nitric acid plants. If nitric oxides emissions increase by 40 TPY or more, please furnish the information required by Rule 17-2.500, FAC, to confirm the modified source will comply with the Prevention of Significant Deterioration (PSD) regulations.
4. The modified plant appears to have a greater capacity than the two existing plants. What will the additional acid be used for? Will the modification of the two existing nitric acid plants cause a change (increase production or emissions) from any other existing sources at the plant? If so, what will be the actual change in emissions of all criteria pollutants from each air pollution source at the plant?
5. Will each stack on the modified nitric acid plant have nitrogen oxides continuous emission monitors that meets the performance specifications listed in 40 CFR 60, Appendix B?

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6. The 33.5 TPH production (p. 4 of 12) is equal to 804 TPD, not 700 TPD that is listed in your answers from p.2 of 12. What will be the maximum daily production of the modified plant?

If you have any questions regarding this matter, please call Willard Hanks at (904)488-1344 or write to me at the above address.

Sincerely,



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

CHF/TH/s

cc: Hillsborough County
SW District Office

No. 0156522

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		
7/2/84		

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978

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

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0156522	

 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 JUL - 6 1984

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6. UNABLE TO DELIVER BECAUSE:

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CLERK'S INITIALS

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