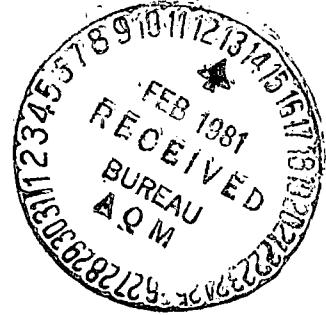


NITRAM, INC.

5321 Hartford St. • P. O. Box 2968 • Tampa, Florida 33601 • Phone (813) 626-2181

February 10, 1981



Mr. William A. Thomas
Engineer
Bureau of Air Quality Management
State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Bill:

As a modification to our application for a construction permit concerning the conversion of our No. 2 prill tower from low "D" to high "D" operation, please accept the following:

1. The discharge rate concerning particulates from the high "D" operation should be no more than 28 lbs/hr.
2. The grain loading associated with this operation should be approximately 0.014 grains/cu.ft.
3. The efficiency of the Beco Scrubber should be no less than 92%.
4. The approximate cost of a new high "D" prill tower is six million dollars, and the cost of our conversion project is roughly two million. These figures allow the project to fall into a "modification" category only.

Please make the four points mentioned above a part of our formal application request.

Again, we appreciate DER's help and direction in our permit application process, and if there is any more information you need, please do not hesitate to let me know.

Sincerely,

A handwritten signature in cursive script that reads "John C. Thompson".

John C. Thompson
Director of Pollution Control

JCT:ml

cc: Frank Shindle, HCEPC
Dan Williams, DER, SW District
W. H. Blevins

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No 33563

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from _____ Date _____

Address _____ Dollars \$ _____

Applicant Name & Address _____

Source of Revenue _____

Revenue Code _____ Application Number _____

By _____

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#0000000039724 COE# DER PROCESSOR:BOB KING DER OFFICE:TLH
FILE NAME:NITRAM, INC. DATE FIRST REC: 02/09/84 APPLICATION TYPE:AC
APPL NAME:JOHN C. THOMPSON APPL PHONE:(813)626-2184 PROJECT COUNTY:29
ADDR:5324 HARTFORD ST., P. O. BOX 2968 CITY:TAMPA ST:FLZIP:33604
AGNT NAME:DANIEL E. ROSS AGNT PHONE:(813)626-8184
ADDR:(ABOVE) CITY: ST: ZIP:

ADDITIONAL INFO REQ: / / / / / REC: / / / / /
APPL COMPLETE DATE: 02/23/84 COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / /
HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / /
HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N

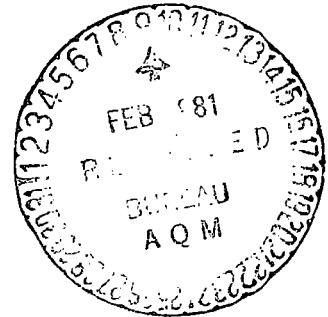
FEE PD DATE#1:02/23/84 \$0020 RECEIPT#000033563 REFUND DATE: / / REFUND \$
FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:IS DATE:05/07/84
REMARKS: CONVERSION OF AN EXISTING PRILL TOWER TO HIGH DENSITY OPERATION.
BECO SCRUBBING SYSTEM. OVERALL EMISSIONS DECREASE AT PLAN1. UTM = 353.450F/
3089.00N. LAT/LONG = 82DEG23'50"N /27DEG54'40"

NITRAM, INC.

5321 Hartford St. • P. O. Box 2968 • Tampa, Florida 33601 • Phone (813) 626-2181

February 6, 1981

Mr. William A. Thomas, Engineer
Bureau of Air Quality Management
State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32301



Dear Bill:

Enclosed are four (4) copies of an application for construction permit covering the conversion of our No. 2 prill tower from low D to high D operation.

Most of the changes which we talked about on Friday, Feb. 6, 1981 are now included in this application. However, if there is any other information that you or your staff need, please don't hesitate to let me know.

Please accept my thanks again for taking time out from your busy schedule to give me the help and direction I needed in filling out the enclosed application. Also, please give your staff my thanks for their contribution during our meeting. As I mentioned to you Friday, state agency personnel have always been most cooperative and helpful; and for this we are greatly appreciative.

Again, please don't hesitate to let me know if further information is needed. Also, the \$20-application fee will arrive under separate cover.

Sincerely yours,

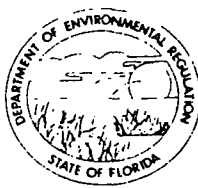
NITRAM, INC.

John C. Thompson

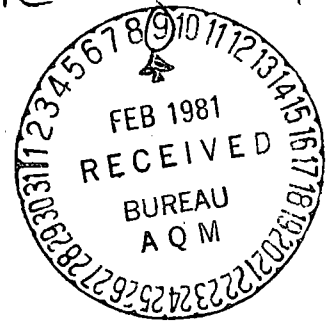
John C. Thompson
Dir. of Pollution Control &
Safety

JCT/es
Enclosures 4

cc: Mr. Robert Shindle, HCEPC
Mr. Dan Williams, Florida DER,
Southwest District



AC 29-39724



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
APPLICATION TO OPERATE/CONSTRUCT
AIR POLLUTION SOURCES

SOURCE TYPE: Prill Tower [] New¹ [X] Existing¹
APPLICATION TYPE: [] Construction [] Operation [X] Modification
COMPANY NAME: Nitram, Inc. COUNTY: Hillsborough
Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) No. 2 Ammonium Nitrate High Density Prill Tower
SOURCE LOCATION: Street 5321 Hartford St. City Tampa, FL 33619
UTM: East 353150 M North 308900 M
Latitude 82° 23' 50" N Longitude 27° 54' 40" W
APPLICANT NAME AND TITLE: John C. Thompson, Director of Pollution Control & Safety
APPLICANT ADDRESS: 5321 Hartford St., P.O.Box 2968, Tampa, FL 33601

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

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

I certify that the statements made in this application for a Construction/modification 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 permitted establishment.

*Attach letter of authorization

Signed: John C. Thompson
John C. Thompson, Dir. of Pollution Control & Safety
Name and Title (Please Type)
Date: 2-4-81 Telephone No. (813) 626-2181

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 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: Daniel E. Ross
Daniel E. Ross
Name (Please Type)
Nitram, Inc.
Company Name (Please Type)
P. O. Box 2968, Tampa, FL 33601
Mailing Address (Please Type)
Date: 2/4/81 Telephone No. 626-2181



Florida Registration No. 29525

¹See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

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.
Conversion of one of existing prill towers from low density to high density operation. Will have Beco scrubbing system resulting in full compliance. Will reduce overall emissions at Nitram by 30-40%.
- B. Schedule of project covered in this application (Construction Permit Application Only)
 Start of Construction May, 1981 Completion of Construction September, 1981
- 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.)
Total cost of Beco Scrubbing System - \$1,003,000.
- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
AO-29-19139 - 6/15/79-6/1/84 - Operating permit.
AO-29-2364 - 6/3/77-6/1/79 - Operating permit.
AC-29-2364 - 9/26/74-7/1/76 - Construction permit.
- E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? Yes No
- F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr -- ; if seasonal, describe: For permit application purposes, the prill tower will operate 365 days/year.
- G. 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? | <u>Yes</u> |
| a. If yes, has "offset" been applied? | <u>N/A - See attachment</u> |
| b. If yes, has "Lowest Achievable Emission Rate" been applied? | <u>N/A</u> |
| c. If yes, list non-attainment pollutants. | <u>Dust particulates</u> |
| 2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. | <u>Yes</u> |
| 3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. | <u>No - See attachment</u> |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? | <u>Yes</u> |
| 5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? | <u>No</u> |

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

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		
NH ₄ NO ₃		99+	110,000	A

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

1. Total Process Input Rate (lbs/hr): 110,000 #'s/hr.
2. Product Weight (lbs/hr): 100,000 #'s/hr. (10% recycle)

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission ¹		Allowed Emission ² Rate per Ch. 17-2, F.A.C.	Allowable ³ Emission lbs/hr	Potential Emission ⁴		Relate to Flow Diagram
	Maximum lbs/hr g/CuFt	Actual T/yr g/CuFt			lbs/hr	T/yr	
NH ₄ NO ₃	0.03	0.014	0.03 (RACT)	26 lbs/hr	253 lbs/hr		A
NH ₃	1-1/2 lbs/hr	4.4 Tons			210 lbs/hr		A

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles ⁵ Size Collected (in microns)	Basis for Efficiency (Sec. V, It ⁵)
Beco Engineering Vortex Scrubber	NH ₄ NO ₃	87% (A)	100 mesh to Sub Micron	See
with "Mistmaster" (one for ea. stream)	NH ₄ NO ₃ NH ₃	87% for NH ₄ NO ₃ 99+ for NH ₃ (A)		Suppl Requirements

¹ See Section V, Item 2.

² Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. - 0.1 pounds per million BTU heat input).

³ Calculated from operating rate and applicable standard

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

⁵ If Applicable

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

*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr - N/A

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 _____ Maximum _____

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

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

Stack Height: 200/20 ft. Stack Diameter: 20 ft.

Gas Flow Rate: 208,000/4,000 ACFM Gas Exit Temperature: 110/120 °F.

Water Vapor Content: 3 wt. % % Velocity: 920 (both) FPS

SECTION IV: INCINERATOR INFORMATION - N/A

Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste _____

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

Approximate Number of Hours of Operation per day _____ days/week _____

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) _____

Brief description of operating characteristics of control devices: _____

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight — show derivation.
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, 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 8½" 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 8½" 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 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

- 9. An application fee of \$20, unless exempted by Section 17-4.05(3), F.A.C. 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

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration
NH ₄ NO ₃	99% plus

B. Has EPA declared the best available control technology for this class of sources (If 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
NH ₄ NO ₃	0.03 g/CuFt

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

- | | |
|---------------------------|----------------------|
| 1. Control Device/System: | 4. Capital Costs: |
| 2. Operating Principles: | 5. Operating Costs: |
| 3. Efficiency: * | 6. Maintenance Cost: |
| 7. Useful Life: | |
| 8. Energy: | |
| 9. Emissions: | |

Contaminant	Rate or Concentration

*Explain method of determining D 3 above.

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: CFCA Shroud
b. Operating Principles: Wet scrubbing system
c. Efficiency*: 89.5% d. Capital Cost: \$1,816,000
e. Useful Life: 10 yrs. f. Operating Cost: \$413/day
g. Energy*: 8.3 KWH/hr. h. Maintenance Cost: 2% of replacement value.
i. Availability of construction materials and process chemicals:
Questionable - early designs damaged by free NH₃; free NH₃ may be present in inlet air stream, necessitating a change of material of cost.
j. Applicability to manufacturing processes:
Questionable - see above.
k. Ability to construct with control device, install in available space, and operate within proposed levels:
More piping required; more energy, materials, etc.

2.

- a. Control Device:
b. Operating Principles:
c. Efficiency*:
d. Capital Cost:
e. Useful Life:
f. Operating Cost:
g. Energy**:
h. Maintenance Costs:
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:

*Explain method of determining efficiency.

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

3.

- a. Control Device:
b. Operating Principles:
c. Efficiency*:
d. Capital Cost:
e. Life:
f. Operating Cost:
g. Energy:
h. Maintenance Cost:

*Explain method of determining efficiency above.

- 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*:
- d. Capital Cost:
- e. Life:
- f. Operating Cost:
- g. Energy:
- 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: Wet scrubbing system
- 2. Efficiency*: 87% - System Design
- 3. Capital Cost: \$1,003,000
- 4. Life: 10-15 yrs.
- 5. Operating Cost: \$198/day
- 6. Energy: 4.0 KWH/hr.
- 7. Maintenance Cost: \$20,000/yr.
- 8. Manufacturer: Beco Engineering
- 9. Other locations where employed on similar processes:

a.

- (1) Company:
- (2) Mailing Address:
- (3) City: (4) State:
- (5) Environmental Manager:
- (6) Telephone No.:

*Explain method of determining efficiency above.

(7) Emissions*:

Contaminant	Rate or Concentration

(8) Process Rate*:

b.

- (1) Company: Atlas Powder Company
- (2) Mailing Address: 12,700 Park Central Place
- (3) City: Dallas (4) State: Texas 75251

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

- (5) Environmental Manager: Henry Bogatko
(6) Telephone No.: 214) 387-2400
(7) Emissions*: 30 lbs/hr

Contaminant	Rate or Concentration
Urea & Ammonium Nitrate	Approx. 30 lbs/hr

- (8) Process Rate*: 700 tons/day

10. Reason for selection and description of systems:

DESCRIPTION OF SYSTEM

The Beco Engineering method consists of a vertical-flow, two-stage, vortex scrubbing system for the removal of ammonium nitrate (AN) particulate from 200,000 ACFM of air @ 180°F. and 14.7 psia. The liquid system for the scrubber shall be divided into two equal systems, each operating a physical "half-scrubber" section. Six panel fans shall exhaust air from the scrubber. All material captured by scrubbing system will be recycled into production process.

REASON FOR SELECTION

The Beco Scrubbing System was selected because of the economics associated with its capital costs, installation costs and operating costs. Also, lead times and periods of construction were shorter and more economical. Beco also has better availability of materials. Beco is approximately one million dollars less expensive initially than other systems, and half as costly to operate and maintain. Energy consumption with Beco is less than half the level of other alternatives.

Beco will result in full compliance with all laws and regulations covering ammonium nitrate prill towers.

Also, based on a yearly operation of 8760 hours, the Beco scrubbing system will reduce the present particulate discharge by 15.72 tons. The present maximum allowable emissions are 25.59 lbs/hr under the process weight rate. The Beco guarantee calls for discharges of no more than approximately 22 lbs/hr.

However, in comparing grain loading between the maximum allowable and the proposed system, the Beco system allows only 50% of the limitation--0.03 g/CuFt--max. allowable.

0.014 g/CuFt--proposed system with Beco Scrubber.

Our existing permit No. is AO-29-19139.

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

SECTION V - SUPPLEMENTAL REQUIREMENTS

1. Total process input rate = 110,000 lbs/hr
Product rate = 100,000 lbs/hr
10,000 lbs/hr recycled.
2. Emission estimate is based on Beco's design calculations which show a maximum grain loading of 0.014 grains/CuFt.

$$\frac{22 \text{ lbs/hr}}{200,000 \text{ ACF/min.} \times 60 \text{ min.}} \times 7000 \text{ grains/lbs} + 20\% =$$

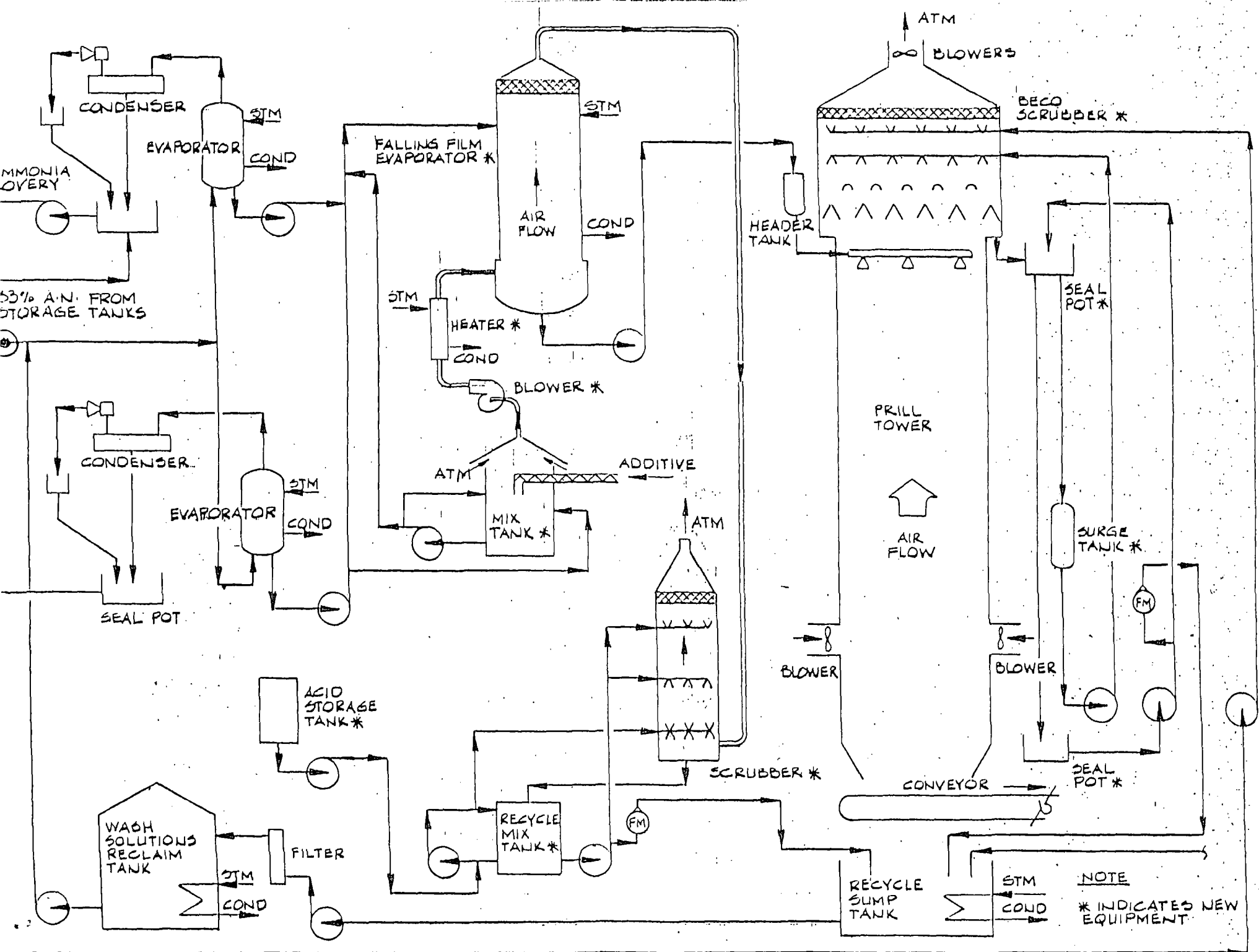
0.014 grains/CuFt

The 20% addition is to ensure compliance.
Method five will be used for compliance determination.

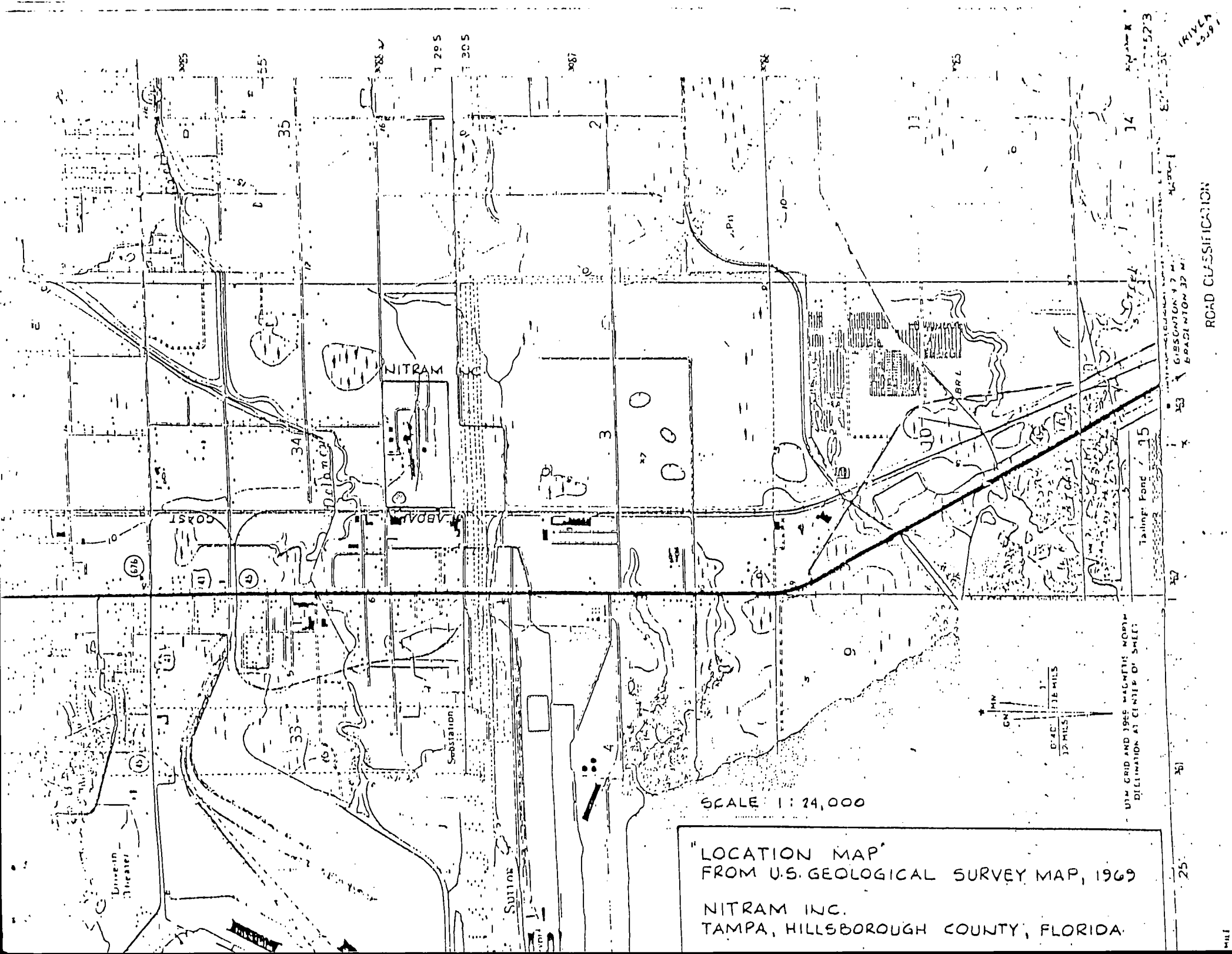
3. Emission factor for potential discharge for high density prilling is generally from 3 to 5 lbs/ton. In this case, based on design calculations, emission factor is 4.6 lbs/ton, giving a potential discharge figure of 253 lbs/hr. With a scrubbing efficiency of 87%, the estimated discharge emission rate is 32.87 lbs/hr, meeting all compliance standards and regulations.
4. See attached drawings.
5. The design production rate is 1320 tons/day. The emission factor, in this case, is 4.6 lbs/ton. Therefore, the potential discharge is 253 lbs/hr. The efficiency of the Beco Scrubber is rated at approximately 87%, which yields an hourly discharge of 32.8 lbs.
6. See Exhibit A.
7. See Exhibit B.
8. See Exhibit C.

ATTACHMENT

- Section II. G. 1.A. - "Offset" is not necessary since project will reduce overall emissions by approximately 30-40%.
3. - Same as above.
- Section III. B. 1. - The production capacity of the new "High D" system is 1200 tons/day. However, the feed rate will be 1320 tons/day, allowing for 10% of production capacity to be off spec for one reason or another and will be recycled.



PROCESS FLOW DIAGRAM — HIGH DENSITY DRILLING



SCALE 1:24,000

"LOCATION MAP"
 FROM U.S. GEOLOGICAL SURVEY MAP, 1969
 NITRAM INC.
 TAMPA, HILLSBOROUGH COUNTY, FLORIDA

UTM GRID AND 1968 MAGNETIC NORTH
 DECLINATION AT CENTER OF SHEET

ROAD CLASSIFICATION

TRIVIA
 13991

1805 1810 1815 1820 1825
 1900 1905 1910 1915 1920

25 30 35 40 45 50 55 60 65 70 75 80 85 90 95 100

Tailing Pond 15

14

12 13 14 15 16 17 18 19 20 21 22 23 24 25

1805 1810 1815 1820 1825

1900 1905 1910 1915 1920

1805 1810 1815 1820 1825

1900 1905 1910 1915 1920

1805 1810 1815 1820 1825

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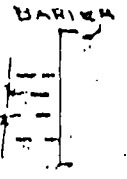
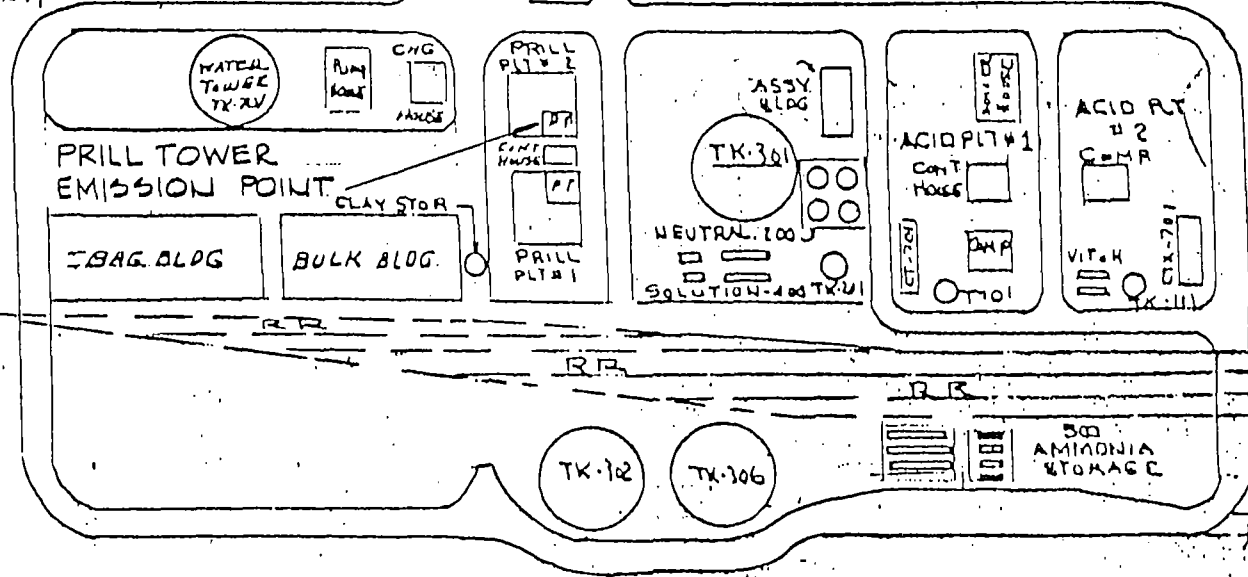
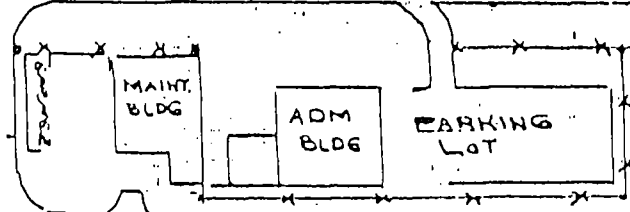
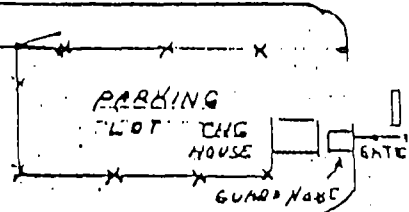
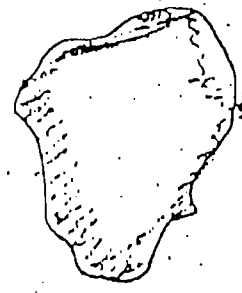
1900 1905 1910 1915 1920

HARTFORD AVE

EG ST

S-12 FENCE

S-32 FENCE

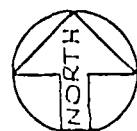


DUMP

FENCE 0-70

E-2010

FENCE S-1290.0



PLOT PLAN

EXHIBIT "C"