DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. JONATHAN HOLTOM
2. FDEP – TALLAHASSEE
3. DARM - BAR
4. MS #5505
5.

PLEASE PREPARE REPLY FOR:

____ SECRETARY'S SIGNATURE
____ DIV/DIST DIR SIGNATURE
____ MY SIGNATURE
____ YOUR SIGNATURE
____ DUE DATE _____

ACTION/DISPOSITION

____ DISCUSS WITH ME
____ COMMENTS/ADVISE
____ REVIEW AND RETURN
____ SET UP MEETING
X FOR YOUR INFORMATION
____ HANDLE APPROPRIATELY
____ INITIAL AND FORWARD
____ SHARE WITH STAFF
____ FOR YOUR FILES

COMMENTS:

NITRAM's
RESPONSE

RECEIVED
MAY 05 2003
BUREAU OF AIR REGULATION

FROM: Jim McDonald DATE: 5-1-03 SC 512-1042 PHONE: x 106

DEP 15-026 (12/93)

Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603

April 29, 2003

0337555

Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Attention: Eric Peterson, P.E., Air Permitting Supervisor

RE: NITRAM, INC.
DEP FILE NO. 0570029-008-AV

Dear Mr. Peterson:

This letter is presented in response to your letter to Dan Ross, dated March 28, 2003, requesting additional information to continue processing an application to renew and revise Nitram, Inc.'s (Nitram) Title V Air Operation Permit.

Our responses, presented below, are organized in the same manner as your original letter:

1. Nitram understands that a construction permit will be required to reactivate the Kaolin Clay Handling and Storage system. A revised application page is included in Attachment No. 1.

2. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment No. 2.

3. An SIC code of 2874 is correct. A revised application page is included in Attachment No. 2.

4. The facility is not major for hazardous air pollutants. A revised application page is included in Attachment No. 4.

5. A. The complete model number for the boiler is FM-10. Nitram's Equipment Number, used in its maintenance, engineering and accounting records, is SG-703. A revised application page is included in Attachment 5A.

   B. Nitram agrees, as explained in Air Construction Permit No. 0570029-007-AC, that Rules 62-296.406(2) and (3) do not apply to this emission unit since it was permitted prior to July 15, 1989. A revised application page is included in Attachment 5B.

   C. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment 5C.

   D. Yes. A revised application page is included in Attachment No. 5D.

   E. Yes. A revised application page is included in Attachment No. 5D.

   F. Yes. A revised application page is included in Attachment No. 5F.

   G. A revised application page is included in Attachment No. 5F.

H. As indicated on the form, Section G of the application must only be completed for emission-limited pollutants and preconstruction review pollutants. Carbon monoxide is not an emission-limited pollutant and this application is for a Title V renewal and revision, not a construction permit.

6. A. Nitram agrees, as explained in Air Construction Permit No. 0570029-007-AC, that Rules 62-296.406(2) and (3) do not apply to this emission unit since it was permitted prior to July 15, 1989. A revised application page is included in Attachment 6A.

B. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment 6B.

C. Yes. A revised application page is included in Attachment No. 6C.

E. Yes. A revised application page is included in Attachment No. 6E.

F. Yes. A revised application page is included in Attachment No. 6E.

G. Yes. A revised application page is included in Attachment No. 6G.

H. Yes. A revised application page is included in Attachment No. 6G

I. As indicated on the form, Section G of the application must only be completed for emission-limited pollutants and preconstruction review pollutants. Carbon monoxide is not an emission-limited pollutant and this application is for a Title V renewal and revision, not a construction permit.

7. A. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment No. 7A.

B. The reference to exceptional conditions is incorrect. A revised application page is included in Attachment No. 6B.

C. Portions of the CAM plan, revised as requested, are included in Attachment No. 7C.

D. As indicated on the form, Section G of the application must only be completed for emission-limited pollutants and preconstruction review pollutants. Although PM is an emission-limited pollutant, PM_{10} is not; and this application is for a Title V renewal and revision, not a construction permit.

8. A. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment No. 8A.

B. This segment has been added. A revised application page is included in Attachment No. 8B.

C. As indicated on the form, Section G of the application must only be completed for emission-limited pollutants and preconstruction review pollutants. Carbon monoxide is not an emission-limited pollutant and this application is for a Title V renewal and revision, not a construction permit.

D. Yes, Nitram is agreeing to use their NO_x continuous emission monitor to demonstrate compliance on a continuous basis.

Will need Rata Rep.

9. A. The correct model number is JV-24-4X.

   B. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment No. 9B.

   C. The potential hourly and annual PM emission rates for the MgO Silo baghouse, 0.12 lb/hr and 0.03 TPY, have historically been calculated using actual flow (acfm) and a grain loading of 0.03 gr/dscf. In fact, the annual PM emission rate calculated in this fashion has been in the Title V permit since August 19, 1998. It is also present in the recently issued Air Construction Permit No. 0570029-007-AC. Since the dry standard flow is less than the actual flow, calculating emissions using the dry standard flow would result in potential annual emissions being less than allowable emissions. To remedy this situation, the application page has been revised to calculate hourly potential emissions based on 0.03 gr/cf and 450 cfm. Since allowable annual emissions from this source are less than 1 TPY, it is exempt from the RACT requirement to limit emissions to below 0.03 gr/dscf (Rules 62-296.711 or 62-296.712).

   The potential annual emission rate has been set equal to the allowable annual emission limit. The source of this allowable emission limit is also indicated on the form. The revised application page is included in Attachment 9C.

10. A. The correct model number is JV-24-4X.

   B. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment No. 10B.

   C. The potential hourly and annual PM emission rates for the MgO Day Tank baghouse, 0.14 lb/hr and 0.05 TPY, have historically been calculated using actual flow (acfm) and a grain loading of 0.03 gr/dscf. In fact, the annual PM emission rate calculated in this fashion has been in the Title V permit since August 19, 1998. It is also present in the recently issued Air Construction Permit No. 0570029-007-AC. Since the dry standard flow is less than the actual flow, calculating emissions using the dry standard flow would result in potential annual emissions being less than allowable emissions. To remedy this situation, the application page has been revised to calculate hourly potential emissions based on 0.03 gr/cf and 550 cfm. Since allowable annual emissions from this source are less than 1 TPY, it is exempt from the RACT requirement to limit emissions to below 0.03 gr/dscf (Rules 62-296.711 or 62-296.712).

   The potential annual emission rate has been set equal to the allowable annual emission limit. The source of this allowable emission limit is also indicated on the form. The revised application page is included in Attachment No. 10C.

11. A. Yes. The revised application page is included in Attachment No. 11A.

   B. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment No. 11B.

   C. Yes. The application pages, Attachment NI-EU8-J3, and the CAM plan have been revised accordingly and are included in Attachment No. 11C.

   D. Yes. A revised application page is included in Attachment No. 11D.

E. Yes. A revised operation and maintenance plan is included in Attachment No. 11E.

F. Yes. A revised CAM plan is included in Attachment No. 11C.

12. A. An East UTM coordinate of 362.5 km is correct. A revised application page is included in Attachment No. 12A.

B. Yes. A revised application page is included in Attachment No. 12B.

C. The annual potential PM emission rate of 0.27 TPY presented in the application was based on the allowable PM emission rate included in the current Title V Permit. However, the recently issued Air Construction Permit (Permit No. 0570029-007-AC) limits annual allowable PM emissions from all boilers (Emission Unit ID Nos. 003, 004, and 013) to 1.18 TPY.

As such, potential hourly and annual emission rates for the Hurst Package Boiler were recalculated based on permitted propane usage of 142 gal/hr and an emission factor of 0.6 lb/10^3 gal. A revised application page is included in Attachment No. 12C.

D. As stated in the permitting note included after Permit Condition C.2 of Air Construction Permit No. 0570029-007-AC, Permit Conditions C.4 and C.5 in the Title V Permit were replaced by Permit Conditions C.1 and C.2, in conjunction with the BACT determination in the construction permit. As such, SO_2 is no longer an emission-limited pollutant. Therefore, Page 19 for SO_2 of the application can be removed. Page 18 of the application has been revised to indicate that SO_2 is no longer an emission-limited pollutant. This revised application page is included in Attachment No. 12D.

E. Yes. A revised application page is included in Attachment 12E.

F. As indicated on the form, Section G of the application must only be completed for emission-limited pollutants and preconstruction review pollutants. Carbon monoxide is not an emission-limited pollutant and this application is for a Title V renewal and revision, not a construction permit. Page 18, included in Attachment No. 12D, has been revised to include CO and indicate it is not an emission-limited pollutant.

G. Yes. A revised application page is included in Attachment No. 12G.

If you have any questions concerning this information, please contact me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES, INC.

Scott A. McCann, P.E.
Associate Engineer
Air Quality Services

Benny Susi, P.E.
Associate Engineer
Office Manager

SAM/nav

Attachments

cc: D. Ross - Nitram

P:\Projects\2002\0237636 Nitram\4\4.1\L042903.doc

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Daniel E. Ross, Manager, President and COO
2. Owner/Authorized Representative or Responsible Official Mailing Address:
   Organization/Firm: **Nitram, Inc.**
   Street Address: **P.O. Box 2968**
   City: **Tampa** State: **FL** Zip Code: **33601-2968**
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: **(813) 626-2181** Fax: **(813) 623-6080**
4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [**X**], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

   Signature _____ Date 30 APR 03

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: **Scott A. McCann**
   Registration Number: **54172**
2. Professional Engineer Mailing Address:
   Organization/Firm: **Golder Associates Inc.***
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653-1500**
3. Professional Engineer Telephone Numbers:
   Telephone: **(352) 336 - 5600** Fax: **(352) 336 - 6603**

*** Board of Professional Engineers Certificate of Authorization #00001670**

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature — Date: 4/29/03

(seal)

*Attach any exception to certification statement.

ATTACHMENT NO. 1

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
003	B&W Package Boiler, Gas Fired		
004	FW Package Boiler, Gas Fired		
006	Ammonium Nitrate Prill Tower No. 2		
007	Nitric Acid Plant with 2 Stacks		
010	MgO Silo w/Griffin Environmental Baghouse (Silo #1)		
011	MgO Day Tank w/Griffin Environmental Baghouse (Silo #2)		
012	Prill Rotary Drums w/Wet Cyclones and Peabody Scrubber		
013	Gas Fired Hurst Package Boiler		
100	Facility-wide Unregulated Emissions Units/Activities		

Application Processing Fee

Check one: [ ] Attached - Amount: $: _____ [X] Not Applicable

ATTACHMENT NO. 2

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **362.50** North (km): **3089.00**			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): **27 / 55 / 13** Longitude (DD/MM/SS): **82 / 23 / 50**			
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **28**	6. Facility SIC(s): **2874**
7. Facility Comment (limit to 500 characters):			

Facility Contact

1. Name and Title of Facility Contact: **Daniel E. Ross, President and COO**		
2. Facility Contact Mailing Address: Organization/Firm: **Nitram, Inc.** Street Address: **P.O. Box 2968** City: **Tampa** State: **FL** Zip Code: **33601-2968**		
3. Facility Contact Telephone Numbers: Telephone: **(813) 626-2181** Fax: **(813) 623-6080**		

ATTACHMENT NO. 4

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source? [ ] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?
4. [ ] Major Source of Hazardous Air Pollutants (HAPs)?
5. [ ] Synthetic Minor Source of HAPs?
6. [X] One or More Emissions Units Subject to NSPS?
7. [ ] One or More Emission Units Subject to NESHAP?
8. [ ] Title V Source by EPA Designation?
9. Facility Regulatory Classifications Comment (limit to 200 characters): **The nitric acid plant is subject to the NSPS for nitric acid plants – 40 CFR 60 Subpart G.**

List of Applicable Regulations

See Title V Core List, Attachment NI-FI-A

ATTACHMENT NO. 5A

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit:
   Manufacturer: **Babcock & Wilcox** Model Number: **FM-10**
2. Generator Nameplate Rating: MW
3. Incinerator Information:
   Dwell Temperature: °F
   Dwell Time: seconds
   Incinerator Afterburner Temperature: °F

ATTACHMENT NO. 5B

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

62-4.070(3), F.A.C.

62-4.160(2), F.A.C.

62-210.200, F.A.C.

62-210.700, F.A.C.

62-213.440(1), F.A.C.

62-296-700, F.A.C.

62-296.700(6), F.A.C.

62-296-702, F.A.C.

62-296-702(2)(a), F.A.C.

62-296-702(2)(b), F.A.C.

62-297, F.A.C.

62-297.310(7)(a)(3), F.A.C.

40 CFR 60, Appendix A

ATTACHMENT NO. 5C

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **29-03**	2. Emission Point Type Code: **2**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **Babcock & Wilcox Boiler, SG-703 (Unit ID 003)** **Foster Wheeler Boiler, SG-701 (Unit ID 004)**		
5. Discharge Type Code: **V**	6. Stack Height: **30** feet	7. Exit Diameter: **4.5** feet
8. Exit Temperature: **450** °F	9. Actual Volumetric Flow Rate: **33,700** acfm	10. Water Vapor: **21.00** %
11. Maximum Dry Standard Flow Rate: **15,600** dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: **17** East (km): **362.5** North (km): **3089.000**		
14. Emission Point Comment (limit to 200 characters): **Flow rates are for two boilers (EU 003 and EU 004) firing simultaneously and exhausting through the common stack.**		

ATTACHMENT NO. 5D

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Natural Gas Combustion**		
2. Source Classification Code (SCC): **1-03-006-02**	3. SCC Units: **Million Cubic Feet Burned (All Gaseous Fuels)**	
4. Maximum Hourly Rate: **0.075**	5. Maximum Annual Rate: **310**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,000**
10. Segment Comment (limit to 200 characters): **Annual rate limited for all three boilers (EU Nos. 003, 004, and 013) to 310 million cubic feet burned. See Permit No. 0570029-007-AC.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Propane Combustion**		
2. Source Classification Code (SCC): **1-03-010-02**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **1.73**	5. Maximum Annual Rate: **3,460**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **43**
10. Segment Comment (limit to 200 characters): **Annual rate limited for all three boilers (EU Nos. 003, 004, and 013) to 3,460 tons burned. See Permit No. 0570029-007-AC.**		

ATTACHMENT NO. 5F

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **7.5** lb/hour **1.18** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.01 lb/MMBtu (allowable x 75 MMBtu/hr) = 7.5 lb/hr**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **The potential emissions are calculated as the allowable emissions under Rule 62-296.702(2)(a) F.A.C.**	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.10 lb/MMBtu**	4. Equivalent Allowable Emissions: **7.5** lb/hour **1.18** tons/year
5. Method of Compliance (limit to 60 characters): **Use of procedures described in the operation & maintenance plan to ensure proper operations.**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Annual emission limit is total for EU Nos. 003, 004, and 013. See Permit No. 0570029-007-AC, Condition D.3.E.**	

ATTACHMENT NO. 5G

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **7.5** lb/hour **15.5** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **100 lb NO_X/ $MMft^3$ Natural Gas** Reference: **AP-42, Section 1.4**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.075 $MMft^3$/hr x 100 lb NO_X/ $MMft^3$ = 7.5 lb NO_X/hr**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **ESCPSD**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **15.5 TPY**	4. Equivalent Allowable Emissions: lb/hour **15.5** tons/year
5. Method of Compliance (limit to 60 characters): **Fuel use records.**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Limit for total combined allowable NO_X emissions for the Babcock & Wilcox Package Boiler (EU 003), Foster Wheeler Package Boiler (EU 004), and the Hurst Package Boiler (EU 013). See Permit No. 0570029-007-AC.**	

ATTACHMENT NO. 6A

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

62-4.070(3), F.A.C.

62-4.160(2), F.A.C.

62-210.200, F.A.C.

62-210.700, F.A.C.

62-213.440(1), F.A.C.

62-296-700, F.A.C.

62-296.700(6), F.A.C.

62-296-702, F.A.C.

62-296-702(2)(a), F.A.C.

62-296-702(2)(b), F.A.C.

62-297, F.A.C.

62-297.310(7)(a)(3), F.A.C.

40 CFR 60, Appendix A

ATTACHMENT NO. 6B

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **29-04**	2. Emission Point Type Code: **2**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **Babcock & Wilcox Boiler, SG-703 (EU ID 003)** **Foster Wheeler Boiler, SG-701 (EU ID 004)**		
5. Discharge Type Code: **V**	6. Stack Height: **30** feet	7. Exit Diameter: **4.5** feet
8. Exit Temperature: **450** °F	9. Actual Volumetric Flow Rate: **33,700** acfm	10. Water Vapor: **21.00** %
11. Maximum Dry Standard Flow Rate: **15,600** dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: **17** East (km): **362.5** North (km): **3089.000**		
14. Emission Point Comment (limit to 200 characters): **Flow rates are for two boilers (EU 003 and EU 004) firing simultaneously and exhausting through the common stack.**		

ATTACHMENT NO. 6C

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Natural Gas Combustion**		
2. Source Classification Code (SCC): **1-03-006-02**	3. SCC Units: **Million Cubic Feet Burned (All Gaseous Fuels)**	
4. Maximum Hourly Rate: **0.05**	5. Maximum Annual Rate: **310**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,000**
10. Segment Comment (limit to 200 characters): **Annual rate limited for all three boilers (EU Nos. 003, 004, and 013) to 310 million cubic feet burned. See Permit No. 0570029-007-AC.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Propane Combustion**		
2. Source Classification Code (SCC): **1-03-010-02**	3. SCC Units: **Tons Burned**	
4. Maximum Hourly Rate: **1.15**	5. Maximum Annual Rate: **3,460**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **43**
10. Segment Comment (limit to 200 characters): **Annual rate limited for all three boilers (EU Nos. 003, 004, and 013) to 3,460 tons burned. See Permit No. 0570029-007-AC.**		

ATTACHMENT NO. 6E

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:	
3. Potential Emissions: **5** lb/hour **1.18** tons/year		4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year		
6. Emission Factor: Reference:		7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **50 MMBtu/hr x 0.01 lb/MMBtu = 5.0 lb/hr**		
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):		

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **0.01 lb/MMBtu**	4. Equivalent Allowable Emissions: **5.0** lb/hour **1.18** tons/year
5. Method of Compliance (limit to 60 characters): **Use of procedures described in the operation & maintenance plan to ensure proper operations.**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Annual emission limit is total for EU Nos. 003, 004, and 013. See Permit No. 0570029-007-AC, Condition D.3.E.**	

ATTACHMENT NO. 6G

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: NO_X	2. Total Percent Efficiency of Control:
3. Potential Emissions: 5.0 lb/hour 15.5 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: 100 lb NO_X/ $MMft^3$ Natural Gas Reference: AP-42, Section 1.4	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 0.050 $MMft^3$/hr x 100 lb NO_X/ $MMft^3$ = 5.0 lb NO_X/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPSD	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 15.5 TPY	4. Equivalent Allowable Emissions: lb/hour 15.5 tons/year
5. Method of Compliance (limit to 60 characters): Fuel use records.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Limit for total combined allowable NO_X emissions for the Babcock & Wilcox Package Boiler (EU 003), Foster Wheeler Package Boiler (EU 004), and the Hurst Package Boiler (EU 013). See Permit No. 0570029-007-AC..	

ATTACHMENT NO. 7A

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **29-06**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **The Prill Tower scrubber discharge is through six identical stacks in a 2 by 3 array.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **178** feet	7. Exit Diameter: **3.25** feet
8. Exit Temperature: **115** °F	9. Actual Volumetric Flow Rate: **41,000** acfm	10. Water Vapor: **8.00** %
11. Maximum Dry Standard Flow Rate: **36,500** dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: **17** East (km): **362.5** North (km): **3089.000**		
14. Emission Point Comment (limit to 200 characters): **Data is for one of six identical stacks.**		

ATTACHMENT NO. 7B

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **Annual testing using EPA Method 9.**	
5. Visible Emissions Comment (limit to 200 characters): **62-296.320(4)(b), F.A.C.**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

ATTACHMENT NO. 7C

Table 1. Monitoring Approach

		Indicator No. 1
I.	Indicator	Scrubber pressure differential.
	Measurement Approach	Measured separately at each of six scrubber cells using magnehelics.
II.	Indicator Range	While Prill Tower No. 2 is operating, an excursion is defined as a pressure differential outside the range from 0.4 and 3.0 inches of water for any cell. Excursions trigger an inspection, corrective action, and a reporting requirement.
III.	Performance Criteria	
I.	Data Representativeness	The magnehelics measure the pressure differential between the inlet and outlet duct of the scrubber cell.
II.	Verification of Operation Status	Not Applicable.
III.	QA/QC Practices and Criteria	The magnehelics will be zeroed prior to reading. The operational status of the magnehelics will be checked if the pressure differential is outside the proposed indicator. The magnehelics will be calibrated against a U-tube manometer annually.
IV.	Monitoring Frequency	The pressure differential will be observed and recorded once per 8-hour shift for each scrubber cell when Prill Tower No. 2 is operating.
	Data Collection Procedures	Pressure differential recorded with the time, date, and name of the observer.
	Averaging Period	Not Applicable.

MONITORING APPROACH JUSTIFICATION

I. Background

Prill Tower No. 2 is used to crystallize and dry liquid ammonium nitrate into either high- or low-density prills. The prill tower has a capacity to produce 37 tons per hour of low-density prills and 50 tons per hour of high-density prills on a daily average basis.

Particulate matter (PM) emissions from Prill Tower No. 2 are controlled by a Beco Dual Vortex Scrubber. The facility's current Title V Operation Permit requires that a log be maintained containing observations of the liquid (water) flow rate to the scrubber and the pressure differential across the scrubber recorded once per 8-hour shift.

U.S. Environmental Protection Agency (EPA) Method 5 compliance tests were performed on the No. 2 Prill Tower during March 7 and 8, 2002 on each of the six scrubber cells. These compliance tests are attached. The total (sum of all six cells) PM emission rate measured during the compliance tests was 14.9 pounds per hour, well below the permitted PM emission limit of 26 lb/hr. The average measured ammonium nitrate production rate measured during the compliance tests was 49.6 tons per hour of high density prills. The pressure differential measured during the compliance test at each scrubber cell ranged between 0.5 and 1.5 inches of water.

The PM emission limit for Prill Tower No. 2 was established in Air Construction Permit No. AC29-29724 (May 7, 1981) and a BACT determination (March 8, 1981).

II. Rationale for Selection of Performance Indicators

A log containing daily observations of the pressure differential is already required by the existing Title V Operation Permit for the facility. Through negotiations with the Florida Department of Environmental Protection (FDEP) and the Environmental Protection Commission of Hillsborough County (EPC), compliance with the PM emission limit has been established to be demonstrated when the pressure differential is within the specified range of 0.4 to 3.0 inches of water, inclusive (Construction Permit No. 0570029-007-AC). An increase in the pressure differential may indicate clogging of the scrubber or increased gas flow. A decrease in the pressure differential may indicate a decrease in the gas or liquid flow or poor liquid distribution. EPA, in Example 4a of Appendix B, of their technical guidance document titled: Compliance Assurance Monitoring, recommends that pressure differential be monitored as an indication of proper scrubber performance.

III. Rationale for Selection of Indicator Ranges

The most recent stack test for Prill Tower No. 2 were performed on March 7 and March 8, 2002. The stack test demonstrated compliance with the established emission limit. During those compliance tests, the minimum pressure differential measured at any cell was 0.5 inches of water. The maximum pressure differential was 1.5 inches of water. The results of previous stack tests have demonstrated compliance with the permitted PM emission rate at measured pressure differentials of 0.4 to 3 inches of water. These compliance tests have been submitted to FDEP and EPC and accepted by these agencies as sufficient evidence that compliance is demonstrated at the range of pressure differentials currently permitted. Nitram intends to use the results of future compliance tests to further refine this indicator range, as necessary. Additional compliance tests were performed in January 2003. These tests were performed while producing high-density prills and then again while processing low-density prills. These results of these tests were not available prior to the submittal deadline for this Title V Permit renewal application.

ATTACHMENT NO. 8A

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **29-07-1 & 29-07-2**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **No. 1 Stack, 30-inch diameter, 65 ft above grade**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **65** feet	7. Exit Diameter: **3.21** feet
8. Exit Temperature: **275** °F	9. Actual Volumetric Flow Rate: **47,000** acfm	10. Water Vapor: **5.00** %
11. Maximum Dry Standard Flow Rate: **39,000** dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: **17** East (km): **362.5** North (km): **3089.000**		
14. Emission Point Comment (limit to 200 characters): **Representative data is given for stack 29-07-2. Additional No. 1 stack data is as follows: Flow, acfm = 40,500; dscfm = 28,300; Moisture = 5%; and Temperature = 265°F.**		

ATTACHMENT NO. 8B

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Nitric Acid Production**		
2. Source Classification Code (SCC): **3-01-013-02**	3. SCC Units: **Tons Produced or Manufactured**	
4. Maximum Hourly Rate: **34.4**	5. Maximum Annual Rate: **255,500**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): **Production rates are in tons of 100% nitric acid. The maximum annual production rate is based on an annual average daily production of 700 TPD. The maximum hourly rate equates to 825 TPD.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Natural Gas Combustion**		
2. Source Classification Code (SCC): **1-03-006-02**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **53**	5. Maximum Annual Rate: **464,280**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,000**
10. Segment Comment (limit to 200 characters): **Natural gas is used to fire the catalytic combustor, which controls NO_x emissions.**		

ATTACHMENT NO. 9B

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **29-10**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **This source is a "Bin Vent" baghouse on a pneumatically filled silo.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **H**	6. Stack Height: **63** feet	7. Exit Diameter: **0.7** feet
8. Exit Temperature: **85** °F	9. Actual Volumetric Flow Rate: **450** acfm	10. Water Vapor: **3.00** %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: **17** East (km): **362.5** North (km): **3089.000**		
14. Emission Point Comment (limit to 200 characters):		

ATTACHMENT NO. 9C

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.12** lb/hour **0.03** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.03 gr/cf x 450 cfm x 60 min/hr/7000 gr/lb = 0.12 lb/hr. Annual potential emissions rate set equal to allowable emissions rate. See Permit No. 0570079-002-AV.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Unit does not operate continuously, as is reflected in emissions calculations. Limits on hours of operation synthetically limit the annual potential emissions.**	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **ESCRACT**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour **0.03** tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Allowable annual emissions requested by applicant to avoid RACT. See Permit No. 0570079-002-AV and Rule 62-296-700(2)(c).**	

ATTACHMENT NO. 10B

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **29-11**	2. Emission Point Type Code:	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
5. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code:	6. Stack Height: **63** feet	7. Exit Diameter: **0.7** feet
8. Exit Temperature: **85** °F	9. Actual Volumetric Flow Rate: **550** acfm	10. Water Vapor: **3.00** %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: **17** East (km): **362.5** North (km): **3089.000**		
14. Emission Point Comment (limit to 200 characters):		

ATTACHMENT NO. 10C

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.14** lb/hour **0.05** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.03 gr/cf x 550 cfm x 60 min/hr/7000 gr/lb = 0.14 lb/hr. Annual potential emissions rate set equal to allowable emissions rate. See Permit No. 0570079-002-AV.**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Pollutant emissions are synthetically limited by limits on hours of operation.**	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **ESCRACT**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour **0.05** tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Allowable annual emissions requested by applicant to avoid RACT. See Permit No. 0570079-002-AV and Rule 62-296-700(2)(c).**	

ATTACHMENT NO. 11A

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:				mmBtu/hr
2. Maximum Incineration Rate:	lb/hr			tons/day
3. Maximum Process or Throughput Rate:		**100,000 lb/hr**		
4. Maximum Production Rate:				
5. Requested Maximum Operating Schedule:				
	24	hours/day	**7**	days/week
	52	weeks/year	**8,760**	hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

The maximum rate of 100,000 lb/hr is for the processing of HD prills. LD prills are processed at a maximum rate of 74,000 lb/hr. These methods of operation will not affect allowable PM emissions. Note: HD = high density, LD = low density.

ATTACHMENT NO. 11B

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **29-12**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
6. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **35** feet	7. Exit Diameter: **5.0** feet
8. Exit Temperature: **101** °F	9. Actual Volumetric Flow Rate: **41,700** acfm	10. Water Vapor: **7.00** %
11. Maximum Dry Standard Flow Rate: **36,100** dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: **17** East (km): **362.5** North (km): **3089.000**		
14. Emission Point Comment (limit to 200 characters):		

ATTACHMENT NO. 11C

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **9.24** lb/hour **40.5** tons/year	4. Synthetically Limited? [**X**]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **7.24 lb/hr x 8,760 hr/yr/2000 lb/ton = 40.5 TPY**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **The allowable emissions pursuant to 62-296.712(2) F.A.C. were used to estimate potential emissions.**	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **ESCPSD**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **9.24 lb/hr, 40.5 TPY**	4. Equivalent Allowable Emissions: **9.24** lb/hour **40.5** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 9 testing annually with EPA Method 5 testing at permit renewal.**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Hourly particulate limits in gr/dscf are pursuant to 62-296.712(2) F.A.C. Construction Permit No. 0570029-007-AC, Condition G.1, sets the combined annual PM emission rate for the Prill Tower and Prill Rotary Drums at 50.5 TPY.**	

ATTACHMENT NI-EU8-J3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

PRILL ROTARY DRUMS WITH WET CYCLONES AND SCRUBBER

Manufacturer and Model No.	Peabody Model SX-351	
Outlet Gas Temperature	101	°F
Outlet Gas Flow Rate	41,700	acfm;
	36,100	dcsfm
Design Efficiency (Particulate Matter)	99	percent
Maximum Permitted Particulate Matter Emissions[a]	9.24	lb/hr;
	50.5	TPY

[a] Annual permitted emissions of 50.5 TPY are for both the Prill Tower and Rotary Drums. See Permit No. 0570029-007-AC, Condition G.1.

ATTACHMENT NI-EU8-J7

OPERATION AND MAINTENANCE PLAN

PRILL ROTARY DRUMS WITH WET CYCLONES AND SCRUBBER

The following Operation and Maintenance (O&M) Plan for particulate matter (PM) control pursuant to Rule 62-296.700(6), F.A.C., shall be followed:

A. Process Parameters:
1. Source Designators: Rotary Drum Scrubber with Wet Cyclone
2. Scrubber Manufacturer: Peabody
3. Model Name and Number: SX-351
4. Design Flow Rate: 41,700 acfm but variable depending on prill grade production
5. Efficiency Rating at Design Capacity: 99%
6. Gas Temperature: Outlet; 101°F
7. Stack Height Aboveground: 35 ft
8. Exit Diameter: 5 ft
9. Water Vapor Content: 100% (100% Relative Humidity)
10. Process Controlled by Collection System: Drying/Cooling of Ammonium Nitrate
11. Material Process Rate: HDP-50 TPH (Daily Average)
LDP-37 TPH (Daily Average)
12. Hours of Operation: 24 hr/day; 7 days/wk; 52 wk/yr (8,760 hr/yr)

B. The following observations, checks, and operations apply to this emissions unit and shall be conducted on the schedule specified:

Daily
1. Observe stack.
2. Note any unusual occurrence in the process being ventilated.
3. Log the volumetric liquid flow (freshwater and make-up water) of the scrubber (gpm).

Monthly
1. Inspect fans for corrosion and material build-up.
2. Check all hoses and clamps.
3. Check all drive belts and chains for wear and tension.
4. Inspect housing for corrosion.

Annually
1. Open and inspect sieve trays, sprays, and mist eliminators and make any necessary repairs.
2. Check deadline circulating pump and note discharge pressure
3. Check for leaks and repair as necessary.
4. Check level control device and make repairs as necessary.
5. Check level gauge sight glass.

C. Records:
Records of inspections, maintenance, and performance parameters shall be retained and shall be made available to the Department of Environmental Protection Commission of Hillsborough County upon request [Rule 62-296.700(6), F.A.C.].

PRILL ROTARY DRUMS

I. Background

A. Emissions Unit

Description:	Prill Rotary Drums
Emission Unit ID:	012
Facility:	Nitram, Inc. Tampa, FL

B. Applicable Regulation, Emission Limits, and Monitoring Requirements

Regulations:	Permit 0570029-007-AC
Emissions Limits:	
Opacity:	5 percent [Rule 62-296.712(2), F.A.C.]
Particulate Matter:	The lesser of 9.24 lb/hr or 0.03 grains per dry standard cubic foot [Rules 62-210.200 and 62-296.712(2), F.A.C.]
Monitoring Requirements:	Maintain a log recording pressure differential and volumetric liquid flow rate (fresh water and make-up water) at least once per day.

C. Control Technology

Three wet cyclones in series with a Peabody Model SX-351 Impingement Scrubber

II. Monitoring Approach

Nitram will continue to monitor and record the scrubber pressure differential as required in their current Title V Operation Permit.

Table 1. Monitoring Approach

		Indicator No. 1
I.	Indicator	Scrubber pressure differential.
	Measurement Approach	Measured using a U-tube manometer.
II.	Indicator Range	While the Rotary Drums are operating, an excursion is defined as a pressure differential outside the range from 0.5 and 5.0 inches of water. Excursions trigger an inspection, corrective action, and a reporting requirement.
III.	Performance Criteria	
I.	Data Representativeness	The U-tube manometer measures the pressure differential between the inlet and outlet duct of the scrubber.
II.	Verification of Operation Status	Not Applicable.
III.	QA/QC Practices and Criteria	The U-tube manometer will be zeroed prior to reading. The operational status of the manometer will be checked if the pressure differential is outside the proposed indicator.
IV.	Monitoring Frequency	The pressure differential will be observed and recorded daily when the Rotary Drums are operating.
	Data Collection Procedures	Pressure differential recorded with the time, date, and name of the observer.
	Averaging Period	Not Applicable.

MONITORING APPROACH JUSTIFICATION

I. Background

The Prill Rotary Drums are used to further dry and cool both high- and low-density prills. The Prill Rotary Drums have a capacity to process 37 tons per hour of low-density prills and 50 tons per hour of high-density prills on a daily average basis.

Particulate matter (PM) emissions from the Prill Rotary Drums are controlled by three wet cyclones in parallel followed in series by a Peabody Model SX-351 Impingement Scrubber. The facility's current Title V Operation Permit requires that a log be maintained containing daily observation of the liquid (water) flow rate to the scrubber and the pressure differential across the scrubber.

U.S. Environmental Protection Agency (EPA) Method 5 compliance tests were performed on the Prill Rotary Drums on December 27, 2001 (processing high-density prills) and on December 28, 2001 (processing low-density prills). Summary pages from these compliance tests are attached. The measured PM emission rate measured while processing high-density prills was 1.4 pounds per hour. The measured PM emission rate measured while processing low-density prills was 0.8 pounds per hour. The results of both compliance tests were below the permitted PM emission limit of 9.24 lb/hr. The process rates during the compliance tests were within 90% of the permitted process rates for both high- and low-density prills. The pressure differential across the scrubber measured during the compliance test while processing high-density prills ranged from 2.5 to 2.7 inches of water. The pressure differential across the scrubber measured during the compliance test while processing low-density prills was 2.6 inches of water.

The PM emission limit for Prill Rotary Drums, the lesser of 9.24 lb/hr, 0.03 grains per dry standard cubic foot, or 40.5 TPY was established by Rules 62-210.200 and 62-296.712(2), F.A.C.

II. Rationale for Selection of Performance Indicators

A log containing daily observations of the pressure differential is already required by the existing Title V Operation Permit for the facility. Through negotiations with the Florida Department of Environmental Protection (FDEP) and the Environmental Protection Commission of Hillsborough County (EPC), compliance with the PM emission limit has been established to be demonstrated when the pressure differential is within the specified range of 0.5 to 5.0 inches of water, inclusive (Construction Permit No. 0570029-007-AC). An increase in the pressure differential may indicate clogging of the scrubber or increased gas flow. A decrease in the pressure differential may indicate a decrease in the gas or liquid flow or poor liquid distribution. EPA, in Example 4a of Appendix B, of their technical guidance document titled: Compliance Assurance Monitoring, recommends that pressure differential be monitored as an indication of proper scrubber performance.

III. Rationale for Selection of Indicator Ranges

The most recent stack test for the Prill Rotary Drums were performed on December 27 and 28, 2001. The stack tests demonstrated compliance with the established PM emission limit while processing either high- or low-density product. During those compliance tests, the minimum pressure differential measured across the scrubber was 2.5 inches of water. The maximum pressure differential was 2.7 inches of water. The results of previous stack tests have demonstrated compliance with the permitted PM emission rate at measured pressure differentials of 0.5 to 5 inches of water. These compliance tests have been submitted to FDEP and EPC and accepted by these agencies as sufficient evidence that compliance is demonstrated at the range of pressure differentials currently permitted. Nitram intends to use the results of future compliance tests to further refine this indicator range as necessary. Additional compliance tests were performed in January 2003. These tests were performed while

producing high-density prills and then again while processing low-density prills. These results of these tests were not available prior to the submittal deadline for this Title V Permit renewal application.

ATTACHMENT NO. 11D

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **5** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): **62-296.712(2) F.A.C.**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

ATTACHMENT NO. 12A

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **29-13**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
7. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **23** feet	7. Exit Diameter: **1.7** feet
8. Exit Temperature: **490** °F	9. Actual Volumetric Flow Rate: **4,360** acfm	10. Water Vapor: **21.00** %
11. Maximum Dry Standard Flow Rate: **1,885** dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: **17** East (km): **362.5** North (km): **3089.000**		
14. Emission Point Comment (limit to 200 characters):		

ATTACHMENT NO. 12B

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **NO_X**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.2** lb/hour **5.3** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **100 lb NO_X/MMft^3 Natural Gas** Reference: **AP-42, Section 1.4**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.012 MMft^3/hr x 100 lb NO_X/ MMft^3 = 1.2 lb NO_X/hr**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **ESCPSD**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **15.5 TPY**	4. Equivalent Allowable Emissions: lb/hour **15.5** tons/year
5. Method of Compliance (limit to 60 characters): **Fuel use records.**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Limit for total combined allowable NO_X emissions for the Babcock & Wilcox Package Boiler (EU 003), Foster Wheeler Package Boiler (EU 004), and the Hurst Package Boiler (EU 013). See Permit No. 0570029-007-AC.**	

ATTACHMENT NO. 12C

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.084** lb/hour **0.37** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.14 10^3 gal/hr x 0.6 lb/10^3 gal = 0.084 lb/hr** **0.084 lb/hr x 8,760 hr/yr x 1 ton/2000 lb = 0.37 TPY**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Pollutant emissions were assumed equal to the allowable emissions set forth by permit condition.**	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **1.18 TPY**	4. Equivalent Allowable Emissions: lb/hour **1.18** tons/year
5. Method of Compliance (limit to 60 characters): **Allow firing of only natural gas or propane.**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Allowable emission limit is total for EU Nos. 003, 004, and 013. See Permit No. 0570029-007-AC, Condition D.3.E.**	

ATTACHMENT NO. 12D

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
NO_x			EL
PM			EL
SO_2			NS
PM_{10}			EL
CO			NS

ATTACHMENT NO. 12E

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM_{10}**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.091** lb/hour **0.4** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **7.6 lb PM_{10}/$MMft^3$** Reference: **AP-42, Section 1.4**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.012 $MMft^3$/hr x 7.6 lb PM_{10}/ $MMft^3$ = 0.091 lb PM_{10}/hr**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **ESCPSD**	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: **1.18 TPY**	4. Equivalent Allowable Emissions: lb/hour **1.18** tons/year
5. Method of Compliance (limit to 60 characters): **Fuel use records.**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Limit for total combined allowable PM_{10} emissions for the Babcock & Wilcox Package Boiler (EU 003), Foster Wheeler Package Boiler (EU 004), and the Hurst Package Boiler (EU 013). See Permit No. 0570029-007-AC.**	

ATTACHMENT NO. 12G

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: **VE**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: **27** % Maximum Period of Excess Opacity Allowed: **6** min/hour	
4. Method of Compliance: **Test using EPA Method 9 performed 8 to 12 months prior to the expiration date of the permit.**	
5. Visible Emissions Comment (limit to 200 characters): **Rule 62-296.406(1), F.A.C. and Permit No. 0570029-007-AC, Condition C.3.**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

March 28, 2003

CERTIFIED MAIL

Mr. Daniel E. Ross
Manager, President and COO
Nitram, Inc.
P.O. Box 2968
Tampa, FL 33601-2968

Re: Request for Additional Information Regarding Renewal Title V Permit Application dated February 17, 2003
File No. 0570029-008-AV
Hillsborough County

Dear Mr. Ross:

On February 18, 2003, the Department received your Title V application to renew permit 0570029-002-AV and incorporate the conditions of construction permit 0570029-007-AC for your ammonium nitrate products manufacturing facility located at 5321 Hartford Street, Tampa. In order to continue processing your application, the Department will need the below additional information pursuant to Rules 62-213.420(1)(b)2. and 62-4.070(1), F.A.C.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Listed on Page 5 of Section I of the application is Emission Unit ID 008 - Kaolin Clay Handling and Storage w/Flex-Kleen Baghouse. As noted on Page 1 of 41 of construction permit 0570029-007-AC, this emission unit is "PERMANENTLY SHUTDOWN". Therefore, in order to conduct the activities an air pollution construction permit application needs to be submitted prior to constructing (re-activating) the emission unit, since it is now regarded as a new source of air pollution. If you intend to submit a construction application to

re-activate this emission unit, be aware that the Department may consider the modifications addressed in construction permit 0570029-007-AC as though construction had not yet commenced, pursuant to Rule 62-212.400(2)(g), F.A.C.

2. Should No. 1 on Page 7 of Section II of the application show the UTM East coordinate as 362.5 instead of 363.5? If no, explain.

3. Should No. 6 on Page 7 of Section II of the application show a SIC number of 2874? In no, explain.

4. Your initial Title V operation permit application and Title V permit 0570029-002-AV indicate your facility is not major for hazardous air pollutants (HAPs). No. 4 on Page 8 of Section II of the application indicates the facility is now major for HAPs. Please explain how you determined the facility to be a major source of HAPs.

Section III of the application

5. Regarding Emission Unit ID 003 - Babcock & Wilcox Package Boiler:

   A. Page 13 shows the model number as FM-10(SG-703). Should the model number be SG-703?

   B. Page 15 shows Rule 62-296.406(2) and (3), F.A.C. as applicable. Do you agree these rules are not applicable, since the boiler was permitted before July 15, 1989, as stipulated in Rule 62-296.406(1), F.A.C. and explained in the emission unit description in permit 0570029-007-AC?

   C. Should No. 13 on Page 16 show the UTM East coordinate as 362.5 instead of 363.200? If no, explain.

   D. Should No. 5 (top) on Page 17 show the value 310 instead of 657, since Specific Condition No. D.1 of permit 0570029-007-AC limits the total maximum quantity of natural gas usage for all 3 boilers at this facility to 309,998,880 ft^3 per any consecutive 12 month period?

E. Should No. 5 (bottom) on Page 17 show the value 3,460, since Specific Condition No. D.2. of permit 0570029-007-AC limits the total maximum quantity of propane usage for all 3 boilers at this facility to 1,631,988 gallons per any consecutive 12 month period? (1,631,988 x 4.24)/2000 = 3,460

F. Should Nos. 3 & 8 (top) and No. 4 (bottom) on Page 19 for PM emissions show 1.18 tons/yr., since Attachment II (3 of 3) of the Technical Evaluation Determination for construction permit 0570029-007-AC limited the total maximum potential PM emission for all 3 boilers at this facility to 1.18 tons/year?

G. Correct and re-submit Page 19 for the NO_x emissions, since No. 8 used 0.05 $MMft^3/hr.$ instead of 0.075 $MMft^3/hr.$ Thus, 5 lbs./hr. goes to 7.5 lbs./hr.

H. Explain why emission information (Section G) for carbon monoxide (CO) was not submitted (i.e., 6.3 lbs./hr. & 13.02 tons/yr.).

6. Regarding Emission Unit ID 004 - Foster Wheeler Package Boiler:

A. Page 15 shows Rule 62-296.406(2) and (3), F.A.C. as applicable. Do you agree these rules are not applicable, since the boiler was permitted before July 15, 1989, as stipulated in Rule 62-296.406(1), F.A.C. and explained in the emission unit description of permit 0570029-007-AC?

B. Should No. 13 on Page 16 show the UTM East coordinate as 362.5 instead of 363.200? If no, explain.

C. Should No. 5 (top) on Page 17 show the value 310 instead of 438, since Specific Condition No. D.1 of permit 0570029-007-AC limits the total maximum quantity of natural gas usage for all 3 boilers at this facility to 309,998,880 ft^3 per any consecutive 12 month period?

D. Should No. 5 (bottom) on Page 17 show the value 3,460, since Specific Condition No. D.2. of permit

0570029-007-AC limits the total maximum quantity of propane usage for all 3 boilers at this facility to 1,631,988 gallons per any consecutive 12 month period? (1,631,988 x 4.24)/2000 = 3,460

E. Should Nos. 3 (top) & 8 (top) and No. 4 (bottom) on Page 19 for PM emissions show 1.18 tons/yr., since Attachment II (3 of 3) of the Technical Evaluation Determination for construction permit 0570029-007-AC limited the total maximum potential PM emission for all 3 boilers at this facility to 1.18 tons/year?

F. Should No. 8 (top) on Page 19 for PM emissions show 50 MMBTU/hr., instead of 75 MMBTU/hr.?

G. Should No. 3 (top) on Page 19 for NO_x emissions show 5.0 lbs./hr., instead of 7.5 lbs./hr.?

H. Should No. 8 (top) on Page 19 for NO_x emissions show 0.050 $MMft^3$ and 5.0 lbs./hr., instead of 0.075 $MMft^3$ and 7.5 lbs./hr.?

I. Explain why emission information (Section G) for carbon monoxide (CO) was not submitted (i.e., 6.3 lbs./hr. & 13.02 tons/yr.).

7. Regarding Emission Unit ID 006 - Ammonium Nitrate Prill Tower No. 2:

A. Should No. 13 on Page 16 show the UTM East coordinate as 362.5 instead of 353.200? If no, explain.

B. Explain why No. 3 (top) on Page 20 shows for visible emissions the Exceptional Conditions: 20%.

C. Regarding the CAM Plan - The first page of Attachment NI-EU3-J14 states, as required in permit 0570029-007-AC, that the values will be recorded at least once per 8-hour shift. The 2nd paragraph of the "Monitoring Approach Justification" states daily recordings. Please re-submit the "Monitoring Approach Justification" to reflect the correct recordings on at least once per 8-hour shift.

D. Explain why emission information (Section G) for PM_{10} was not submitted.

8. Regarding Emission Unit ID 007 - Nitric Acid Plant:

   A. Should No. 13 on Page 16 show the UTM East coordinate as 362.5 instead of 363.200? If no, explain.

   B. Explain why the Segment (Process/Fuel) Information (page 17) for the 53 MMBTU/hr. of natural gas usage is not included.

   C. Explain why emission information (Section G) for carbon monoxide (CO) was not submitted (i.e. 19.50 tons/yr.).

   D. Are you agreeing to use the NO_x continuous emission monitor to demonstrate compliance on a continuous basis, which includes the requirements of 40 CFR 60.13? Note, 40 CFR 60.13(a) requires compliance with 40 CFR 60, Appendix B and Appendix F. If no, submit a Compliance Assurance Monitoring (CAM) Plan for this emission unit.

9. Regarding Emission Unit ID 010 - MgO Silo:

   A. Page 13 shows the model number as JV-24-4X. Should the model number be 24-JV-4X? If yes, also change Attachment NI-EU6-J3.

   B. Should No. 13 on Page 16 show the UTM East coordinate as 362.5 instead of 353.100? If no, explain.

   C. No. 8 on Page 19 for PM emissions uses the "acfm" airflow rate from Page 16 in the calculation with "dscfm". Re-submit this calculation and other effected information using the correct "dscfm" airflow rate.

10. Regarding Emission Unit ID 011 - MgO Day Tank:

A. Page 13 shows the model number as JV-24-4X. Should the model number be 24-JV-4X? If yes, also change Attachment NI-EU7-J3.

B. Should No. 13 on Page 16 show the UTM East coordinate as 362.5 instead of 353.100? If no, explain.

C. No. 8 on Page 19 for PM emissions uses the "acfm" airflow rate from Page 16 in the calculation with "dscfm". Re-submit this calculation and other effected information using the correct "dscfm" airflow rate.

11. Regarding Emission Unit ID 012 - Prill Rotary Drums:

A. Should No. 6 on Page 14 show the LD prills are processed at a maximum rate of 74,000 lbs./hr. (37 tons/hr.), instead of the 46,000 lbs./hr.?

B. Should No. 13 on Page 16 show the UTM East coordinate as 362.5 instead of 363.200? If no, explain.

C. Should No. 3 (top) and No. 4 (bottom) on Page 19 state 9.24 lbs./hr. and 40.5 tons/yr., instead of 9.28 lbs./hr and 50.5 tons/yr. (9.24 lbs./hr. x 8760 hrs./yr. divided by 2000 lbs./ton = 40.5 tons/yr.)? If yes, also change Attachment NI-EU8-J3. Note, your CAM Plan shows 9.24 lbs./hr. and 40.7 tons/yr., thus the 40.7 may need to be changed to 40.5.

D. Should No. 5 (top) on Page 20 show Rule 62-296.712(2), F.A.C., instead of Rule 62-296.711(2)(a), F.A.C.?

E. Should A.11. and B.3. in the O & M Plan of Attachment NI-EU8-J7 be like the information in

the O & M Plan on Pages 27 & 28 of construction permit 0570029-007-AC?

F. The first page of your CAM Plan in Attachment NI-EU8-J14 states the log shall have recordings at least once per 8-hour shift. Should this state the log shall have recordings at least once per day as required by Specific Condition No. F.7 of construction permit 0570029-007-AC?

12. Regarding Emission Unit ID 013 - Hurst Package Boiler:

A. Should No. 13 on Page 16 show the UTM East coordinate as 362.5 instead of 363.200? If no, explain.

B. Should No. 3 (top) of Page 19 for NO_x emissions show 1.2 lbs./hr. and 5.26 tons/yr. (0.012 $MMft^3$/hr. x 100 lbs./$MMft^3$ = 1.2 lbs/hr. and 1.2 lbs./hr. x 8760 hrs./yr. divided by 2000 lbs./ton = 5.26 tons/yr.)? Note, Specific Condition No. C.1.B. of construction permit 0570029-007-AC limits the natural gas usage to a maximum of 12,000 ft^3 per hour.

C. Show how the value of 0.27 tons/yr. of PM emissions in No. 3 on Page 19 was derived.

D. Show how the value of 0.11 tons/yr. of SO_2 emissions in No. 3 of Page 19 was derived, since this value is greater than the 0.09 tons/yr. value shown in Attachment II (3 of 3) of the Technical Evaluation Determination for construction permit 0570029-007-AC.

E. Should the values in No. 3 on Page 19 for PM_{10} emissions be 0.0912 lbs./hr. (0.012 $MMft^3$/hr. x 7.6 lbs./$MMft^3$) and 0.4 tons/yr. (0.0912 lbs./hr. x 8760 hrs./yr. divided by 2000 lbs./ton)?

F. Explain why emission information (Section G) for carbon monoxide (CO) was not submitted.

G. Should No. 3 (top) on Page 20 show for visible emissions that the Exceptional Conditions are 27% for one 6-minute period in any one hour, in

accordance with Specific Condition No. C.3. of construction permit 0570029-007-AC?

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the application form, DEP Form No. 62-210.900(1), effective February 11, 1999.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your responses should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the application form, DEP Form No. 62-210.900(1), effective February 11, 1999.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. A copy of your response should be sent to Mr. Ron Dennis of the Environmental Protection Commission of Hillsborough County.

If you should have any questions, please call Mr. Jim McDonald of my staff at (813)744-6100 extension 106.

Sincerely,

Eric Peterson, P.E.
Air Permitting Supervisor

copy to: Mr. Ron Dennis - EPCHC

Mr. Scott A. McCann, P.E.
Golder Associates, Inc.
6241 NW 223rd Street, Suite 500

Gainesville, FL 32653-1500

[electronic file name: 0570029008Nitram_EPinc.doc]

Request for Additional Information Regarding CAM

Nitram, Inc.
Title V Permit Renewal
Project Number: 1230005-005-AV

To: Jim McDonald

From: Jonathan Holtom

Date: March 18, 2003

The following comments/questions are a result of my review of the submitted CAM plans for Subject facility. You may be able to answer them yourself, or you may use these questions in a further request for additional information.

B&W Gas-Fired Boiler (EU 003)

1. CAM not applicable because of no control equipment being used.

FW Package Boiler (EU 004)

2. CAM not applicable because of no control equipment being used.

Ammonium Nitrate Prill Tower No. 2 (EU 006) A.C. 0.4–3.0

3. Jim – The recent stack test showed compliance with PM limit at a pressure drop between 0.5 and 1.5 inches of water. The application states that previous tests have shown compliance with the PM limit at a pressure drop between 0.4 to 3.0 inches of water. Please compare past test PM emissions levels vs. pressure drop. The indicator ranges need to be sufficiently protective of the emissions limit to provide for corrective action to be taken prior to exceeding the emissions limit. If the requested ranges are OK, then the proposal is acceptable.

Jim
Still
Check

Nitric Acid Plant with Two Stacks (EU 007)

NOx CEM
Compl OK

4. While the permit requires that a NO_X CEM be maintained and operated (condition E.8.), compliance is specified using EPA Methods 7, 7A, 7B, 7C or 7D. If the permittee requests to have the NO_X CEMS specified for continuous compliance purposes, then CAM will be exempted. Otherwise, an acceptable CAM plan will need to be submitted for this emissions unit.

NO CAM

Kaolin Clay Handling and Storage with Flex-Kleen Baghouse (EU 008)

5. "60 days prior to commencing operation" is not sufficient time to open the Title V permit and install a CAM plan. The company either needs to submit an acceptable CAM plan now, that they will use if the unit is re-started, or establish emission limits that will keep their potential uncontrolled emissions under 100 tpy.

Rpms
Shutdown

M_gO Silo w/Griffin Env. Baghouse (EU 010)

6. Jim – If you concur with the 99% efficiency for their baghouse and/or some other measure of potential uncontrolled emissions that shows less than 100 tpy, then CAM does not apply.

?

OK NO CAM

M_gO Day Tank w/Griffin Env. Baghouse (EU 011)

7. Jim – If you concur with the 99% efficiency for their baghouse and/or some other measure of potential uncontrolled emissions that shows less than 100 tpy, then CAM does not apply.

Prill Rotary Drums w/Wet Cyclones and Peabody Scrubber (EU 012)

8. Jim – The recent stack test showed compliance with PM limit at a pressure drop between 2.5 and 2.7 inches of water. The application states that previous tests have shown compliance with the PM limit at a pressure drop between 0.5 to 5.0 inches of water. Please compare past test PM emissions levels vs. pressure drop. The indicator ranges need to be sufficiently protective of the emissions limit to provide for corrective action to be taken prior to exceeding the emissions limit. If the requested ranges are OK, then the proposal is acceptable.

Gas-fired Hurst Packaged Boiler (EU 013)

9. CAM not applicable because of no control equipment being used.

After you get a chance to review these comments, please call me if you have any questions. I can be reached at SunCom 291-9531.