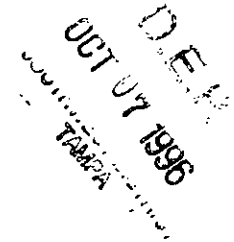




# CORONET INDUSTRIES, INC.

November 4, 1996

Mr. Jerry Kissel  
Air Permitting Section  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619



**Re: Expiration Date Extension of AC29-259884, Request for**

Dear Mr. Kissel:

The construction permit for Coronet Industries, Inc.'s Defluorination Kilns 6 & 7, AC29-259884, is scheduled to expire on 07/01/97. Due to logistics and specification problems, the construction of this plant will not be completed by 07/01/97. Coronet is requesting an extension of the completion date to 07/01/99. We appreciate your cooperation in this matter.

If I may be of further assistance, please contact me at (813) - 719 - 7255.

Sincerely,

Samuel F. Sweet  
Environmental Affairs Manager

cc: Dr. V. Scialli, COO/Pres.  
N. Lowrey, VP/Prod. Mgr.  
K. Kuzutani, Director, CII  
Mr. Jerry Campbell, EPCHC

MEMORANDUM

AIRS Processing No. NONE

TO: W.C. Thomas, P.E. *WCT 10/25/95* DATE: October 25, 1995  
District Air Administrator

Thru: Gerald J. Kissel, P.E. *GJK*  
District Air Engineer

FROM: John J. Taylor, P.E. *JAT*  
Air Permit Engineer

SUBJECT: **Coronet Industries, Inc.**  
**Defluorination Kilns No. 6 & 7**  
**Request for Supplemental Fuel Performance Tests**

Ref: Permit A029-218851  
County: Hillsborough  
Project: Request for Supplemental Fuel Performance Tests

On September 15, 1995, this Department received a request from Mr. Frank Sweat, Environmental Affairs Manager for Coronet Industries Inc. requesting authorization for a trial run at this emission unit using a mixture of petroleum coke and animal feed. The petroleum coke is to be used as a supplemental fuel and will be mixed at approximately 5% of the feed rate to the kilns.

Emissions will be sampled for Particulate Matter, Sulfur Dioxide, Sulfuric Acid Mist, Carbon Monoxide, Volatile Organic Compounds, Nitrogen Oxides and Fluorides.

The attached letter authorizes emissions tests to be conducted in order to gather data regarding pollutant emissions during baseline processing and during processing with a feed blend containing the requested supplemental fuel.

This request has been coordinated with the EPC/HC and the BAR/NSR Section.

The BAR/NSR Section recommended the Sulfuric Acid Mist and Carbon Monoxide testing which is included in the attached letter of authorization.

I recommend approval of the attached letter of authorization..



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

**Facsimile      Transmission      Sheet**

DATE September 28, 1995

TO: Cargos Gonzales  
Hillsborough County EPC, Air Quality Division

FROM: John J. Taylor 

DEPT: DEP, SOUTHWEST DISTRICT

PHONE: 813-744-6100      SUNCOM 542-6100      EXT. 117

MESSAGE: RE: Coronet Industries Request for Rate Increase -  
Defluorination Kilns 6/7. A029-218851.

Per our telephone conversation this date, attached is a copy of the request letter, dated August 30, 1995, from Frank Sweat requesting another rate increase. We granted a similar rate increase in July 1995 (from 18 tph to 19.8 tph), which was issued as a letter amendment July 18, 1995. This request is the second request for a rate increase (from 19.8 tph to 22 tph).

Please review and comment. This change involves no physical change in the operation, so this Department is planning to approve the request.

AIR DIVISION FAX NUMBER: 813-744-6458      SUNCOM 542-6458

Total Number of Pages 2



CORONET INDUSTRIES, INC.

Rec'd  
9/15/95  
JTR

September 13, 1995

Mr. John Taylor  
Florida Department of Environmental Protection  
Southwest District  
Air Permitting Section  
3804 Coconut Palm Drive  
Tampa, FL 33619

NO AIRS I.D.

CONFIDENTIAL

Re: Defluorinating Kilns #6 and #7, Request for Alternate Fuel Usage for AO29-218851

Dear Mr. Taylor:

Defluorinating kilns #6 and #7 presently operate under air permit no. AO29-218851 at a combined rate of 19.8 tons per hour feed as amended on July 18, 1995. The kilns are fired normally on natural gas at a maximum rate of 94.46 MMBTU/hr. These units presently operate under an operating permit but a construction permit was not on file at FDEP. Pursuant to 17-2.100 Coronet Industries, Inc. requested a change in the feed rate from 19.8 tph (9.9 tph/ kiln) to 22 tph (11 tph/ kiln) on August 30, 1995 [ also 40 cfr 60.14(e)(2)]. As discussed with you on September 6, 1995, Coronet Industries, Inc. desires to use an alternate supplemental fuel source to be fed with the feed. We propose to utilize petroleum coke to be fed at a maximum rate of 5% of the feed rate for a test period of 10 days. The emissions from this point source would be sampled for NO<sub>x</sub>, SO<sub>x</sub>, and unburned hydrocarbons prior to the test and after the plant was stabilized during the test. Coronet requests that this test be kept confidential.

Under AO29-218851 as amended, the maximum fluoride emissions are limited to 2.57 lb/hr and the particulate emissions are limited to 15.0 lb/hr with < 20% opacity. Recent stack tests show that these kilns emit only a fraction of the permitted fluorides and particulates. It is not anticipated that this alternate fuel would increase the fluoride or particulate emissions. Unless there is a tremendous amount of unburned coke in the exit gasses, the stack should continue to show < 20% opacity.

Sincerely,

Samuel F. Sweat  
Environmental Affairs Manager

cc Mr. Jerry Kissel, FDEP  
File, COO & Pres.  
Nolan Lowrey  
Mr. Kazuhisa Kuzutani

1003

# Product Description Sheet

## McCLAIN CORPORATION

### FS-CARB

#### Foamy Slag Addition

Chemistry: Typical

<u>Component</u>	<u>% by Weight</u>
Fixed Carbon	97.0
Ash	1.8
Volatile	1.6
Moisture	0.1
Sulfur	2.5

Size: Typical

<u>Mesh Size</u>	<u>% by Weight</u>
+ 3	0.9
+ 10	5.6
+ 20	2.5
+100	19.1
+200	70.6
- 200	1.5

*average*

*32 mesh*

Packaging:

2300 lb. bulk bags on pallets or 30 lb. bags on pallets

DISCLAIMER: The claims, ratings, and recommendations are referred to the full extent of meeting the performance use or handling of the products of technology herein described are based on our research and personal experience. While we believe the information to be accurate and reliable, we do not guarantee accuracy of the results to be obtained in any particular situation. It is intended as a guide only and you must determine the suitability of such materials for your own particular process. We warrant that the product referred to herein will conform to specifications and standards as set forth in the applicable product literature. However, we do not assume liability for any incidental or consequential damages. NOTHING HEREIN SHALL CONSTITUTE A WARRANTY OF MERCHANTABILITY OR A WARRANTY THAT THE PRODUCT IS FIT FOR ANY PARTICULAR PURPOSE UNDER THE UNIFORM COMMERCIAL CODE.



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

Mr. Samuel F. Sweat  
Environmental & Safety Manager  
Coronet Industries, Inc.  
P.O. Box 760  
Plant City, FL 33564-0760

September 28, 1995

RE: Air Pollution Permit A029-218851  
Request For Feed Rate Increase  
Defluorination Kilns No. 6 & 7  
DEP Processing No. 0570075-001

Dear Mr. Sweat:

On September 1, 1995, the Department received your request for a feed rate increase for the existing Defluorination Kilns Nos. 6 & 7. Defluorination Kilns Nos. 6 & 7 presently have a permitted combined feed rate of 19.8 tph which was authorized by A029-218851 Permit Amendment, July 18, 1995.

This request is the second request for an amendment to the operation permit in order to increase the production rate at the existing facility. At this point, the Department has determined that any further production rate increase for the existing facility will first require a construction permit.

Coronet Industries, Inc. is requested to submit to the Air Permitting Section of this Department a separate application and appropriate fee for a construction permit in order to increase the production rate and increase the allowable fluoride emission rate (0.37 pounds of fluoride per ton P2O5 kiln input). A fee of \$250 would be required for an emission increase less than 5 tons per year.

Please submit a copy of your application to the Environmental Protection Commission of Hillsborough County, Air Management Division.

If you should have any questions, please call Mr. John J. Taylor or myself at (813)744-6100.

Sincerely,

  
Gerald J. Kissel, P.E.  
Air Permitting Supervisor

copy: R. Kirby/C. Gonzales/B. Kalra, HCEPC

cii95851.111 "Protect, Conserve and Manage Florida's Environment and Natural Resources"

JERRY

SAVE IN FILE

ATTACHED IS A FOLLOW-UP LETTER FOR THE TWO PROJECT REQUESTS FRANK SWEAT HAS REQUESTED FOR CORONET INDUSTRIES:

REQUEST NO. 1 - RATE INCREASE KILNS 6/7 (AO29-218851)

THIS REQUEST HAS BEEN GIVEN AIRS ID 057 0075 001 AO.

REQUEST NO. 2 - PETROLEUM COKE "ALTERNATE FUEL"

THIS REQUEST HAS NO AIRS ID AS YET, BUT HAS BEEN ASSIGNED TO ME AS OF 9/7/95 AS A RESULT OF FRANK'S VISIT TO THIS OFFICE.

I WAS TALKING WITH BRUCE MITCHELL ON A DIFFERENT SUBJECT LAST WEEK AND I MENTIONED THIS REQUEST TO BURN PETROLEUM COKE, BUT DID NOT MENTION THAT IT WAS CORONET INDUSTRIES. BRUCE RECOMMENDED THAT WE TALK DIRECTLY WITH CLAIR FANCY AND LET HIM DECIDE WHO SHOULD HANDLE THESE PET COKE BURN REQUESTS (TALLAHASSEE OR DISTRICT). BRUCE IS WORRIED THAT SINCE THIS IS A MAJOR FACILITY, WE NEED TO LOOK CLOSELY AT ACTUAL EMISSIONS.

I WILL ASSUME THAT THE SOUTHWEST DISTRICT (ME) WILL PROCEED WITH THIS PROJECT, UNLESS YOU INDICATE OTHERWISE.

JOHN J. TAYLOR  
9/18/95

*if you were assigned this one on 9/6 to write within the <sup>\*</sup> if they later come in with application, I'll get Tall's involved*

*\* we have examples from the petcoke within letters at Lakeland Dist. Fla. Pwr. Corp. River 2, Teco Big Bend.*



CORONET INDUSTRIES, INC.

September 13, 1995

Mr. John Taylor  
Florida Department of Environmental Protection  
Southwest District  
Air Permitting Section  
3804 Coconut Palm Drive  
Tampa, Fl 33619

**CONFIDENTIAL**

Re: Defluorinating Kilns #6 and #7, Request for Alternate Fuel Usage for AO29-218851

Dear Mr. Taylor:

AICS JD.  
057 0075 001A6  
RAY 1 = DEPT 1

~~Defluorinating kilns #6 and #7 presently operate under air permit no. AO29-218851 at a combined rate of 19.8 tons per hour feed as amended on July 18, 1995. The kilns are fired normally on natural gas at a maximum rate of 94.46 MMBTU/hr. These units presently operate under an operating permit but a construction permit was not on file at FDEP. Pursuant to 17-2.100 Coronet Industries, Inc. requested a change in the feed rate from 19.8 tph (9.9 tph/ kiln) to 22 tph (11 tph/ kiln) on August 30, 1995 [ also 40 of 60.14(e)(2)]. As discussed with you on September 6, 1995, Coronet Industries, Inc. desires to use an alternate supplemental fuel source to be fed with the feed. We propose to utilize petroleum coke to be fed at a maximum rate of 5% of the feed rate for a test period of 10 days. The emissions from this point source would be sampled for NO<sub>x</sub>, SO<sub>x</sub>, and unburned hydrocarbons prior to the test and after the plant was stabilized during the test. Coronet requests that this test be kept confidential.~~

Under AO29-218851 as amended, the maximum fluoride emissions are limited to 2.57 lb/hr and the particulate emissions are limited to 15.0 lb/hr with < 20% opacity. Recent stack tests show that these kilns emit only a fraction of the permitted fluorides and particulates. It is not anticipated that this alternate fuel would increase the fluoride or particulate emissions. Unless there is a tremendous amount of unburned coke in the exit gasses, the stack should continue to show < 20% opacity.

Sincerely,

Samuel F. Sweat  
Environmental Affairs Manager

cc: Mr. Jerry Kissel, FDEP  
File, COO & Pres.  
Nolan Lowrey  
Mr. Kazuhisa Kuzutani





# CORONET INDUSTRIES, INC.

September 13, 1995

*recd. 9/15  
JK*

Mr. John Taylor  
Florida Department of Environmental Protection  
Southwest District  
Air Permitting Section  
3804 Coconut Palm Drive  
Tampa, FL 33619

**CONFIDENTIAL**

**Re: Defluorinating Kilns #6 and #7, Request for Alternate Fuel Usage for AO29-218851**

Dear Mr. Taylor:

Defluorinating kilns #6 and #7 presently operate under air permit no. AO29-218851 at a combined rate of 19.8 tons per hour feed as amended on July 18, 1995. The kilns are fired normally on natural gas at a maximum rate of 94.46 MMBTU/hr. These units presently operate under an operating permit but a construction permit was not on file at FDEP. Pursuant to 17-2.100 Coronet Industries, Inc. requested a change in the feed rate from 19.8 tph (9.9 tph/ kiln) to 22 tph (11 tph/ kiln) on August 30, 1995 [also 40 cfr 60.14(e)(2)]. As discussed with you on September 6, 1995, Coronet Industries, Inc. desires to use an alternate supplemental fuel source to be fed with the feed. We propose to utilize petroleum coke to be fed at a maximum rate of 5% of the feed rate for a test period of 10 days. The emissions from this point source would be sampled for NO<sub>x</sub>, SO<sub>x</sub>, and unburned hydrocarbons prior to the test and after the plant was stabilized during the test. Coronet requests that this test be kept confidential.

Under AO29-218851 as amended, the maximum fluoride emissions are limited to 2.57 lb/hr and the particulate emissions are limited to 15.0 lb/hr with < 20% opacity. Recent stack tests show that these kilns emit only a fraction of the permitted fluorides and particulates. It is not anticipated that this alternate fuel would increase the fluoride or particulate emissions. Unless there is a tremendous amount of unburned coke in the exit gasses, the stack should continue to show < 20% opacity.

Sincerely,

Samuel F. Sweat  
Environmental Affairs Manager

cc: Mr. Jerry Kissel, FDEP  
File, COO & Pres.  
Nolan Lowrey  
Mr. Kazuhisa Kuzutani

TO: CANONIC INDUSTRIES INC.

1/14/95

ATTN: DENNIS SIMMS

FROM: MCCLAIN CORPORATION

FAX 513-338-2167

TOM TRICKEN

PH 513-338-7106 FAX 513-338-7167

DENNIS. HERE IS SPEC SHEET PER OUR CONV.

Y- DAY. CALL ME IF/WHEN YOU WANT MORE INFO

*Tom*

# Product Description Sheet

## McCLAIN CORPORATION

### FS-CARB

#### Pottery Slag Addition

Chemistry: Typical

<u>Component</u>	<u>% by Weight</u>
Fixed Carbon	97.0
Ash	1.8
Volatile	1.6
Moisture	0.1
Sulfur	2.5

Size: Typical

<u>Mesh Size</u>	<u>% by Weight</u>
+ 3	0.9
+ 10	5.5
+ 20	2.5
+100	19.1
+200	70.6
- 200	1.5

*average*  
*32 mesh*

Packaging:

2500 lb. bulk bags on pallets or 50 lb. bags on pallets

DISCLAIMER: The values, ranges, and conditions are intended to give a general idea of the performance, use or handling of the product or technical service provided and are based on our best estimate of the product's performance. While we believe the information is accurate and reliable, we do not guarantee accuracy of the results or the performance of the product. It is the user's responsibility to test the product under the conditions of use and to determine the suitability of the product for their own purposes. We warrant that the product is free from defects in material and workmanship at the time of shipment. However, we do not assume liability for any consequential or special damages. NO OTHER REPRESENTATION OR WARRANTY OF MERCHANTABILITY OR A WARRANTY THAT THE PRODUCT IS FIT FOR ANY PARTICULAR PURPOSE UNDER THE UNIFORM COMMERCIAL CODE.



CORONET INDUSTRIES, INC.

RECEIVED  
SEP 01 1995

Department of Environmental Protection  
SOUTHWEST DISTRICT  
August 30, 1995

Mr. Jerry Kissel  
Florida Department of Environmental Protection  
Southwest District  
Air Permitting Section  
3804 Coconut Palm Drive  
Tampa, Fl 33619

Re: **Defluorinating Kilns #6 and #7, Request for Feed Rate Increase for AO29-218851**

*EXISTING APIS 40HIL290075, pt. 05*

Dear Mr. Kissel:

Defluorinating kilns #6 and #7 presently operate under air permit no. AO29-218851 at a combined rate of 19.8 tons per hour feed as amended on July 18, 1995. The kilns are fired normally on natural gas at a maximum rate of 94.46 MMBTU/hr. These units presently operate under an operating permit but a construction permit was not on file at FDEP. Pursuant to 17-2.100 Coronet Industries, Inc. is requesting a change in the feed rate from 19.8 tph (9.9 tph/ kiln) to 22 tph (11 tph/ kiln) [ also 40 cfr 60.14(e)(2)]. This change in feed rate request involves no physical change in the operation.

Under AO29-218851 as amended, the maximum fluoride emissions are limited to 2.57 lb/hr and the particulate emissions are limited to 15.0 lb/hr with < 20% opacity. Recent stack tests show that these kilns emit only a fraction of the permitted fluorides and particulates. It is not anticipated that an increase of 2.2 tph will increase the emissions to a point approaching the permit limits.

Sincerely,


Samuel F. Sweat  
Environmental Affairs Manager


cc: Jerry Campbell, EPCHC  
File. COO & Pres  
Nolan Lowrey

→ CARLOS GONZALEZ - EPC 9/23/95 (FAXED BY JET)

**MEMORANDUM**

**TO:** W.C. Thomas, P.E.  
District Air Administrator

**THRU:** Gerald J. Kissel, P.E.   
District Air Engineer

**FROM:** William E. Schroeder   
Air Permitting Engineer

**DATE:** July 17, 1995

**SUBJECT:** Coronet Industries, Incorporated  
DEFLUORINATION KILNS #6 AND #7

**STATUS:** FILE NUMBER - 270324  
COUNTY - Hillsborough  
PATS DAY - 84  
PATS DAY 90 - 7/23/95  
TITLE V FACILITY

Coronet has requested an amendment to A029-218851 to increase production from 18.0 tons/hour to 19.8 tons/hour. No physical modification of the equipment was necessary for the increase. This was verified by on-site inspection of the facility. This interim increase was approved by letter of authorization from DEP dated December 1, 1994. AC29-259884 has been issued for an additional rate increase which will involve actual modification of the emissions unit.

The permittee also requested an increase in hours of operation from 8,064 hours/year to 8,760 hours/year. No increase in emission rate was requested.

This facility has performed the required modeling to qualify for RACT exemption.

Hillsborough EPC was provided a copy of the draft and had no comments to provide regarding the amendment.

Based upon our review, we recommend that the amendment be issued as drafted.

**CORONET INDUSTRIES, INC.**

**SUMMARY OF PARTICULATE EMISSIONS**

**DEFLU KILNS 6 & 7**

**4/13/95**

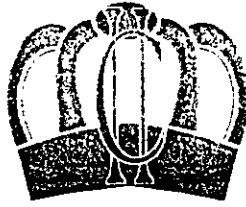
\*\*\*\*\*  
\*\*\*\*\*

PROCESS  RUN NO.	WEIGHT RATE TONS / HR.	STACK GAS	STACK GAS	STACK GAS	STACK GAS	PARTICU- LATE	EMISSION
		FLOW RATE ACFM	FLOW RATE DSCFM	TEMP. DEG. F	MOISTURE %	CONC. gr / DSCF	RATE lb / HR
1	18.07	69,729	59,136	110	7.91	.0114	5.77
2	18.07	70,864	59,628	110	8.56	.0143	7.29
3	18.07	68,788	58,734	110	7.36	.0159	7.99
<b>AVG.</b>	<b>18.07</b>	<b>69,794</b>	<b>59,166</b>	<b>110</b>	<b>7.94</b>	<b>.0139</b>	<b>7.02</b>

\*\*\*\*\*  
\*\*\*\*\*

**ALLOWABLE PARTICULATE EMISSION RATE: 15 LBS / HR.**

**ALLOWABLE PERCENT OPACITY < 20 %**



**CORONET INDUSTRIES, INC.**

April 27, 1995

**RECEIVED**  
MAY 02 1995  
Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

Mr. Gerald Kissel, P. E.  
Air Permitting Supervisor  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Fl 33619

Re: Completion of Construction for A029-218851

Dear Mr. Kissel:

Attached you will find the Certificate of Completion for the rate increase requested in November of 1994 and authorized in December of 1994; extended on March 1, 1995. The stack test results at 91.3% of the requested rate are also attached. Please amend permit no. A029-218851, the permit for Nos. 6 & 7 kilns, to reflect the higher rate.

if I may be of further assistance, please contact me at (813) - 719 - 7255.

Sincerely,

Samuel F. Sweat  
Environmental Affairs Manager

cc: N. Lowrey

*cc: EPA, State of Florida, Dept. of Environmental Protection, Plant City, Florida, 33564-0760*

*4/27/95*



RECEIVED  
MAY 02 1995

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
BY Department of Environmental Protection  
SOUTHWEST DISTRICT

AIR POLLUTION SOURCES  
CERTIFICATE OF COMPLETION OF CONSTRUCTION\*

PERMIT NO. A029-218851 DATE: 4/21/95

Company Name: Coronet Industries, Inc. County: Hillsborough

Source Identification(s): Defluorinating Kilns 6 & 7

Actual costs of serving pollution control purpose: \$ N/A

Operating Rates: 18.07 TPH Design Capacity: 19.8 TPH

Expected Normal 18-19.5 TPH During Compliance Test 18.07 TPH

Date of Compliance Test: 4/13/95 (Attach detailed test report)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge
	<u>Particulates</u>	<u>7.02 lb/HR</u>	<u>15 lb/HR</u>
	<u>Fluorides</u>	<u>1.79 lb/HR</u>	<u>2.56 lb/HR</u>

Date plant placed in operation: N/A Coronet began trying to increase rates in early Dec., 1994  
Rates were raised to 19.8 to 19.8 in February.

This is to certify that, with the exception of deviations noted\*\*, the construction of the project has been completed in accordance with the application to construct and ~~Construction Permit~~ Letters of Authorization dated 12/1/94 & 3/1/95.

A. Applicant:  
N. Lowrey  
Name of Person Signing (Type)

Nolan W. Lowrey Acting President  
Signature of Owner or Authorized Representative and Title

Date: 5/1/95 Telephone: 813-752-1161

B. Professional Engineer:  
Russell K. Watkins  
Name of Person Signing (Type)

Russell K. Watkins  
Signature of Professional Engineer

Malatino & Associates  
Company Name

Florida Registration No. 10501

4415 Florida National Drive  
Suite 101  
Lakeland, FL 33813

Date: 5-1-95

(Seal)

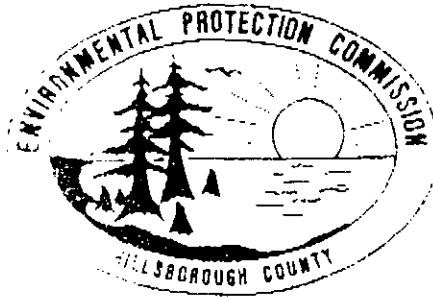
(813) 646-2828  
Mailing Address  
Telephone Number

\*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

\*\*As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

COMMISSION

- DAVID BERGER
- PHILIP BUSBY
- JOE CABELERA
- CHRIS HART
- JIM NEWMAN
- EDYURANICHYK
- SANDRA WILSON



ADMINISTRATIVE OFFICES, LOCAL WATER MANAGEMENT DISTRICT  
 1900 - 9TH AVENUE  
 TAMPA, FLORIDA 33606  
 TELEPHONE (813) 272-5605  
 FAX (813) 272-5607

AIR MANAGEMENT DIVISION  
 TELEPHONE (813) 272-5607

WASTE MANAGEMENT DIVISION  
 TELEPHONE (813) 272-5607

ECOSYSTEMS MANAGEMENT DIVISION  
 TELEPHONE (813) 272-5607

EXECUTIVE DIRECTOR

PHILIP B. BLOWART

ENVIRONMENTAL PROTECTION COMMISSION  
 OF HILLSBOROUGH COUNTY

FAX TRANSMITTAL SHEET

DATE: 5/23/95

TO: Bill Schroeder

FAX PHONE: 744-6458 VOICE PHONE: 744-6100 x 104

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 3

USE FAX TRANSMISSION LINE: (813) 272-5605  
 FOR RETRANSMISSION OF ANY FAX PROBLEMS, CALL: (813) 272-5630

FROM: CARLOS GONZALEZ

(CIRCLE APPLICABLE SECTION BELOW)

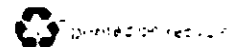
AIR DIVISION

-ENFORCEMENT

ENGINEERING

-SUPPORT OPERATIONS

SPECIAL INSTRUCTIONS: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_





COMMISSION

- RONALD BERGER
- JOHN P. SUBANSKY
- DR. HILKKA
- CHAS HART
- BOB NORMAN
- ED LUPANDEK
- ANDRA WILSON

EXECUTIVE DIRECTOR

ROBERT STEWART



ADMINISTRATIVE SERVICES DIVISION  
 WATER MANAGEMENT DIVISION  
 1900 10th Street  
 TAMPA, FLORIDA 33605  
 TELEPHONE (813) 272-3900  
 FAX (813) 272-3157

AIR MANAGEMENT DIVISION  
 TELEPHONE (813) 272-3900

WASTE MANAGEMENT DIVISION  
 TELEPHONE (813) 272-3900

WETLANDS MANAGEMENT DIVISION  
 TELEPHONE (813) 272-3900

MEMORANDUM

DATE: May 23, 1995

TO: William Schroeder, DEP/SW District

FROM: Carlos Gonzalez *CG* THRU *R* Richard C. Kirby, IV, P.E.

SUBJECT: Coronet Industries, Inc.: Response to DEP letter of authorization to amend the production rate on Defluorinating Kilns 6 and 7 (AO29-218851), PAIS #270324

I reviewed the above response and I do not have any additional information to be requested at this time. Any items of concern that may be raised during the inspection, which is scheduled for May 24 at 10:00, may be requested thereafter.

Attachments

DM



# CORONET INDUSTRIES, INC.

April 20, 1995

FILED  
APR 25 1995  
ENV. PROT. COMM.  
OF H.C.

Mr. Jerry Campbell  
Environmental Protection Commission of  
Hillsborough County  
Air Permitting Section  
1207 Ninth Avenue  
Tampa, FL 33605

**Re: Scheduled Emission Testing at 91.3% of Higher Requested Rate for  
Kilns 6 & 7, Compliance Testing of AO29- 218851**

Dear Mr. Campbell:

In accordance with the requirements of operating permit no. AO29-218851  
EPA NO. 0075, Point ID: 05, kilns 6 & 7, a compliance test was conducted on  
April 13, 1995, for fluoride and particulate emissions. The test methods utilized  
were 1, 2, 4, 5, 9, and 13B, 40 CFR 60, Appendix A, adopted in rule 60-290  
F.A.C. The fluoride emissions were tested in compliance with test conditions  
No. 2 and No. 5. Particulate emissions were conducted in compliance with  
test conditions No. 3 and No. 5. Opacity was conducted in compliance with  
test conditions No. 4 and No. 5.

Under the original TSP authorization of 10/31/94, and extended on 1/11/95, the  
plant was authorized to operate at 16.07 TPD feed, 91.3% of the requested rate of 17.6  
TPD (10/31/94). The reasons for this testing were to ensure  
compliance with the 20% requested feed rate increase for def. 10/31/94.  
AO29-218851. The emission test was conducted for an hour and was  
an average rate of fuel usage of 83.87 mm BTU/hr.

NEDS NO: 0075-05  
LOGGED IN [initials]  
COMPUTER LIST [initials]  
REVIEWED BY: [signature]



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

Mr. Samuel F. Sweat  
Environmental Affairs Manager  
Coronet Industries Incorporated  
P.O. Box 760  
Plant City, Florida 33564-0760

December 1, 1994

Re: Request for Feed Rate Increase  
Defluorinating Kilns Nos. 6 & 7  
FDEP Permit No. AO29-218851

Dear Frank:

The Department has reviewed your request to increase the feed rates for the Defluorinating Kilns Nos. 6 & 7 from a combined 18.0 tons per hour to a combined 19.8 tons per hour. Based on the information provided in your letter received by this Department on November 10, 1994, the Department has concluded the following:

(1) The requested increase in feed rate is not considered a "modification" since there will be no physical modifications to either kiln and it can be accomplished without a capital expenditure. Consequently, per Rule 40CFR60.14 - MODIFICATION, this request for an increase in feed rate meets the definition for exemption per 40CFR60.14(e).

(2) The requested increase in feed rate is not subject to NEW SOURCE REVIEW/PREVENTION OF SIGNIFICANT DETERIORATION (NSR/PSD) since the requested increase in feed rate is not prohibited under any federally enforceable permit condition. Consequently, this request is exempt from the definition of a "MODIFICATION" per 62-212.200(46).

This letter authorizes Coronet Industries Incorporated to proceed with the proposed rate increase as addressed in the letter to this Department, dated November 9, 1994.

The authorization is subject to the following conditions:

1. Within 30 days of achieving the higher rate, Coronet Industries shall schedule a stack test for visible emissions, particulate matter emissions, and fluoride emissions per operating permit AO29-218851.

Mr. Samuel F. Sweat  
Coronet Industries Incorporated

Defluorinating Kilns 6 & 7

2. All testing should be conducted within 90-100% of the requested maximum combined feed rate of 19.8 tons per hour and the permitted maximum heat input rate of 94.46 MMBtu per hour. The visible emission test period shall be at least thirty (30) minutes in duration. Any operating restrictions or limitations observed during the test shall be reported and shall be subject to inclusion in the amended operating permit.

3. Coronet Industries shall notify this Department and the Hillsborough County Environmental Protection Commission, Air Management Division prior to conducting the emissions tests. The notification shall state the reason for the testing (Requested Feed Rate Increase for Defluorinating Kilns 6 & 7) and reference this letter of authorization.

NOTIFY: Mr. Bill Proses  
Air Compliance Supervisor  
Florida Department Of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619  
Phone: 813-744-6100, x 417  
Fax: 813-744-6083

NOTIFY: Mr. Rick Kirby, Chief, Air Permitting Section  
Hillsborough County Environmental Protection Commission  
Air Management Division  
1410 North 21st Street  
Tampa, Florida, 33605  
Phone: 813-272-5530  
Fax: 813-272-7144

4. Coronet Industries shall provide the following within 45 days of testing:

A. Two copies of the test data to this Department. Forward to:

Mr. Bill Proses, Air Compliance Supervisor  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

(Continued On Next Page)

Mr. Samuel F. Sweat  
Coronet Industries Incorporated

Defluorinating Kilns 6 & 7

4. (Continued)

B. One copy of the test data to:

Mr. Rick Kirby, Chief, Air Permitting Section  
Hillsborough County Environmental Protection Commission,  
Air Management Division  
1410 North 21st Street  
Tampa, Florida, 33605

C. A completed DER Form 17-1.202(3), *Certificate of Completion of Construction*, for an amendment to permit A029-218851, to:

Mr. Gerald Kissel, P.E.  
Air Permitting Supervisor  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

5. Coronet Industries shall comply with all A029-218851 permit conditions.

Pending review of the test data, the Department will acknowledge that the above conditions have been satisfied by amending permit A029-218851. This authorization expires March 1, 1995. A time extension may be requested and must be received by this Department at least 30 days prior to expiration of this authorization.

If you should have any questions, please call me at (813) 744-6100, extension 419.

Sincerely,



Gerald Kissel, P.E.  
Air Permitting Supervisor

Mr. Samuel F. Sweat  
Coronet Industries Incorporated

Defluorinating Kilns 6 & 7

copy: Mr. Rick Kirby, Hillsborough County Environmental  
Protection Commission, Air Management Division

copy: Mr. Ben Kalra, Hillsborough County Environmental  
Protection Commission, Air Management Division

attachment: DER Form 17-1.202(3), *Certificate of Completion of  
Construction*

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# CORONET INDUSTRIES, INC.

## SUMMARY OF FLUORIDE EMISSIONS

DEFLU KILNS 6 & 7

4/13/95

\*\*\*\*\*  
\*\*\*\*\*

RUN NO.	PROCESS WEIGHT RATE TONS / HR.	STACK GAS FLOW RATE ACFM	STACK GAS FLOW RATE DSCFM	STACK GAS TEMP. DEG. F	STACK GAS MOISTURE %	FLUORIDE EMISSIONS	
						CONC. PPM	RATE lb / HR
1	18.07	69,729	59,136	110	7.91	10.48	1.75
2	18.07	70,864	59,628	110	8.56	11.41	1.92
3	18.07	68,788	58,734	110	7.36	10.17	1.69
AVG.	18.07	69,794	59,166	110	7.94	10.69	1.79

\*\*\*\*\*  
\*\*\*\*\*

ALLOWABLE FLUORIDE EMISSION RATE 2.56 LBS / HR.

ALLOWABLE PERCENT OPACITY < 20 %

**AIR POLLUTION SOURCE INSPECTION REPORT FORM  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

FACILITY CORONET INDUSTRIES, INC.		PAGE 1 OF 2		
FACILITY ADDRESS CORONET ROAD		CITY PLANT CITY		
MAILING ADDRESS		CITY		ST FL ZIP 33566
INSPECTION DATE 5/24/95	TIME IN 1000	TIME OUT 1140	INSPECTION TYPE PERMITTING	STATS 3
NEDS NO. 40HIL29007505				
SOURCE DISCRPTION DEFLURINATION KILNS 6 & 7				
CONTACT(S) SAM SWEAT				

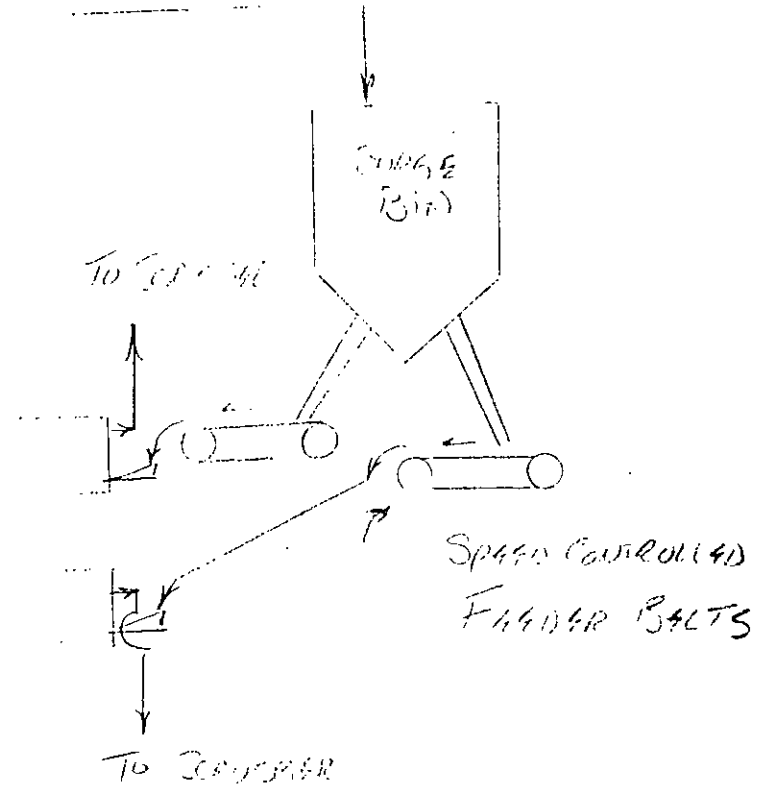
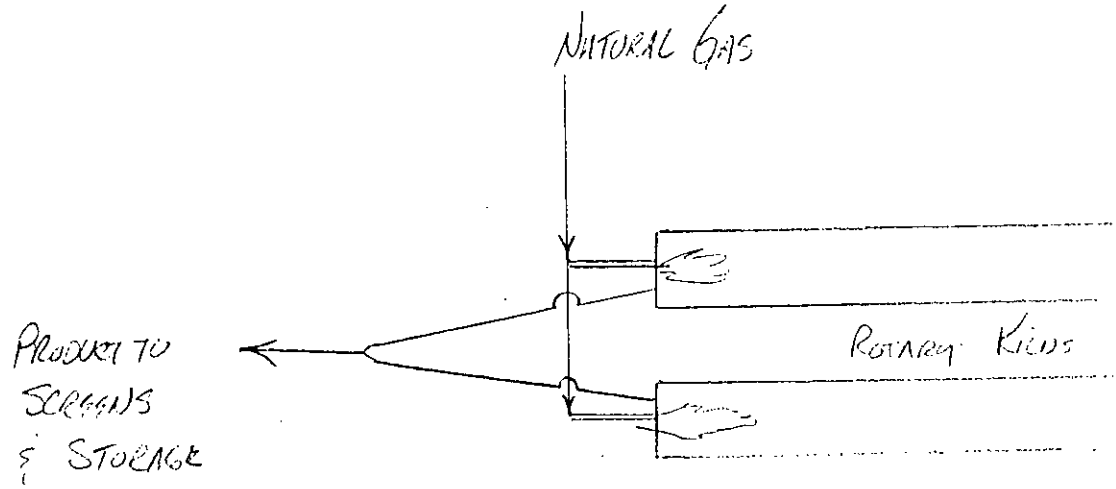
ANNOUNCED INSPECTION FOR PERMITTING PURPOSES. THE KILN THROUGHPUT RATE HAS BEEN INCREASED FROM 18 TPH (6.9 TPH P2O5) TO 24.3 TPH (8.66 TPH P2O5) TOTAL FOR BOTH KILNS. KILN 6 WAS TEMPORARILY DOWN SINCE 9AM FOR WASHING ACCORDING TO THE OPERATOR'S LOG. KILN 7 WAS OPERATING ON A SHIFT MAXIMUM OF 492 CFH NATURAL GAS AND A MAXIMUM INPUT OF 9.0 TPH FEED. EACH OF THE TWO KILNS HAS A BELT SCALE READOUT IN THE CONTROL ROOM. SAM STATED THAT THE PROBLEM WITH HOLDING HIGHER RATES IS THAT THE CURRENT BELT SYSTEM FEEDING FROM THE 100 TON FEED SILO WAS NOT WELL CONTROLLED. ALTHOUGH EACH BELT FEEDING THE KILNS WAS EQUIPPED WITH A LOAD CELL TYPE BELT SCALE, THE CONTROL SYSTEM DRIVING THE BELT SPEED WILL OVERLOAD AND UNDERLOAD, CAUSING THE END PRODUCT FLOURINE CONTENT TO FLUCTUATE HIGHER THAN THE SPEC 0.13%F. ALTHOUGH THIS SYSTEM WILL BE REPLACED AT A LATER DATE NO NEW CONSTRUCTION/EQUIPMENT WAS NOTED AT THE SITE.

Staff	Min
<b>Total</b>	

INSPECTOR(S) <i>W. J. [Signature]</i>	REPORT DATE <i>5/20/95</i>
---------------------------------------	----------------------------



TO  
FROM  
FROM 10/11



DEFLOW. KILNS 6 & 1

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 2	
To	CARLOS GONZALEZ	From	BILL S.
Co.	EPC	Co.	SAUDEP
Dept.	AIR ENLG.	Phone #	
Fax #		Fax #	



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

Mr. Samuel F. Sweat  
Environmental Affairs Manager  
Coronet Industries Incorporated  
P.O. Box 760  
Plant City, Florida 33564-0760

March 1, 1995

Re: Request for Time Extension  
Feed Rate Increase  
Defluorinating Kilns Nos. 6 & 7  
FDEP Permit No. A029-218851

Dear Frank:

The Department has received your request for a 90 day time extension to the letter of authorization for an increase to the feed rates for the Defluorinating Kilns Nos. 6 & 7.

The Department approves the 90 day time extension. This authorization now expires June 1, 1995.

This authorization is subject to all the same conditions stated in the original authorization letter, dated December 1, 1994.

If you should have any questions, please call me at (813) 744-6100, extension 419.

127

Sincerely,

Gerald Kissel, P.E.  
Air Permitting Supervisor

copy: Mr. Rick Kirby, Hillsborough County Environmental  
Protection Commission, Air Management Division

copy: Mr. Ben Kalra, Hillsborough County Environmental  
Protection Commission, Air Management Division

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*CORONET INDUSTRIES, INC.*

February 28, 1995

Mr. John Taylor  
Air Permitting Section  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

D.E.P.  
MAR - 2 1995  
SOUTHWEST DISTRICT  
TAMPA

**Re: Rate Increase for AO29-218851**

Dear Mr. Taylor:

Our letter of authorization to increase the feed rate to kilns 6 & 7 expires 3/1/95. We have not been able to sustain the 9.1 TPH feed rate for a sufficient period of time to sample the stack due to rock composition and feed grade. Thus, we are requesting a 90 day extension of the authorization to remedy the feed problems and sample the emissions.

If I may be of further assistance, please contact me at 813-719-7255.

Sincerely,

Samuel F. Sweat  
Environmental Affairs Mgr.

SFS:cr

cc: N. Lowrey  
S. Oikawa  
J. Campbell/EPCHC



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

**Facsimile      Transmission      Sheet**

DATE   March 1, 1995  

TO:   Rick Kirby  

DEPT:   EPCHC, Air Management Division  

PHONE: \_\_\_\_\_

FROM:   John J. Taylor  

DEPT: DEP, SOUTHWEST DISTRICT

PHONE: 813-744-6100      SUNCOM 542-6100      EXT. 117

MESSAGE:   Rick:   Frank Sweat of Coronet Industries has requested a 90 time extension to the original letter of authorization to increase the process rate on the Defluorinating Kilns 6 & 7.

I have prepared a reply letter approving the request. A draft is attached for your review. Please call me or Jerry if you have any comments.

  Jerry Kissel x 107.  

Thanks: John J. Taylor 

AIR DIVISION FAX NUMBER: 813-744-6458      SUNCOM 542-6458

Total Number of Pages   3  

Protect, Conserve and Manage Florida's Environment and Natural Resources



# Department of Environmental Protection

# DRAFT

3/1/95 JHR

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

Mr. Samuel F. Sweat  
Environmental Affairs Manager  
Coronet Industries Incorporated  
P.O. Box 760  
Plant City, Florida 33564-0760

March 1, 1995

Re: Request for Time Extension  
Feed Rate Increase  
Defluorinating Kilns Nos. 6 & 7  
FDEP Permit No. A029-218851

Dear Frank:

The Department has received your request for a 90 day time extension to the letter of authorization for an increase to the feed rates for the Defluorinating Kilns Nos. 6 & 7.

The Department approves the 90 day time extension. This authorization now expires June 1, 1995.

This authorization is subject to all the same conditions stated in the original authorization letter, dated December 1, 1994.

If you should have any questions, please call me at (813) 744-6100, extension 419.

Sincerely,

Gerald Kissel, P.E.  
Air Permitting Supervisor

copy: Mr. Rick Kirby, Hillsborough County Environmental  
Protection Commission, Air Management Division

copy: Mr. Ben Kalra, Hillsborough County Environmental  
Protection Commission, Air Management Division

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**CORONET INDUSTRIES, INC.**

February 28, 1995

Mr. John Taylor  
Air Permitting Section  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

**Re: Rate Increase for AO29-218851**

Dear Mr. Taylor:

Our letter of authorization to increase the feed rate to kilns 6 & 7 expires 3/1/95. We have not been able to sustain the 9.1 TPH feed rate for a sufficient period of time to sample the stack due to rock composition and feed grade. Thus, we are requesting a 90 day extension of the authorization to remedy the feed problems and sample the emissions.

If I may be of further assistance, please contact me at 813-719-7255.

Sincerely,

A handwritten signature in cursive script, appearing to read "Samuel F. Sweat".

Samuel F. Sweat  
Environmental Affairs Mgr.

SFS:cr

cc: N. Lowrey  
S. Oikawa  
J. Campbell//EPCHC



CORONET INDUSTRIES, INC.

February 25, 1995

Mr. John Taylor  
Air Permitting Section  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33618

Re: Rate Increase for AQ2 - 218851

Dear Mr. Taylor:

Our letter of authorization to increase the feed rate to kilns 6 & 7 expired 3/1/95. We have not been able to sustain the 9.1 TPH lead rate for a sufficient period of time to remove the stack due to rock composition and feed grade. Thus, we are requesting a 90 day extension of the authorization to remedy the feed problems and sample the emissions.

If you need further assistance, please contact me at 813 719-7251.

Sincerely,

Samuel I. Sweat  
Environmental Affairs Mgr.


BTB:ur


cc: M. Lowery  
S. Okawa  
J. Campbell/PCIC

**MEMORANDUM**  
**Final-Issue**

Pats Processing No. 259884

**TO:** W.C. Thomas, P.E. **DATE:** February 20, 1995  
District Air Administrator

**Thru:** Gerald J. Kissel, P.E.   
District Air Engineer

**FROM:** John J. Taylor, P.E.   
Air Permit Engineer

**SUBJECT:** *Coronet Industries, Inc.*  
*Defluorination Kilns No. 6 & 7*

Permit No: AC29-259884 Final Issue  
County: Hillsborough  
Project: Increase Production Rate to 24.3 tph

Intent Notice sent: January 23, 1995  
Intent Notice Published: January 30, 1995  
Proof-Of-Publication Rec'd: February 16, 1995  
Published date + 14 days: February 13, 1995

AC29-259884 was public noticed on January 30, 1995 for the increase in production capacity to 24.3 tph. (approximately 8.66 tons per hour equivalent P<sub>2</sub>O<sub>5</sub> feed).

This project is not subject to the requirements of 40CFR60, *Standards of Performance for New Stationary Sources (NSPS)*, Subpart NN, Standard of Performance for Phosphate Rock Plants, since the proposed changes are not considered modifications per 40CFR60.14(e). The facility commenced operation prior to September 21, 1979 and is not subject to the applicability of Subpart NN, 60.400(b).

This project is not subject to the requirements of Rule 62-212.500, F.A.C. - *New Source Review for Non-attainment Areas* since the proposed increases in the hours of operation and process rate are not considered modifications absent any federally enforceable permit conditions.

The Department issued an "Intent to Issue" on January 23, 1995. The "Notice of Intent to Issue Permit" was published in The Tampa Tribune on January 30, 1995.

No comments have been received to date.

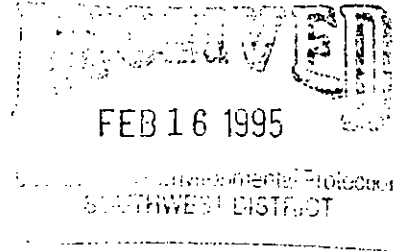
I recommend that permit AC29-259884 be issued, and submit it for your approval.





*CORONET INDUSTRIES, INC.*

February 14, 1995



Mr. John Taylor  
Florida Department of Environmental Protection  
Southwest District - Air Program  
3804 Coconut Palm Drive  
Tampa, FL 33619

**Re: Publication of Notice of Intent to Publish**

Dear John:

As usual, the Tampa Tribune has published the Notice of Intent to Issue for the kilns 6&7 (AC29-259884) but has failed to forward a certification of publication within the 7 days required. However, a copy was cut from the paper on 1/30/95 and is enclosed. The certified copy will be forwarded when received.

Coronet has had the Tribune publish the Notice of Intent to Issue for the no. 2 fluoride plant (AC29-259881) on 2/13/95. A copy of the publication is also enclosed as you requested. Please forward to Mr. Bill Shroeder. Kindly inform him that the certification of publication will be sent to him when it is received.

Sincerely,

Samuel F. Sweat  
Environmental Affairs Mgr.

SFS:cr

Enclosures

cc: Frank Cheesman  
Nolan Lowrey  
Jerry Campbell/HCEPC  
John Koogler/Koogler & Associates

**Legals**

**STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION NOTICE OF  
INTENT TO ISSUE PERMIT**

The Department of Environmental Protection gives notice of its intent to issue an air pollution permit (AC29-259884) to Coronet Industries, Inc. in order to increase the production rate for the existing animal feed defluorination equipment, designated as Kilns Nos. 6 & 7, located at 4082 Coronet Road, Plant City, Florida. MAILING ADDRESS: Attention - Mr. Frank Sweat, Environmental Affairs Manager, P.O. Box 760, Plant City, Florida 33564.

A person whose substantial interests are affected by this proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair

**Legals**

Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A

**Legals**

statement of facts which petitioner contends warrants reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of

**Legals**

receipt of this notice, in the Office of General Counsel at the above address of the Department.

Failure to petition within the allotted time frame constitutes a waiver of any rights such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, 8407 Laurel Fair Circle, Tampa, Florida 33619.

1314

1/30/95

CERTIFICATION

Source Name CORUNET INDUSTRIES

Application No. 259884

I HEREBY CERTIFY that the engineering features described in the above referenced application, with the exception of all references to Rule 17-712, F.A.C., provide reasonable assurance of compliance with applicable air provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-2. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

*J. Russell*

\_\_\_\_\_  
(Signed)

*1/19/95*

\_\_\_\_\_  
(Date)

(Seal)

This application raised a new issue of significant SO<sub>2</sub> emissions (see attached). The emissions have always existed, but were never addressed in the permitting process. This also applies to other animal feed plants, and perhaps phosphate fertilizer plants as well (since there is sulfur in the phosphate rock).

It is our judgement that although production is increasing as a result of this project, SO<sub>2</sub> emissions are probably decreasing due to the additional control equipment being added. This is indeterminable, however, and we have included a requirement to test for SO<sub>2</sub> and included Specific Condition No. 32 in the event that this testing shows additional action to be warranted.

Note: the attachment to this note is confidential and should be moved to the confidential file when the permit file is moved to the files.

*JR 1/19/95*

Coronet Kilns #6/#7

**Section III (C)/Section V(2&3): Airborne Emissions Calculations**  
Page 2 of 3

**SO<sub>2</sub>**

SO<sub>2</sub> emissions are calculated from available sulfur in the prepared feed which is liberated as SO<sub>2</sub> by the calcining process. Additional SO<sub>2</sub> is from the combustion of fuels.

Maximum lb/hr: Sulfur content is calculated at 0.47%/ weight of Prepared Feed.

Efficiency of SO<sub>2</sub> Removal = 40%+; This level of SO<sub>2</sub> removal has been projected for the fluoride recovery tower, the existing secondary spray tower, and the tail gas scrubber.

Control Inefficiency Factor = 0.60

Feed Rate = 24.3 tph total feed => 8.66 tph P<sub>2</sub>O<sub>5</sub>

Fuel Usage: Natural Gas at 103.91 MMbtu/hr

Alternate Fuel is #2 Fuel Oil with a maximum of 0.5%S @ 110.91 MMbtu/hr

**SO<sub>2</sub> from Prepared Feed + SO<sub>2</sub> from #2 Fuel Oil (Worst Case)**

(48,600 lbs feed/hr) X (0.0047 pounds sulfur/pound feed) X (2 lbs. SO<sub>2</sub>/1 lb. S) X 0.6 =  
= 274.1 lb/hr

Actual TPY SO<sub>2</sub> from Prepared Feed = (274.1 lb/hr X 8760 hr/yr) / (2000 lb/ton) = 1200.58 TPY

274.1 lb/hr from Feed + 33.5 lb/hr from #2 fuel = 307.6 lb/hr = (@8760 hpy) 1347.3 tpy

**SO<sub>2</sub> from fuels**

*Natural Gas:* AP-42 Table 1.4-2, Emission Factors from Natural Gas Combustion

Assume 1000 btu/scf; 103.91 MMbtu/hr = 103910 ft<sup>3</sup>/hr

SO<sub>2</sub> emission factor for large industrial boilers = 0.6 lb/10<sup>6</sup> ft<sup>3</sup>

0.10391 X 10<sup>6</sup> ft<sup>3</sup> Natural Gas/hr X 0.6 lb SO<sub>2</sub>/10<sup>6</sup> ft<sup>3</sup> Natural Gas X 0.6 = 0.037 lb/hr

@ 8760 hpy = 0.16 tpy

*#2 Fuel Oil:*

AP-42 Table 1.3-2, Criteria Pollutant Emission Factors for Uncontrolled Fuel Oil Combustion

Maximum %S = 0.5%

Assume 141,000 btu/gal; 110.91 MMbtu/hr = 786.6 gal/hr

SO<sub>2</sub> emission factor for industrial boilers:

= 142(0.5) lb. SO<sub>2</sub>/10<sup>3</sup> gal. of fuel X 0.7866 X 10<sup>3</sup> gal. of fuel/hr X 0.6

= 33.5 lb/hr

@ 8760 hpy = 146.77 tpy

Allowed Emission Rate per Rule: No Rule

Allowable emission: --

Potential Emission: Based on 8760 hpy, 100% of Sulfur from feed liberated as SO<sub>2</sub>, no control equipment.

Operating Scenario #1: All natural gas usage

(48,600 lbs feed/hr) X (0.0047 pounds sulfur/pound feed) X (2 lbs. SO<sub>2</sub>/1 lb. S) = 456.84 lbs/hr

= 2001 tpy

0.10391 X 10<sup>6</sup> ft<sup>3</sup> Natural Gas/hr X 0.6 lb SO<sub>2</sub>/10<sup>6</sup> ft<sup>3</sup> Natural Gas = 0.062 lb/hr = 0.27 tpy

Total = 456.90 lb/hr = 2001 tpy



# Department of Environmental Protection

# DRAFT

1-19-95  
J. STAYLOR

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

**PERMITTEE:**

Coronet Industries, Inc.  
P.O. Box 760  
Plant City, Florida 33564-0760

**PERMIT/PROJECT:**

Permit: AC29-259884  
County: Hillsborough  
Expiration Date: 07/01/97  
Project: Defluorination  
Kilns Nos. 6 & 7

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapters 62-2 through 62-297, Florida Administrative Code. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Department of Environmental Protection, and made a part hereof and specifically described as follows:

For the construction modification of Defluorination Kilns No. 6 & 7. Kilns No. 6 & 7 defluorinate prepared animal feed produced in the feed preparation area of the facility. This purpose of this construction modification project is to increase:

1. the combined prepared feed processing rate from 18 tons per hour (approximately 6.96 tons per hour P205), to 24.30 tons per hour (approximately 8.66 tons per hour P205),
2. the combined natural gas consumption from 94.46 MM Btu per hour to 103.91 MM Btu per hour (110.91 MM Btu per hour for No. 2 fuel oil).
3. the hours of operation from 8064 hours per year to unrestricted hours of operation (8760 hours per year).

This construction modification project also includes the installation of new additional air pollution control equipment. New exhaust fans, new electrostatic precipitators and fluoride (HF) absorption spray towers will be installed in order to increase the recovery of fluorine compounds and reduce fluoride, sulfur dioxide and particulate matter emissions. Sulfur dioxide emissions will be limited by restricting alternate fuels to only new, No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight.

(Continued)

DRAFT

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

Kilns No. 6 & 7 exhaust through a common stack. Emissions generated from the defluorinating process will now be vented through a revised fluoride and particulate matter recovery system. Each kiln will exhaust through a low velocity dust settling chamber, exhaust gas cooling spray tower, electrostatic precipitator, two HF absorption spray towers in series, and finally through a Tellerett packed bed tail gas scrubber.

Particulate matter recovered from the dust settling chambers and the electrostatic precipitators is recycled into the process as feed material. Wastewater from the scrubbers is discharged to a series of ponds, treated with limestone, and recirculated. The solids precipitated from the treated pond water are used for dam construction. The HF recovery solution from the HF absorption spray towers will be processed in a new Fluoride Plant permitted separately as FDEP Permit AC29-259881.

This project is not subject to the requirements of 40CFR60, *Standards of Performance for New Stationary Sources (NSPS)*, Subpart NN, Standard of Performance for Phosphate Rock Plants, since the proposed changes are not considered modifications per 40CFR60.14(e). The facility commenced operation prior to September 21, 1979 and is not subject to the applicability of Subpart NN, 60.400(b).

This project is not subject to the requirements of Rule 62-212.500, F.A.C. - *New Source Review for Non-attainment Areas* since the proposed increases in the hours of operation and process rate are not considered modifications absent any federally enforceable permit conditions.

**Location:** 4082 Coronet Road, Plant City

**UTM:** 17-393.8 E 3096.3 N  
**NEDS No:** 0075  
**POINT ID:** 05 - Common Exhaust Stack Kilns Nos. 6 & 7  
**Facility ID:** 40-HIL-29-0075  
**Reference:** FDEP Permit A029-218851

**SPECIFIC CONDITIONS:**

1. A part of this permit is the attached GENERAL CONDITIONS.  
[Rule 62-4.160, F.A.C.]
2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-2 through 62-297, F.A.C. or any other requirements under federal, state or local law.  
[Rule 62-200.300, F.A.C.]

**DRAFT**

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

**OPERATION LIMITATIONS**

3. The combined prepared feed input rate to Kiln Nos. 6 & 7 shall not exceed 24.3 tons per hour (8.66 tons per hour P205).  
[Construction permit application, 10/27/94]

4. Kiln Nos. 6 & 7 shall be fired using natural gas at a combined maximum heat input rate of 103.91 MM Btu per hour (monthly average), or new, No. 2 fuel oil, only, at a maximum combined heat input rate of 110.91 MM Btu per hour (monthly average). "New" No. 2 fuel oil is defined as being refined from crude oil and has not been used, and may or may not contain additives. [Construction permit application, 10/27/94]

5. The hours of operation are not restricted (8760 hours per year).  
[Construction permit application, 10/27/94]

6. The sulfur content of the new, No. 2 fuel oil shall not exceed 0.5 percent, by weight, as determined by the ASTM D-129 test method referenced in 40CFR60.17 (July 1, 1991). An alternate test method may be used if approved by the Department. [Construction permit application, 10/27/94]

7. The firing of waste oil or recycled oil is prohibited. No other fuel oil supply system shall be physically connected to the new, No. 2 fuel oil system. [Rule 62-4.070(3), F.A.C.]

8. The applicant shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C. and Hillsborough County, Environmental Protection Commission Chapter 1-3.22(3)]

9. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.310(3), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.310(3), F.A.C.]

**EMISSION LIMITATIONS**

10. Visible emissions from the stack exhaust shall not be equal to or greater than 20% opacity. [Hillsborough County, Environmental Protection Commission Chapter 1-3.62, and Rule 62-296.310(2), F.A.C.]

# DRAFT

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

## **SPECIFIC CONDITIONS:**

11. The maximum allowable combined fluoride emission rate for Kiln Nos. 6 & 7 is 0.37 pounds fluorides per ton P2O5 input. Based on a maximum combined prepared feed input rate to Kiln Nos. 6 & 7 of 24.30 tons per hour (8.66 tons per hour P2O5), the maximum allowable fluoride emission rate is 3.2 pounds per hour. [Rule 62-296.403(1)(h), and construction permit application, 10/27/94]

12. The maximum allowable combined emission rate of particulate matter for Kiln Nos. 6 & 7 is set at 13.81 pounds per hour and 60.5 tons per year (based on 8760 hours per year of operation). This particulate matter limitation exempts the facility from *Reasonably Available Control Technology* (PM RACT). [Rule 62-296.700(2)(b), requested by applicant]

## **TESTING AND COMPLIANCE REQUIREMENTS**

13. The initial compliance testing shall be conducted within 60 days after achieving 90% of the maximum prepared feed input rate of 24.30 tons per hour, but not later than 180 days after initial start up. Initial start up is defined as the first introduction of feed material into a kiln following the completion of the modifications authorized by this permit. The common stack exhaust shall be tested for visible emissions, fluoride emissions, and particulate matter emissions, per Specific Condition Nos. 10, 11 and 12, respectively. The initial compliance testing shall also include a one-time special test for determining the sulfur dioxide emission rate. Testing for visible emissions, fluoride emissions, and particulate matter emissions, per Specific Condition Nos. 10, 11 and 12, respectively shall be conducted annually, thereafter, within the 60 day period prior to the anniversary date established by the initial compliance testing. No additional testing for sulfur dioxide emissions is required after completion of the initial determination of the sulfur dioxide emission rate required for start up. Submit a copy of all test data to the Air Section of the Southwest District Office of the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division within 45 days of testing. [Rules 62-297.340(1)(d), 62-297.570(2), and 62-4.070(3), F.A.C.]

14. Test the stack exhaust for visible emissions, fluoride emissions, and particulate matter emissions, per Specific Condition Nos. 10, 11 and 12, respectively, within 30 days of a change from natural gas to fuel oil. Emission tests need not be repeated for any change to fuel oil that occurs within a consecutive 12 month period. [Rule 62-4.070(3), F.A.C.]



DRAFT

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

15. Compliance with the visible emission limitation of Specific Condition No. 10 shall be determined using EPA Method 9 contained in 40CFR60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The visible emission test shall be conducted by a certified observer and be a minimum of 30 minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40CFR60, Appendix A. [Rules 62-297.330(1)(b), and 62-4.070(3) F.A.C.]

16. The stack tests required by Specific Condition Nos. 13 and 14, should be conducted at the exhaust stack common to Kiln Nos. 6 & 7 with both kilns operating. However, the kilns may be tested individually provided the stack test results for both kilns can be shown to be in compliance with the emission limitations in Specific Condition Nos. 10, 11 and 12. [Rule 62-4.070(3), F.A.C.]

17. Compliance with the fluoride emission limitation and the particulate matter emission limitation of Specific Condition Nos. 11, and 12, respectively, and the determination of the sulfur dioxide emissions shall be determined using EPA Methods 1, 2, 3, 4, 5, 6, 13A or 13B contained in 40CFR60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40CFR60, Appendix A.

18. The compliance tests for visible emissions, fluoride emissions, particulate matter emissions, and sulfur dioxide emissions should be conducted while operating at the following conditions:

- (A) within 90 - 100% of the maximum combined permitted prepared feed input rate of 24.30 tons per hour, and
- (B) within 90 - 100% of the maximum permitted heat input rate of 110.91 MM Btu per hour (test period average), for new, No. 2 fuel oil, or  
within 90 - 100% of the maximum permitted heat input rate of 103.91 MM Btu per hour (test period average), for natural gas.

(Specific Condition No. 18, Continued on Next Page)

# DRAFT

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

## **SPECIFIC CONDITIONS:**

18. (Continued)

NOTE: Within 15 days of exceeding a lower rate from a previous test by more than 10%, or to increase a previously established rate(s), another compliance test shall be performed and a copy of the results submitted to this Department and the Environmental Protection Commission of Hillsborough County, Air Management Program within 45 days. Acceptance of the test by the Department will automatically amend permit this permit at the higher tested rate(s), plus 10%, but in no case shall the maximum permitted rates exceed the rates of Specific Condition Nos. 3 and 4. Failure to submit the prepared feed input rate, the maximum heat input rate, the type of fuel(s) and fuel usage rate(s) for the testing period, or operating at conditions which do not reflect normal operating conditions, may invalidate the test.

[Rules 62-297.570(2), 62-297.570(3), and 62-4.070(3), F.A.C.]

A compliance test submitted for the purpose of obtaining an operating permit (See Specific Condition No. 33) at rate(s) less than 90% of the maximum prepared feed input rate or maximum heat input rate will result in the issuance of an operation permit limited to the reduced rate(s), plus 10%.

## **NOTIFICATION REQUIREMENTS**

19. The permittee shall notify the Air Section of the Southwest District Office of the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division at least 15 days prior to the date on which the compliance test is to begin. The notification shall include the date, time, and place of the test, and the test contact person who will be responsible for coordinating the test. [Rule 62-297.340(1)(i), F.A.C.]

## **RECORDKEEPING/DOCUMENTATION REQUIREMENTS**

20. In order to document compliance with the fuel oil sulfur limitation of Specific Condition No. 6, a fuel oil analysis indicating the sulfur content of the fuel, or a certification of the sulfur content of the fuel oil by the supplier is required. The sulfur content of the fuel oil used during compliance testing shall be submitted in conjunction with all test reports. [Rule 62-4.070(3), F.A.C.]

# DRAFT

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

## SPECIFIC CONDITIONS:

21. The following operational parameters for the HF absorption spray towers and the electrostatic precipitators, serving both Kiln Nos. 6 & 7, shall be recorded daily, each day the kiln(s) operates, and shall be maintained in a form suitable for inspection:

### HF Absorption Spray Tower Operational Parameters

- (A) Pressure drop across spray tower (inches of water);
- (B) Pressure drop across demisting pad (inches of water);
- (C) Pressure in kiln hood (negative or positive);
- (D) pH of the scrubber water (0.0 - 14.0);
- (E) Flow rate of the scrubber water (gallons per minute); and
- (F) Pressure of the scrubber water on headers.

### Electrostatic Precipitator Operational Parameters

- (A) Primary Voltage (volts)
- (B) Primary Current (amps)
- (C) Secondary Voltage (kilovolts)
- (D) Secondary Current (milliamps)
- (E) Discharge Rate (counts per minute)

All operational parameter records shall be made available to the Department or the Environmental Protection and the Environmental Protection Commission of Hillsborough County, upon request. The records shall be retained at the facility for at least 3 years from the date of measurement. [Rule 62-4.070(3), F.A.C.]

22. In order to document compliance with the maximum heat input limitations of Specific Condition No. 4, the applicant shall establish and maintain a log for each kiln that contains, at a minimum:

- (A) the number of hours of operation of each kiln,
- (B) a calculation of heat input rate (maximum monthly average) to ensure that the maximum heat input rate of 103.91 MM Btu per hour is not exceeded for natural gas usage, and
- (F) a calculation of heat input rate (maximum monthly average) to ensure that the maximum heat input rate of 110.91 MM Btu per hour is not exceeded for new, No. 2 fuel oil usage.

Each log shall be maintained in a form suitable for inspection. Records shall be updated and completed by the end of the following month. [Rule 62-4.070(3), F.A.C.]

DRAFT

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

23. Records of inspection, maintenance and performance data shall be retained at the facility for a minimum of 3 years and shall be made available to the Department of Environmental Protection and the Hillsborough County, Environmental Protection Commission, upon request. Records and logs required by this permit shall be updated monthly and shall be completed by the end of the following month. [Rule 62-4.070(3), F.A.C. and Hillsborough County, Environmental Protection Commission Chapter 1-3.22(3)]

**REPORTING REQUIREMENTS**

24. All test reports shall be submitted to the Air Program, Compliance Section of the Southwest District Office of the Department of Environmental Protection and to the Environmental Protection Commission of Hillsborough County, Air Management Division within 45 days of testing. [Rule 62-296.570(2), F.A.C.]

25. All test reports submitted to the Department during the testing period shall include a statement documenting any changes made to the pollution control equipment used for Kilns Nos. 6 & 7. The documentation shall include any changes or any revisions made to capacity, flow rates, stack parameters, control device operational parameters, and control device efficiencies that may have changed from the original permit application. [Rule 62-4.070(3), F.A.C.]

26. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C., *Stationary Sources - Emission Monitoring* and 40CFR60, Appendix A. [Rule 62-297.420, F.A.C.]

27. Failure to submit the actual prepared feed input rate, the operating records for the test day, or the actual operating conditions may invalidate the test. [Rule 62-4.070(3), F.A.C.]

28. Coronet Industries, Inc. shall report any proposed process changes, including, but not limited to, (a) any proposed change to process materials, or (b) any proposed increase in the production rate, to the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division for proper processing. Any physical change in the method of operation, or addition to a stationary source or facility, which increases the actual emissions of any air pollutant may be considered a "Modification". [Rule 62-296.200(112), F.A.C.]

DRAFT

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

29. The permittee shall submit to Air Management Division of the Environmental Protection Commission of Hillsborough County, each calendar year, on or before March 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility," for the preceding calendar year. The report shall include the sum total of particulate matter and fluoride emissions from the common stack exhaust. The report shall also include the sulfur content of the new, No. 2 fuel oil as required by Specific Condition No. 6. [Rule 62-210.370(2), F.A.C.]

**NOTIFICATION REQUIREMENTS**

30. The applicant shall notify, in writing, the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division within 15 days prior to:

(A) the initial start up of either Kiln Nos. 6 & 7 as defined by Specific Condition No. 13, and

(B) any subsequent periods after initial start up when the manufacturing capability has been inactive for more than 30 consecutive days.

[Rule 62-4.070(3), F.A.C.]

31. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division at least 15 days prior to the date on which each compliance test is to begin. The notification shall include the date, time, and place of each scheduled test, and the test contact person who will be responsible for coordinating the test.

[Rule 62-297.340(1)(i), F.A.C.]

**OTHER REQUIREMENTS**

32. Based on the sulfur dioxide emission rates reported from the required testing per Specific Condition No. 13, the Department may require the permittee to conform to new or additional conditions to limit sulfur dioxide emission from this source in order to prevent ambient air concentrations of sulfur dioxide which exceed Rule 62-272.300(3)(a), *Ambient Air Quality Standards Established*, Sulfur Dioxide, or the Department's *Ambient Reference Concentrations* established by the Florida Air Toxics Working Group. [Rules 62-272.300(2), and 62-4.070(3), F.A.C.]

DRAFT

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

**OPERATION PERMIT REQUIREMENTS**

33. Coronet Industries, Inc. shall request the Department amend operating permit AO29-218851 by submitting:

- (A) the appropriate application (DEP Form 62-210.900(1), *Application for Air Permit*),
- (B) a copy of the test reports required by Specific Condition No. 13, if not previously submitted, and
- (C) a copy of the operational parameters for the pollution control equipment required by Specific Condition No. 21,
- (D) a copy of the log documenting the heat input limitations required by Specific Condition No. 22, and
- (E) a copy of the final "as built" list of the pollution control equipment as required by Specific Condition No. 25,

to the Southwest District Office of Department of Environmental Protection within 45 days of compliance testing, or by April 1, 1997, whichever date is earliest. A copy of the application and the other required information shall also be sent to the Environmental Protection Commission of Hillsborough County, Air Management Division.  
[Rule 62-213.420, F.A.C.]

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

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Richard D. Garrity, Ph.D.  
Director of District Management  
Southwest District

5cii884c.pmt(1)

MEMORANDUM

**AMAX** Chemical Corporation

402 SOUTH KENTUCKY AVENUE • LAKELAND, FLORIDA 33801

*rec'd 1/20/95 5PM after  
unit sent for signature & mailing  
NOW CORNET*

TO: Fred G. Mullins

DATE October 30, 1984

FROM: Robert L. Harrison, Jr.

SUBJECT: Defluorination Kilns Nos. 6 and 7 SO<sub>2</sub> Test

A Method 8 compliance test for SO<sub>2</sub> emissions was conducted at the Defluorination Kilns Nos. 6 and 7 at the Plant City Operation on October 24, 1984. During the test the facility process input rate was 18.6 TPH. The test results were as follows:

Run	Stack Conditions		Sulfur Dioxide Emissions
	DSCFM	Temp °F	Lbs/Hr
1	81,201	102.3	248.5
2	82,853	102.5	270.7
3	82,454	102.4	246.6
Avg	82,169	102.4	255.3

*Robert L. Harrison Jr.*  
Robert L. Harrison, Jr.

RLH/cw


- cc: J. E. Handcock
- J. J. Lewis
- N. W. Lowrey
- G. Townsend


*add a bit to report  
good emissions (good)*

**MEMORANDUM**  
Intent to Issue  
Pats Processing No. 259884

**TO:** W.C. Thomas, P.E.  
District Air Administrator

**DATE:** January 18, 1995

**Thru:** Gerald J. Kissel, P.E.   
District Air Engineer

**FROM:** John J. Taylor, P.E.   
Air Permit Engineer

**SUBJECT:** *Coronet Industries, Inc.*  
*Defluorination Kilns No. 6 & 7*

Permit No: AC29-259884 Intent to Issue  
County: Hillsborough  
Project: Increase Production Rate to 24.3 tph  
PATS Day 90: January 25, 1995

An application for a construction permit in order to increase the production capacity of the existing Defluorination Kilns No. 6 & 7 was received by the Department on October 27, 1994. Kilns No. 6 & 7 defluorinate prepared animal feed produced in the feed preparation area of the facility. This purpose of this construction modification project is to increase:

1. the combined prepared feed processing rate from 18 tons per hour (approximately 6.96 tons per hour P205), to 24.30 tons per hour (approximately 8.66 tons per hour P205),
2. the combined natural gas consumption from 94.46 MM Btu per hour to 103.91 MM Btu per hour.
3. the hours of operation from 8064 hours per year to unrestricted hours of operation (8760 hours per year).

This construction modification project also includes the installation of new additional air pollution control equipment. New exhaust fans, new electrostatic precipitators and fluoride absorption spray towers will be installed in order to increase the recovery of fluorine compounds which will further reduce both fluoride and particulate matter emissions. Sulfur dioxide emissions will be limited by restricting alternate fuels to only new, No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight.

No additional information was requested, and the application was deemed complete as of the date the application was received, October 27, 1994.

**(Continued)**



**MEMORANDUM**  
**Intent to Issue**  
**Pats Processing No. 259884**

**Key Issues:**

**Rule Applicability:**

This project is not subject to the requirements of 40CFR60, *Standards of Performance for New Stationary Sources (NSPS)*, Subpart NN, Standard of Performance for Phosphate Rock Plants, since the proposed changes are not considered modifications per 40 CFR 60.14(e).

This project is not subject to the requirements of Rule 62-212.500, F.A.C. - *New Source Review for Non-attainment Areas* since the proposed increases in the hours of operation and process rate are not considered modifications absent any federally enforceable permit conditions.

**Sulfur Dioxide Emissions:**

Sulfur dioxide emissions are liberated from the sulfur in the fuel oil (0.5%) used as fuel and from the sulfur content of the animal feed itself. The available sulfur in the prepared animal feed is estimated at 0.47% by weight. Based on the sulfur dioxide emission rates reported in the application, the potential total SO<sub>2</sub> emissions are 307.6 pounds per hour and 1347.3 tons per year.

This SO<sub>2</sub> emission rate exceeds the Ambient Air Quality Standards for SO<sub>2</sub> for the 8 hour and 24 hour limits, as shown in the Air Toxic Working List, Version 3.0.

Below is a comparison summary of the SO<sub>2</sub> emissions:

<u>Reference</u>	SO <sub>2</sub> (ug/m <sup>3</sup> ) Hour				annual
	1	3	8	24	
Modelling (Screen 1.2)	522	470	366	209	52
Air Toxic Working List	-	-	52	13	-
Rule 62-212.300, F.A.C.	-	1300	-	260	60

NOTE: The values in the table have been rounded to the nearest whole number.

The sulfur dioxide emissions for the defluorination process have probably always existed. However, this is first time the sulfur dioxide emissions submitted in the permit application have included the contribution due to the sulfur content of the animal feed itself.

**(Continued)**

**MEMORANDUM**  
Intent to Issue  
Pats Processing No. 259884

This stack was tested for SO<sub>2</sub> emissions by KOOGLER & ASSOCIATES many years ago, but the information was not available at the time this permit was finalized. Any test data or information on SO<sub>2</sub> emissions from this source would be based on the old pollution control equipment and would not change the recommendation below.

**Recommendation:**

A Specific Condition has been added to this draft permit AC29-259884 requiring the applicant to test for SO<sub>2</sub> emissions with the new pollution control equipment in place. Based on the results of the SO<sub>2</sub> emissions testing, the Department may require the permittee to conform to new or additional conditions to limit sulfur dioxide emission from this source in order to prevent ambient air concentrations of sulfur dioxide which exceed Rule 62-272.300(3)(a), *Ambient Air Quality Standards Established*, Sulfur Dioxide, or the Department's *Ambient Reference Concentrations* established by the Florida Air Toxics Working Group.

The attached *Intent to Issue* and draft permit are submitted for your review and approval.

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION  
FOR  
Coronet Industries, Inc.  
Defluorinating Kilns Nos. 6 & 7  
Increase in Production Capacity  
to 24.3 tph (8.66 tph P<sub>2</sub>O<sub>5</sub> feed input)

Hillsborough County

AC29-259884

Florida Department of Environmental Protection

Southwest District

Tampa, FL

January 12, 1995

John J. Taylor  
Permit Engineer

I. PROJECT DESCRIPTION

AC29-259884

A. Applicant:

Mr. Frank W. Cheesman  
President & Chief Operating Officer  
Coronet Industries, Incorporated  
P.O. Box 760  
Plant City, Florida 33564

B. Engineer:

Mr. John B. Koogler, P.E.  
Koogler & Associates  
Environmental Services  
4014 NW Thirteenth Street  
Gainesville, Florida 32609

C. Project and Location/

D. Process and Controls:

The applicant is requesting a construction permit to be issued by the Department in order to increase the production capacity of the Animal Defluorination Kilns Nos. 6 & 7.

This purpose of this construction modification project is to increase:

1. the combined prepared feed processing rate from 18 tons per hour (approximately 6.96 tons per hour P2O5), to 24.3 tons per hour (approximately 8.66 tons per hour P2O5),
2. the combined natural gas consumption from 94.46 MM Btu per hour to 103.91 MM Btu per hour.
3. the hours of operation from 8064 hours per year to unrestricted hours of operation (8760 hours per year).

This construction modification project also includes the installation of new additional air pollution control equipment. New exhaust fans, new electrostatic precipitators and fluoride absorption spray towers will be installed in order to increase the recovery of fluorine compounds which will further reduce both fluoride and particulate matter emissions. Sulfur dioxide emissions will be limited by restricting alternate fuels to only new, No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight.

Kilns No. 6 & 7 exhaust through a common stack. Emissions generated from the defluorinating process will now be vented through a revised fluoride and particulate matter recovery system.

Each kiln will exhaust through a low velocity dust settling chamber, exhaust gas cooling spray tower, electrostatic precipitator, two HF absorption spray towers in series, and finally through a Tellerett packed bed tail gas scrubber.

Particulate matter recovered from the dust settling chambers and the electrostatic precipitators is recycled into the process as feed material. Wastewater from the scrubbers is discharged to a series of ponds, treated with limestone, and recirculated. The solids precipitated from the treated pond water are used for dam construction. The HF recovery solution from the HF absorption spray towers will be processed in a new Fluoride Plant permitted separately as FDEP Permit AC29-259881.

**Location:** 4082 Coronet Road, Plant City

**UTM:** 17-393.8 E 3096.3 N  
**NEDS No:** 0075  
**POINT ID:** 05 - Common Exhaust Stack Kilns Nos. 6 & 7  
**Facility ID:** 40-HIL-29-0075

E. Application Information:

Received on: October 27, 1994  
Information Requested: None  
Application Complete: October 27, 1994  
Notice Published Requested: Yes

II. RULE APPLICABILITY

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-209, 62-210, 62-212, 62-272, 62-275, 62-296, and 62-297, Florida Administrative Code (F.A.C.).

The existing facility is regulated by 62-296.403(1)(h), *Phosphate Processing*, with the maximum allowable combined fluoride emission rate for Kiln Nos. 6 & 7 equal to 0.37 pounds fluorides per ton P2O5 input.

This project is not subject to the requirements of Rule 62-212.500, F.A.C. - *New Source Review for Non-attainment Areas* since the proposed increases in the hours of operation and process rate are not considered modifications absent any federally enforceable permit conditions.

This project is not subject to the requirements of 40CFR60, Standards of Performance for New Stationary Sources (NSPS), Subpart NN, Standard of Performance for Phosphate Rock Plants, since the proposed changes are not considered modifications per 40 CFR 60.14(e). The facility commenced operation prior to September 21, 1979 and is not subject to the applicability of Subpart NN, 60.400(b).

This project is not subject to the requirements of Rule 62-296.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS), since the plant is not considered a wet process phosphoric acid plant. Subpart T, Standards for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants, is not applicable.

This project is not subject to the requirements of Rule 62-296.310(3), General Particulate Emission Limiting Standards, F.A.C., since the project is regulated under the provisions of Rule 62-296.403, F.A.C.

This project is not subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since it is not a potential source of VOC odors.

This project is not subject to the requirements of Rule 62-296.500(VOC-RACT);, Reasonably Available Control Technology (RACT), since it is not a specific source listed under this rule.

This project is subject to the requirements of Rule 62-296.700, F.A.C., Reasonably Available Control Technology (PM-RACT), because the project is located within the area of influence of an air quality maintenance area. The maximum allowable combined emission rate of particulate matter for Kiln Nos. 6 & 7 is set at 13.81 pounds per hour and 60.5 tons per year, based on 8760 hours per year of operation. This particulate matter limitation **exempts** the facility from Reasonably Available Control Technology (PM RACT) per Rule 62-296.700(2)(b). This limitation was requested by applicant.

This project is not subject to the requirements of Rule 62-296.810, F.A.C. - National Emission Standard for Hazardous Air Pollutants (NESHAP), since there is not an affected pollutant category.

This project is subject to the requirements of Rule 62-297.100, F.A.C, - Stationary Point Source Emission Testing Procedures, since the permittee will be required to conduct compliance testing.

This project is not subject to the requirements of Rule 62-297.500, F.A.C, - Continuous Emission Monitoring, since there is not a source category for this project.

The Project is subject to 62-210.650: Circumvention, 62-210.700: Excess Emissions, and 62-4.130: Plant Operations-Problems.

### III. VISIBLE EMISSIONS:

Visible emissions from the stack exhaust shall not be equal to or greater than 20% opacity. Previous permits established this opacity requirement per Hillsborough County, Environmental Protection Commission Chapter 1-3.62, and Rule 62-296.310(2), F.A.C.

### IV. EMISSION ESTIMATES:

#### FLUORIDE

The maximum allowable combined fluoride emission rate for Kiln Nos. 6 & 7 is 0.37 pounds fluorides per ton P2O5 input. This total includes a 0.05 pounds fluorides per ton P2O5 allocation for the Feed Preparation Dryer (Ref: A029-218854). This allocation is based on a memorandum on fluoride allocations dated, 11/13/87. Based on a maximum combined prepared feed input rate to Kiln Nos. 6 & 7 of 24.30 tons per hour (8.66 tons per hour P2O5), the maximum allowable fluoride emission rate is 3.2 pounds per hour.

#### PARTICULATE

The maximum allowable combined emission rate of particulate matter for Kiln Nos. 6 & 7 is set at 13.81 pounds per hour and 60.5 tons per year. This is based on 8760 hours per year of operation. This particulate matter limitation exempts the facility from *Reasonably Available Control Technology* (PM RACT) per Rule 62-296.700(2)(b). This 13.81 pounds per hour limitation was discussed with the applicant and consultant and is less than the 15 pounds per hour limitation in A029-218851. The PM hourly emission limitation is being reduced in order to increase the hours of operation to 8760 hours per year, and still cap the total annual particulate matter emission limit at the 60.5 tons per year as conditioned in A029-218851.

SULFUR DIOXIDE

Sulfur dioxide emissions are liberated from the sulfur in the fuel oil (0.5%) used as fuel and from the sulfur content of the animal feed itself. The available sulfur in the prepared animal feed is estimated at 0.47% by weight. Based on the sulfur dioxide emission rates reported in the application, the total SO<sub>2</sub> emissions are 307.6 pounds per hour and 1347.3 tons per year.

This SO<sub>2</sub> emission rate **exceeds** the Ambient Air Quality Standards for SO<sub>2</sub> as shown in the Air Toxic Working List, Version 3.0. Below is a summary of the SO<sub>2</sub> emissions:

<u>Reference</u>	SO <sub>2</sub> (ug/m <sup>3</sup> ) Hour				
	1	3	8	24	annual
Modelling (Screen 1.2)	522	470	366	209	52
Air Toxic Working List			52	13	
Rule 62-212.300, F.A.C.		1300		260	60

NOTE: The values in the table have been rounded to the nearest whole number.

These sulfur dioxide emissions for the defluorination process have probably always existed. However, this is first time the sulfur dioxide emissions have been included the contribution due to the sulfur content of the animal feed itself.

Since this stack has never been tested for SO<sub>2</sub> emissions, a Specific Condition has been added to permit AC29-259884 to test for SO<sub>2</sub> emissions. Based on the results of the SO<sub>2</sub> emissions testing, the Department may require the permittee to conform to new or additional conditions to limit sulfur dioxide emission from this source in order to prevent ambient air concentrations of sulfur dioxide which exceed Rule 62-272.300(3)(a), *Ambient Air Quality Standards Established, Sulfur Dioxide*.

## V. HOURS OF OPERATION

The facility has requested to be permitted to operate 8760 hours per year.



VI. CONCLUSIONS/PROPOSED AGENCY ACTION

Pursuant to Section 403.087, Florida Statutes and Section 62-4.07, Florida Administrative Code, the Department hereby gives notice of its intent-to-issue a construction permit for the above mentioned air pollution source in accordance with draft permit AC29-259884.



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

## CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

DEP File: AC29-259884  
Hillsborough County

Mr. Frank W. Cheesman  
President & Chief Operating Officer  
Coronet Industries, Incorporated  
Post Office Box 760  
Plant City, Florida 33564

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## INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue a permit (draft copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Coronet Industries, Incorporated, applied on October 27, 1994, to the Department of Environmental Protection for an air pollution permit for the modification of existing Defluorination Kilns No. 6 & 7 in order to increase the production rate for defluorination of prepared animal feed. The facility is located at 4082 Coronet Road, Plant City, Florida.

The Department has permitting jurisdiction under 403.087(c), F.S. This project is not exempt from permitting procedures. The Department has determined that an air pollution construction permit is required for the proposed work.

The Department intends to issue this permit based on the belief that reasonable assurances have been provided to indicate the proposed project will not adversely impact air quality and the proposed project will comply with the appropriate provisions of Florida Administrative Code Rules 62-200 through 62-297 and 62-4.

Pursuant to Section 403.815, Florida Statutes and DEP Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed NOTICE OF INTENT TO ISSUE PERMIT. The notice shall be published one time only, within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place.

Mr. Frank W. Cheesman  
Coronet Industries, Inc.

DEP File: AC29-259884  
Hillsborough County

Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. The applicant shall provide proof of publication to the Department of Environmental Protection, at the Southwest District office, 3804 Coconut Palm Drive, Tampa, Florida 33619-8318, within seven days of publication. Failure to publish the notice or provide proof of publication within the allotted time may result in denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrants reversal or modification of the Department's action or proposed action;

Mr. Frank W. Cheesman  
Coronet Industries, Inc.

DEP File: AC29-259884  
Hillsborough County

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



Richard D. Garrity, Ph.D.  
Director of District Management

- copies to:
- (1) Mr. John B. Koogler, Ph.D., P.E.  
KOOGLER & ASSOCIATES  
4014 NW Thirteenth Street  
Gainesville, Florida 32609
  - (2) Mr. Frank Sweat, Environmental Affairs Manager  
CORONET INDUSTRIES, INC.  
Post Office Box 760  
Plant City, Florida 33564
  - (3) Mr. Rick Kirby, P.E.  
HILLSBOROUGH COUNTY ENVIRONMENTAL PROTECTION  
COMMISSION



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

**PERMITTEE:**

Coronet Industries, Inc.  
P.O. Box 760  
Plant City, Florida 33564-0760

**PERMIT/PROJECT:**

Permit: AC29-259884  
County: Hillsborough  
Expiration Date: 07/01/97  
Project: Defluorination  
Kilns Nos. 6 & 7

**DRAFT**

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapters 62-2 through 62-297, Florida Administrative Code. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Department of Environmental Protection, and made a part hereof and specifically described as follows:

For the construction modification of Defluorination Kilns No. 6 & 7. Kilns No. 6 & 7 defluorinate prepared animal feed produced in the feed preparation area of the facility. The purpose of this construction modification project is to increase:

1. the combined prepared feed processing rate from 18 tons per hour (approximately 6.96 tons per hour P205), to 24.30 tons per hour (approximately 8.66 tons per hour P205),
2. the combined natural gas consumption from 94.46 MM Btu per hour to 103.91 MM Btu per hour (110.91 MM Btu per hour for No. 2 fuel oil).
3. the hours of operation from 8064 hours per year to unrestricted hours of operation (8760 hours per year).

This construction modification project also includes the installation of new additional air pollution control equipment. New exhaust fans, new electrostatic precipitators and fluoride (HF) absorption spray towers will be installed in order to increase the recovery of fluorine compounds and reduce fluoride, sulfur dioxide and particulate matter emissions. Sulfur dioxide emissions will be limited by restricting alternate fuels to only new, No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight.

(Continued)

Coronet Industries, Inc.

**DRAFT**

Permit: AC29-259884

Defluorination Kilns Nos. 6 & 7

Kilns No. 6 & 7 exhaust through a common stack. Emissions generated from the defluorinating process will now be vented through a revised fluoride and particulate matter recovery system. Each kiln will exhaust through a low velocity dust settling chamber, exhaust gas cooling spray tower, electrostatic precipitator, two HF absorption spray towers in series, and finally through a Tellerett packed bed tail gas scrubber.

Particulate matter recovered from the dust settling chambers and the electrostatic precipitators is recycled into the process as feed material. Wastewater from the scrubbers is discharged to a series of ponds, treated with limestone, and recirculated. The solids precipitated from the treated pond water are used for dam construction. The HF recovery solution from the HF absorption spray towers will be processed in a new Fluoride Plant permitted separately as FDEP Permit AC29-259881.

This project is not subject to the requirements of 40CFR60, *Standards of Performance for New Stationary Sources (NSPS)*, Subpart NN, *Standard of Performance for Phosphate Rock Plants*, since the proposed changes are not considered modifications per 40CFR60.14(e). The facility commenced operation prior to September 21, 1979 and is not subject to the applicability of Subpart NN, 60.400(b).

This project is not subject to the requirements of Rule 62-212.500, F.A.C. - *New Source Review for Non-attainment Areas* since the proposed increases in the hours of operation and process rate are not considered modifications absent any federally enforceable permit conditions.

**Location:** 4082 Coronet Road, Plant City

**UTM:** 17-393.8 E 3096.3 N  
**NEDS No:** 0075  
**POINT ID:** 05 - Common Exhaust Stack Kilns Nos. 6 & 7  
**Facility ID:** 40-HIL-29-0075  
**Reference:** FDEP Permit A029-218851

#### **SPECIFIC CONDITIONS:**

1. A part of this permit is the attached GENERAL CONDITIONS.  
[Rule 62-4.160, F.A.C.]
2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-2 through 62-297, F.A.C. or any other requirements under federal, state or local law.  
[Rule 62-200.300, F.A.C.]

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

**DRAFT**

OPERATION LIMITATIONS

3. The combined prepared feed input rate to Kiln Nos. 6 & 7 shall not exceed 24.3 tons per hour (8.66 tons per hour P205).  
[Construction permit application, 10/27/94]
4. Kiln Nos. 6 & 7 shall be fired using natural gas at a combined maximum heat input rate of 103.91 MM Btu per hour (monthly average), or new, No. 2 fuel oil, only, at a maximum combined heat input rate of 110.91 MM Btu per hour (monthly average). "New" No. 2 fuel oil is defined as being refined from crude oil and has not been used, and may or may not contain additives. [Construction permit application, 10/27/94]
5. The hours of operation are not restricted (8760 hours per year).  
[Construction permit application, 10/27/94]
6. The sulfur content of the new, No. 2 fuel oil shall not exceed 0.5 percent, by weight, as determined by the ASTM D-129 test method referenced in 40CFR60.17 (July 1, 1991). An alternate test method may be used if approved by the Department. [Construction permit application, 10/27/94]
7. The firing of waste oil or recycled oil is prohibited. No other fuel oil supply system shall be physically connected to the new, No. 2 fuel oil system. [Rule 62-4.070(3), F.A.C.]
8. The applicant shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C. and Hillsborough County, Environmental Protection Commission Chapter 1-3.22(3)]
9. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.310(3), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.310(3), F.A.C.]

EMISSION LIMITATIONS

10. Visible emissions from the stack exhaust shall not be equal to or greater than 20% opacity. [Hillsborough County, Environmental Protection Commission Chapter 1-3.62, and Rule 62-296.310(2), F.A.C.]

Coronet Industries, Inc.

Permit: AC29-259884

Defluorination Kilns Nos. 6 & 7

SPECIFIC CONDITIONS:

**DRAFT**

11. The maximum allowable combined fluoride emission rate for Kiln Nos. 6 & 7 is 0.37 pounds fluorides per ton P2O5 input. Based on a maximum combined prepared feed input rate to Kiln Nos. 6 & 7 of 24.30 tons per hour (8.66 tons per hour P2O5), the maximum allowable fluoride emission rate is 3.2 pounds per hour. [Rule 62-296.403(1)(h), and construction permit application, 10/27/94]

12. The maximum allowable combined emission rate of particulate matter for Kiln Nos. 6 & 7 is set at 13.81 pounds per hour and 60.5 tons per year (based on 8760 hours per year of operation). This particulate matter limitation exempts the facility from *Reasonably Available Control Technology* (PM RACT). [Rule 62-296.700(2)(b), requested by applicant]

#### TESTING AND COMPLIANCE REQUIREMENTS

13. The initial compliance testing shall be conducted within 60 days after achieving 90% of the maximum prepared feed input rate of 24.30 tons per hour, but not later than 180 days after initial start up. Initial start up is defined as the first introduction of feed material into a kiln following the completion of the modifications authorized by this permit. The common stack exhaust shall be tested for visible emissions, fluoride emissions, and particulate matter emissions, per Specific Condition Nos. 10, 11 and 12, respectively. The initial compliance testing shall also include a one-time special test for determining the sulfur dioxide emission rate. Testing for visible emissions, fluoride emissions, and particulate matter emissions, per Specific Condition Nos. 10, 11 and 12, respectively shall be conducted annually, thereafter, within the 60 day period prior to the anniversary date established by the initial compliance testing. No additional testing for sulfur dioxide emissions is required after completion of the initial determination of the sulfur dioxide emission rate required for start up. Submit a copy of all test data to the Air Section of the Southwest District Office of the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division within 45 days of testing. [Rules 62-297.340(1)(d), 62-297.570(2), and 62-4.070(3), F.A.C.]

14. Test the stack exhaust for visible emissions, fluoride emissions, and particulate matter emissions, per Specific Condition Nos. 10, 11 and 12, respectively, within 30 days of a change from natural gas to fuel oil. Emission tests need not be repeated for any change to fuel oil that occurs within a consecutive 12 month period. [Rule 62-4.070(3), F.A.C.]



SPECIFIC CONDITIONS:

**DRAFT**

15. Compliance with the visible emission limitation of Specific Condition No. 10 shall be determined using EPA Method 9 contained in 40CFR60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The visible emission test shall be conducted by a certified observer and be a minimum of 30 minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40CFR60, Appendix A. [Rules 62-297.330(1)(b), and 62-4.070(3) F.A.C.]

16. The stack tests required by Specific Condition Nos. 13 and 14, should be conducted at the exhaust stack common to Kiln Nos. 6 & 7 with both kilns operating. However, the kilns may be tested individually provided the stack test results for both kilns can be shown to be in compliance with the emission limitations in Specific Condition Nos. 10, 11 and 12. [Rule 62-4.070(3), F.A.C.]

17. Compliance with the fluoride emission limitation and the particulate matter emission limitation of Specific Condition Nos. 11, and 12, respectively, and the determination of the sulfur dioxide emissions shall be determined using EPA Methods 1, 2, 3, 4, 5, 6, 13A or 13B contained in 40CFR60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40CFR60, Appendix A.

18. The compliance tests for visible emissions, fluoride emissions, particulate matter emissions, and sulfur dioxide emissions should be conducted while operating at the following conditions:

- (A) within 90 - 100% of the maximum combined permitted prepared feed input rate of 24.30 tons per hour, and
- (B) within 90 - 100% of the maximum permitted heat input rate of 110.91 MM Btu per hour (test period average), for new, No. 2 fuel oil, or  
within 90 - 100% of the maximum permitted heat input rate of 103.91 MM Btu per hour (test period average), for natural gas.

(Specific Condition No. 18, Continued on Next Page)

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

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18. (Continued)

NOTE: Within 15 days of exceeding a lower rate from a previous test by more than 10%; or to increase a previously established rate(s), another compliance test shall be performed and a copy of the results submitted to this Department and the Environmental Protection Commission of Hillsborough County, Air Management Program within 45 days. Acceptance of the test by the Department will automatically amend permit this permit at the higher tested rate(s), plus 10%, but in no case shall the maximum permitted rates exceed the rates of Specific Condition Nos. 3 and 4. Failure to submit the prepared feed input rate, the maximum heat input rate, the type of fuel(s) and fuel usage rate(s) for the testing period, or operating at conditions which do not reflect normal operating conditions, may invalidate the test.

[Rules 62-297.570(2), 62-297.570(3), and 62-4.070(3), F.A.C.]

A compliance test submitted for the purpose of obtaining an operating permit (See Specific Condition No. 33) at rate(s) less than 90% of the maximum prepared feed input rate or maximum heat input rate will result in the issuance of an operation permit limited to the reduced rate(s), plus 10%.

**NOTIFICATION REQUIREMENTS**

19. The permittee shall notify the Air Section of the Southwest District Office of the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division at least 15 days prior to the date on which the compliance test is to begin. The notification shall include the date, time, and place of the test, and the test contact person who will be responsible for coordinating the test. [Rule 62-297.340(1)(i), F.A.C.]

**RECORDKEEPING/DOCUMENTATION REQUIREMENTS**

20. In order to document compliance with the fuel oil sulfur limitation of Specific Condition No. 6, a fuel oil analysis indicating the sulfur content of the fuel, or a certification of the sulfur content of the fuel oil by the supplier is required. The sulfur content of the fuel oil used during compliance testing shall be submitted in conjunction with all test reports. [Rule 62-4.070(3), F.A.C.]

SPECIFIC CONDITIONS:

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21. The following operational parameters for the HF absorption spray towers and the electrostatic precipitators, serving both Kiln Nos. 6 & 7, shall be recorded daily, each day the kiln(s) operates, and shall be maintained in a form suitable for inspection:

HF Absorption Spray Tower Operational Parameters

- (A) Pressure drop across spray tower (inches of water);
- (B) Pressure drop across demisting pad (inches of water);
- (C) Pressure in kiln hood (negative or positive);
- (D) pH of the scrubber water (0.0 - 14.0);
- (E) Flow rate of the scrubber water (gallons per minute); and
- (F) Pressure of the scrubber water on headers.

Electrostatic Precipitator Operational Parameters

- (A) Primary Voltage (volts)
- (B) Primary Current (amps)
- (C) Secondary Voltage (kilovolts)
- (D) Secondary Current (milliamps)
- (E) Discharge Rate (counts per minute)

All operational parameter records shall be made available to the Department or the Environmental Protection and the Environmental Protection Commission of Hillsborough County, upon request. The records shall be retained at the facility for at least 3 years from the date of measurement. [Rule 62-4.070(3), F.A.C.]

22. In order to document continuing compliance with the maximum heat input limitations of Specific Condition No. 4, the applicant shall establish and maintain a log for each kiln that contains, at a minimum:

- (A) the number of hours of operation of each kiln,
- (B) a calculation of heat input rate (monthly average) to ensure that the maximum heat input rate of 103.91 MM Btu per hour is not exceeded for natural gas usage, and
- (C) a calculation of heat input rate (monthly average) to ensure that the maximum heat input rate of 110.91 MM Btu per hour is not exceeded for new, No. 2 fuel oil usage.

Each log shall be maintained in a form suitable for inspection. Records shall be updated and completed by the end of the following month. [Rule 62-4.070(3), F.A.C.]

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

**DRAFT**

23. Records of inspection, maintenance and performance data shall be retained at the facility for a minimum of 3 years and shall be made available to the Department of Environmental Protection and the Hillsborough County, Environmental Protection Commission, upon request. Records and logs required by this permit shall be updated monthly and shall be completed by the end of the following month. [Rule 62-4.070(3), F.A.C. and Hillsborough County, Environmental Protection Commission Chapter 1-3.22(3)]

**REPORTING REQUIREMENTS**

24. All test reports shall be submitted to the Air Program, Compliance Section of the Southwest District Office of the Department of Environmental Protection and to the Environmental Protection Commission of Hillsborough County, Air Management Division within 45 days of testing. [Rule 62-296.570(2), F.A.C.]

25. All test reports submitted to the Department during the testing period shall include a statement documenting any changes made to the pollution control equipment used for Kilns Nos. 6 & 7. The documentation shall include any changes or any revisions made to capacity, flow rates, stack parameters, control device operational parameters, and control device efficiencies that may have changed from the original permit application. [Rule 62-4.070(3), F.A.C.]

26. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C., *Stationary Sources - Emission Monitoring* and 40CFR60, Appendix A. [Rule 62-297.420, F.A.C.]

27. Failure to submit the actual prepared feed input rate, the operating records for the test day, or the actual operating conditions may invalidate the test. [Rule 62-4.070(3), F.A.C.]

28. Coronet Industries, Inc. shall report any proposed process changes, including, but not limited to, (a) any proposed change to process materials, or (b) any proposed increase in the production rate, to the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division for proper processing. Any physical change in the method of operation, or addition to a stationary source or facility, which increases the actual emissions of any air pollutant may be considered a "Modification". [Rule 62-296.200(112), F.A.C.]

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

**SPECIFIC CONDITIONS:**

**DRAFT**

29. The permittee shall submit to Air Management Division of the Environmental Protection Commission of Hillsborough County, each calendar year, on or before March 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility," for the preceding calendar year. The report shall include the sum total of particulate matter and fluoride emissions from the common stack exhaust. The report shall also include the sulfur content of the new, No. 2 fuel oil as required by Specific Condition No. 6. [Rule 62-210.370(2), F.A.C.]

**NOTIFICATION REQUIREMENTS**

30. The applicant shall notify, in writing, the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division within 15 days prior to:

(A) the initial start up of either Kiln Nos. 6 & 7 as defined by Specific Condition No. 13, and

(B) any subsequent periods after initial start up when the manufacturing capability has been inactive for more than 30 consecutive days.

[Rule 62-4.070(3), F.A.C.]

31. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County, Air Management Division at least 15 days prior to the date on which each compliance test is to begin. The notification shall include the date, time, and place of each scheduled test, and the test contact person who will be responsible for coordinating the test.

[Rule 62-297.340(1)(i), F.A.C.]

**OTHER REQUIREMENTS**

32. Based on the sulfur dioxide emission rates reported from the required testing per Specific Condition No. 13, the Department may require the permittee to conform to new or additional conditions to limit sulfur dioxide emission from this source in order to prevent ambient air concentrations of sulfur dioxide which exceed Rule 62-272.300(3)(a), *Ambient Air Quality Standards Established*, Sulfur Dioxide, or the Department's *Ambient Reference Concentrations* established by the Florida Air Toxics Working Group. [Rules 62-272.300(2), and 62-4.070(3), F.A.C.]

Coronet Industries, Inc.

Permit: AC29-259884  
Defluorination Kilns Nos. 6 & 7

SPECIFIC CONDITIONS:

**DRAFT**

OPERATION PERMIT REQUIREMENTS

33. Coronet Industries, Inc. shall request the Department amend operating permit A029-218851 by submitting:

- (A) the appropriate application (DEP Form 62-210.900(1), *Application for Air Permit*),
- (B) a copy of the test reports required by Specific Condition No. 13, if not previously submitted, and
- (C) a copy of the operational parameters for the pollution control equipment required by Specific Condition No. 21,
- (D) a copy of the log documenting the heat input limitations required by Specific Condition No. 22, and
- (E) a copy of the final "as built" list of the pollution control equipment as required by Specific Condition No. 25,

to the Southwest District Office of Department of Environmental Protection within 45 days of compliance testing, or by April 1, 1997, whichever date is earliest. A copy of the application and the other required information shall also be sent to the Environmental Protection Commission of Hillsborough County, Air Management Division.  
[Rule 62-213.420, F.A.C.]

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

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Richard D. Garrity, Ph.D.  
Director of District Management  
Southwest District

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ATTACHMENT - GENERAL CONDITIONS:

**DRAFT**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

GENERAL CONDITIONS:

**DRAFT**

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.



# DRAFT

## GENERAL CONDITIONS:

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Compliance with New Source Performance Standards (NSPS)
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - the date, exact place, and time of sampling or measurements;
    - the person responsible for performing the sampling or measurements;
    - the dates analyses were performed;
    - the person responsible for performing the analyses;
    - the analytical techniques or methods used; and
    - the results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Mr. Frank W. Cheesman  
 Coronet Industries, Inc.

DEP File: AC29-259884  
 Hillsborough County


**CERTIFICATE OF SERVICE**

This is to certify that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on JAN 23 1995 to the listed persons.

FILING AND ACKNOWLEDGEMENT  
 FILED, on this date, pursuant to Section 120.52(11), Florida Statutes, with the designated Department Clerk, receipt of \_\_\_\_\_ hereby acknowledged.

P 648 752 800  
 **Certified Mail Receipt**  
 No Insurance Coverage Provided  
 Do not use for International Mail

P 648 752 799  
 **Certified Mail Receipt**  
 No Insurance Coverage Provided

P 648 752 798  
 **Certified Mail Receipt**  
 No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

MR FRANK CHEESMAN  
 PRESIDENT & COO  
 CORONET INDUSTRIES INC  
 PO BOX 760  
 PLANT CITY FL 33465

Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	JAN 23 1995

PS Form 3800, June 1990

AC29-259884

Items 1 and/or 2 for additional services.  
 Items 3, and 4a & b.  
 name and address on the reverse of this form so that we can  
 rd to you.  
 form to the front of the mailpiece, or on the back if space  
 if.  
 "Receipt Requested" on the mailpiece below the article number.  
 receipt will show to whom the article was delivered and the date

I also wish to receive the following services (for an extra fee):  
 1.  Addressee's Address  
 2.  Restricted Delivery  
 Consult postmaster for fee.

FRANK CHEESMAN  
 4a. Article Number  
 59884

I also wish to receive the following services (for an extra fee):  
 1.  Addressee's Address  
 2.  Restricted Delivery  
 Consult postmaster for fee.

I also wish to receive the following services (for an extra fee):  
 1.  Addressee's Address  
 2.  Restricted Delivery  
 Consult postmaster for fee.

4a. Article Number  
 P 648 752 800

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 1/23/95

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

**DOMESTIC RETURN RECEIPT**

01-12-95  
12:55:46

1  
\*\*\* SCREEN-1.2 MODEL RUN \*\*\*  
\*\*\* VERSION DATED 91/10 \*\*\*

coronet - kilns 6/7 SO2

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT  
EMISSION RATE (G/S) = 38.80  
STACK HEIGHT (M) = 45.72  
STK INSIDE DIAM (M) = 1.77  
STK EXIT VELOCITY (M/S) = 9.7840  
STK GAS EXIT TEMP (K) = 316.00  
AMBIENT AIR TEMP (K) = 293.00  
RECEPTOR HEIGHT (M) = .00  
IOPT (1=URB,2=RUR) = 2  
BUILDING HEIGHT (M) = .00  
MIN HORIZ BLDG DIM (M) = .00  
MAX HORIZ BLDG DIM (M) = .00

\*\*\*\*\*  
\*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
\*\*\*\*\*

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	522.3	461.	0.

\*\*\*\*\*  
\*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*  
\*\*\*\*\*

BUOY. FLUX = 5.47 M\*\*4/S\*\*3; MOM. FLUX = 69.52 M\*\*4/S\*\*2.

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
\*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
\*\*\*\*\*

\*\*\* TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES \*\*

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
152.	41.94	1	3.0	3.3	960.0	68.7	39.6	22.7	NO
200.	178.8	1	3.0	3.3	960.0	68.7	50.4	30.0	NO
300.	402.5	1	2.0	2.2	640.0	80.2	72.4	48.5	NO
400.	475.7	1	1.0	1.1	320.0	114.6	94.8	73.8	NO
500.	509.2	1	1.0	1.1	320.0	114.6	114.7	106.5	NO
600.	407.3	1	1.0	1.1	320.0	114.6	134.3	155.2	NO
700.	415.5	2	1.0	1.1	320.0	114.6	113.7	76.5	NO
800.	422.3	2	1.0	1.1	320.0	114.6	127.7	87.8	NO
900.	405.7	2	1.0	1.1	320.0	114.6	141.6	99.3	NO
1000.	377.8	2	1.0	1.1	320.0	114.6	155.4	111.1	NO
1100.	367.7	3	1.0	1.2	320.0	111.5	114.0	69.3	NO
1200.	377.9	3	1.0	1.2	320.0	111.5	123.2	74.6	NO
1300.	379.2	3	1.0	1.2	320.0	111.5	132.2	80.0	NO
1400.	374.4	3	1.0	1.2	320.0	111.5	141.3	85.3	NO
1500.	365.2	3	1.0	1.2	320.0	111.5	150.2	90.6	NO
1600.	353.3	3	1.0	1.2	320.0	111.5	159.2	95.8	NO

1700.	339.8	3	1.0	1.2	320.0	111.5	168.0	101.1	NO
1800.	325.4	3	1.0	1.2	320.0	111.5	176.8	106.3	NO
1900.	310.8	3	1.0	1.2	320.0	111.5	185.6	111.6	NO
2000.	296.2	3	1.0	1.2	320.0	111.5	194.4	116.8	NO
2100.	282.0	3	1.0	1.2	320.0	111.5	203.0	122.0	NO
2200.	268.3	3	1.0	1.2	320.0	111.5	211.7	127.2	NO
2300.	255.2	3	1.0	1.2	320.0	111.5	220.3	132.3	NO
2400.	242.8	3	1.0	1.2	320.0	111.5	228.9	137.5	NO
2500.	231.1	3	1.0	1.2	320.0	111.5	237.4	142.6	NO
2600.	225.1	4	2.0	2.5	640.0	76.2	162.5	60.0	NO
2700.	222.1	4	1.0	1.3	320.0	106.7	168.8	63.3	NO
2800.	223.5	4	1.0	1.3	320.0	106.7	174.4	64.7	NO
2900.	224.3	4	1.0	1.3	320.0	106.7	179.9	66.1	NO
3000.	224.6	4	1.0	1.3	320.0	106.7	185.5	67.4	NO
3500.	219.2	4	1.0	1.3	320.0	106.7	212.9	73.6	NO
4000.	209.2	4	1.0	1.3	320.0	106.7	239.9	79.4	NO
4500.	197.3	4	1.0	1.3	320.0	106.7	266.6	85.0	NO
5000.	184.9	4	1.0	1.3	320.0	106.7	293.0	90.4	NO
5500.	172.8	4	1.0	1.3	320.0	106.7	319.1	95.6	NO
6000.	161.4	4	1.0	1.3	320.0	106.7	344.9	100.6	NO
6500.	155.4	5	1.0	1.7	5000.0	89.6	277.2	64.8	NO
7000.	149.9	5	1.0	1.7	5000.0	89.6	296.2	67.2	NO
7500.	144.4	5	1.0	1.7	5000.0	89.6	315.0	69.5	NO
8000.	139.0	5	1.0	1.7	5000.0	89.6	333.7	71.7	NO
8500.	133.7	5	1.0	1.7	5000.0	89.6	352.2	73.9	NO
9000.	128.6	5	1.0	1.7	5000.0	89.6	370.7	76.0	NO
9500.	123.7	5	1.0	1.7	5000.0	89.6	388.9	78.1	NO
10000.	119.0	5	1.0	1.7	5000.0	89.6	407.1	80.1	NO
15000.	91.35	6	1.0	2.3	5000.0	78.6	388.5	55.7	NO
20000.	76.37	6	1.0	2.3	5000.0	78.6	501.0	61.0	NO
25000.	65.24	6	1.0	2.3	5000.0	78.6	609.8	65.5	NO
30000.	56.77	6	1.0	2.3	5000.0	78.6	715.6	69.5	NO
40000.	44.79	6	1.0	2.3	5000.0	78.6	920.3	75.1	NO
50000.	36.96	6	1.0	2.3	5000.0	78.6	1117.5	79.7	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 152. M:  
 461. 522.3 1 1.0 1.1 320.0 114.6 107.2 93.4 NO

- DIST = DISTANCE FROM THE SOURCE
- CONC = MAXIMUM GROUND LEVEL CONCENTRATION
- STAB = ATMOSPHERIC STABILITY CLASS (1=A, 2=B, 3=C, 4=D, 5=E, 6=F)
- U10M = WIND SPEED AT THE 10-M LEVEL
- USTK = WIND SPEED AT STACK HEIGHT
- MIX HT = MIXING HEIGHT
- PLUME HT= PLUME CENTERLINE HEIGHT
- SIGMA Y = LATERAL DISPERSION PARAMETER
- SIGMA Z = VERTICAL DISPERSION PARAMETER
- DWASH = BUILDING DOWNWASH:  
 DWASH= MEANS NO CALC MADE (CONC = 0.0)  
 DWASH=NO MEANS NO BUILDING DOWNWASH USED  
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED  
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED  
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3\*LB

\*\*\*\*\*  
 \*\*\* USER SPECIFIED AVERAGING TIMES \*\*\*  
 \*\*\*\*\*

ESTIMATED MAXIMUM CONCENTRATION FOR 3 HR AVERAGING TIME:  
 470.07(+/-52.23) UG/M\*\*3

ESTIMATED MAXIMUM CONCENTRATION FOR 8 HR AVERAGING TIME:  
 365.61(+/-104.46) UG/M\*\*3

ESTIMATED MAXIMUM CONCENTRATION FOR 24 HR AVERAGING TIME:  
 208.92(+/-104.46) UG/M\*\*3

ESTIMATED MAXIMUM CONCENTRATION FOR ANNUAL AVERAGING TIME:  
41.784(+/-104.46) UG/M\*\*3

\*\*\*\*\*  
\*\*\* END OF SCREEN MODEL OUTPUT \*\*\*  
\*\*\*\*\*

**COMMISSION**

DOTTIE BERGER  
PHYLLIS BUSANSKY  
JOE CHILLURA  
CHRIS HART  
JIM NORMAN  
ED TURANCHIK  
SANDRA WILSON

**EXECUTIVE DIRECTOR**

ROGER P. STEWART



ADMINISTRATIVE OFFICES, LEGAL &  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813)272-5960  
FAX (813)272-5157

AIR MANAGEMENT DIVISION  
TELEPHONE (813)272-5530

WASTE MANAGEMENT DIVISION  
TELEPHONE (813)272-5788

ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813)272-7104

**D.E.R.**

**MEMORANDUM**

DEC 21 1994

**DATE:** December 14, 1994

**SOUTHWEST DISTRICT  
TAMPA**

**TO:** John Taylor

**THRU:** Jerry Kissel

**FROM:** Ben Kalra *fenk*

**THRU:** Jerry Campbell

**SUBJECT:** Kilns 6 and 7 - Coronet Industries, Inc.  
Ref. DEP File No. 259884

On October 27, 1994, Coronet Industries submitted a request to increase the prepared feed processing rate of Kilns 6 and 7 from 18.0 TPH (6.96 TPH of P<sub>2</sub>O<sub>5</sub>) to 24.3 TPH (8.66 TPH of P<sub>2</sub>O<sub>5</sub>). Coronet proposed to install the following additional control equipment 1) ESP, 2) kiln exhaust gas turbo fan, and 3) HF absorption tower.

EPC reviewed the application and recommends the following details to be included in the letter of authority.

- a) Request for the make, model of the controls.
- b) Specify initial compliance test to determine the control efficiency.
- c) Request for the estimates to determine the allowable emission limit due to the change in sulfur content of No. 2 fuel oil.
- d) Submittal of the notice of report for the compliance test in a timely manner.

bm

COMMISSION

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PHYLLIS BUSANSKY  
JOE CHILLURA  
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SANDRA WILSON

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TELEPHONE (813)272-7104

**D.E.R.**

M E M O R A N D U M

DEC 21 1994

DATE: December 14, 1994

SOUTHWEST DISTRICT  
TAMPA

TO: John Taylor

THRU: Jerry Kissel

FROM: Ben Kalra *Bnk*

THRU: Jerry Campbell

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bm



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

Mr. Samuel F. Sweat  
Environmental Affairs Manager  
Coronet Industries Incorporated  
P.O. Box 760  
Plant City, Florida 33564-0760

December 1, 1994

Re: Request for Feed Rate Increase  
Defluorinating Kilns Nos. 6 & 7  
FDEP Permit No. A029-218851

Dear Frank:

The Department has reviewed your request to increase the feed rates for the Defluorinating Kilns Nos. 6 & 7 from a combined 18.0 tons per hour to a combined 19.8 tons per hour. Based on the information provided in your letter received by this Department on November 10, 1994, the Department has concluded the following:

(1) The requested increase in feed rate is not considered a "modification" since there will be no physical modifications to either kiln and it can be accomplished without a capital expenditure. Consequently, per Rule 40CFR60.14 - MODIFICATION, this request for an increase in feed rate meets the definition for exemption per 40CFR60.14(e).

(2) The requested increase in feed rate is not subject to NEW SOURCE REVIEW/PREVENTION OF SIGNIFICANT DETERIORATION (NSR/PSD) since the requested increase in feed rate is not prohibited under any federally enforceable permit condition. Consequently, this request is exempt from the definition of a "MODIFICATION" per 62-212.200(46).

This letter authorizes Coronet Industries Incorporated to proceed with the proposed rate increase as addressed in the letter to this Department, dated November 9, 1994.

The authorization is subject to the following conditions:

1. Within 30 days of achieving the higher rate, Coronet Industries shall schedule a stack test for visible emissions, particulate matter emissions, and fluoride emissions per operating permit A029-218851.



Mr. Samuel F. Sweat  
Coronet Industries Incorporated

Defluorinating Kilns 6 & 7

2. All testing should be conducted within 90-100% of the requested maximum combined feed rate of 19.8 tons per hour and the permitted maximum heat input rate of 94.46 MMBtu per hour. The visible emission test period shall be at least thirty (30) minutes in duration. Any operating restrictions or limitations observed during the test shall be reported and shall be subject to inclusion in the amended operating permit.

3. Coronet Industries shall notify this Department and the Hillsborough County Environmental Protection Commission, Air Management Division prior to conducting the emissions tests. The notification shall state the reason for the testing (Requested Feed Rate Increase for Defluorinating Kilns 6 & 7) and reference this letter of authorization.

NOTIFY: Mr. Bill Proses  
Air Compliance Supervisor  
Florida Department Of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619  
Phone: 813-744-6100, x 417  
Fax: 813-744-6083

NOTIFY: Mr. Rick Kirby, Chief, Air Permitting Section  
Hillsborough County Environmental Protection Commission  
Air Management Division  
1410 North 21st Street  
Tampa, Florida, 33605  
Phone: 813-272-5530  
Fax: 813-272-7144

4. Coronet Industries shall provide the following within 45 days of testing:

A. Two copies of the test data to this Department. Forward to:

Mr. Bill Proses, Air Compliance Supervisor  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

(Continued On Next Page)

Mr. Samuel F. Sweat  
Coronet Industries Incorporated

Defluorinating Kilns 6 & 7

4. (Continued)

B. One copy of the test data to:

Mr. Rick Kirby, Chief, Air Permitting Section  
Hillsborough County Environmental Protection Commission,  
Air Management Division  
1410 North 21st Street  
Tampa, Florida, 33605

C. A completed DER Form 17-1.202(3), *Certificate of Completion of Construction*, for an amendment to permit A029-218851, to:

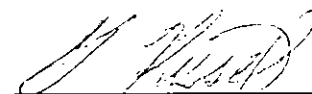
Mr. Gerald Kissel, P.E.  
Air Permitting Supervisor  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

5. Coronet Industries shall comply with all A029-218851 permit conditions.

Pending review of the test data, the Department will acknowledge that the above conditions have been satisfied by amending permit A029-218851. This authorization expires March 1, 1995. A time extension may be requested and must be received by this Department at least 30 days prior to expiration of this authorization.

If you should have any questions, please call me at (813) 744-6100, extension 419.

Sincerely,



Gerald Kissel, P.E.  
Air Permitting Supervisor

Mr. Samuel F. Sweat  
Coronet Industries Incorporated

Defluorinating Kilns 6 & 7

copy: Mr. Rick Kirby, Hillsborough County Environmental  
Protection Commission, Air Management Division

copy: Mr. Ben Kalra, Hillsborough County Environmental  
Protection Commission, Air Management Division

attachment: DER Form 17-1.202(3), *Certificate of Completion of  
Construction*

C:\ltr\cii94851.ltr

COMMISSION  
PHYLLIS BUSANSKY  
JOE CHILLURA  
LYDIA MILLER  
JIM NORMAN  
JAN KAMINIS PLATT  
ED TURANCHIK  
SANDRA WILSON

J.E.R.

DEC 13 1994

SOUTHWEST DISTRICT  
TAMPA



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
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TELEPHONE (813) 272-5788  
ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

FAX (813) 272-5157

M E M O R A N D U M

**DATE:** November 30, 1994

**TO:** Jerry Kissel

**FROM:** Rick Kirby *RK* **THRU:** Jerry Campbell

**SUBJECT:** Coronet Industries, Inc.  
Request for Feed Rate Increase from 18.0 to 19.9 TPH for  
Defluorinating Kilns Nos. 6 and 7  
Permit No. AO29-218851

I have researched the files for this facility, including associated fluid bed reactors, and can find no federally enforceable construction permit covering these kilns. A modification by definition would require a construction permit, but this does not appear to meet the criteria. Pursuant to Rule 200, F.A.C., an increase in the production with no physical change and no applicable federally enforceable restriction, is not a modification if the pollutants involved are "regulated pollutants". The question is whether the PM and the HF are considered regulated. Rule 62-213.100(28) defines regulated pollutant as any pollutant regulated under NSPS or in which a natural primary ambient standard exists. There is a primary standard for PM and fluorides are regulated under NSPS; therefore it appears that all the pollutants are regulated. We even called the EPA to confirm that HF from a non-NSPS source category was covered. We referenced their guidance memo on the subject (Wegman's memo of 4/26/93) and they agreed with our interpretation.

Based on this I am in agreement with your conclusion that the request does not fit the definition for "Modification". I am also in agreement with the amendment being contingent upon testing of VE, particulates, and fluoride emissions at the proposed higher throughput rate.

bm



**CORONET INDUSTRIES, INC.**  
**D.E.R.**

**NOV 10 1994**

November 9, 1994

**SOUTHWEST DISTRICT**  
**TAMPA**

*11/10*

Mr. Jerry Kissel  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

**Re: Defluorinating Kilns #6 & 7, Request for Feed Rate  
Increase for AO29-218851)**

Dear Mr. Kissel:

Defluorinating kilns #6 & 7 presently operate under air operating permit no. AO29-218851 at a combined feed rate of 18.0 tons per hour feed. The kilns are fired normally on natural gas at a maximum rate of 94.46 MMBTU/hr. These units presently operate under an operating permit but a construction permit was not on file at FDEP. Pursuant to 17-2.100(1.18) Coronet Industries, Inc. is requesting a change in the feed rate from 18.0 TPH (9.0 TPH/kiln) to 19.8 TPH (9.9 TPH/kiln) [also 40 cfr 60.14(e)(2)]. This request involves no physical change in the operation.

Under AO29-218851, the maximum allowable particulate emissions are limited to 15.0 pounds per hour; the visible emissions (opacity) are limited to less than 20%; and the fluoride emissions are limited to 2.57 lbs/hr. Recent stack test analyses of this source show about 16% of the allowable particulates and approximately 25% of the allowable emissions with an opacity of <5%. It is not anticipated that an increase of 10% in the feed rate will increase the emissions to a point approaching the permit limits.

Sincerely,

Samuel F. Sweat  
Environmental Affairs Mgr.

SFS:cr

cc: Jerry Campbell, EPCHC  
Frank Cheesman  
Nolan Lowrey

permit file

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 10/26/94 Subject \_\_\_\_\_  
Time \_\_\_\_\_ Permit No. \_\_\_\_\_  
M J Taylor, J Kiser - DEP County \_\_\_\_\_  
J Hoogler, S Lillian - Hoogler & Associates Telephone No. \_\_\_\_\_  
Representing Frank Luedt - Coronet Coronet

Telephoned Me.  Was Called  Scheduled Meeting  Unscheduled Meet  
(R Kelly had been invited)  
Other Individuals Involved in Conversation/Meeting \_\_\_\_\_

Summary of Conversation/Meeting \_\_\_\_\_

Will be submitting app for re bid. Through a  
hour will increase but this can be accommodated  
~~the~~ in present app, just a matter of "turning up"  
"the bid" but with broader context app to hold  
emissions below prior levels (if R comments) but for  
products of combustion like NO<sub>x</sub> & CO, emissions  
would probably increase actual

Their proposal will show they are not a modern because

- 1) for NPS (budget 111) not a modern because emissions  
and no new capital exp. (see 1.10 def's)
- 2) NPS/PSD not applicable because no new point - permit

cc: R Kelly

(continue on another sheet, if necessary)

Signature J Kiser  
Title SPS



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619  
813-744-6100

Virginia B. Wetherell  
Secretary

Mr. Samuel F. Sweat  
Environmental Affairs Manager  
Coronet Industries, Inc.  
P.O. Box 760  
Plant City, FL 33564-0760

March 1, 1994

RE: Air Pollution Permit, Hillsborough County  
DEP File Nos. AO29-218851  
Defluorination Kilns 6 & 7  
Request for Modification

Dear Mr. Sweat:

The Department has reviewed your request(2/28/94) for a modification to the Defluorination Kilns 6 & 7 in order to increase the fluoride recovery. Per our discussion on 2/28/94, the modification will include:

1. the addition of electrostatic precipitator(s),
2. an increase in process rate of approximately 20 percent, and
3. an increase in the heat input rate.

The fluoride and particulate matter emission rates are expected to decrease as a result of this modification.

Based on this information, you are requested to supply the Department with the following additional information:

1. a process description of the project,
2. the maximum anticipated feed rate(tph) per kiln, and the maximum P205 input feed rate(tph) per kiln,
3. emission estimates for fluoride and particulate matter,
4. design criteria and manufacturer's data on the proposed new control equipment, and
5. certification by a professional engineer, registered in the State of Florida, that the engineering features of this modification provide reasonable assurance of compliance with the applicable provisions of Chapter 403, Florida Statutes, Chapter 17-4, and Chapters 17-200 through 17-297, Florida Administrative Code.

MEMORANDUM

To: FILE DATE: March 1, 1994  
Ben Kalra - EPCHC

FROM: John J. Taylor, P.E.  
Air Permitting Engineer

SUBJECT: *Coronet Industries , Defluorination Kilns 6 & 7.*

RE: Air Pollution Permit, Hillsborough County  
DEP File No. AO29-218851  
Defluorination Kilns 6 & 7  
Request for Modification

A request by Mr. Frank Sweat for a modification to the defluorination kilns no. 6 & 7 was reviewed by John J. Taylor and Gerald Kissel, and the following conclusions were made:

1. New Source Review (NSR): 17-212.500:  
The modification does not trigger NSR for FL  
The modification does trigger NSR for PM

Hillsborough County is non-attainment for PM. New Source Review(NSR) for non-attainment areas applies only to the emissions of the affected pollutant. In this case ~~PM~~ PM for this source point. PM for the facility is greater than 100 Tpy, so the facility is major, so 17-212.500(d)4 applies, ~~PM~~

~~PM~~ The actual PM for the source point, based on stack tests, is 1.94 pounds per hour, averaged over the last two years. The permitted hours of operation of the source are 8066.66(?) per year. Therefore, the new PM limit for the source will be 7.82 Tpy + 25.0 Tpy(table 212.400-2 increment) = 32.8 Tpy. The FL permitted limit of 2.57 pounds per hour does not change, however the PM permitted limit would be reduced from the now permitted 15.0 pounds per hour to 8.1 pounds per hour. The actual emissions for both the FL and the PM from this source are expected to decrease with the installation of the new control equipment.

2. Process rate or heat input rate increases are allowed:

There is not a federally enforceable process rate or heat input rate for this operation. No construction permit exists for this operation that would limit the process rate or heat input rate for this operation. Both the process rate or heat input rate for this operation are expected to increase as much as 20 percent. Therefore, a request for an increase in the process rate or heat input rate for this operation as a result of the installation of the new control equipment is permissible.

(Continued on Next Page)



3. A construction permit is not required for the modification:

Only the control equipment is being modified in order to increase the fluoride recovery, which will reduce both the FL and PM emissions. In this case, the need for a construction permit would not be required since the change does not meet the definition of a "modification" as defined in 17-212.200(46)(b), <sup>4487</sup> since there is no federally enforceable condition that would prohibit the requested rate increases.

MEMORANDUM

TO: FILE

THROUGH: BILL THOMAS, P.E.

THROUGH: HARRY KERNS, <sup>HC</sup>P.E.

FROM: GEORGE RICHARDSON *GR*

DATE: December 9, 1993

SUBJECT: Hillsborough County - AP  
Permit Amendment  
Transfer of Permits  
Coronet Industries, Inc.  
AO29-143447, AO29-143448, AO29-143449, AO29-161061,  
AO29-162678, AO29-162680, AO29-184541, AO29-187291,  
AO29-218846, AO29-218847, AO29-218851, AO29-218853,  
AO29-218854, AO29-224300, AO29-225263, AO29-230030,  
AO29-230032, AO29-230033, AO29-230035, AO29-230037,  
AO29-231515, AO29-235079

On October 13, 1993 the Department received 22 Applications For Transfer of Permit.

This Notice of Permit Amendment transfers the Permittee from Consolidated Minerals, Inc. to Coronet Industries, inc.

I recommend this amendment be issued.

FEED RATE : 9 TONS / HR / KILN

P<sub>2</sub>O<sub>5</sub> RATE : 3.48 %

T PH<sub>2</sub> KILN

x2

YIELDS → 6.96 TPH

P<sub>2</sub>O<sub>5</sub> IN RT  
MAX FEED  
RATE.

2/28/94  
JST.

APPLICATION TRACKING SYSTEM

DEC 10 1993

APPL NO:239608

APPL RECVD:10/13/93 TYPE CODE:AO SUBCODE:TD LAST UPDATE:10/20/93

DER OFFICE RECVD:TPA DER OFFICE TRANSFER TO:\_\_\_ APPLICATION COMPLETE:\_\_\_/\_\_\_/\_\_\_

DER PROCESSOR:KERNS

APPL STATUS:AC DATE:10/13/93 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUED/GENERAL)

RELIEF:\_\_\_ (SSAC/EXEMPTIONS/VARIANCE)

(Y/N) N MANUAL TRACKING DISTRICT:40 COUNTY:29
(Y/N) N OGC HEARING REQUESTED LAT/LONG:\_\_\_/\_\_\_/\_\_\_
(Y/N) N PUBLIC NOTICE REQD? BASIN-SEGMENT:\_\_\_
(Y/N) N GOV BODY LOCAL APPROVAL REQD? COE #:\_\_\_
(Y/N) Y LETTER OF INTENT REQD? (I/ISSUE D/DENY) ALT#:\_\_\_-218851

PROJECT SOURCE NAME:#6&7 DEFLOURINATING KILNS

STREET:CORONET ROAD CITY:PLANT CITY

STATE:FL ZIP:\_\_\_ PHONE:\_\_\_

APPLICATION NAME:CORONET INDUSTRIES, INC.

STREET:P.O. BOX 760 CITY:PLANT CITY

STATE:FL ZIP:33564 PHONE:813-752-1161

AGENT NAME:SWEAT, SAMUEL F.

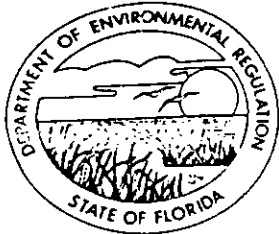
STREET:P.O. BOX 760 CITY:PLANT CITY

STATE:FL ZIP:33564 PHONE:813-752-1161

FEE #1 DATE PAID:\_\_\_/\_\_\_/\_\_\_ AMOUNT PAID:NOFEE RECEIPT NUMBER:\_\_\_

B DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE - - - \_\_\_/\_\_\_/\_\_\_
C DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - \_\_\_/\_\_\_/\_\_\_
D DATE DER REQ. COMMENTS FROM GOV. BODY FOR LOCAL APP. - - - \_\_\_/\_\_\_/\_\_\_
E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - \_\_\_/\_\_\_/\_\_\_
E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - \_\_\_/\_\_\_/\_\_\_
E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - \_\_\_/\_\_\_/\_\_\_
E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - \_\_\_/\_\_\_/\_\_\_
E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - \_\_\_/\_\_\_/\_\_\_
E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - \_\_\_/\_\_\_/\_\_\_
F DATE LAST 45 DAY LETTER WAS SENT - - - \_\_\_/\_\_\_/\_\_\_
G DATE FIELD REPORT WAS REQ--REC - - - \_\_\_/\_\_\_/\_\_\_
H DATE DNR REVIEW WAS COMPLETED - - - \_\_\_/\_\_\_/\_\_\_
I DATE APPLICATION WAS COMPLETE - - - 10/31/93
J DATE GOVERNING BODY PROVIDED COMMENTS OR OBJECTIONS - - - \_\_\_/\_\_\_/\_\_\_
K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - \_\_\_/\_\_\_/\_\_\_
L DATE PUBLIC NOTICE WAS SENT TO APPLICANT - - - \_\_\_/\_\_\_/\_\_\_
M DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED - - - \_\_\_/\_\_\_/\_\_\_
N WAIVER DATE BEGIN--END (DAY 90) - - - \_\_\_/\_\_\_/\_\_\_

COMMENTS:



# Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

April 13, 1993

Tampa, Florida 33619

Virginia B. Wetherell, Secretary

MR FRANK W CHEESMAN  
PRESIDENT  
CONSOLIDATED MINERALS INC  
PO BOX 790  
PLANT CITY FL 33564

Dear Permittee:

RE: Permit Expiration Letters for Non-delegated Facility in Hillsborough County

The Department recently delegated air permitting authority to the Environmental Protection Commission of Hillsborough County, except for a few non-delegated facilities, such as yours. This letter is to advise you that in the future, the Department will not continue the practice of notifying your facility of permits due to expire. This service was provided by the County in the past.

For information purposes only please note the following:

Pursuant to Rule 17-4.080(3), F.A.C., *Modification of Permit Conditions*, the permittee, may, for good cause, request that a construction permit be extended. Such a request shall be submitted to the Department at least 60 days prior to the expiration date of the permit.

Pursuant to Rule 17-4.090(1), F.A.C., *Renewals*, an application to renew an operating permit shall be submitted to the Department no later than 60 days prior to the expiration date of the permit.

Thank you for your cooperation in this matter. If you have any questions, please call Mr. J. Harry Kerns, P.E., District Air Engineer, of my staff at (813)744-6100 extension 419.

Sincerely,

W. C. Thomas, P.E.  
Air Program Administrator

WCT/HK/ss

cc: Read file  
EPCHC

permits.ltr

COMMISSION  
PHYLLIS BUSANSKY  
JOE CHILLURA  
PAM IORIO  
SYLVIA KIMBELL  
JAN KAMINIS PLATT  
JAMES D. SELVEY  
ED TURANCHIK

FAX (813) 272-5157



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960  
AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530  
WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5788  
ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

M E M O R A N D U M

**DATE:** November 17, 1992

**TO:** J. Harry Kerns, P.E. *JHK*

**FROM:** William Schroeder **THRU:** Gerald Kissel, P.E. *WK*

**SUBJECT:** Operating Permit - Consolidated Minerals, Inc.

Attached is Permit No. AO29-218851 for the operation of Defluorinating Kilns #6 and #7. Collectively, both kilns defluorinate animal feed, produced in the Feed Preparation area of this facility, at a rate of 18.0 tons per hour. The kilns are fired with natural gas at a rate of 94.46 MMbtu/hour, with No. 5 oil used as a backup fuel. Both kilns exhaust through a single stack. Emissions from each kiln are controlled by two separate sets of control equipment, consisting of a settling chamber, two fluoride recovery towers (in series), and a cross-flow packed Tellerett scrubber.

In order to remain exempt from particulate RACT, the permittee has requested an emissions limitation of 15 pounds per hour (17-2.650(2)(b)2., F.A.C.). Fluoride is regulated at 0.37 pounds per ton of P<sub>2</sub>O<sub>5</sub> input pursuant to 17-2.600(3)(a)8., F.A.C., with a maximum hourly emission rate of 2.57 pounds per hour based on a P<sub>2</sub>O<sub>5</sub> input of 6.96 tons per hour.

EPCHC recommends issuing the permit as drafted. A draft is attached for your review, along with a diskette.

WES:AO218851

PERMIT APPLICATION FEE/ASSIGNMENT SHEET

APPLICATION TYPE Renewal FILE/PROCESSING NO. A029-2/8851  
COMPANY Consolidated Minerals COUNTY Hills.  
SOURCE DESCRIPTION/COMMENTS Defluorinating Kilns 6 & 7  
DATE APPL. REC'D (Day 1): 9-4  
CHECK ATTACHED:  Y  N APPLICATION SUB TYPE CODE 2A  
Not Required ( )  
FEE SUBMITTED:  correct ( ) incorrect - Should Be \$ 1500.00  
Submitted \$ ~~2500~~ 5,000.00  
Needed/Refund \$ \_\_\_\_\_  
FEE CHECKED BY: A.K. DATE 9-10  
APPLICATION ASSIGNED TO: \_\_\_\_\_ DATE \_\_\_\_\_

PERMIT APPLICATION PROCESSING STATUS

	<u>Completed</u>	<u>Initials</u>
Date PATS Updated With Processor Name:	_____	_____
Date AC Logged By Section Secretary:	_____	_____
Permit Engineer Submit Finished Permit Package & Recommendations to District Air Engineer:	_____	_____
Permit Package to District Air Administrator:	_____	_____
Permit Package to Director of District Management:	_____	_____
Permit Package Mailed Out:	<u>NOV 24 1992</u>	<u>TMQ</u>

DATA FOLLOW UP

Issue Date Updated on PATS:	<u>NOV 24 1992</u>	<u>TMQ</u>
Updated on Wang:	_____	_____

APPLICATION TRACKING SYSTEM

NOV 24 1992

09/10/92

APPL NO:218851

APPL RECVD:09/04/92 TYPE CODE:AD SUBCODE:2A LAST UPDATE:09/10/92

DER OFFICE RECVD:TPA DER OFFICE TRANSFER TO:\_\_\_ APPLICATION COMPLETE:\_\_\_/\_\_\_/\_\_\_

DER PROCESSOR: *Ken*

APPL STATUS:AC DATE:09/04/92 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUED/GENERAL)

RELIEF:\_\_\_ (SSAC/EXEMPTIONS/VARIANCE)

(Y/N) N MANUAL TRACKING DISTRICT:40 COUNTY:29  
(Y/N) N OGC HEARING REQUESTED LAT/LONG:\_\_\_/\_\_\_/\_\_\_  
(Y/N) N PUBLIC NOTICE REQD? BASIN-SEGMENT:\_\_\_  
(Y/N) N GOV BODY LOCAL APPROVAL REQD? COE #:\_\_\_  
(Y/N) Y LETTER OF INTENT REQD? (I/ISSUE D/DENY) ALT#:\_\_\_

PROJECT SOURCE NAME:#6&7 DEFLOURINATING KILNS

STREET:CORONET ROAD CITY:PLANT CITY

STATE:FL ZIP:\_\_\_ PHONE:\_\_\_

APPLICATION NAME:CONSOLIDATED MINERALS, INC.

STREET:P.O. BOX 790 CITY:PLANT CITY

STATE:FL ZIP:33566 PHONE:813-752-1161

AGENT NAME:FRANK CHEESMAN

STREET:P.O. BOX 790 CITY:PLANT CITY

STATE:FL ZIP:33566 PHONE:813-752-1161

FEE #1 DATE PAID:09/09/92 AMOUNT PAID:01500 RECEIPT NUMBER:00200449

B DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE - - - - - / /  
C DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - - - / /  
D DATE DER REQ. COMMENTS FROM GOV. BODY FOR LOCAL APP. - - - - - / /  
E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - 10/02/92--10/05/92  
E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - / /  
E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - / /  
E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - / /  
E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - / /  
E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - / /  
F DATE LAST 45 DAY LETTER WAS SENT - - - - - / /  
G DATE FIELD REPORT WAS REQ--REC - - - - - / /  
H DATE DNR REVIEW WAS COMPLETED - - - - - / /  
I DATE APPLICATION WAS COMPLETE - - - - - 10/08/92  
J DATE GOVERNING BODY PROVIDED COMMENTS OR OBJECTIONS - - - - - / /  
K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - - - / /  
L DATE PUBLIC NOTICE WAS SENT TO APPLICANT - - - - - / /  
M DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED - - - - - / /  
N WAIVER DATE BEGIN--END (DAY 90) - - - - - / /

COMMENTS:

**CMI**  
**CONSOLIDATED MINERALS, INC.**  
FEED SUPPLEMENT DIVISION

October 6, 1992

D. E. R.  
OCT 02 1992  
SOUTHWEST DISTRICT  
TAMPA

Mr. William E. Schroeder  
Air Permit Engineer  
Environmental Protection Commission of  
Hillsborough County  
1900 Ninth Avenue  
Tampa, FL 33605

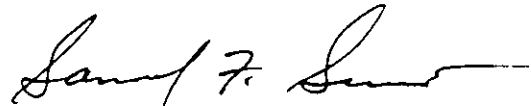
**Re: Hillsborough County - AP, DER File No. 218851**

Dear Mr. Schroeder:

The feed rate to the two kilns is approximately 9 tons/hr/kiln of prepared feed. The P content of this feed ranges from 16.7 to 17.0% (ie 38.32 to 38.96% P2O5). Thus the feed rate to each kiln is 3.45 to 3.51 tons P2O5 (avg. 3.48). This gives a utilization rate of approximately 6.96 TPH P2O5 input. This would be the maximum anticipated feed rate.

If I can be of any further assistance, please call me at (813) 752-1161.

Sincerely,



Samuel F. Sweat  
Environmental Affairs Manager

SFS:cr

cc: F. W. Cheesman  
J. Harry Kerns, P.E., FDER, SW-District  
J. Gries, P.E., FCS



*Aie - Happy Kears*

COMMISSION  
PHYLLIS BUSANSKY  
JOE CHILLURA  
PAM IORIO  
SYLVIA KIMBELL  
JAN KAMINIS PLATT  
JAMES D. SELVEY  
ED TURANCHIK



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
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WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5788  
ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

FAX (813) 272-5157

October 2, 1992

CERTIFIED MAIL #P 648 747 331

Mr. F. W. Cheesman  
President  
Consolidated Minerals, Inc.  
Feed Supplement Division  
P. O. Box 790  
Plant City, FL 34289-0790

Re: Hillsborough County - AP  
DER File No. 218851

Dear Mr. Cheesman:

Please be advised that the Environmental Protection Commission of Hillsborough County (EPCHC) and the Florida Department of Environmental Regulation (FDER) have completed their initial review of the above application and found it to be incomplete. In order to complete the review process two copies of the following additional information is being requested pursuant to Chapter 17-4.070, F.A.C.:

1. The application did not specify kiln input in tons per hour P205. Please provide maximum anticipated feed rate.

"NOTICE! Pursuant to the provisions of Section 120.600 F.S., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department will issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered question will be submitted. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available. Or for operating permits, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of

Mr. F. W. Cheesman  
October 2, 1992  
Page 2

information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

In your response, please submit the original to the undersigned and a copy to J. Harry Kerns of the Southwest District of the FDER.

If you have any questions, please feel free to contact me at (813) 272-5530.

Sincerely,



William E. Schroeder  
Air Permit Engineer

bm

cc: J. Harry Kerns, P.E., FDER SW-District  
Jack L. Gries, P.E., Fla. Crushed Stone

MEMORANDUM

TO: File

THRU: W. C. Thomas *WCT 11/10/87*

FROM: George W. Richardson *GWR*

DATE: November 5, 1987

SUBJECT: Hillsborough County - AP  
Consolidated Minerals, Inc.  
Air Operation Permits: AO29-139054, 139056, 139057  
139058, 139060 & 139061

The permits are for the the Dicalcium Phosphate Plant, the Potassium Fluorborate Plant, the Ground Phosphate Rock Handling, the Feed Preparation Plant Dryer, the Feed Preparation Product Handling and Defluorinating Kilns 6 and 7 located on Coronet Road, Hillsborough County.

All the sources are in compliance. The EPCHC and I recommend the permits be issued as conditioned.

NOTICE OF PERMIT

Mr. Frank W. Cheesman, President  
Feed Supplement Division  
Consolidated Minerals, Inc.  
P.O. Box 790  
Plant City, FL 34289

Dear Mr. Cheesman:

Re: Hillsborough County - AP  
Defluorinating Kilns 6 and 7

139056

Enclosed is Permit Number A029- to operate defluorinating kilns 6 and 7, issued pursuant to Section 403.087, Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.01, F.A.C., and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399, within fourteen (14) days of receipt of this notice. Failure to file a petition within fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the Department. An administrative determination is filed in accordance with this paragraph if unless request for extension of time to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the Department.

D. E. R.

NOV 05 1987

**SOUTH WEST DISTRICT  
TAMPA**

Mr. Frank W. Cheesman  
Plant City, FL 34289

Page Two

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2500 Blair Stone Road, Tallahassee, Florida 32301; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

George W. Richardson  
Air Permitting Engineer

BWR/mjh

Attachment: as stated

cc: ~~MRPPL~~

RECEIVED BY SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
120.52(1), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is  
hereby acknowledged.

\_\_\_\_\_  
Clerk Date

PERMITTEE:

~~Mr. Frank W. Cheesman, President  
Feed Supplement Division  
Consolidated Minerals, Inc.  
P.O. Box 790  
Plant City, FL 34289~~

PERMIT/CERTIFICATION

Permit No.:  
County: Hillsborough  
Expiration Date: 1-5-92  
Project: Defluorinating Kilns  
6 and 7

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

For the operation of two kilns for defluorinating prepared animal feed. Kilns 6 and 7 has a maximum total production rate of 16TPH. Kilns are fueled with natural gas at a maximum rate of 95MMBTU/hr. No. 5 fuel oil is used as auxiliary fuel. Emissions from the rotary kilns are controlled by a 90,000 ACFM Teledeltac Bagged Incess-Fit Filter Equipment. Filter inlet exhaust through a bag house.

Location: Carpent Road, Plant City, FL 34289

UTR: 17-393.88 3095.3M REG NO: 0075 Point ID: 05

Replaces Permit No.: 4029-61494

PERMITTEE:  
Consolidated Minerals  
Inc.

Permit/Certification No.: A029-  
Project: Defluorinating Kilns  
6 and 7

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.287, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department records that may be required for title aspects of the local project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the trustees of the Internal Improvement Trust Fund may exercise state title as to title.

5. This permit does not relieve the permittee from liability for harm to man, to human health or welfare, animal, plant or aquatic life or property, and casualties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

PERMITTEE: Permit/Certification No.: A029-  
Consolidated Minerals Project: Defluorinating Kilns  
Inc. 6 and 7

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of:

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the conduct being investigated.

8. If, for a reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for all and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.



PERMITTEE: Permit/Certification No.: A029-  
Consolidated Minerals Project: Defluorinating Kilns  
Inc. 6 and 7

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.11, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- Certification of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State water Quality Standards (Section 401, PL 92-500)  
Compliance with new source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. When required, the permittee shall furnish all records and data required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:  
Consolidated Minerals  
Inc.

Permit/Certification No.: A029-  
Project: Defluorinating Kilns  
6 and 7

14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts shall be submitted to the department as corrected promptly.

#### SPECIFIC CONDITIONS:

1. As requested by the permittee, in order to exempt the source from Particulate PACT, maximum allowable particulate emissions shall not exceed 15 pounds per hour. (Subsection 17-8.150(2)(b) & (c), F.A.C.

2. Pursuant to Section 17-8.900(2)(a)(5), F.A.C., fluoride emissions shall not exceed 0.1% (weight of PACT input or 1/10 lbs) or based on a weight PACT input base of 100 lbs.

3. Visible emissions shall not be equal to or greater than 2.0 units, in accordance with Subsection 17-8.510 E, F.A.C.

PERMITTEE: Consolidated Minerals Inc.  
Permit/Certificate No.: Project: Defluorinating Kilns  
6 and 7

4. Test the emissions for the following pollutant(s) at intervals of six (6) months from April 24, 1987 and submit 2 copies of test data to the Air Section of the Environmental Protection Commission of Hillsborough County Office within forty five days of such testing. If the back-up fuel oil is used for more than five consecutive days in the six month period, then the semi-annual compliance test shall be conducted using the back-up fuel. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C.

(X) Particulates  
(X) Fluorides  
(X) Opacity  
( ) Sulfur Oxides\*  
( ) Nitrogen Oxides  
( ) Hydrocarbons  
( ) Total Reduced Sulfur

\* Fuel analysis may be submitted for required sulfur dioxide emission test.

5. Compliance with the emission limitations of Specific Conditions Nos. 1, 2, and 3 shall be determined using EPA Methods 1, 2, 3, 4, 5 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

6. Testing of emissions must be accomplished at actual operating rates as shown on the permit. The permit will show the actual or specified operating rates. Failure to submit the proper rates of operation at conditions which do not reflect actual operating conditions may invalidate the data (Section 42.161(1)(c), Florida Statutes).

7. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as set forth in Section 17-2.700, F.A.C.

1. Annual amount of materials and/or fuels utilized.
2. Annual emissions, with calculation basis.
3. Any changes in the information contained in the permit application.

Duplicate copies of all reports shall be submitted to the Environmental Protection Commission of Hillsborough County.

PERMITTEE:  
Consolidated Minerals  
Inc.

Permit/Certificate No.: A029-  
Project: Defluorinating Kilns  
6 and 7

8. The Environmental Protection Commission of Hillsborough County shall be notified 15 days in advance of any compliance test to be conducted on this source.

9. Sulfur content of the #5 fuel oil shall not exceed 2.08 % by weight.

10. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Section 17-2.610(3), F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition of wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include but are not limited to using industrial vacuum cleaners to remove dust from ventilation ducts before any repair - which will potentially generate dust emissions - is conducted. Reasonable precautions also include removing particulate matter from paved roadways and applying water or dust suppressants on unpaved grounds on an as needed basis.

11. Pursuant to Section 17-4.09, F.A.C., an application for renewal of permit to operate this source shall be submitted to the Environmental Protection Commission of Hillsborough County at least 30 days prior to the expiration date.

12. Pursuant to Chapter 1-1.201(B) of the Rules of the Environmental Protection Commission of Hillsborough County, the permittee shall not allow the discharge of air pollutants which contribute to an objectionable odor.

# Note To File:

AO 29 - 139056 : Nos. 6 & 7 Defluorinating Kilns

AO 29 - 139061 : Feed prep. plant for  
Defluorinating Kilns - Dryer

Rule : 17 - 2.600 (3) (a) 8.

Provider allowance of 0.37 lb. F per  
ton P<sub>2</sub>O<sub>5</sub> input, including kiln and  
aux. equip.

The plant consist of a feed prep. unit  
and defluorinating kilns. The feed  
prep. dryer is allocated 0.05 lb. F/ton P<sub>2</sub>O<sub>5</sub>  
and kilns are allocated 0.32 lb. F/ton P<sub>2</sub>O<sub>5</sub>.

Feed Prep. Dryer	0.05
Kilns	0.32
Total	<u>0.37</u>

Approved  
11/13/87  
WLS

11/13/87  
WLS

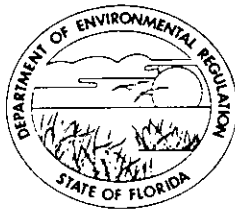
File

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

**SOUTHWEST DISTRICT**

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610

813-985-7402  
SunCom - 570-8000



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

November 26, 1985

Mr. George Townsend  
Environmental Supervisor  
AMAX Chemical Corporation  
P.O. Box 790  
Plant City, Florida 34289

RE: Hillsborough County - AP  
AMAX Chemical Corporation  
A029-61494; Defluorination Phosphate Rock Kilns  
Nos. 6 & 7  
(1) Meeting of 11/21/85 at S.W. DER Office between  
AMAX, DER, and HCEPC  
(2) Letter Dated 11/21/85; To - J. Campbell,  
HCEPC, From - G. Townsend, AMAX

Dear Mr. Townsend:

This letter is written to document the results of a meeting held at the District Office on Thursday morning, November 21, 1985 between AMAX Chemical Corp., the Department of Environmental Regulation, and Hillsborough County Environmental Protection Commission.

The purpose of this meeting was to discuss the following:

1. A request by AMAX to conduct a seven-day test burn on the No. 7 kiln using a blend of petroleum coke and natural gas.
2. How the test should be planned to measure the environmental impact of using the above fuel in place of either natural gas or No. 5 fuel oil.
3. How AMAX should go about obtaining a change in their permitted status based on the results of the test burn.

The Department approves a seven day test burn by AMAX which may commence after December 1, 1985 and prior to February 1, 1986. If an extension in time is required beyond seven days for the test burn, it may be granted upon request.

Mr. George Townsend  
Plant City, Florida

November 6, 1985  
Page Two

In any event, HCEPC shall be notified upon commencement of the test burn and immediately after its completion. During the test burn, all reasonable precautions and best operating practices shall be taken to minimize emissions.

Since No. 6 and No. 7 kilns use a common exhaust gas stack and No. 7 kiln will be used for the test burn, No. 6 kiln will be fired independently on natural gas before or after the test burn and con-currently with natural gas during the test burn to adequately measure by difference the effect of the test fuel mixture.

The pollutants to be measured in the stack by EPA Methods 1,2,4,5,6,7 and 13 are:

- Particulates
- Sulfur Oxides
- Nitrogen Oxides
- Fluorides

Prior to Petroleum Coke being included in any permit, AMAX will be required to establish a baseline for actual emissions of each of the above pollutants. Because historical data to establish the baselines is non-existent, AMAX will need to run a series of compliance tests burning one of the permitted fuels to determine the baselines. A pretest meeting to establish the test protocol is suggested.

If the test run results using the "Best Mix" of petroleum coke yields higher actual emission levels of any measured pollutant than the baseline, fuel oil burn, and AMAX chooses to be permitted for burning the "Best Mix", then a construction modification permit application will be required to A029-61494. This application will be processed by CAPS at the state level.

If the test run results in equal or lower actual emission levels for all pollutants, then an amendment only to permit A029-61494 will be required and this will be handled by the District Office of DER in conjunction with HCEPC.

The stack tests should all be conducted at approximately the rates as stated in the current permit (A029-61494).

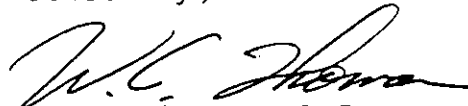
Allowable emission Specific Conditions in the current permit are relaxed for the duration of the test run.

Mr George Townsend  
Plant City, Florida

September 26, 1985  
Page Three

If there are any questions or comments on the above, please notify  
Bill Thomas at (813) 985-7402.

Sincerely,



W. C. Thomas, P.E.  
District Air Engineer

WJP/js

cc: Bob Harrison, AMAX  
Joe Floyd, AMAX  
Bruce Galloway, AMAX  
Jerry Campbell, HCEPC  
Jack Prendergast, DER



PANY NAME

AMAX, phosphate, inc.

RRB  
Processor

File Number A029-61494

PERMIT APPLICATION STATUS SHEET

Type of permit applied for \_\_\_\_\_

County \_\_\_\_\_

Date Recieved 10-18-82

P.E. seal & signature   
Check   
No check   
Letter of corp. standing

CLOCK  
DAYS

DATE TASK COMPLETED

INITIALS

3	Logging by Sec'y	<u>10-18-82</u>	<u>SEM</u>
5	Review by Sec. head and transfer to permitting Engineer	<u>Held by DEEPC Inactive</u>	<u>ME</u>
28	Completeness Review	_____	_____
	request additional info *	_____	_____
	information received *	_____	_____
	Public Notice Published * (for Air Construction only)	_____	_____
<u>35</u>	Letter of Intent sent to * Supervisor	_____	_____
60	Letter of Intent submitted * to District Manager	_____	_____
75	Intent to issue/deny mailed *	_____	_____
80	Permitting Eng'r submit finished permit package & recommendations to supervisor	_____	_____
83	Permit Package to Dist. Engr.	_____	_____
85	Permit Package to Dist. Manager	<u>1-14-82</u>	<u>EM</u>
90	Final Issuance/denial	_____	_____

\*If needed, If not indicate by N/A

TO: The Files  
THROUGH: Bill Thomas *BTJ 11/14/83*  
FROM: Bob Garrett *RG*  
DATE: December 2, 1982  
SUBJECT: AMAX, Application For Permit Renewal For Nos. 6 & 7 Defluorinating Kilns Scrubber, Hillsborough County, AP

*Back-up fuel* { AMAX Phosphates, Inc. has applied for a renewal to their Permit No. AO29-6316 to operate their Nos. 6 & 7 defluorinating kilns with a packed bed scrubber to capture fluoride and particulate emissions. They are presently burning 2% sulfur oil at a rate of 15 barrels an hour which translates to 220 lbs. of uncontrolled SO<sub>2</sub> per hour. There is no regulation for this emission at present.

The most recent stack tests, May 25, 1982, showed emissions of 6.70 PPH of particulates and 0.58 PPH of fluorides at a process weight rate of 18 TPH roughly 1/3 of which is P<sub>2</sub>O<sub>5</sub>. Allowables are ~~18.56~~ <sup>15</sup> lbs/hr. TSP and 2.12 lbs/hr. of Fluorides.

HCEPC and I recommend issuing Permit No. AO29-61494 for 5 years testing for fluorides and particulates every 6 months. Of interest, ~~the~~ fire burned No. 6 fan and the fiberglass stacks; Hills reports repaired complete to date.

RRG/scm

*Kilns are routinely fired with natural gas. No. 5 oil is back-up fuel.*

*No. 6 & 7 kiln emissions discharge thru a common scrubber and stack. Prod rates, emissions and etc., shown above are for combined No. 6 & 7 kiln.*

Air

*Carrett*

*WJ*

# AMAX Phosphate, Inc.

A SUBSIDIARY OF AMAX INC.

402 SOUTH KENTUCKY AVENUE • SUITE 600 • LAKELAND, FLORIDA 33801 • (813) 687-2561

November 16, 1982

**D.E.R.**  
**NOV 17 1982**  
**SOUTHWEST DISTRICT**  
**TAMPA**

Dan Williams, P.E.  
Air Permitting Section  
Southwest District  
Department of Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610

*gib*  
*Nov 17 1982*

Dear Mr. Williams:

In accordance with Section 17.414 of the Florida Administrative Code, this letter is to notify you that AMAX Plant City's 6 and 7 defluorination kilns (FDER Permit #AO29-6316) will be shut down for the remainder of 1982 and possibly early 1983. The current feed phosphate market conditions have necessitated this shutdown, however, these conditions could change and require an earlier restart of the 6 and 7 defluorination kilns. Should this happen, your department and the Hillsborough County Environmental Protection Commission will be promptly notified of the restart.

If you have any questions concerning this production curtailment, please let me know.

Sincerely,

*Fred G. Mullins*

Fred G. Mullins  
Manager of Regulatory Compliance

FGM/rit

- cc: J. Egan ( HCEPC)
- J. J. Lewis
- G. Townsend
- G. Uebelhoer

**AMAX** Phosphate, Inc.

A SUBSIDIARY OF AMAX INC.

402 SOUTH KENTUCKY AVENUE • SUITE 600 • LAKELAND, FLORIDA 33801 • (813) 687-2561

D. E. R.

OCT 18 1982

SOUTHWEST DISTRICT  
October 14, 1982

Dan Williams, P.E.  
Air Permitting Section  
Southwest District  
Department of Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610

Dear Mr. Williams:

Please find attached (4) four copies of an operating permit renewal application for the AMAX Plant City No. 6 and No. 7 Defluorinating Kilns (FDER Permit Number A029-6316).

Also attached is a check for \$500.00 to cover the application fee. A copy of the application and the appropriate application fee has been transmitted to the Hillsborough County Environmental Protection Commission.

If you have any questions concerning the contents of this application, please let me know.

Sincerely,



Fred G. Mullins  
Manager of Regulatory Compliance

FGM/rit

Attachments

cc: (All With Attachments)  
Mr. A. R. Lenkei  
Mr. J. J. Lewis  
Mr. G. Townsend

File: Hills G- AP, Phos

# AMAX Phosphate, Inc.

A SUBSIDIARY OF AMAX INC.

402 SOUTH KENTUCKY AVENUE • SUITE 600 • LAKELAND, FLORIDA 33801 • (813) 687-2561

March 8, 1982

Mr. Hoosang Boostani  
Hillsborough County Environmental  
Protection Commission  
1900 Ninth Avenue  
Tampa, Florida 33605

MAR 10 1982  
SOUTHWEST DISTRICT  
TAMPA

Dear Mr. Boostani:

Pursuant to our telephone conversation of March 1, 1982, and Sections 17-4.13 of the Florida Administrative Code, this letter is to report a fan/stack fire at the AMAX Plant City 6 and 7 Defluorination Kilns (FDER Permit Number A029-6316). The 6 and 7 kilns were shutdown due to production curtailments on January 30, 1982; and were undergoing preventative maintenance during this shutdown period. On the morning of Saturday, February 27th, two maintenance personnel were removing a section of air duct between the #6 kiln fan and the stack. These two men were using a cutting torch to remove the bolts which hold the duct in place. At approximately 10:00 a.m., hot slag from the bolt cutting ignited the rubber lining in the fan housing. The flames then spread from the fan housing through the transition duct and ignited the rubber lining in the stack. The fire lasted approximately 35 minutes and destroyed the rubber lining in the #6 kiln fan and the stack, and destroyed the fiberglass transition duct. The Springhead Volunteer Fire Department and the Midway Volunteer Fire Department were summoned to assist the plant fire brigade in extinguishing the fire.

Since the affected production facility was shutdown during the incident, there were no excess process emissions.

The #6 kiln fan and stack will receive a new rubber lining and the damaged fiberglass transition duct will be replaced prior to restarting the #6 and #7 kilns in May 1982.

If you have any questions concerning this fire or if you need additional information, please let me know.

Sincerely,



Fred G. Mullins  
Regulatory Compliance Manager

FGM/rit

cc: Mr. Dan Williams (FDER, Tampa)  
Mr. J. J. Lewis  
Mr. George Townsend  
Ms. Rhea Law

*Kiln Shot Down Problem*

**AMAX Phosphate, Inc.**

A SUBSIDIARY OF AMAX INC.

402 SOUTH KENTUCKY AVENUE • SUITE 600 • LAKELAND, FLORIDA 33801 • (813) 687-2561

May 11, 1982

Mr. Ivan Choronenko  
Environmental Engineer  
Hillsborough County  
Environmental Protection Commission  
1900 Ninth Avenue  
Tampa, Florida 33605

Dear Mr. Choronenko:

Recently AMAX Phosphate has approached your agency and the Department of Environmental Regulation with a request to divide the AMAX Plant City Fluid Bed Reactors 1 and 2 and Paragon Kiln (FDER Permit Number A029-6778) into three separate operating permits. During our discussions on the permit change, a question was raised concerning a problem of point source compliance testing for the individual units. The problem is all three production units use a common stack.

In exploring this point source problem, three possible sampling alternatives were considered. The first alternative would involve the start up and shut down of the process units so that individual compliance tests may be made on each unit. This alternative is economically prohibitive to AMAX due to costs involved with the energy losses, production losses, and maintenance required to start up and shut down each one of these units. Also the time required for the start up and shut down of the three units could span several months and accurate scheduling of the compliance test would be difficult if not impossible. Attached as Exhibit A is a letter from the Plant City Facility Manager describing in detail the problems associated with the start up and shut down of the three production units.

The second sampling alternative would be to perform the individual unit compliance testing at the ductwork leading from the exit of the scrubbing system to the fan entrance and prior to discharge to the common stack. These sampling locations do not meet the requirements of Section 17-2.700(4) of the Florida Administrative Code, and in fact, do not fall within the limits of Section 17-2.700(4)(c)i or EPA Method 1. It is reasonable

Letter to Mr. Ivan Choronenko  
May 11, 1982  
Page Two

to assume that any point source sampling at these locations would be done at the sacrifice of an acceptable level of accuracy. Attached as Exhibit B is a letter from the AMAX Stack Team Coordinator which addresses the difficulties associated with this fan-inlet compliance sampling.

The third and most acceptable of the three alternatives is a collective point source sample at the existing sampling point on the common emissions stack for the three units. This method would provide an acceptable level of accuracy for sampling and the individual emissions rate would be allocated proportionately to the process input weight of each unit.

An example with two units in operation follows:

Total Combined Emissions = 24 Lbs./Hr.

Unit A Process Input Rate = 6 TPH

Unit B Process Input Rate = 9 TPH

Total Process Input Rate = 15 TPH

$\frac{\text{Unit A Process Input Rate}}{\text{Total Process Input Rate}} = \frac{6 \text{ TPH}}{15 \text{ TPH}} = .40 \text{ or } 40\%$

$.40 \times 24 \text{ Lbs./Hr. Total Combined Emission Rate} =$   
 $9.6 \text{ Lbs./Hr. Allocated Emissions to Unit A}$

The allowable per unit would be a function of the process weight equation based on the unit's actual process input rate.

Example:

Unit A Process Input Rate = 6 TPH

$(6 \text{ TPH})^{0.62} \times 3.59 = 10.90 \text{ Lbs./Hr. Allowable Emissions}$

Letter to Mr. Ivan Choronenko  
May 11, 1982  
Page Three

Using the 9.6 Lbs./Hr. Allocated Emissions for Unit A from the previous example, the stack test would show compliance for Unit A.

If, after reviewing this material, you find that you have questions or need additional information, please let me know.

Sincerely,

A handwritten signature in dark ink, appearing to read "Fred G. Mullins", with a horizontal line extending to the right from the end of the name.

Fred G. Mullins  
Regulatory Compliance Manager

FGM/rit

Attachments

cc: Mr. Dan Williams  
Mr. Anthony Jones  
Ms. Rhea Law

bcc: Mr. F. W. Cheesman  
Mr. J. J. Lewis  
Mr. G. Townsend  
Mr. G. P. Uebelhoer



EXHIBIT A

MEMORANDUM

**AMAX** PHOSPHATE, INC.

A SUBSIDIARY OF AMAX INC.

TO Mr. F. G. Mullins

May 7, 1982

FROM J. J. Lewis

SUBJECT FBR/PARAGON STACK

This is in response to a request to run compliance tests on individual trains i.e.: fluid bed reactors 1 & 2 and kiln no. 2.

As you know, this process is very energy intensive. With the cost of natural gas today, to heat each unit to 2500-2700° F for short durations for test purposes is cost prohibitive.

It takes 3 days to bring a train on line for production. The reactors are the worse case situation since they are a fluid bed operation. Once they are heated up and reactor beds are charged with finished product (15 to 20 tons at 2500 degrees) which is fluidized, it is impractical to shut down. A shutdown would require slow cooling (48 to 72 hours) to remove hot product for restart. The total delay then becomes 6 to 7 days between shutdowns. Also, there is the loss of refractory life in the reactors which is damaged by thermal shock going from a cold to hot refractory and then cooling down. Refractory life is directly proportional to the number of shutdowns experienced. The cost to replace a hot face liner is approximately \$100,000/unit.

The paragon kiln can be curtailed much easier but the loss is in refractory, production and energy of reheat would be very costly. The time required to shut a kiln down is approximately 3 days and can be reheated in 36 hours or a total of 4½ days down.

Considering that compliance tests are to be run twice a year on each unit, the production downtime for all 3 units would be a minimum of 70 days per year. This would amount to a production loss of approximately 8,400 tons, not including maintenance downtime for refractory replacement.

In my opinion, it is not feasible to try to isolate each train for compliance tests.

If more detailed information is required, please advise.

  
J. J. Lewis

EXHIBIT B

**AMAX** Phosphate, Inc.

A SUBSIDIARY OF AMAX INC.

402 SOUTH KENTUCKY AVENUE • SUITE 600 • LAKELAND, FLORIDA 33801 • (813) 687-2561

May 4, 1982

Mr. Anthony M. Jones  
Hillsborough County  
Environmental Protection Agency  
1900 9th Ave.  
Tampa, Fl. 33605

Dear Mr. Jones:

Individual scrubber system outlet sampling at the systems servicing Fluid Bed Reactors 1 & 2 and Paragon Kiln 2 is possible, but would not be acceptable. Sampling of these locations would require test facilities that would have to meet OSHA requirements contained in CFR 29, Section 1910, Subparts D and E. This fact in itself would not be insurmountable, but the major concern would be the overall accuracy of the test results and accomplishing the 90° change between traverses as described in source sampling methods referenced by FDER Ch. 17-2.23, with all available sampling locations on horizontal ducts. Also, any port location would be adjacent to a bend or constriction and in close proximity of the stack fan and the turbulence encountered would have an adverse affect on the accuracy of test results (see attached drawings).

Accuracy for point source compliance is a legal requirement, but accuracy for permitting and/or engineering purposes is of equal importance, which is also the basis of our ability to comply with permitted emission allowables.

In my opinion, to continue to generate test results which are indicative of standards of accuracy acceptable to the regulatory agencies and AMAX Phosphate, Inc., testing of the three units should be conducted at the common source.

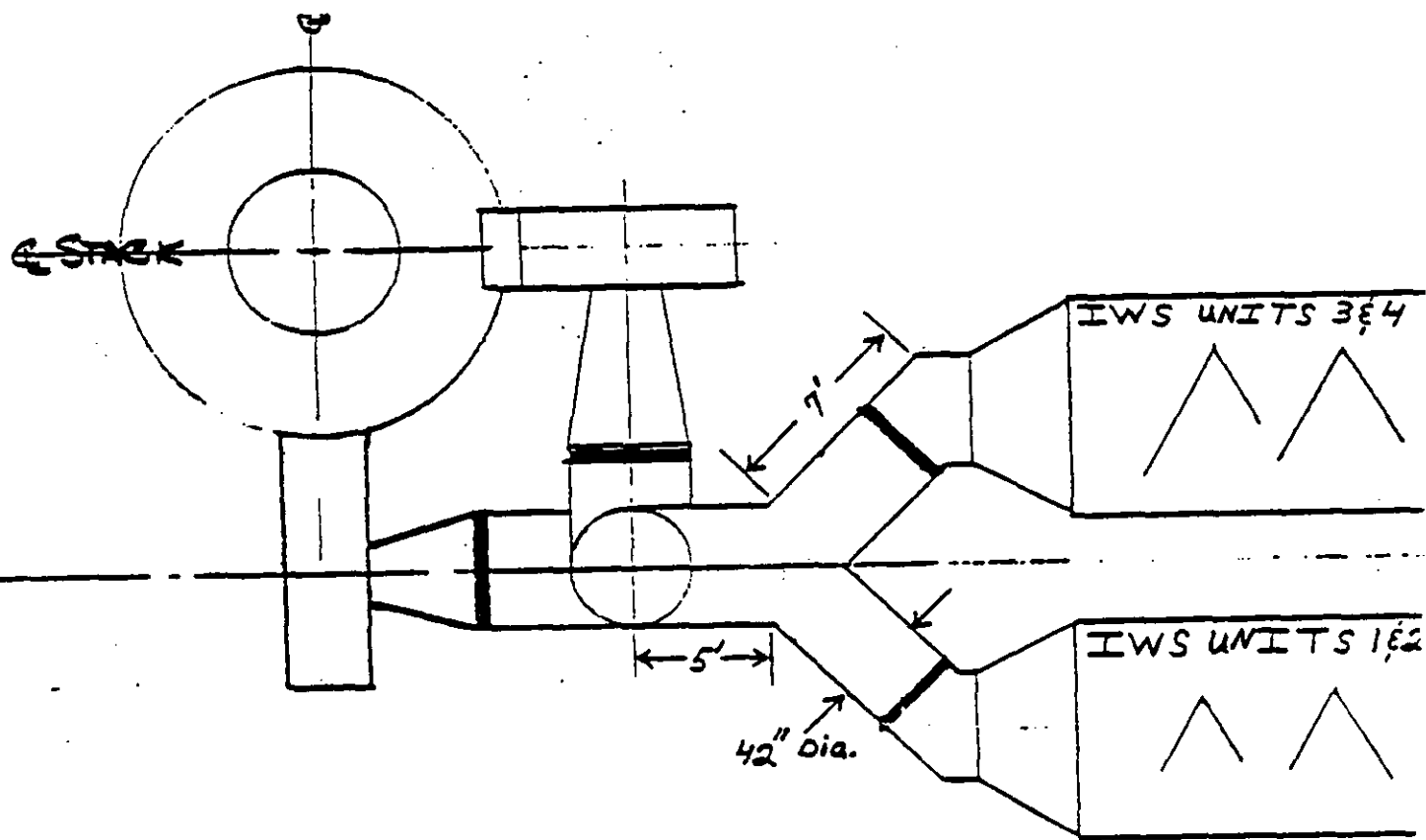
Sincerely,

*George Townsend*

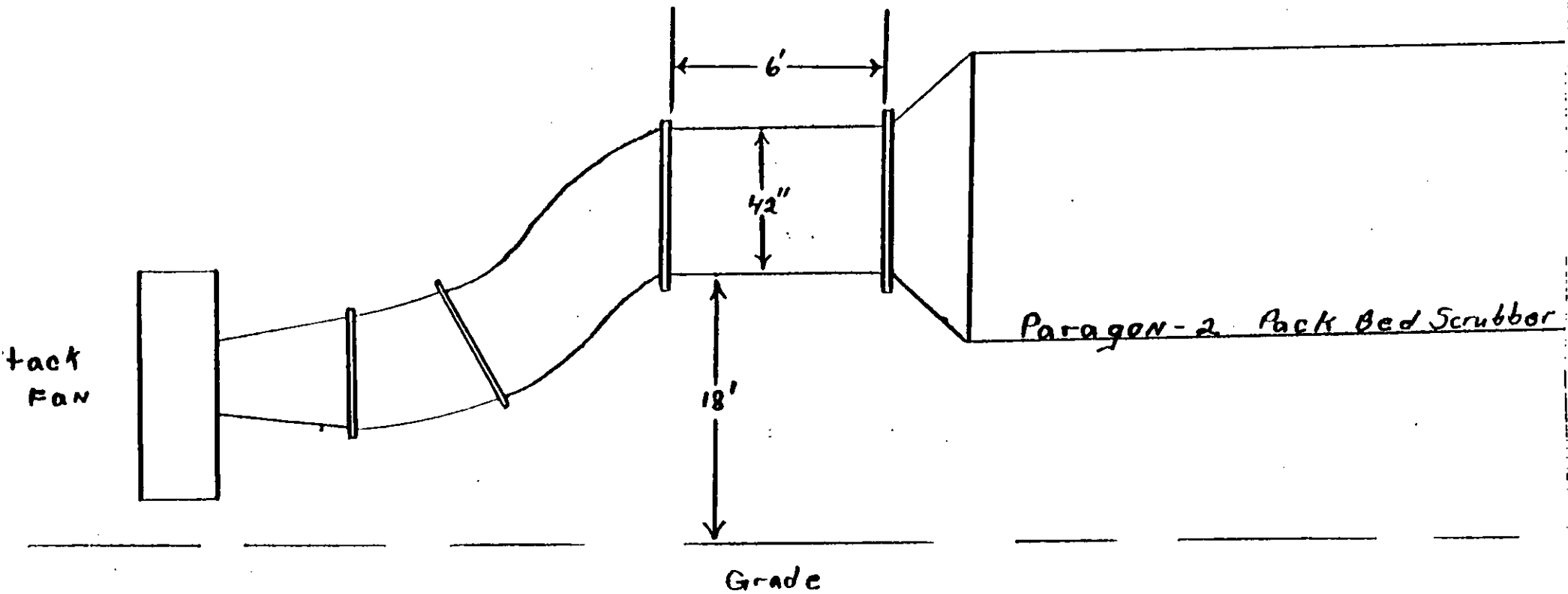
George Townsend  
Stack Team Coordinator

GT/rit

bcc: ~~Mr. Fred Mullins~~  
Ms. Rhea Law  
Mr. Dan Williams, DER



Scrubber Outlet Configuration of Ionizing Wet  
 Scrubber Units Sericing Fluid Bed Reactors 1 & 2.



Scrubber Outlet Configuration of Packed  
Bed Scrubber Servicing Paragon Kiln 2.

*offsets*

*File with applic.*

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

Routing To District Offices And/Or (to Other Than The Addressee)		
To: _____	Locn.: _____	
To: _____	Locn.: _____	
To: _____	Locn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Clair Fancy  
 THROUGH: Dan Williams *rwj*  
 FROM: Bob Garrett *rwj*  
 DATE: June 21, 1982  
 SUBJECT: AMAX applications for increase in production  
 and emissions for 3 of their AFI Reactors

On June 15, 1982 a conference was held at the District office with representatives from AMAX, HCEPC, ourselves, and Dr. John Koogler, consultant for AMAX, to discuss the technicalities of expanding productivity and emissions to Paragon Kiln No.2, Fluid Bed Reactors No. 1, and No.2 at the Plant City complex.

The description of these applications is described in detail by letter to Dan Williams, DER, from Fred Mullins, AMAX. The request is to split out each reactor on separate permits from an existing permit, AO 27-6778, covering these 3 reactors to a single stack. The total increase in emissions of 90 tons/year TSP may be offset by their truck loadout controls estimated as 121 TPY improvement over the previously unconfined emissions.

Several questions were discussed:

1. What is the method of quantifying the uncontrolled emissions?

A letter to Mullins, March 26, 1982, from Koogler references an EPA document as a detailed forerunner of AP 42's summary for fugitive particulate matter control. This is used as the numerical basis.

2. How are present emissions quantified?

Stack tests and a visible determination of capture efficiency. The Truck L/O operation was witnessed by Koogler, qualified plant V.E. readers, and the Local Program as 0% opacity. There was no uncaptured dust visible as a result of a L/O operation.

3. Are there other sources of offsets?

Yes, a pile of scrap AFI has been reduced to 50% its original size with resulting decreases in fugitive emissions. The crane-way turbine bag collector could be used and is within the time frame limitations. Also, there are other projected improvements.

4. When did all these recent improvements occur?

Since March 1981, except for paving access roads which was in December of 1980.

The Southwest District recognizes the vast efforts resulting in the change of ownership from Borden to AMAX to deal with inherited uncontrolled emissions and favors this conservative use of this offset. We have reservations in the following areas, however:

1. Are AFI unsintered (some sintered) particulates similar enough to stack emissions from their reactors to justify tradeoff?
2. AMAX has installed a quadrant of ambient air monitors around the Plant City plant. We would like to see comparative "before" and "after" data.
3. As pointed out in Bill Thomas' memo of April 21, 1982 to Dan Williams, paragraph 4, perhaps the small increment of emissions from newly affected controls should be considered for RACT modeling since the "unconfined emissions" evidently were not previously incorporated.

RRG/jk



SHOLTES & KOOGLER, ENVIRONMENTAL CONSULTANTS  
1213 N.W. 8th Street Gainesville, Florida 32601 (904) 377-5822

RECEIVED  
AMAX Phosphate

March 19, 1982

MAR 22 1982

Mr. Fred Mullins  
AMAX PHOSPHATES INC.  
Suite 600, 402 S. Kentucky Avenue  
Lakeland, FL 33801

Subject: Impact of AMAX Plant City Facility on the Hillsborough  
County Particulate Matter Non-Attainment Area

Dear Fred:

In accordance with your recent request, I have conducted the necessary modeling to determine the impact of the AMAX Plant City facility on the Hillsborough County Particulate Matter Non-Attainment Area incorporating both the increase in particulate matter emissions from the truck loading baghouse (addressed in my letter to you dated February 26, 1982) and the decrease in the height of the stack serving the No. 6 and No. 7 kiln. The No. 6 and No. 7 kiln stack, a single stack serving both kilns, was modeled at a proposed reduced height of 150 feet. The present height of the stack is 200 feet.

As with the previous modeling conducted on the Plant City facility, I used the unmodified CRSTER air quality model to evaluate the impact of particulate matter emissions. Prior to running this model the meteorological data used were preprocess with a program developed by the Florida Department of Environmental Regulation. This program was design to select only days containing a vector which would result in the transport of pollutants from your facility to the non-attainment area. For purpose of evaluating the revision to the No. 6 and No. 7 kiln stack height, I used only 1972 Tampa meteorological data. These data have been shown by previously modeling to result in the greatest impact by emissions from your facility at the boundary of the non-attainment area.

The results of the air quality modeling show that the maximum annual impact of particulate matter emissions from your facility at the boundary of the non-attainment area will be 0.6 micrograms per cubic meter. This impact is the same as I reported in my letter to you February 26, 1982 and demonstrates that the reduction in the No. 6 and No. 7 kiln stack height will not result in a change in the annual average particulate matter impact at the boundary of the non-attainment area. This impact is

also less than the annual significant impact level of 1.0 micrograms per cubic meter defined by the Florida Department of Environmental Regulation and the U. S. Environmental Protection Agency.

For the 24-hour period, the maximum impact of particulate matter emissions from your facility at the boundary of the non-attainment area will be 4.4 micrograms per cubic meter. This compares with a significant impact level of 5.0 micrograms per cubic meter and an impact of 4.3 micrograms per cubic meter as reported in my letter to you dated February 26, 1982. This demonstrates that the reduction in the No. 6 and No. 7 kiln stack height to 150 feet will not have a significant 24-hour impact on the non-attainment area.

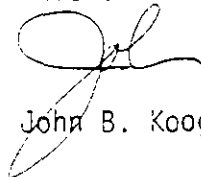
It can be concluded that the particulate matter emissions from your Plant City facility, including the revision to the truck loading baghouse emissions of February 23, 1982 and the reduction in the No. 6 and No. 7 kiln stack height, will not have a significant impact on the Hillsborough County Particulate Matter Non-Attainment Area for either the annual or the 24-hour period. The modeling conducted to reach this conclusion incorporated the assumption that all sources at your facility were operating at the emission rate summarized in Table 1 and 100 percent of their rated capacity.

As with the previous modeling, the maximum annual impact was calculated using only days which contained a vector which would allow the pollutants from your facility to be transported to the non-attainment area; 272 days during calendar year 1972. The modeling also assumed all sources at the Plant City facility would operate 8760 hours per year. If the annual impact was calculated using all 366 days of the year and using the actual operating times of each source, the annual impact at the boundary of the non-attainment area would be significantly lower than reported herein. The assumptions stated in this paragraph will have no effect on the protection 24-hour impacts, however.

If you have any questions or comments regarding this data please give me a call.

Very truly yours,

SHOLTES & KOGLER  
ENVIRONMENTAL CONSULTANTS



John B. Koogler, Ph.D., P.E.

JBK:ls  
Attachments



Rec'd.  
1/13/83

TABLE 1

PARTICULATE MATTER EMISSION RATES.

AMAX PHOSPHATES, INC.  
PLANT CITY, FLORIDA

Source	Particulate Matter Emissions (lbs/hr.)	Stack Parameters			
		Ht. (m)	Dia. (m)	Vel. (m/s)	Temp (°K)
6 Reactor/paragon	42.0*	45.7	1.76	17.4	315
6 3, 4, 5 kilns	16.76	45.7	1.76	14.7	315
7 6, 7 kilns	15.0*	45.7	1.76	17.6	315
8 Feed Prep.	20.0*	30.5	1.37	11.5	318
9 Dikal	13.33	24.4	1.68	8.6	338
→ 2 Feed Prep., North 6199 ?	<del>0.57</del> 4.16	29.6	0.36	15.2	317
1 Feed Prep., South	0.35	29.6	0.28	15.2	317
2 Feed Prep., Soda	<del>0.21</del> 1.29	22.6	0.22	15.2	317
3 Lime Bin, Dikal	0.17	14.0	0.20	15.2	317
3 CDP Bin, Dikal	0.99	16.5	0.48	15.2	317
3 Dikal	0.51	15.9	0.34	15.2	317
4 Millroom 1	7.12	10.4	1.05	15.2	317
4 Millroom 2	1.71	12.2	0.63	15.2	317
5 Craneway	34.29	53.4	2.81	15.2	317
3 800 Ton Bin	1.71	17.4	0.63	15.2	317
2 Baghouse, West	0.69	20.4	0.40	15.2	317
2 Baghouse, East	1.22	21.3	0.53	15.2	317
3 Bulk Loading	1.71	16.5	0.63	15.2	317
2 Truck Loading	2.15**	18.9	0.53	26.4	317

\* Revised 1/28/82

\*\* Revised 2/23/82

Emission rates used in air model Jan. 1983.



RING DISTANCES(KM)= 10.00 25.00 31.50 35.00 40.00

STACK # 1--FEED PREP N63  
 STACK # 2--FEED PREP 500A, BAG HSE E&W, TRUCK LDG  
 STACK # 3--LINE BIN, COP BIN, DIKAL, BOOT BIN, BLK LDG  
 STACK # 4--MILLROOM 1 & 2  
 STACK # 5--CRAWLWAY  
 STACK # 6--REACTOR PARADISE & KILNS 3,4,65  
 STACK # 7--KILNS 6 & 7  
 STACK # 8--FEED PREP  
 STACK # 9--DIKAL

STACK	MONTH	EMISSION RATE (GMS/SEC)	HEIGHT (METERS)	DIAMETER (METERS)	EXIT VELOCITY (M/SEC)	TEMP (DEG.K)	VOLUMETRIC FLOW (M**3/SEC)
1	ALL	0.1200	29.60	0.32	15.20	317.00	1.22
2	ALL	0.5400	20.90	0.43	15.20	317.00	2.21
3	ALL	0.6400	16.10	0.46	15.20	317.00	2.53
4	ALL	1.1100	11.30	0.84	15.20	317.00	8.42
5	ALL	4.3200	53.40	2.81	15.20	317.00	94.26
6	ALL	7.4000	45.72	1.77	16.01	316.30	39.39
7	ALL	1.8900	45.73	1.77	17.56	316.30	43.21
8	ALL	2.5200	30.48	1.37	11.50	338.50	16.95
9	ALL	1.6300	24.38	1.68	8.56	318.50	18.98

PLANT NAME: AMAX - PLANT CITY

POLLUTANT: PART

EMISSION UNITS: GM/SEC

AIR QUALITY UNITS: GM/M\*\*3

MAXIMUM MEAN CONC: 6.0559E-07 DIRECTION= 27 DISTANCE= 19.7 KM

YEAR= 72

DIR	RANGE	ANNUAL MEAN CONCENTRATION AT EACH RECEPTOR				
		19.7 KM	25.3 KM	31.6 KM	35.0 KM	40.0 KM
1		4.21636E-08	3.14421E-08	2.35900E-09	2.08371E-08	1.77162E-09
2		5.70232E-09	5.02413E-08	3.79798E-08	3.36847E-08	2.89096E-08
3		4.95555E-08	3.75230E-08	2.85668E-08	2.54011E-08	2.17948E-08
4		4.31730E-03	3.22720E-08	2.42830E-08	2.14772E-08	1.82952E-08
5		4.54753E-09	3.45253E-08	2.63811E-08	2.34811E-08	2.01722E-08
6		4.98567E-08	3.77550E-08	2.90835E-08	2.59207E-08	2.23025E-08
7		4.14776E-08	3.06145E-08	2.28342E-08	2.01464E-08	1.71189E-08
8		3.13027E-03	2.29659E-03	1.70993E-08	1.50845E-08	1.28231E-08
9		1.11264E-07	8.25150E-08	6.17943E-08	5.46033E-08	4.64759E-09
10		6.60699E-03	4.86687E-08	3.61927E-08	3.18912E-08	2.70235E-08
11		4.75320E-08	3.45206E-08	2.52492E-09	2.20721E-08	1.85157E-08
12		5.26949E-08	3.94715E-08	2.96807E-03	2.62555E-08	2.23710E-08
13		6.83475E-08	5.19125E-08	3.93608E-09	3.49115E-08	2.99483E-08
14		9.29585E-08	7.05518E-08	5.36603E-03	4.76132E-08	4.06954E-08
15		6.79820E-08	5.16532E-08	3.93673E-03	3.49767E-08	2.99579E-09
16		7.96450E-08	6.11930E-09	4.71167E-08	4.20394E-08	3.62032E-08
17		6.00496E-08	4.57003E-08	3.48533E-09	3.09602E-08	2.65019E-09
18		7.91143E-08	6.01933E-08	4.59036E-08	4.07982E-08	3.49539E-08
19		3.17443E-09	6.24977E-08	4.78416E-08	4.25711E-08	3.65271E-08
20		5.19161E-08	3.83478E-08	2.94642E-08	2.50128E-08	2.11225E-08
21		1.75589E-07	1.35842E-07	1.05199E-07	9.40732E-08	8.12417E-08
22		1.58304E-07	1.19338E-07	9.03302E-08	8.00381E-08	6.83151E-08
23		3.27975E-07	2.49985E-07	1.91028E-07	1.69926E-07	1.45764E-07
24		4.25633E-07	3.26975E-07	2.51594E-07	2.24400E-07	1.93137E-07
25		4.04727E-07	3.07561E-07	2.34083E-07	2.07766E-07	1.77657E-07
26		4.23416E-07	3.21437E-07	2.44458E-07	2.16924E-07	1.95447E-07
27		5.06595E-07	4.64478E-07	3.56273E-07	3.17333E-07	2.72638E-07
28		3.77756E-07	2.89154E-07	2.21981E-07	1.97710E-07	1.69973E-07
29		2.62827E-07	2.00310E-07	1.53082E-07	1.36174E-07	1.16816E-07
30		3.07290E-07	2.39533E-07	1.95384E-07	1.56035E-07	1.43676E-07
31		1.54727E-07	1.17294E-07	8.94005E-08	7.94900E-08	6.91878E-08
32		3.58739E-08	6.41692E-08	4.83404E-08	4.28074E-08	3.65451E-08
33		1.13860E-07	9.70639E-08	6.58145E-08	5.95526E-08	5.12237E-08
34		7.07347E-08	5.34980E-08	4.07243E-09	3.62031E-08	3.10546E-08
35		7.03018E-08	5.39914E-08	4.12427E-09	3.66670E-08	3.14262E-08
36		5.54856E-08	4.17499E-08	3.16073E-08	2.80316E-08	2.39672E-08

PLANT NAME: AMAX - PLANT CITY

POLLUTANT: PART

EMISSION UNITS: GM/SEC

AIR QUALITY UNITS: GM/M<sup>3</sup>

YEARLY MAXIMUM 24-HOUR CONC= 4.3590E-06 DIRECTION= 27 DISTANCE= 19.7 KM DAY= 1  
 YEAR= 72

DIR	HIGHEST 24-HOUR CONCENTRATION AT EACH RECEPTOR					
	RANGE	17.7 KM	25.0 KM	31.6 KM	35.0 KM	40.0 KM
1	1.6525E-06 (10)	1.2724E-06 (10)	9.7613E-07 (10)	8.6844E-07 (10)	7.4852E-07 (9)	
2	2.1224E-06 (39)	1.5741E-06 (89)	1.1723E-06 (89)	1.0317E-06 (89)	8.7250E-07 (89)	
3	2.8735E-06 (258)	2.3489E-06 (258)	1.9079E-06 (258)	1.7383E-06 (258)	1.5368E-06 (258)	
4	1.7029E-06 (274)	1.3178E-06 (274)	1.0130E-06 (274)	9.0035E-07 (274)	7.6986E-07 (274)	
5	2.6239E-06 (24)	2.1674E-06 (24)	1.7766E-06 (24)	1.6235E-06 (24)	1.4408E-06 (24)	
6	2.1429E-06 (334)	1.7303E-06 (334)	1.3497E-06 (334)	1.2602E-06 (334)	1.1075E-06 (334)	
7	1.1300E-06 (219)	9.2942E-07 (219)	7.2982E-07 (219)	6.5501E-07 (219)	5.6888E-07 (219)	
8	1.4041E-06 (219)	1.1054E-06 (219)	8.6915E-07 (219)	7.8192E-07 (219)	6.8013E-07 (219)	
9	2.6214E-06 (334)	2.0001E-06 (334)	1.5208E-06 (334)	1.3516E-06 (67)	1.1736E-06 (67)	
	2.0379E-06 (24)	1.6237E-06 (24)	1.2879E-06 (24)	1.1616E-06 (24)	1.0134E-06 (24)	
	1.1028E-06 (349)	8.2366E-07 (349)	6.1421E-07 (349)	5.3947E-07 (349)	4.5451E-07 (349)	
	1.9340E-06 (138)	1.4970E-06 (138)	1.1651E-06 (138)	1.0445E-06 (138)	9.0565E-07 (138)	
13	2.8173E-06 (291)	2.3054E-06 (291)	1.8760E-06 (291)	1.7105E-06 (291)	1.5140E-06 (291)	
14	1.6306E-06 (322)	1.2672E-06 (231)	1.0001E-06 (231)	9.0070E-07 (231)	7.9424E-07 (231)	
13	2.5096E-06 (45)	2.0167E-06 (45)	1.6147E-06 (45)	1.4633E-06 (45)	1.2850E-06 (45)	
16	2.0609E-06 (79)	1.6739E-06 (78)	1.3496E-06 (78)	1.2245E-06 (79)	1.0764E-06 (79)	
17	2.1041E-06 (81)	1.7075E-06 (91)	1.3754E-06 (81)	1.2476E-06 (81)	1.0963E-06 (81)	
19	1.6341E-06 (48)	1.2804E-06 (333)	1.0121E-06 (333)	9.1196E-07 (333)	7.9474E-07 (333)	
19	3.4839E-06 (78)	2.8157E-06 (78)	2.2577E-06 (78)	2.0439E-06 (78)	1.7910E-06 (78)	
20	1.2260E-06 (300)	9.2410E-07 (300)	6.9203E-07 (300)	6.0804E-07 (300)	5.1203E-07 (300)	
21	2.1216E-06 (337)	1.7226E-06 (337)	1.3908E-06 (337)	1.2644E-06 (337)	1.1146E-06 (337)	
22	2.0841E-06 (345)	1.6844E-06 (345)	1.3540E-06 (345)	1.2289E-06 (345)	1.0810E-06 (345)	
23	3.5896E-06 (289)	2.9132E-06 (289)	2.3581E-06 (289)	2.1443E-06 (289)	1.8918E-06 (289)	
24	4.1490E-06 (244)	3.3404E-06 (244)	2.6725E-06 (244)	2.4184E-06 (244)	2.1183E-06 (244)	
25	4.1388E-06 (246)	3.2764E-06 (246)	2.5864E-06 (246)	2.3304E-06 (246)	2.0312E-06 (246)	
26	3.7755E-06 (364)	3.0029E-06 (364)	2.3913E-06 (364)	2.1486E-06 (364)	1.8763E-06 (364)	
27	4.8590E-06 (1)	3.8917E-06 (1)	3.1090E-06 (1)	2.8159E-06 (1)	2.4718E-06 (1)	
28	4.1359E-06 (242)	3.3410E-06 (242)	2.6876E-06 (242)	2.4391E-06 (242)	2.1457E-06 (242)	
29	2.6055E-06 (260)	2.1342E-06 (260)	1.6868E-06 (260)	1.5183E-06 (260)	1.3210E-06 (260)	
30	3.4195E-06 (48)	2.7991E-06 (48)	2.2777E-06 (48)	2.0769E-06 (48)	1.8379E-06 (48)	
31	2.0109E-06 (61)	1.6144E-06 (61)	1.2890E-06 (61)	1.1661E-06 (61)	1.0211E-06 (61)	
32	1.6077E-06 (348)	1.2217E-06 (348)	9.3024E-07 (348)	8.2529E-07 (348)	7.0495E-07 (348)	
33	3.2132E-06 (158)	2.5757E-06 (158)	2.0524E-06 (158)	1.8552E-06 (158)	1.6228E-06 (158)	
34	1.5352E-06 (237)	1.1823E-06 (237)	9.3716E-07 (241)	8.4886E-07 (241)	7.4443E-07 (241)	
35	2.5341E-06 (359)	2.0305E-06 (324)	1.6321E-06 (324)	1.4826E-06 (324)	1.3072E-06 (324)	
36	1.4555E-06 (359)	1.1481E-06 (359)	9.0237E-07 (359)	8.1094E-07 (359)	7.0420E-07 (359)	

PLANT NAME: AMAX - PLANT CITY      POLLUTANT: PART      EMISSION UNITS: GM/SEC      AIR QUALITY UNITS: GM/M<sup>3</sup>

YEARLY SECOND MAXIMUM 24-HOUR CONC= 4.3733E-06      DIRECTION= 27      DISTANCE= 19.7 KM      DAY=275

YEAR= 72

DIR	SECOND HIGHEST 24-HOUR CONCENTRATION AT EACH RECEPTOR					
	RANGE	19.7 KM	25.0 KM	31.6 KM	35.0 KM	40.0 KM
1	1.3957E-06 ( 9)	1.1410E-06 ( 9)	9.2749E-07 ( 9)	8.4573E-07 ( 9)	7.4414E-07 ( 10)	
2	1.6090E-06 ( 10)	1.2421E-06 ( 10)	9.6770E-07 (195)	8.8065E-07 (195)	7.7787E-07 (195)	
3	1.1654E-06 ( 61)	9.4793E-07 ( 61)	7.6716E-07 ( 61)	6.9344E-07 ( 61)	6.1694E-07 ( 61)	
4	1.4358E-06 ( 4)	1.1419E-06 ( 4)	9.0578E-07 ( 4)	8.1790E-07 ( 4)	7.1505E-07 ( 4)	
5	1.0530E-06 (312)	8.1145E-07 (312)	6.2505E-07 (312)	5.5765E-07 (312)	4.7994E-07 (312)	
6	2.0945E-06 (239)	1.5942E-06 (239)	1.2116E-06 (239)	1.0733E-06 (239)	9.1484E-07 (239)	
7	7.3946E-07 ( 58)	7.0183E-07 ( 58)	5.2099E-07 ( 58)	4.6055E-07 ( 74)	4.0114E-07 ( 74)	
9	6.1832E-07 (243)	4.9441E-07 (243)	3.9664E-07 (243)	3.6023E-07 (243)	3.1760E-07 (243)	
9	2.4541E-06 ( 67)	1.9211E-06 ( 67)	1.5047E-06 ( 67)	1.3474E-06 (334)	1.1480E-06 (334)	
10	1.8683E-06 (259)	1.5261E-06 (259)	1.2378E-06 (259)	1.1302E-06 (259)	1.0001E-06 (259)	
11	7.2519E-07 (290)	5.5800E-07 (243)	4.5266E-07 (243)	4.1325E-07 (243)	3.6692E-07 (243)	
12	1.3067E-06 (237)	9.7401E-07 (237)	7.2576E-07 (292)	5.5630E-07 (292)	5.7440E-07 (292)	
13	1.4643E-06 (206)	1.1904E-06 (206)	9.6295E-07 (206)	8.7654E-07 (206)	7.7409E-07 (206)	
14	1.5976E-06 (231)	1.2645E-06 (322)	9.7810E-07 (322)	8.7355E-07 (322)	7.5244E-07 (322)	
15	2.0313E-06 (138)	1.6317E-06 (138)	1.3026E-06 (138)	1.1782E-06 (138)	1.0314E-06 (138)	
16	1.7353E-06 (112)	1.3860E-06 (112)	1.1009E-06 (112)	9.9404E-07 (112)	8.6832E-07 (112)	
17	1.2007E-06 (314)	9.5934E-07 (314)	7.6014E-07 (314)	5.8554E-07 (314)	5.9788E-07 (314)	
19	1.6142E-06 (333)	1.2742E-06 ( 48)	9.9781E-07 ( 48)	8.9673E-07 ( 48)	7.7983E-07 ( 48)	
19	1.6870E-06 ( 87)	1.3167E-06 ( 87)	1.0207E-06 ( 87)	9.1024E-07 ( 87)	7.8184E-07 ( 87)	
20	7.9465E-07 (322)	7.6881E-07 (322)	5.9233E-07 (322)	5.2759E-07 (322)	4.5277E-07 (322)	
21	2.0246E-06 (279)	1.6175E-06 (279)	1.2922E-06 (279)	1.1664E-06 (279)	1.0224E-06 (279)	
22	1.8210E-06 (204)	1.4929E-06 (204)	1.2164E-06 (204)	1.1101E-06 (204)	9.8350E-07 (204)	
23	1.1233E-06 (323)	2.5163E-06 (323)	2.0192E-06 (323)	1.8310E-06 (323)	1.6093E-06 (323)	
24	1.6377E-06 (333)	2.0948E-06 (333)	1.6613E-06 (333)	1.4996E-06 (333)	1.3108E-06 (333)	
25	2.4476E-06 (227)	1.8764E-06 (227)	1.4417E-06 (227)	1.2845E-06 (227)	1.1043E-06 (227)	
26	2.7358E-06 (253)	2.1877E-06 (253)	1.7437E-06 (253)	1.5759E-06 (253)	1.3794E-06 (253)	
27	4.3733E-06 (275)	3.4859E-06 (275)	2.7658E-06 (275)	2.4953E-06 (275)	2.1779E-06 (275)	
29	2.6620E-06 ( 54)	2.1890E-06 ( 54)	1.7886E-06 ( 54)	1.6339E-06 ( 54)	1.4494E-06 ( 54)	
29	2.4421E-06 (224)	1.9348E-06 (224)	1.5305E-06 (224)	1.3806E-06 (224)	1.2059E-06 (224)	
30	3.2801E-06 (355)	2.6190E-06 (355)	2.0781E-06 (355)	1.8744E-06 (355)	1.6351E-06 (355)	
31	1.5814E-06 (262)	1.2536E-06 (317)	1.0364E-06 (317)	9.1323E-07 (317)	8.0348E-07 (317)	
32	1.1833E-06 (162)	9.6034E-07 (162)	7.7577E-07 (162)	7.0581E-07 (162)	6.2296E-07 (162)	
33	2.3509E-06 ( 4)	1.9037E-06 ( 4)	1.5333E-06 ( 4)	1.3926E-06 ( 4)	1.2260E-06 ( 4)	
34	1.4438E-06 (241)	1.1693E-06 (241)	9.1538E-07 (237)	8.1916E-07 (237)	7.0879E-07 (237)	
35	2.5300E-06 (324)	2.0060E-06 (359)	1.5772E-06 (359)	1.4168E-06 (359)	1.2290E-06 (359)	
36	1.3934E-06 (234)	1.0576E-06 (234)	8.0316E-07 (234)	7.1141E-07 (234)	6.0652E-07 (234)	

# CMI

CONSOLIDATED MINERALS, INC.  
FEED SUPPLEMENT DIVISION

October 6, 1992

D.E.R.  
OCT 08 1992  
SOUTHWEST DISTRICT  
TAMPA

Mr. William E. Schroeder  
Air Permit Engineer  
Environmental Protection Commission of  
Hillsborough County  
1900 Ninth Avenue  
Tampa, FL 33605

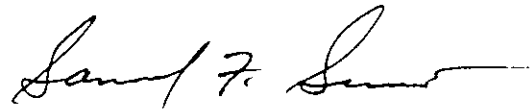
**Re: Hillsborough County - AP, DER File No. 218851**

Dear Mr. Schroeder:

The feed rate to the two kilns is approximately 9 tons/hr/kiln of prepared feed. The P content of this feed ranges from 16.7 to 17.0% (ie 38.32 to 38.96% P<sub>2</sub>O<sub>5</sub>). Thus the feed rate to each kiln is 3.45 to 3.51 tons P<sub>2</sub>O<sub>5</sub> (avg. 3.48). This gives a utilization rate of approximately 6.96 TPH P<sub>2</sub>O<sub>5</sub> input. This would be the maximum anticipated feed rate.

If I can be of any further assistance, please call me at (813) 752-1161.

Sincerely,



Samuel F. Sweat  
Environmental Affairs Manager

SFS:cr

cc: F. W. Cheesman  
J. Harry Kerns, P.E., FDER, SW-District  
J. Gries, P.E., FCS

*Aie - Happy Kears*

COMMISSION  
PHYLLIS BUSANSKY  
JOE CHILLURA  
PAM IORIO  
SYLVIA KIMBELL  
JAN KAMINIS PLATT  
JAMES D. SELVEY  
ED TURANCHIK



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960  
AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530  
WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5788  
ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

FAX (813) 272-5157

October 2, 1992

CERTIFIED MAIL #P 648 747 331

Mr. F. W. Cheesman  
President  
Consolidated Minerals, Inc.  
Feed Supplement Division  
P. O. Box 790  
Plant City, FL 34289-0790

Re: Hillsborough County - AP  
DER File No. 218851

Dear Mr. Cheesman:

Please be advised that the Environmental Protection Commission of Hillsborough County (EPCHC) and the Florida Department of Environmental Regulation (FDER) have completed their initial review of the above application and found it to be incomplete. In order to complete the review process two copies of the following additional information is being requested pursuant to Chapter 17-4.070, F.A.C.:

1. The application did not specify kiln input in tons per hour P205. Please provide maximum anticipated feed rate.

"NOTICE! Pursuant to the provisions of Section 120.600 F.S., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department will issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered question will be submitted. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available. Or for operating permits, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of



Mr. F. W. Cheesman  
October 2, 1992  
Page 2

information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

In your response, please submit the original to the undersigned and a copy to J. Harry Kerns of the Southwest District of the FDER.

If you have any questions, please feel free to contact me at (813) 272-5530.

Sincerely,



William E. Schroeder  
Air Permit Engineer

bm

cc: J. Harry Kerns, P.E., FDER SW-District  
Jack L. Gries, P.E., Fla. Crushed Stone

MEMORANDUM

TO: File

THRU: W. C. Thomas *WCT 11/12/87*

FROM: George W. Richardson *GWR*

DATE: November 5, 1987

SUBJECT: Hillsborough County - AP  
Consolidated Minerals, Inc.  
Air Operation Permits: A029-139054, 139056, 139057  
139058, 139060 & 139061

The permits are for the the Dicalcium Phosphate Plant, the Potassium Fluorborate Plant, the Ground Phosphate Rock Handling, the Feed Preparation Plant Dryer, the Feed Preparation Product Handling and Defluorinating Kilns 6 and 7 located on Coronet Road, Hillsborough County.

All the sources are in compliance. The EPCHC and I recommend the permits be issued as conditioned.

Plant Inspection



Charles MacDreah  
Plant Inspector



# OFFICIAL NOTICE

HILLSBOROUGH COUNTY ENVIRONMENTAL PROTECTION COMMISSION  
7402 N. 56th St., Bldg. 500, Tampa, Fl. 33617  
Phone: 272-5960

Issued to:

Name:

Borden Chemicals

Phone: (813) 752-1161

Address:

PO Box 190 Plant City FL 33566

This notice is to inform you that certain conditions have been found on your premises which are in violation of the Hillsborough County Environmental Protection Act and/or the Rules and Regulations of the Hillsborough County Environmental Protection Commission under section or chapter:

Chp 1-3.03 (III) &

Chp 1-1.06 of the Rules and Sections 18 of the Act.

(Remarks) Scrubber Controls for #6 + 7 Feed Tank not operating causing fugitive particulates

On (date) 31 July 78

At (time) 1055

You are hereby directed to take the following action: Correct promptly and provide this agency with a written report as to the cause, corrective actions and future preventive actions

To be completed by (month, day, year): Aug 8, 1978

Failure to comply with the above directive constitutes a misdemeanor and is punishable as provided by law.

Agent [Signature]

Date: 31 July 78

Received by: [Signature]  
Operation Superintendent

**D.E.R.**

AUG 24 1978

SOUTHWEST DISTRICT  
TAMPA

# SMITH-DOUGLASS

Division of  
BORDEN CHEMICAL, BORDEN INC

August 8, 1978



Ms. Vilma Brueggemeyer  
Hillsborough County Environmental  
Protection Commission  
7402 N. 56th St.  
Building 500  
Tampa, Fla. 33617

RECEIVED

AUG 9 1978

H.C.E.P.C.

Re: Official Notice dated July 31, 1978 issued to Borden Chemical,  
Plant City, by Jose B. Rodriguez

Dear Ms. Brueggemeyer:

This is in response to the Official Notice requiring the submission of  
a report by August 8, 1978.

Cause of the upset was a burned out motor. Further investigation re-  
vealed that it was also necessary to replace the shaft and impeller. This  
equipment is part of the control device at No. 6 and No. 7 feed tank.

Corrective action required obtaining another motor and inasmuch as  
the shaft and impeller are not readily available as a stock item, it was  
necessary to have them built at an outside shop. We were fortunate to have  
a motor readily accessible. The shaft and impeller were delivered to the  
plant last evening, August 7, 1978. Assembly is being accomplished at this  
writing and it is anticipated the unit will be operable today.

It is not possible to predict a motor burning out. As for preventive  
action, we can only be prepared to replace the motor should it happen. We  
do have a motor that could be utilized as a spare with relative minor alter-  
ations.

If further action is required or you have comments, please advise.

Yours very truly,

A handwritten signature in cursive script that reads "B. V. Galloway".

B. V. Galloway  
Environmental Manager  
Florida Operations

BVG:st

cc: Mr. W. B. Barton  
Mr. D. H. Griffin  
Mr. J. J. Lewis  
Mr. J. Rodriguez  
Mr. R. S. Rydell  
Mr. H. Rosenzweig  
Mr. R. W. Sims

D. E. R.

AUG 24 1978

SOUTHWEST DISTRICT  
TAMPA

STATE OF FLORIDA  
 DEPARTMENT OF ENVIRONMENTAL REGULATION  
 ANNUAL OPERATIONS REPORT FORM  
 FOR AIR EMISSIONS SOURCES

D. E. R.

MAR 27 1978

For each permitted emission point, please submit a separate report for calendar year 1977 prior to March 1st of the following year.

SOUTHWEST DISTRICT  
 TAMPA

**I GENERAL INFORMATION:**

1. Source Name: Defluorinated Phosphate Plant
2. Permit Number: AO 29-6316
3. Source Address: Borden, Inc., P. O. Box 790, Plant City, Fla, 33566
4. Description of Source: Kilns No. 6 & 7 Stack

II OPERATING SCHEDULE: 22.3 hrs/day 7 days/wk 52 wks/yr

**III RAW MATERIAL INPUT PROCESS WEIGHT:**

Raw Material	Input Process Weight	
<u>Prepared Feed</u>	<u>101,205</u>	tons/yr
_____	_____	tons/yr
_____	_____	tons/yr
_____	_____	tons/yr

**IV TOTAL FUEL USAGE, including standby fuels. If fuel is oil, specify weight and sulfur content (e.g., No. 6 oil with 1%S).**

<u>436.767</u> 10 <sup>6</sup> cubic feet Natural Gas	<u>1,820.177</u> 10 <sup>3</sup> gallons No. <u>5</u> Oil, <u>1.90</u> %S
_____ 10 <sup>3</sup> gallons Propane	_____ 10 <sup>3</sup> gallons Kerosene
_____ tons Coal	_____ 10 <sup>6</sup> lb Black Liquor Solids
_____ tons Carbonaceous	_____ tons Refuse
Other (Specify type and units) _____	

**V EMISSION LEVEL (tons/yr):**

A. <u>19.1</u> Particulates	_____ Carbon Monoxide
_____ Nitrogen Oxide	_____ Total Reduced Sulfur
_____ Hydrocarbon	<u>2.0</u> Fluoride
_____ Sulfur Dioxide	_____
Other (Specify type and units) _____	

B. Method of calculating emission rates (e.g., use of fuel analysis and materials balance, emission factors drawn from AP 42, etc.)  
 Source Tests

**VI CERTIFICATION:**

I hereby certify that the information given in this report is correct to the best of my knowledge.

*B. V. Galloway*  
 Signature of Owner or Authorized Representative  
B. V. Galloway, Environmental Manager  
 Typed Name and Title  
March 23, 1978  
 Date



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT  
7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610

EUBIN O'D. ASKEW  
GOVERNOR

No. 6&7 Defluorinating Kiln  
BORDEN, INC. Scrubber  
HILLSBOROUGH COUNTY - - A.P.  
March 8, 1978

JOSEPH W. LANDERS, JR.  
SECRETARY

B. V. Galloway, Environmental Manager  
Borden, Inc.  
P. O. Box 790  
Plant City, Florida 33566

Dear Mr. Galloway:

Pursuant to your recent application, please find enclosed a permit (No. A029-6316 ) dated March 8, 1978 to operate the subject pollution source.

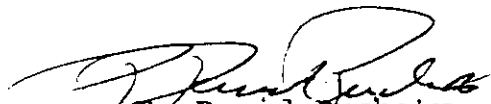
This permit will expire on 12/15/82 , and will be subject to the conditions, requirements, and restrictions checked or indicated otherwise in the attached sheet "Operation Permit Conditions".

This permit is issued under the authority of Florida Statute 403.061(16). The time limits imposed herein are a condition to this permit and are enforceable under Florida Statute 403.161. You are hereby placed on Notice that the department will review this permit before the scheduled date of expiry and will seek court action for violation of the conditions and requirements of this permit.

You have ten days from the date of receipt hereof within which to seek a review of the conditions and requirements contained in this permit. Failure to file a written request to review or modify the conditions or requirements contained in this permit shall be deemed a waiver of any objections thereto.

Your continued cooperation in this matter is appreciated and in future communication please refer to your permit number.

Yours very truly,

  
P. David Puchaty  
District Manager  
Southwest District

cc: Central Files  
HCEPC  
A.R. Lenkei