Best Available Copy

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

RECEIVED
JUN 29 1998
D E P

June 23, 1998

Mr. William Schroeder
Air Permitting Engineer
FDEP Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

SUBJECT: Coronet Industries, Inc.
Hillsborough County – Air Permit
DEP File No. 0570075-009

Dear Mr. Schroeder:

This letter shall provide the additional information requested in your letter dated May 21, 1998. All questions have been reproduced, preserving your numbering. Responses follow each question.

1. **Since there is a considerable contribution to sulfur dioxide emissions from sulfates in the phosphate rock, what steps will be taken to provide assurance that variations in rock quality do not cause emission higher than specified in the application.**

Response
Although the rock quality reportedly does vary, the total sulfur content in the phosphate rock has insignificant variation.

JOHN
THIS IS THE
INC'N LETTER
REFERENCED IN
MY 6/9/98
LETTER TO
ALLEN
-MR

2. **Information from past Annual Operating Reports, supplied by Hillsborough County EPC, show that the increases requested for sulfur dioxide, particulate matter, and fluorine emissions exceed the amounts required for PSD analysis. Please address this issue.**

Response
The emissions increases resulting from the increase in feed rate (from 18.0 tons/hour to 24.3 tons/hour) were evaluated prior to the issuance of permit No. 0570075-006-AC. The increase in production rate was not subject to PSD review, because there were no federally enforceable limitations on production rate.

The current request to amend permit No. 0570075-006-AC requests only a slight increase in permitted heat input – no changes to production rate are requested. The current application represents a minor modification to a major source – therefore PSD review is not applicable.

Prior "actual" emissions are set equal to "allowable" emissions under permit No. 0570075-006-AC. This is because the plant has not operated at the rate authorized by permit No. 0570075-006-AC, and there is no representative emissions data for this production rate. The

emissions increases will be only those increases resulting from the increased fuel use. The current request involves no increase in the permitted emission rates for particulate matter and fluoride emissions, with respect to permit No. 0570075-006-AC. Therefore, only sulfur dioxide increases resulting from the requested increase in fuel use are to be considered. Also, the sulfur content of natural gas is generally considered insignificant, so the sulfur dioxide emissions are only considered with respect to the use of No. 2 fuel oil.

Permit No. 0570075-006-AC	**Requested by Applicant, 0570075-009**
Heat Input = 110.91 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10^3 gal. Gallons/yr = 110.91 * 8760/141 = **6891 x 10^3**	Heat Input = 128.0 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10^3 gal. Gallons/yr = (Synthetic Limit) = **7591 x 10^3**
Increase in fuel use (gal/yr) = 7591 x 10^3 - 6891 x 10^3 = 700 x 10^3	
SO2 Emission Factor = 142(%S) lbs/10^3 gal, at 0.5% S = 71 lbs/10^3 gal	
Increase in SO2 Emission Rate = 71 lbs/10^3 gal x 700 x 1.0 ton/2000 lbs = **25 TPY**	

It is important to note that the annual fuel oil use has been synthetically limited to reduce permitting fees – not to avoid PSD review. The requested heat input level without the synthetic limitation would still result in a less than significant increase in SO2 emissions.

The emissions increase for sulfur dioxide would be only that resulting from the requested increase in fuel oil use. This increase would be less than the PSD significant emission rate.

3. **Please quantify the increase in emissions from the Feed Preparation section, materiel transfer and handling, and loading of product for transport**

Response

The emissions increases resulting from the increase in feed rate (from 18.0 tons/hour to 24.3 tons/hour) were evaluated prior to the issuance of permit No. 0570075-006-AC. The increase in production rate was not subject to PSD review, because there were no federally enforceable limitations on production rate.

The current application does not involve an increase in production rate for Feed Preparation, material handling and transfer, and product loading; with respect to permit No. 0570075-006-AC.

Please contact me if further information is required.

Sincerely,

Steven C. Cullen, P.E.
Koogler & Associates

copy to: Frank Sweat – Coronet Industries

Department of Environmental Protection

D.E.R.
APR 22 1998
SOUTHWEST DISTRICT
TAMPA

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

project 009

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: **Coronet Industries, Inc.**	
2. Site Name: **Plant City Facility**	
3. Facility Identification Number: **0570075**	[ ] Unknown
4. Facility Location: Street Address or Other Locator: **4082 Coronet Road** City: **Plant City** County: **Hillsborough** Zip Code: **33566**	
5. Relocatable Facility? [ ] Yes [**X**] No	6. Existing Permitted Facility? [**X**] Yes [ ] No

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
   Vincent T. Scialli -- President & Chief Operating Officer

2. Owner/Authorized Representative or Responsible Official Mailing Address:

   Organization/Firm: **Coronet Industries, Inc.**
   Street Address: **P.O. Box 760**
   City: **Plant City** State: **FL** Zip Code: **33564-0760**

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: **(813) 752-1161** Fax: **(813) 754-2182**

4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

Vint T. Scialli Jr — Signature

April 14, 1998 — Date

* Attach letter of authorization if not currently on file.

Scope of Application

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Emissions Unit ID	Description of Emissions Unit	Permit Type
005	Defluorinating Kilns #6 and #7	AC1E

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

[ ] Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

[ ] Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

[ ] Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: _____

[ ] Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit to be revised: _____

[ ] Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

[ ] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: _____

Reason for revision: _____

_____

Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain:

[ ] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s):

_____

[ ] Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

[ ] Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: _____

Reason for revision: _____

_____

Category III: All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain:

[X] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: **AO29-218851 & 0570075-006-AC**

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

[**X**] Attached - Amount: **$1000** [ ] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

The proposed project will increase the production rates and fuel usage rates described in permit AO29-218851.

The proposed project will update and amend permit 0570075-006-AC. The additional fluoride recovery equipment and electrostatic precipitators described in the AC will not be installed.

2. Projected or Actual Date of Commencement of Construction: **Upon DEP Approval**

3. Projected Date of Completion of Construction: **No Construction Required**

Professional Engineer Certification

1. Professional Engineer Name: **Steven C. Cullen, P.E.**
   Registration Number: **45188**
2. Professional Engineer Mailing Address:

   Organization/Firm: **Koogler & Associates**
   Street Address: **4014 NW 13th Street**
   City: **Gainesville** State: **FL** Zip Code: **32609**
3. Professional Engineer Telephone Numbers:
   Telephone: **(352) 377-5822** Fax: **(352) 377-7158**

4. Professional Engineer Statement:

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

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

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

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

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

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

Signature

April 9, 1998
Date

(seal)

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact: **Steve Cullen - Project Engineer**

2. Application Contact Mailing Address:

   Organization/Firm: **Koogler & Associates**
   Street Address: **4014 NW 13th Street**
   City: **Gainesville** State: **FL** Zip Code: **32609**

3. Application Contact Telephone Numbers:
   Telephone: **(352) 377-5822** Fax: **(352) 377-7158**

Application Comment

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **393.8** North (km): **3096.3**			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): **27/59/21** Longitude (DD/MM/SS): **82/04/57**			
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **20**	6. Facility SIC(s): **2048** **2819**
7. Facility Comment (limit to 500 characters): **Animal feed defluorination facility. A proprietary mixture of phosphate rock, phosphoric acid, and soda ash is defluorinated in kilns and calciners before use as an animal feed supplement. The final product is called CDP (Coronet Defluorinated Product).** **Fluorine compounds are recovered from kiln and calciner exhaust gases, and are used to produce various fluoride salts (potassium fluoborate [KBF_4] and others) in the fluoride salts plant.**			

Facility Contact

1. Name and Title of Facility Contact: **Samuel Franklin Sweat - Environmental Affairs Manager**
2. Facility Contact Mailing Address: Organization/Firm: **Coronet Industries, Inc.** Street Address: **P.O. Box 760** City: **Plant City** State: **FL** Zip Code: **33564-0760**
3. Facility Contact Telephone Numbers: Telephone: **(813) 719-7255** Fax: **(813) 754-8558**

Facility Regulatory Classifications

1. Small Business Stationary Source?	[ ] Yes [ ] No [X] Unknown
2. Title V Source?	[X] Yes [ ] No
3. Synthetic Non-Title V Source?	[ ] Yes [X] No
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	[X] Yes [ ] No
5. Synthetic Minor Source of Pollutants Other than HAPs?	[ ] Yes [X] No
6. Major Source of Hazardous Air Pollutants (HAPs)?	[ ] Yes [X] No
7. Synthetic Minor Source of HAPs?	[ ] Yes [X] No
8. One or More Emissions Units Subject to NSPS?	[ ] Yes [X] No
9. One or More Emission Units Subject to NESHAP?	[ ] Yes [X] No
10. Title V Source by EPA Designation?	[ ] Yes [X] No
11. Facility Regulatory Classifications Comment (limit to 200 characters):	

B. FACILITY REGULATIONS

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

NA

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

Title V Core List	
Rule 62-4, F.A.C.	
Rule 62-210, F.A.C.	
Rule 62-213, F.A.C.	
Rule 62-297, F.A.C.	
Rule 62-296, F.A.C.	
40 CFR 60, Appendix A	
Hillsborough County EPC Rules Chapter 1-1	
Hillsborough County EPC Rules Chapter 1-3	

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
PM	**A**
PM10	**A**
NOX	**A**
SO2	**A**
CO	**A**
FL	**B**

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Detail Information: Pollutant _____ of _____

1. Pollutant Emitted: **NA**		
2. Requested Emissions Cap:	(lb/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

Facility Pollutant Detail Information: Pollutant _____ of _____

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

E. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **On File with Department**
2. Facility Plot Plan: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **On File with Department**
3. Process Flow Diagram(s): [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **On File with Department**
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested
6. Supplemental Information for Construction Permit Application: [ ] Attached, Document ID: _____ [**X**] Not Applicable

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: [ ] Attached, Document ID:_____ [**X**] Not Applicable
8. List of Equipment/Activities Regulated under Title VI: [ ] Attached, Document ID:_____ [ ] Equipment/Activities On site but Not Required to be Individually Listed [**X**] Not Applicable
9. Alternative Methods of Operation: [ ] Attached, Document ID:_____ [**X**] Not Applicable
10. Alternative Modes of Operation (Emissions Trading): [ ] Attached, Document ID:_____ [**X**] Not Applicable

11. Identification of Additional Applicable Requirements: [ ] Attached, Document ID:_____ [**X**] Not Applicable
12. Compliance Assurance Monitoring Plan: [ ] Attached, Document ID:_____ [**X**] Not Applicable
13. Risk Management Plan Verification: [ ] Plan Submitted to Implementing Agency - Verification Attached, Document ID:_____ [ ] Plan to be Submitted to Implementing Agency by Required Date [**X**] Not Applicable
14. Compliance Report and Plan: [ ] Attached, Document ID:_____ [**X**] Not Applicable
15. Compliance Certification (Hard-copy Required): [ ] Attached, Document ID:_____ [**X**] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

[**X**] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one:

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[**X**] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): **Defluorinating Kilns #6 & #7**		
2. Emissions Unit Identification Number: **005** [ ] No Corresponding ID [ ] Unknown		
3. Emissions Unit Status Code: **A**	4. Acid Rain Unit? [ ] Yes [**X**] No	5. Emissions Unit Major Group SIC Code: **20**
6. Emissions Unit Comment (limit to 500 characters): **Kilns #6 & #7 defluorinate prepared feed from the feed preparation area of the facility.**		

Emissions Unit Control Equipment

A.

1. Description (limit to 200 characters): **Gas Scrubber (General, Not Classified)** **Tellerett Packed Bed Tail Gas Scrubber**
2. Control Device or Method Code: **013**

B.

1. Description (limit to 200 characters): **Gravity Collector - Low Efficiency** **Low Velocity Duct**
2. Control Device or Method Code: **006**

C.

1. Description (limit to 200 characters): **Spray Towers** **(2) Fluoride recovery spray towers in series**
2. Control Device or Method Code: **052**

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Details

1. Initial Startup Date: **NA**		
2. Long-term Reserve Shutdown Date: **NA**		
3. Package Unit: **NA** Manufacturer:	Model Number:	
4. Generator Nameplate Rating: **NA**	MW	
5. Incinerator Information: **NA** Dwell Temperature: Dwell Time: Incinerator Afterburner Temperature:		°F seconds °F

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate: **Natural Gas = 120.0 mmBtu/hr** **No. 2 Fuel Oil = 128.0 mmBtu/hr**		
2. Maximum Incineration Rate: **NA**	lb/hr	tons/day
3. Maximum Process or Throughput Rate: **24.30 tons/hour of prepared feed input** **0570075-006-AC, SC 3**		
4. Maximum Production Rate: **NA**		
5. Operating Capacity Comment (limit to 200 characters): **Increase in heat input rate for natural gas and fuel oil.** **AO29-218851: Gas = 94.46 mmBtu/hr; No. 5 fuel oil = 100.82 mmBtu/hr** **0570075-006-AC: Gas = 103.91 mmBtu/hr; No. 5 fuel oil = 110.91 mmBtu/hr**		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	**8760** hours/year

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

NA

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

62-296.403(1)(h), FAC	
40 CFR 60.14(e)	
62-296.700(2)(b), FAC	
62-296.320(4)(b), FAC	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **Stack, Kilns 6 & 7**	
2. Emission Point Type Code: [ ] 1 [X] 2 [ ] 3 [ ] 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **NA**	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **Kilns 6 & 7 are described as one emissions unit (005) with a common stack.**	
5. Discharge Type Code: [ ] D [ ] F [ ] H [ ] P [ ] R [X] V [ ] W	
6. Stack Height:	**150** feet
7. Exit Diameter:	**5.8** feet
8. Exit Temperature:	**104**°F

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

9. Actual Volumetric Flow Rate:	**95400** acfm
10. Percent Water Vapor :	**15%**
11. Maximum Dry Standard Flow Rate:	**75750** dscfm
12. Nonstack Emission Point Height: **NA**	feet
13. Emission Point UTM Coordinates: Zone: East (km): North (km):	
14. Emission Point Comment (limit to 200 characters): **NA**	

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): **Food & Agriculture: Other Not Classified** **(Defluorination of prepared feed)**	
2. Source Classification Code (SCC): **3-02-999-99**	
3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **24.3 Tons Processed**	5. Maximum Annual Rate: **212,868 Tons Processed**
6. Estimated Annual Activity Factor: **NA**	
7. Maximum Percent Sulfur: **NA**	8. Maximum Percent Ash: **NA**
9. Million Btu per SCC Unit: **NA**	
10. Segment Comment (limit to 200 characters): 24.3 TPH x 8760 HPY = **212868 Tons Processed** **0570075-006-AC, SC 3**	

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): **In-Process Fuel Use: Natural Gas**
2. Source Classification Code (SCC): **3-90-006-99**
3. SCC Units: **Million Cubic Feet (MMcf) Burned**

4. Maximum Hourly Rate: **0.114 MMcf Burned**	5. Maximum Annual Rate: **1001 MMcf Burned**
6. Estimated Annual Activity Factor: **NA**	
7. Maximum Percent Sulfur: **NA**	8. Maximum Percent Ash: **NA**
9. Million Btu per SCC Unit: **1050 MMBtu/MMcf**	

10. Segment Comment (limit to 200 characters):

Max. heat input = 120 MMBtu/hr
1050 Btu/cf = 1050 MMBtu/MMcf
Hourly rate = 120 MMBtu/hr x 1.0 MMcf/1050 MMBtu = 0.114 MMcf
Annual = 0.114 MMcf x 8760 hrs/yr = 1001 MMcf Burned

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

Segment Description and Rate: Segment 3 of 3

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): **In-Process Fuel Use: Distillate Oil** **(#2 fuel oil is permitted as an alternate fuel)**
2. Source Classification Code (SCC): **3-90-005-99**
3. SCC Units: **Thousand Gallons Burned**

4. Maximum Hourly Rate: **0.91 Thousand Gallons Burned**	5. Maximum Annual Rate: **7591 Thousand Gallons Burned**
6. Estimated Annual Activity Factor: **NA**	
7. Maximum Percent Sulfur: **0.5**	8. Maximum Percent Ash: **NA**

9. Million Btu per SCC Unit: **141 MMBtu/Thousand Gallons Burned**
10. Segment Comment (limit to 200 characters): **141,000 Btu/gallon = 141 MMBtu/Thousand Gallons Burned** **Hourly rate = 128 MMbtu/hr x 1.0 TGB/141 MMBtu = 0.91 TGB** **Annual = Synthetically limited to 7591 thousand gallons/year**

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	**010**	**006**	**EL**
PM10	**010**	**006**	**NS**
NOX			**NS**
SO2	**0**	**013**	**EL**
FL	**052**	**013**	**EL**
CO			**NS**

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information: Pollutant 1 of 3

1. Pollutant Emitted: **PM**		
2. Total Percent Efficiency of Control:		**99 %**
3. Potential Emissions:	**13.81** lb/hour	**60.5** tons/year
4. Synthetically Limited? [ ] Yes [**X**] No		
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3	_____ to _____	tons/year
6. Emission Factor: **13.81 lbs/hr** Reference: **0570075-006-AC, SC #12**		
7. Emissions Method Code: [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5		
8. Calculation of Emissions (limit to 600 characters): **Hourly = 13.81 lbs/hr** **Annual = 13.81 lbs/hr x 8760 hrs/yr ÷ 2000 lbs/ton = 60.5 tpy**		
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):		

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: **ESCRACT**		
2. Future Effective Date of Allowable Emissions: **NA**		
3. Requested Allowable Emissions and Units: **NA**		
4. Equivalent Allowable Emissions:	**13.81** lb/hour	**60.5** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 5**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Rule basis = 62-296.700(2)(b), FAC**		

B. (NA)

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

Pollutant Detail Information: Pollutant 2 of 3

1. Pollutant Emitted: **FL**	
2. Total Percent Efficiency of Control:	%
3. Potential Emissions: **3.2** lb/hour	**14.0** tons/year
4. Synthetically Limited? [ ] Yes [**X**] No	
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3	_____ to _____ tons/year
6. Emission Factor: **0.37 lb/ton of P2O5 = 3.2 lbs/hr** Reference: **62-296.403(1)(h), FAC and 0570075-006-AC, SC #11**	
7. Emissions Method Code: [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5	
8. Calculation of Emissions (limit to 600 characters): **24.3 TPH of feed = 8.66 TPH P2O5** **8.66 TPH x 0.37 lb/ton = 3.2 lbs/hr** **Annual = 3.2 lbs/hr x 8760 hrs/yr ÷ 2000 lbs/ton = 14.0 tpy**	
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):	

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: **RULE**		
2. Future Effective Date of Allowable Emissions: **NA**		
3. Requested Allowable Emissions and Units: **NA**		
4. Equivalent Allowable Emissions:	**3.2** lb/hour	**14.0** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 13A or 13B**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Rule basis = 62-296.403(1)(h), FAC**		

B. (NA)

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

Pollutant Detail Information: Pollutant 3 of 3

1. Pollutant Emitted: **SO2**		
2. Total Percent Efficiency of Control:		%
3. Potential Emissions:	**210.41** lb/hour	**908.1** tons/year
4. Synthetically Limited? [**X**] Yes [ ] No		
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3	_____ to _____	tons/year
6. Emission Factor: **142(%S) lbs/thousand gallons burned** Reference: **AP42, 5th Edition, Table 1.3-2**		
7. Emissions Method Code: [ ] 0 [ ] 1 [ ] 2 [X] 3 [ ] 4 [ ] 5		

8. Calculation of Emissions (limit to 600 characters):

Fuel Oil
Hourly = (142 x 0.5) lbs/TGB x 0.91 TGB/hr = 64.61 lbs/hr
Annual = 7591 TGB/yr x (142 x 0.5) lbs/TGB ÷ 2000 lbs/ton = 269.5 tpy

Feed
Approximately 6.0 lb/ton of feed @ 24.3 tph = 145.8 lb/hr
@ 212,868 tpy = 638.6 tpy

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):

ΔSO2 = 908.1 TPY - 884.3 TPY = **23.8 TPY**
Annual No. 2 fuel oil use is synthetically limited to 7591 thousand gallons burned.

Emissions Unit Information Section 1 of 1 [005: Kilns #6 & #7]

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: **OTHER**		
2. Future Effective Date of Allowable Emissions: **NA**		
3. Requested Allowable Emissions and Units: **0.5% Sulfur in #2 Oil**		
4. Equivalent Allowable Emissions:	**210.41** lb/hour	**908.1** tons/year
5. Method of Compliance (limit to 60 characters): **Fuel Oil Analysis**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Annual No. 2 fuel oil use is synthetically limited to 7591 thousand gallons burned. This is to limit the increase of potential SO2 emissions below 25 TPY, to incur a lower permit processing fee.**		

B. [NA]

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Visible Emissions Limitation: Visible Emissions Limitation __1__ of __1__

1. Visible Emissions Subtype: **VE20**
2. Basis for Allowable Opacity: [**X**] Rule [ ] Other **Rule 62-296.320(4)(b), FAC**
3. Requested Allowable Opacity: Normal Conditions: **20%** Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance: **EPA Method 9**
5. Visible Emissions Comment (limit to 200 characters):

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____ **(NA)**

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

J. CONTINUOUS MONITOR INFORMATION (NA)
(Regulated Emissions Units Only)

Continuous Monitoring System: Continuous Monitor _____ of _____

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

Continuous Monitoring System: Continuous Monitor _____ of _____

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

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

   If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

   [ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [**X**] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[**X**] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	[ ] C	[ ] E	[**X**] Unknown
SO2	[ ] C	[ ] E	[**X**] Unknown
NO2	[ ] C	[ ] E	[**X**] Unknown

4. Baseline Emissions:		
PM	lb/hour	tons/year
SO2	lb/hour	tons/year
NO2		tons/year

5. PSD Comment (limit to 200 characters): **Both kilns installed in 1970**

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1. Process Flow Diagram [ ] Attached, Document ID: _____ [ ] Not Applicable [**X**] Waiver Requested **Department has on file**
2. Fuel Analysis or Specification [ ] Attached, Document ID: _____ [ ] Not Applicable [**X**] Waiver Requested **Department has on file**
3. Detailed Description of Control Equipment [ ] Attached, Document ID: _____ [ ] Not Applicable [**X**] Waiver Requested **Department has on file**
4. Description of Stack Sampling Facilities [ ] Attached, Document ID: _____ [ ] Not Applicable [**X**] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID: _____ [ ] Previously submitted, Date: _____ [**X**] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID: _____ [**X**] Not Applicable
7. Operation and Maintenance Plan [ ] Attached, Document ID: _____ [**X**] Not Applicable
8. Supplemental Information for Construction Permit Application [ ] Attached, Document ID: _____ [**X**] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID: _____ [**X**] Not Applicable

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [**X**] Not Applicable

11. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [**X**] Not Applicable

12. Identification of Additional Applicable Requirements
[ ] Attached, Document ID: _____ [**X**] Not Applicable

13. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [**X**] Not Applicable

14. Acid Rain Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[**X**] Not Applicable

TO: Al Linero

August 18, 1998

FROM: Jerry Kissel

RECEIVED
AUG 20 1998
BUREAU OF
AIR REGULATION

REF: Coronet Industries, Kilns 6 & 7
0570075, e.u. 005, project -009

We'd appreciate your input on a PSD situation as follows:

Permitting history

o Various operating permits since 1978

o First construction permit, 2/95 (AC29-259884, later renumbered to 0570005-006-AC) which involved physical changes (a modification) and a production limit of 24.3 tons/hr.

o An operating permit was issued 7/95 for a maximum of 19.8 tph, based on maximum rates achievable during the AC period.

o Current application (project 009) is a modification, at the least because it requests an increase in fuel use from 0570005-006-AC. It also requests an increase in production rate to 24.3 tph.

Question

Is the current application subject to PSD analysis (prior actuals compared to requested allowables) for pollutants related to the production increase? We raised the question in an incompletion letter, and I've attached the consultant's response. Please note that day 90 is September 25.

c: R. Kirby
W. Schroeder
W. Thomas

attach

coron898

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

RECEIVED
JUN 29 1998
D E P

June 23, 1998

Mr. William Schroeder
Air Permitting Engineer
FDEP Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

SUBJECT: Coronet Industries, Inc.
Hillsborough County – Air Permit
DEP File No. 0570075-009

Post-it® Fax Note 7671	Date 7/30	# of pages ▶ 3
To NOEL M.	From BILL S.	
Co./Dept. EPC	Co. FDEP	
Phone #	Phone #	
Fax #	Fax #	

Dear Mr. Schroeder:

This letter shall provide the additional information requested in your letter dated May 21, 1998. All questions have been reproduced, preserving your numbering. Responses follow each question.

2. Information from past Annual Operating Reports, supplied by Hillsborough County EPC, show that the increases requested for sulfur dioxide, particulate matter, and fluorine emissions exceed the amounts required for PSD analysis. Please address this issue.

Response

The emissions increases resulting from the increase in feed rate (from 18.0 tons/hour to 24.3 tons/hour) were evaluated prior to the issuance of permit No. 0570075-006-AC. The increase in production rate was not subject to PSD review, because there were no federally enforceable limitations on production rate.

The current request to amend permit No. 0570075-006-AC requests only a slight increase in permitted heat input – no changes to production rate are requested. The current application represents a minor modification to a major source – therefore PSD review is not applicable.

Prior "actual" emissions are set equal to "allowable" emissions under permit No. 0570075-006-AC. This is because the plant has not operated at the rate authorized by permit No. 0570075-006-AC, and there is no representative emissions data for this production rate. The

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emissions increases will be only those increases resulting from the increased fuel use. The current request involves no increase in the permitted emission rates for particulate matter and fluoride emissions, with respect to permit No. 0570075-006-AC. Therefore, only sulfur dioxide increases resulting from the requested increase in fuel use are to be considered. Also, the sulfur content of natural gas is generally considered insignificant, so the sulfur dioxide emissions are only considered with respect to the use of No. 2 fuel oil.

Permit No. 0570075-006-AC	**Requested by Applicant, 0570075-009**
Heat Input = 110.91 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10^3 gal. Gallons/yr = 110.91 * 8760/141 = **6891 x 10^3**	Heat Input = 128.0 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10^3 gal. Gallons/yr = (Synthetic Limit) = **7591 x 10^3**
Increase in fuel use (gal/yr) = 7591 x 10^3 - 6891 x 10^3 = 700 x 10^3	
SO2 Emission Factor = 142(%S) lbs/10^3 gal, at 0.5% S = 71 lbs/10^3 gal	
Increase in SO2 Emission Rate = 71 lbs/10^3 gal x 700 x 1.0 ton/2000 lbs = **25 TPY**	

It is important to note that the annual fuel oil use has been synthetically limited to reduce permitting fees – not to avoid PSD review. The requested heat input level without the synthetic limitation would still result in a less than significant increase in SO2 emissions.

The emissions increase for sulfur dioxide would be only that resulting from the requested increase in fuel oil use. This increase would be less than the PSD significant emission rate.

Please contact me if further information is required.

Sincerely,

Steven C. Cullen, P.E.
Koogler & Associates

copy to: Frank Sweat – Coronet Industries

Florida Department of
Environmental Protection

Memorandum

BUREAU OF AIR REGULATION
FEB 09 1999
RECEIVED

John - Please follow up with Jerry Kissel.
Please make sure Kimber has an active file on this with correspondence to date.
Al

To: Al Linero
John Reynolds

February 3, 1999

From: Jerry Kissel

Subject: Coronet Industries, Project 0570075-009 AC (Kilns 6 & 7, emission unit 005)

Ref: My prior memo to Al Linero on this subject January 8, 1999

Since my memo, we have learned that the oil burners, fuel tank, etc. have been removed and the kilns can only fire natural gas.

If you believe it is permissable to allow Coronet to surrender their past construction permit, I believe it would be reasonable for us (Southwest District) to issue a new construction permit for an increase in production and fuel use (natural gas only). Note that this change does not appear to meet the definition of modification under 210.200(188)(a)2 which says that "...a change in the method of operation [i.e., a modification] shall not include an increase in the hours of operation or in the production rate..." It appears that the increase in natural gas usage would also be allowed, although not specifically mentioned in the above sentence as it is integrally tied to the production rate.

We've set this up as your call, though, so please let me know what you think. EPC may have some further thoughts on this also - Coronet visited EPC on this subject since my 1/8/99 memo.

c S. Cullen, Koogler & Associates
R. Kirby, EPC
F. Sweat, Coronet
W. Schroeder, DEP

K.T.
Please set up file. Thanks

c:\coroa199

RECEIVED
APR 25 1995
Department of Environmental Protection
BY SOUTHWEST DISTRICT

CORONET INDUSTRIES, INC.

April 20, 1995

Mr. Jerry Campbell
Environmental Protection Commission of
Hillsborough County
Permitting Section
900 Ninth Avenue
Tampa, Fl 33605

STACK TEST SUMMARIES

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, NEDS 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 17-2.700, F.A.C. The fluoride emissions were tested in compliance with special conditions No. 2 and No. 5. Particulate emissions were conducted in compliance with special conditions No. 3 and No. 5. Opacity was conducted in compliance with special conditions No. 4 and No. 5.

As required by FDEP authorization of 12/01/94, and extended on 3/1/95, the emissions were tested at 18.07 TPH feed (91.3 % of the requested rate of 19.8 TPH in November, 1994). The reasons for this testing were: 1) annual compliance testing and 2) requested feed rate increase for deflu. kilns 6 & 7, AO29-218851. A visible emission test was conducted for an hour. There was an average natural gas usage of 83.87 mm BTU / hr.

P. O. Box 760 • Plant City, Florida 33564-0760 • (813) 752-1161 • FAX (813) 754-2182

CORONET INDUSTRIES, INC.

SUMMARY OF FLUORIDE EMISSIONS

DEFLU KILNS 6 & 7 **4/13/95**

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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

****

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ALLOWABLE FLUORIDE EMISSION RATE 2.56 LBS / HR.

ALLOWABLE PERCENT OPACITY < 20 %

CORONET INDUSTRIES, INC.

SUMMARY OF PARTICULATE EMISSIONS

DEFLU KILNS 6 & 7 **4/13/95**

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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 %	PARTICULATE CONC. gr / DSCF	EMISSION 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
AVG.	18.07	69,794	59,166	110	7.94	.0139	7.02

****

****

ALLOWABLE PARTICULATE EMISSION RATE: 15 LBS / HR.

ALLOWABLE PERCENT OPACITY < 20 %

CORONET INDUSTRIES, INC.

RECEIVED
APR 25 1995
Department of Environmental Protection
BY SOUTHWEST DISTRICT

April 20, 1995

Mr. Jerry Campbell
Environmental Protection Commission of
Hillsborough County
Air Permitting Section
1900 Ninth Avenue
Tampa, Fl 33605

AO29-270324

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, NEDS 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 17-2.700, F.A.C. The fluoride emissions were tested in compliance with special conditions No. 2 and No. 5. Particulate emissions were conducted in compliance with special conditions No. 3 and No. 5. Opacity was conducted in compliance with special conditions No. 4 and No. 5.

As required by FDEP authorization of 12/01/94, and extended on 3/1/95, the emissions were tested at 18.07 TPH feed (91.3 % of the requested rate of 19.8 TPH in November, 1994). The reasons for this testing were: 1) annual compliance testing and 2) requested feed rate increase for deflu. kilns 6 & 7, AO29-218851. A visible emission test was conducted for an hour. There was an average natural gas usage of 83.87 mm BTU / hr.

P. O. Box 760 • Plant City, Florida 33564-0760 • (813) 752-1161 • FAX (813) 754-2182

CORONET INDUSTRIES, INC.

SUMMARY OF FLUORIDE EMISSIONS

DEFLU KILNS 6 & 7 **4/13/95**

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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	FLUORIDE EMISSIONS 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

****

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ALLOWABLE FLUORIDE EMISSION RATE 2.56 LBS / HR.

ALLOWABLE PERCENT OPACITY < 20 %

CORONET INDUSTRIES, INC.

SUMMARY OF PARTICULATE 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 %	PARTICULATE CONC. gr / DSCF	EMISSION 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
AVG.	18.07	69,794	59,166	110	7.94	.0139	7.02

ALLOWABLE PARTICULATE EMISSION RATE: 15 LBS / HR.

ALLOWABLE PERCENT OPACITY < 20 %

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CORONET INDUSTRIES, INC.

RECEIVED
JUN 04 1998
Department of Environmental Protection
SOUTHWEST DISTRICT
BY

May 28, 1998

Mr. Jerry Campbell
Environmental Protection Commission
of Hillsborough County
Air Permitting Section
1900 Ninth Avenue
Tampa, Florida 33605

Re: Scheduled Stack Test for Defluorinating Kilns 6 & 7, AO29-218851, Coronet Industries, Inc.

Dear Mr. Campbell:

In accordance with the requirements of the Specific Condition No.'s 2, 3, 4, 5, 6, 7, and 10 of AO29-218851 as amended on July 18,1995, the scheduled stack tests were conducted on May 8, 1998. The AIRS No. is 0570075, the NEDS No. is 0075, and the emissions unit is 005. For these tests, the units were operated on natural gas at a combined feed rate of 18.0 TPH. The tests were conducted using Methods 1, 2, 4, 5, 9, and 13B as contained in 40 CFR 60, Appendix A and adopted by reference in Rule 17-297, F.A.C. Our APIS Id is 40-HIL-29-0075-05. The natural gas consumption for these tests averaged 67.9 MMBTU's / Hr.

The results of these tests are being transmitted via the attached report. Should you have any questions concerning these results, please contact me at (813)- 719-7255.

Sincerely,

Samuel F. Sweat
Environmental Affairs Manager

Attachments
cc: Bill Thomas / FDEP
V. T. Scialli -COO / President
Keith Gibson
Shuji Ishimatsu
W. Ragins

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

CORONET INDUSTRIES, INC

SUMMARY OF FLUORIDE EMISSIONS

KILNS 6 & 7 — MAY 8, 1998

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	FLUORIDE EMISSIONS RATE lb / HR
1	18.0	37.578	31.689	109.5	8.75	20.47	1.83
2	18.0	32.912	27.689	109.8	8.92	20.88	1.63
3	18.0	33.526	27.979	111.24	9.42	32.50	2.57
AVG	18.0	34.672	29.119	110.18	9.03	24.62	2.01

ALLOWABLE FLUORIDE EMISSION RATE 2.83 LBS / HR

ALLOWABLE PERCENT OPACITY < 20 %

CORONET INDUSTRIES, INC

SUMMARY OF PARTICULATE EMISSIONS

KILNS 6 & 7 — MAY 8, 1998

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 %	PARTICULATE EMISSIONS CONC. GR/DSCF	PARTICULATE EMISSIONS RATE lb / HR
1	18.0	37,578	31,689	109.5	8.75	0.0266	7.22
2	18.0	32,912	27,689	109.8	8.92	0.0288	6.85
3	18.0	33,526	27,979	111.24	9.42	0.0515	12.36
AVG	18.0	34,672	29,119	110.18	9.03	0.0356	8.81

ALLOWABLE PARTICULATE EMISSION RATE 15.0 LBS / HR
ALLOWABLE PERCENT OPACITY < 20 %

Best Available Copy

AA

CORONET INDUSTRIES, INC.

RECEIVED
NOV 13 1996
Department of Environmental Protection
BY SOUTHWEST DISTRICT

November 11, 1996

Mr. Jerry Campbell
Environmental Protection Commission
of Hillsborough County
Air Permitting Section
1900 Ninth Avenue
Tampa, Florida 33605

Re: Scheduled Stack Test for the Defluorinating Kilns 6 & 7, AO29-218851, Coronet Industries, Inc.

Dear Mr. Campbell:

In accordance with the requirements of the Specific Conditions of AO29-218851, the scheduled stack tests were conducted on November 1, 1996. The AIRS No. is 0570075, the NEDS No. is 0075, and the Emissions Unit No. is 005. For these tests, the units were operated at 18.48 TPH. The test was conducted using Methods 1, 2, 4, 5, 9, and 13B as contained in 40 CFR 60, Appendix A and adopted by reference in Rule 17-297, F.A.C. Our APIS Id is 40-HIL-29-0075-05. These tests were conducted in compliance with Special Conditions 2, 3, 4, and 5, and the permit amendment of July 18, 1995. There was an average natural gas usage of 92.0 MM BTU / hr.

The results of these tests are being transmitted via the attached report. Should you have any questions concerning these results, please contact me at (813)- 719-7255.

Sincerely,

Samuel F. Sweat
Environmental Affairs Manager

Attachments
cc: Bill Thomas / FDEP
V. T. Scialli -COO / President
N. W. Lowrey
J. Reed
W. Ragins

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

CORONET INDUSTRIES, INC

SUMMARY OF PARTICULATE EMISSIONS

Kilns 6 & 7 — November 1, 1996

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 %	PARTICULATE EMISSIONS CONC. GR/DSCF	PARTICULATE EMISSIONS RATE lb / HR
1	18.48	60.893	49.464	119.71	11.21	0.0183	7.75
2	18.48	58.611	47.586	118.33	11.47	0.0214	8.75
3	18.48	63.357	50.677	118.58	12.74	0.0205	8.89
AVG	18.48	60.954	49.242	118.87	11.81	0.0201	8.46

ALLOWABLE PARTICULATE EMISSION RATE 15.00 LBS / HR
ALLOWABLE PERCENT OPACITY < 20 %

CORONET INDUSTRIES, INC

SUMMARY OF FLUORIDE EMISSIONS

Kilns 6 & 7 — November 1, 1996

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	FLUORIDE EMISSIONS RATE lb / HR
1	18.48	60.893	49.464	119.71	11.21	15.72	2.20
2	18.48	58.611	47.586	118.33	11.47	16.65	2.24
3	18.48	63.357	50.677	118.58	12.74	14.19	2.03
AVG	18.48	60.954	49.242	118.87	11.81	15.52	2.16

ALLOWABLE FLUORIDE EMISSION RATE 2.56 LBS / HR

ALLOWABLE PERCENT OPACITY < 20 %

Florida Department of
Environmental Protection

Memorandum

RECEIVED
JAN 19 1999
BUREAU OF
AIR REGULATION

To: Al Linero

January 8, 1999

From: Jerry Kissel

Subject: Coronet Industries, Project 0570075-009 AC (Kilns 6 & 7, emission unit 005)

We issued a denial (attached) on this project, based on PSD considerations, and Coronet filed for a hearing. Coronet has subsequently proposed a settlement (attached) which proposes to surrender the prior construction permit, thereby making moot the limitations of the prior construction permit and any resulting PSD analysis. Since this is essentially a PSD situation, we would appreciate your input.

This e.u. had a series of operating permits through 1992, and its first and only construction permit was issued in 1995, as shown in the table below. Note that the construction permit authorized additional equipment and increases in allowables. The additional equipment was never installed, as stated in the proposed settlement letter. However, the other increases did occur. Thus the statement in the settlement letter appears incorrect in stating 'if the facility takes no action under the conditions of an air construction permit, then this permit can be surrendered....' (the facility has taken some actions, such as increasing production).

It appears to us, however, that even if the AC is not surrendered, Coronet may be able to take annual restrictions (actual to potential) to keep emission increases from triggering PSD applicability. They have not proposed this though.

Permit	Issue Date/ Exp'n Date[2]	Allowable Limits				
		PM, lbs/hr	F, lbs/ton of P_2O_5	Produc'n Tons/Hr	MM Btu/hr	Hours Per Year
AO29-218851	1992 exp. 11/97	15	0.37	18	94.5 gas 100.8 oil	8,064
AC29-259884/ 0570075-006AC[1]	2/95 exp. 7/97	13.81	0.37	24.3	103.9 gas 110.9 oil	8,760
AO29-218851 Amendment	7/95 exp. 11/97	unspec'd; AC governs	0.37	19.8	unspec'd; AC governs	8,760
0570075-009 Application	submitted 4/22/98	15	0.37	24.3	120 gas 128 oil	8,760

[1]Permit was renumbered [2]Title V permit not yet issued; expirations extended

The above table deals with short term limits, and does not include some annual limits which have been proposed. They are not necessary though, to answer the current questions, however, which are whether the prior AC can be surrendered, and if so, is the project under the proposed settlement exempt from PSD analysis.

I don't know where we are on the legal clock on this re the hearing. but I believe there is some urgency to resolving this rather than preparing for a hearing. We agreed to pass along Steve Cullen's request that you get back to us in ten days if possible.

c: D. Beason, DEP OGC
S. Cullen, Koogler & Associates
R. Kirby, EPC
W. Schroeder, DEP

Attachments, to Al Linero only:
Permit denial
Petition for hearing
12/1/98 proposed settlement letter

c:\coron199

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT DENIAL

CERTIFIED MAIL

In the Matter of an Application
for Permit by:

DEP File No.: 0570075-009-AC
County: Hillsborough

Mr. Vincent T. Scialli
President & COO
Coronet Industries, Inc.
4082 Coronet Road
Plant City, FL 33564-0760

_____/

The applicant, Coronet Industries, Inc., applied on April 22, 1998, to the Department of Environmental Protection for a permit to increase natural gas and oil heat input and a process rate increase in Kilns 6 and 7, located at the Plant City Animal Feed Ingredient facility.

The Department has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

The Department denies this air pollution permit based on the belief reasonable assurances have not been provided to indicate the proposed project will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 & 62-4.

The Department's reason for denial is set forth as follows:

1. Fuel use was previously limited by a construction permit; thus this application for an increase in fuel use is subject to PSD review, requiring an "actual to potential" test for PSD significance. The applicant has not provided proper justification for the application of this approach, as in the attached incompletion letter response, which uses a "potential to potential" test for SO_2 (sulfur dioxide). Furthermore, the "actual to potential" reasoning must be used for other pollutants such as PM (particulate matter), fluorides, and NO_x(nitrogen oxides).

Note: The application is denied on the above basis. Another issue, however, raised in the application, is a request for a return to a production rate of 24.3 tph allowed in permit 0570005-006-AC, later limited to 19.8 tph in amended permit AO29-218851, July 1995. Since a permit could be written for the fuel rate increase without the production rate increase, the application is

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Printed on recycled paper.

not denied on the basis of the request for a production rate increase, but the following comments are germane.

A) The Department's position is that the application for a production rate increase should require a PSD permit review. The applicant was queried by the Department in a letter dated May 21, 1998, to provide reasons that PSD regulations did not apply to the project. In a response letter, dated June 23, 1998, the applicant stated that the increased kiln feed rate was capped at 24.3 tons/hour by previous construction permit No. 0570075-006-AC and that PSD did not apply to a feed rate increase. DEP comment: This was incorrect in that permit No. 0570075-006-AC was written to include additional HF recovery equipment which was never installed.

[The kilns were tested for emissions on November 1, 1996, at a feed rate of 18.48 tons/hour and were in compliance. The kilns were unable to produce a satisfactory product at a higher rate, and therefore operating permit No. AO29-218851 was amended to reflect a feed rate of 19.8 tons/hour (18.48 tons/hour + 10%)].

B) Construction permit No. AC29-259884, issued in 1995, later renumbered to 0570075-006-AC, ~~95~~ authorized a proposed "fluoride plant" to utilize additional HF provided by the rate increase and additional fluoride removal towers. This fluoride plant has not been constructed and, as previously stated, the HF removal towers were not added to the kilns exhaust. With the intent to increase feed rate to the kilns for additional HF byproduct, failure to construct the said equipment would dictate that this current application must be considered a "new" project and subject to PSD analysis.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this permit denial. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following:

(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 the petitioner, if any;
(e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and
(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this permit denial.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this permit denial. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this permit denial.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;
(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
(c) Each rule or portion of a rule from which a variance or waiver is requested;
(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
(e) The type of action requested;
(f) The specific facts that would justify a variance or waiver for the petitioner;
(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by the person under the Clean Air Act unless and until Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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

RDG/WES/ws
Attachment

cc: R. Kirby, P.E., EPCHC
Steven C. Cullen, P.E., Koogler & Associates, P.E.

Z 260 542 311

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*
Sent to

Mr. Vincent T. Scialli,
President & COO
Coronet Industries, Inc.
4082 Coronet Road
Plant City, FL 33564-0760

Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	9/24/98

PS Form **3800**, April 1995

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT DENIAL was sent to the addressee by certified mail and all copies were sent by regular mail before the close of business on SEP 24 1998 to the listed persons, unless otherwise noted.

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Patricia Pruckett SEP 24 1998

Clerk Date

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

RECEIVED
JUN 29 1998
D E P

June 23, 1998

Mr. William Schroeder
Air Permitting Engineer
FDEP Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

SUBJECT: Coronet Industries, Inc.
Hillsborough County – Air Permit
DEP File No. 0570075-009

Dear Mr. Schroeder:

This letter shall provide the additional information requested in your letter dated May 21, 1998. All questions have been reproduced, preserving your numbering. Responses follow each question.

(Questions 1 & 3 are not included with this copy)

2. Information from past Annual Operating Reports, supplied by Hillsborough County EPC, show that the increases requested for sulfur dioxide, particulate matter, and fluorine emissions exceed the amounts required for PSD analysis. Please address this issue.

Response

The emissions increases resulting from the increase in feed rate (from 18.0 tons/hour to 24.3 tons/hour) were evaluated prior to the issuance of permit No. 0570075-006-AC. The increase in production rate was not subject to PSD review, because there were no federally enforceable limitations on production rate.

The current request to amend permit No. 0570075-006-AC requests only a slight increase in permitted heat input – no changes to production rate are requested. The current application represents a minor modification to a major source – therefore PSD review is not applicable.

Prior "actual" emissions are set equal to "allowable" emissions under permit No. 0570075-006-AC. This is because the plant has not operated at the rate authorized by permit No. 0570075-006-AC, and there is no representative emissions data for this production rate. The

emissions increases will be only those increases resulting from the increased fuel use. The current request involves no increase in the permitted emission rates for particulate matter and fluoride emissions, with respect to permit No. 0570075-006-AC. Therefore, only sulfur dioxide increases resulting from the requested increase in fuel use are to be considered. Also, the sulfur content of natural gas is generally considered insignificant, so the sulfur dioxide emissions are only considered with respect to the use of No. 2 fuel oil.

Permit No. 0570075-006-AC	**Requested by Applicant, 0570075-009**
Heat Input = 110.91 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10^3 gal. Gallons/yr = 110.91 * 8760/141 = **6891 x 10^3**	Heat Input = 128.0 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10^3 gal. Gallons/yr = (Synthetic Limit) = **7591 x 10^3**
Increase in fuel use (gal/yr) = 7591 x 10^3 - 6891 x 10^3 = 700 x 10^3	
SO2 Emission Factor = 142(%S) lbs/10^3 gal, at 0.5% S = 71 lbs/10^3 gal	
Increase in SO2 Emission Rate = 71 lbs/10^3 gal x 700 x 1.0 ton/2000 lbs = **25 TPY**	

It is important to note that the annual fuel oil use has been synthetically limited to reduce permitting fees – not to avoid PSD review. The requested heat input level without the synthetic limitation would still result in a less than significant increase in SO2 emissions.

The emissions increase for sulfur dioxide would be only that resulting from the requested increase in fuel oil use. This increase would be less than the PSD significant emission rate.

Please contact me if further information is required.

Sincerely,

Steven C. Cullen, P.E.
Koogler & Associates

copy to: Frank Sweat – Coronet Industries

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

CORONET INDUSTRIES, INC.

Petitioner,

vs.

CASE NO.: 98-2690

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.
_____/

RECEIVED
OCT 7 1998
Dept. of Environmental Protection
Office of General Counsel

PETITION FOR ADMINISTRATIVE HEARING

TO: Department of Environmental Protection
Office of the General Counsel
3900 Commonwealth Blvd.
Mail Station 35
Tallahassee, FL 32399-3000

In accordance with § 120.569 and § 120.57, F.S. (1997), the Petitioner, Coronet Industries, Inc. (hereinafter "Coronet") files this Petition for an administrative hearing. In accordance with the Notice of Permit Denial (copy attached at Exhibit "A"), the following is submitted:

(a) Coronet Industries, Inc., P.O. Box 760, Plant City, Florida 33650-0760, telephone number 813/752-1161. DEP File No. 0570075-009-AC Hillsborough County.

(b) Coronet received the Notice of Permit Denial by certified mail on September 28, 1998.

(c) 1. The Permit Denial would prohibit Coronet's proposal to increase natural gas and oil heat input into kilns 6 and 7 located at the plant site.

2. Coronet is an animal feed supplement plant.

3. The Permit Denial reflects that the increase in fuel use is subject to a PSD review requiring an "actual to potential" test for PSD significance. This decision is erroneous and reflects a misunderstanding of the operations of the plant.

4. The Permit Denial, if unchallenged, would prohibit Coronet from increasing its production, its rate of fuel use to accommodate its production and it would have an adverse economic impact on Coronet.

5. The Permit Denial would required Coronet to comply with standards which are not applicable to it.

6. The requested increase in natural gas in no way affects the emission of SO_2, NOX, fluorides or particulates.

(d) The Department's basis for denial is not given with any specificity.

1. The discussion indicates that the Department believes a PSD review is applicable for the project. This information, combined with knowledge of the facility, directs one to Rule 62-212.400(2)(d)4., F.A.C. This rule provides for the applicability of PSD review to modifications to major facilities, required when net emissions increases exceed certain amounts, when using "actual-to-potential" calculations.

2. The specific project changes (production and heat input increases) do not rise to the level of "modifications," as defined at Rule 62-210.200(188), F.A.C. This rule provides that a modification shall not include an increase in the

production rate or an increase in annual hours of operation unless such change would be prohibited by a federally-enforceable permit condition.

3. This facility was issued an air construction permit (No. AC29-259884, issued 1/23/95) that allowed for a rate and heat input increase, an increase in annual hours, and the installation of extensive equipment related to a second fluoride salts plant. It is important to note that the application resulting in Permit No. AC29-259884 was not subject to PSD review, absent federally enforceable limitations. The permit conditions would be federally enforceable only if Coronet had performed any actions under the authority of the referenced air construction permit. No such actions have taken place. Permit No. AC29-259884 was renumbered and reissued on 1/13/97 as 0570075-006-AC.

4. In April 1998, Coronet decided not to undertake the activities in the air construction permit, but was interested in increasing production (to the rate specified in the AC) and heat input (to rates necessary to increase production) and to increase annual hours. It was agreed, in consultation with Department staff, that these goals could be achieved in one of two ways, without incurring PSD review:

A. Amend the air construction permit as construction had not commenced. This approach relies on the permit conditions not being federally enforceable, because the project was not constructed. Further, any review would necessitate a "potential-to-potential" approach, as no

opportunity for measuring actual emissions generated during operations under the increased rates were present.

B. Surrender the air construction permit and apply for the increases in production (with attendant fuel needs) and annual hours. This approach would not be subject to PSD review, as the parameters would not be subject to any federally enforceable conditions after the surrender.

At the direction of the Department staff, the first option was selected.

(e) 1. The denial of the Permit that Coronet is subject to PSD review and the Department's belief that reasonable assurances have not been provided that Coronet will comply with appropriate provisions of Chapter 62-204 through 62-297 and 62-4, F.A.C.. The Department has not specified the appropriate provisions of this code.

2. Coronet requests that the Permit Denial be reversed because the Department did not issue its approval or denial within a timely basis.

3. In this permit, the following dates are applicable:

A. April 22, 1998 - Application received by DEP.

B. May 21, 1998 - Request for additional information made by DEP.

C. June 23, 1998 - Coronet provides additional information to DEP.

D. September 28, 1998 - Denial of permit received by Coronet.

4. No additional extension had been granted by Coronet.

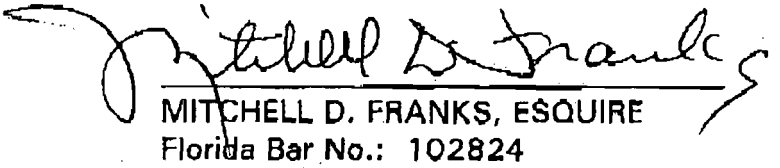
5. The Department was not authorized by law to seek the additional information as this information was not pertinent to the permit. Also, the information requested was already in the possession of the Department. The increase in natural gas and fuel was previously authorized in a permit (No. AC29-259884).

(f) The actions taken pursuant to Chapter 62-204 through 62-297 and 62-4, F.A.C., upon which the Department relies, must be reversed or the petition Permit Denial modified. In addition, § 120.569, § 120.57 and § 403.0872, Florida Statues, require reversal or modification of the Department's denial of the permit.

(g) Coronet seeks to have the Notice of Permit Denial revoked, the basis of the denial rescinded and the Department denied the opportunity to defend its action based upon its failure to comply with the required time limits regarding permits.

Respectfully submitted.

LANE, TROHN, BERTRAND &
VREELAND, P.A.



MITCHELL D. FRANKS, ESQUIRE
Florida Bar No.: 102824
One Lake Morton Drive (33801)
Post Office Box 3
Lakeland, Florida 33802-0003
Phone: (941) 284-2200
Fax: (941) 688-9771
Attorneys for Petitioner

Best Available Copy

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT DENIAL

CERTIFIED MAIL

In the Matter of an Application for Permit by:

DEP File No.: 0570075-009-AC
County: Hillsborough

Mr. Vincent T. Scialli
President & COO
Coronet Industries, Inc.
4082 Coronet Road
Plant City, FL 33564-0760

The applicant, Coronet Industries, Inc., applied on April 22, 1998, to the Department of Environmental Protection for a permit to increase natural gas and oil heat input and a process rate increase in Kilns 6 and 7, located at the Plant City Animal Feed Ingredient facility.

The Department has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

The Department denies this air pollution permit based on the belief reasonable assurances have not been provided to indicate the proposed project will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 & 62-4.

The Department's reason for denial is set forth as follows:

1. Fuel use was previously limited by a construction permit; thus this application for an increase in fuel use is subject to PSD review, requiring an "actual to potential" test for PSD significance. The applicant has not provided proper justification for the application of this approach, as in the attached incompletion letter response, which uses a "potential to potential" test for SO_2 (sulfur dioxide). Furthermore, the "actual to potential" reasoning must be used for other pollutants such as PM (particulate matter), fluorides, and NO_x(nitrogen oxides).

Note: The application is denied on the above basis. Another issue, however, raised in the application, is a request for a return to a production rate of 24.3 tph allowed in permit 0570005-006-AC, later limited to 19.8 tph in amended permit AO29-218851, July 1995. Since a permit could be written for the fuel rate increase without the production rate increase, the application is

EXHIBIT "A"

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

Printed on recycled paper.

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

RECEIVED
DEC 0 2 1998
Air Protection
SOUTHWEST DISTRICT
BY

December 1, 1998

Gerald Kissel, P.E.
Southwest District -- Air Program
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

SUBJECT: Coronet Industries, Inc. -- Plant City Facility
DEP File No. 0570075-009-AC
Notice of Permit Denial
Emissions Unit 005: Kilns 6 & 7

Dear Mr. Kissel:

Thank you and thanks to Jim McDonald and Bill Schroeder for meeting with me and Frank Sweat (Coronet) recently. We were in the area, and wanted to discuss administrative settlement of the DEP's Notice of Permit Denial and Coronet's resulting Petition for Administrative Hearing.

We had general agreement that if Coronet were to surrender Air Construction Permit No. 0570075-006-AC, then kilns 6 and 7 would once again be without federally enforceable limitations on production rate and heat input.

In discussions with Pat Comer (DEP-OGC) and an EPA attorney, we were advised that if a facility takes no action under the conditions of an air construction permit, then this permit can be surrendered and the facility reverts back to the status it held prior to the issuance of the permit. In the case of Coronet, Permit No. 0570075-006-AC was the first construction permit issued for the emissions unit. By surrendering this air construction permit, the emissions unit is once again without any federally enforceable permit conditions. This discussion is meaningful prior to the issuance of the Title V Operation permit.

As we stated at the meeting and restate here, Coronet has taken no action under Permit No. 0570075-006-AC. An increase in production rate was permitted under existing air operation Permit No. AO29-218851. Coronet attempted to amend Permit No. 0570075-006-AC. This request to amend the permit was denied and Coronet filed a Petition for a Formal Administrative Hearing. It appears that Coronet can achieve its goals by surrendering Permit No. 0570075-006-AC, and applying for the requested production and heat input increases without federally enforceable limitations.

In an attempt to settle this matter and to avoid the costs of an administrative hearing, Coronet proposes an administrative settlement of this issue. Coronet's proposed settlement includes actions by Coronet as well as the Department. Accordingly, Coronet's actions are offered in the context of a complete settlement that will result in the issuance of an air construction permit authorizing the requested changes.

Coronet proposes the following:

a. Coronet will:

1. Surrender Air Construction Permit No. 0570075-006-AC.

2. If the Department agrees to settle this matter as set forth in b.1-3 below, Coronet will dismiss the Petition for an Administrative Hearing.

b. Department Actions:

1. Review the permit application submitted on April 22, 1998 in the context of the emissions unit having no federally enforceable limitations on production rate and heat input.

2. Accept the previously submitted processing fee as adequate for this review.

3. Issue an air construction permit, as the "first" air construction permit for this emissions unit, authorizing the requested increases in production rate and heat input.

Thank you for reviewing this proposed settlement. Please provide me with your response by December 18, 1998. If you have any questions, please contact me or Frank Sweat at Coronet. We hope that this agreement will be acceptable to the Department so that we can dismiss the Petition for an Administrative Hearing. If, however, the Department is unwilling to settle this matter as we have discussed, then Coronet will proceed with the administrative hearing on the matter.

Sincerely,

Steven C. Cullen, PE
Koogler & Associates

copy to: Mitchell D. Franks, Esq.
Frank Sweat – Coronet
R Kirby, EPC
– JK 12/8/98

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

CORONET INDUSTRIES, INC.

November 4, 1996

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

DEP
OCT 07 1996
TAMPA

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. Sweat
Environmental Affairs Manager

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

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

MEMORANDUM

AIRS Processing No. NONE

TO: W.C. Thomas, P.E. 11/6/95 **DATE:** October 25, 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
Request for Supplemental Fuel Performance Tests

Ref: Permit AO29-218851
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. AO29-218851.

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_

Best Available Copy

CORONET INDUSTRIES, INC.

Rec'd 9/15/95 (WTR)

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:

AIRS ID 057 0076 001 AO

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_x, SO_x, and unburned hydrocarbons prior to the test and after the plant was stabilized during the test. Coronet requests that this test be kept confidential.

AIRS ID

AIRS ID

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

Samuel F Sweat
Environmental Affairs Manager

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

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

Best Available Copy

Product Description Sheet

McCLAIN CORPORATION

FS-CARB

Foamy Slag Addition

Chemistry: Typical

Component	% by Weight
Fixed Carbon	97.0
Ash	1.8
Volatile	1.6
Moisture	0.1
Sulfur	2.5

Size: Typical

Mesh Size	% by Weight
+ 3	0.9
+ 10	5.5
+ 20	2.5
+100	19.1
+200	70.5
- 200	1.5

average

32 mesh

Packaging:

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

DISCLAIMER: The ratings, findings, and recommendations contained in this data sheet concerning the performance, use or handling of the product or techniques herein described are based on our research and general 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 application. It is the responsibility of the user to test and fully determine the suitability of every recommendation for your own particular purpose. We warrant that the product conforms to our specifications and we agree to replace any defective products. However, we do not assume liability for any incidental or consequential damages. ANYTHING HEREIN SHALL CREATE 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 AO29-218851
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 AO29-218851 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.ill

Best Available Copy

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 PROCEEDED WITH THIS PROJECT, UNLESS YOU INDICATE OTHERWISE.

JOHN J. TAYLOR
9/18/95

You were assigned this one on 9/6 to write auth'n ltr.* If they later come in with application, I'll get Tall'e involved

JJK 9/21/95

*we have examples from other petrole auth'n letters at Lakeland Elec Fla Pwr Crys. River 2, Tsco Big Bend.

Best Available Copy

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:

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_x, SO_x, 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

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

CORONET INDUSTRIES, INC.

September 13, 1995
Rec'd 9/15 GK

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_x, SO_x, 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

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

Best Available Copy

TO: CORONET INDUSTRIES INC. 2/14/95
ATTN: DENNIS SIMMS
FROM: MCCLAIN CORPORATION FAX 513-754-2182
TOM THOMSEN
PH 513-338-7105 FAX 513-338-7167

DENNIS. HERE IS SPEC SHEET PER OUR CONV.
Y-DAY. CALL ME IF/WHEN YOU HAVE MORE INFO

TOM

Product Description Sheet

McCLAIN CORPORATION

FS-CARB

Foamy Slag Addition

Chemistry: Typical

Component	% by Weight
Fixed Carbon	97.0
Ash	1.8
Volatile	1.6
Moisture	0.1
Sulfur	2.5

Size: Typical

Mesh Size	% by Weight
+ 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 ratings, findings, and recommendations are furnished to you solely as an opinion of the performance, use or handling of the product or technique herein evaluated and based on our research and general experience. While we believe that information to be accurate and reliable, we do not guarantee accuracy or the results to be obtained in any particular application. It is your responsibility to rely upon your own tests to determine the suitability of these techniques for your own particular purpose. We warrant that the products meet the chemical analysis and size ranges as stated on the respective analysis. However, we do not assume liability for any incidental or consequential damages. NOTHING HEREIN SHALL CREATE A 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
BY

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

Samuel F. Sweat
Environmental Affairs Manager

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

→ CARLOS GONZALES - EPC 9/23/95 (FAXED BY JJT)

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

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 AO29-218851 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

****

****

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 %	PARTICULATE CONC. gr / DSCF	EMISSION 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
AVG.	18.07	69,794	59,166	110	7.94	.0139	7.02

****

****

ALLOWABLE PARTICULATE EMISSION RATE: 15 LBS / HR.

ALLOWABLE PERCENT OPACITY < 20 %

Best Available Copy

CORONET INDUSTRIES, INC.

April 27, 1995

RECEIVED
MAY 02 1995
Department of Environmental Protection
BY SOUTHWEST DISTRICT

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 AO29-218851

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. AO29-218851, 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

P. O. Box 760 • Plant City, Florida 33564-0760 • (813) 752-1161 • FAX (813) 754-2182

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED
MAY 02 1995
Department of Environmental Protection
SOUTHWEST DISTRICT
BY

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
	Particulates	7.02 lb/HR	15 lb/HR
	Fluorides	1.79 lb/HR	2.56 lb/HR

Date plant placed in operation: N/A Coronet began trying to increase rates in early Dec.,1994 Rates were raised to 17.8 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 No.~~ 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

Date: 5-1-95

4415 Florida National Drive
Suite 101
Lakeland, FL 33813
Mailing Address

(Seal)

(813) 646-2828
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

Best Available Copy

COMMISSION

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

EXECUTIVE DIRECTOR

PHILIP P. STEWART

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

ADMINISTRATIVE OFFICES, LOCAL & 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

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

FAX TRANSMITTAL SHEET

DATE: 5/23/95

TO: Bill Schroeder

FAX PHONE: 744-6458 VOICE PHONE: 744-6100 x104

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 3

EPC FAX TRANSMISSION LINE: (813) 272-5605
FOR RETRANSMISSION OR ANY FAX PROBLEMS, CALL: (813) 272-5530

FROM: CARLOS GONZALEZ
(CIRCLE APPLICABLE SECTION BELOW)

AIR DIVISION

-ENFORCEMENT

-ENGINEERING

-SUPPORT OPERATIONS

SPECIAL INSTRUCTIONS: _____

An Affirmative Action - Equal Opportunity Employer

Printed on recycled paper

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COMMISSION
NOTTIE BERGER
[illegible] BUDANSKY
[illegible] ILLURA
CHRIS HART
[illegible] NORMAN
ED TURANCHIK
SANDRA WILSON

EXECUTIVE DIRECTOR
ROGER P. STEWART

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

ADMINISTRATIVE [illegible] LEGAL &
WATER MAN[illegible] DIVISION
1900 [illegible] AVE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
FAX (813) 272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-[illegible]

WASTE MANAGEMENT DI[illegible]
TELEPHONE (813) 272-[illegible]

WETLANDS MANAGEMENT
TELEPHONE (813) 272-[illegible]

M E M O R A N D U M

DATE: May 23, 1995

TO: William Schroeder, DEP/SW District

FROM: Carlos Gonzalez CG THRU: RK 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), PATS #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

bm

An Affirmative Action - Equal Opportunity Employer

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CORONET INDUSTRIES, INC.

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

April 20, 1995

Mr. Jerry Campbell
Environmental Protection Commission of
Hillsborough County
Air Permitting Section
1900 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 [illegible] NO. 0075. Point ID: 05, kilns 6 & 7, a compliance test was conducted on [illegible] 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 by rule [illegible] A.C. The fluoride emissions were tested in compliance with specific condition No. 3 and No. 6. Particulate emissions were conducted in compliance with specific conditions No. 3 and No. 5. Opacity was conducted in compliance with specific conditions No. 4 and No. 5.

[illegible] TSP authorization of 10/01/94 and extended on 3/1/95 the [illegible] at 19.07 TPH feed, 91.3 % of the requested rate of 19.8 TPH [illegible] 1994). The reasons for this testing were [illegible] and complete [illegible] 21 requested feed rate increase for def[illegible] 6 & 7 AO29-21[illegible] emission test was conducted for an hour [illegible] was an average [illegible] usage of 83.87 mm BTU / hr.

NEDS NO: 0025-05
LOGGED IN
COMPUTER LIST
REVIEWED BY:

P. O. Box 760 • Plant City, Florida 33564-0760 • (813) 752-1161 • FAX (813) 754-2182

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.

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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)

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 AO29-218851, 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 AO29-218851 permit conditions.

Pending review of the test data, the Department will acknowledge that the above conditions have been satisfied by amending permit AO29-218851. 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

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	FLUORIDE EMISSIONS 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 %

Best Available Copy

AIR POLLUTION SOURCE INSPECTION REPORT FORM
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FACILITY	PAGE 1 OF 2
CORONET INDUSTRIES, INC.	

FACILITY ADDRESS	CITY
CORONET ROAD	PLANT CITY

MAILING ADDRESS	CITY	ST	ZIP
		FL	33566

INSPECTION DATE	TIME IN	TIME OUT	INSPECTION TYPE	STATS
5/24/95	1000	1140	PERMITTING	3

NEDS NO. 40HIL29007505

SOURCE DISCRIPTION DEFLURINATION KILNS 6 & 7

CONTACT(S) SAM SWEAT

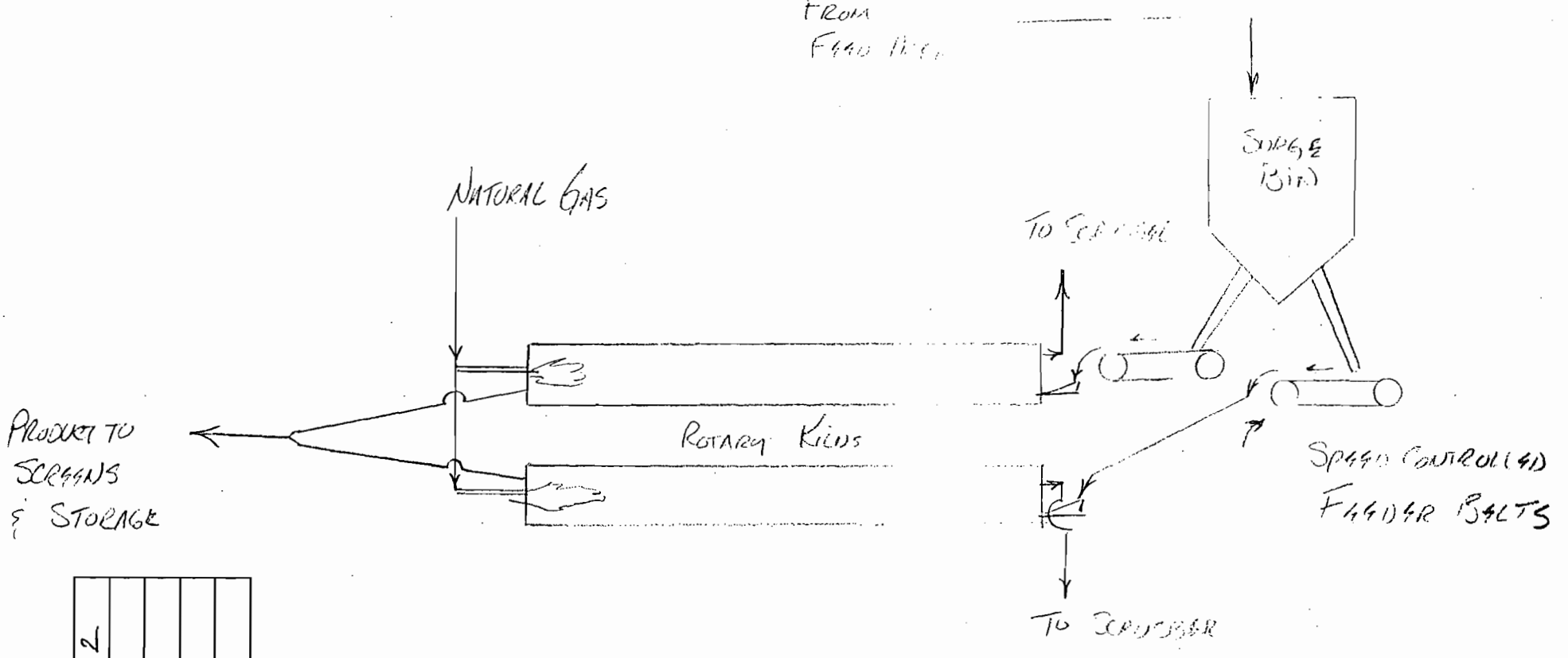
ANNOUNCED INSPECTION FOR PERMITTING PURPOSES. THE KILN THROUGHPUT RATE HAS BEEN INCREASED FROM 18 TPH (6.9 TPH P2O5) TO 24.3 TPH (8.66 TPH P2O5) TOTAL FOR BOTH KILNS. KILN 6 WAS TEMPORARILY DOWN SINCE 9AM FOR WASHING ACCORDING TO THE OPERATOR'S LOG. KILN 7 WAS OPERATING ON A SHIFT MAXIMUM OF 492 CFH 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
Total	

PREPARED BY: [signature] REPORT DATE 5/30/95

Best Available Copy



DEFLO. KILNS 6 & 7

Post-It™ brand fax transmittal memo 7671 | # of pages ▸ 2

To CARLOS GONZALEZ	From BILL S.		
Co. EPC	Co. SWDEP		
Dept. AIR ENG.	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. AO29-218851

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~~ 197.

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

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

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

Department of Environmental Protection

DRAFT
3/1/95 (JF)

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

March 1, 1995

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

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

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,

Samuel F. Sweat
Environmental Affairs Mgr.

SFS:cr

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

Best Available Copy

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 AO2[illegible]-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 complete 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 require further assistance, please contact me at 813 [illegible]-7255.

Sincerely,

Samuel F. Sweat
Environmental Affairs Mgr.

SFS/sjr

cc: M. Lowery
S. Oliaee
J. Compton/EPCHC

P. O. Box 750 • Plant City, Florida 33564-0750 • Tel (813) 752-1161 • Fax (813) 754-8565

MEMORANDUM
Final-Issue

Pats Processing No. 259884

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

DATE: February 20, 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 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_2O_5 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

RECEIVED
FEB 16 1995
Environmental Protection
SOUTHWEST DISTRICT

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

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

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 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 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 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 CORONET 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_2 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_2 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_2 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

SO_2

SO_2 emissions are calculated from available sulfur in the prepared feed which is liberated as SO_2 by the calcining process. Additional SO_2 is from the combustion of fuels.
Maximum lb/hr: Sulfur content is calculated at 0.47%/ weight of Prepared Feed.
Efficiency of SO_2 Removal = 40%+; This level of SO_2 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_2O_5
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_2 from Prepared Feed + SO_2 from #2 Fuel Oil (Worst Case)

(48,600 lbs feed/hr) X (0.0047 pounds sulfur/pound feed) X (2 lbs. SO_2/1 lb. S) X 0.6 =
= 274.1 lb/hr
Actual TPY SO_2 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_2 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^3/hr
SO_2 emission factor for large industrial boilers = 0.6 lb/10^6 ft^3
0.10391 X 10^6 ft^3 Natural Gas/hr X 0.6 lb SO_2/10^6 ft^3 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_2 emission factor for industrial boilers:
= 142(0.5) lb. SO_2/10^3 gal. of fuel X 0.7866 X 10^3 gal. of fuel/hr X 0.6
= 33.5 lb/hr
@ 8760 hpy = 146.77 tpy

Allowed Emission Rate per Rule: No Rule
Allowable emisson: --

Potential Emission: Based on 8760 hpy, 100% of Sulfur from feed liberated as SO_2, 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_2/1 lb. S) = 456.84 lbs/hr
= 2001 tpy
0.10391 X 10^6 ft^3 Natural Gas/hr X 0.6 lb SO_2/10^6 ft^3 Natural Gas = 0.062 lb/hr = 0.27 tpy
Total = 456.90 lb/hr = 2001 tpy

Department of Environmental Protection

DRAFT
1-19-95
JJTAYLOR

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 P2O5), to 24.30 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 (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)

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

Printed on recycled paper.

DRAFT

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 AO29-218851

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.]

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 P2O5). [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.]

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.]

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)

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 amended 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:

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.]

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.]

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.]

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

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

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MEMORANDUM

AMAX Chemical Corporation (NOW CORONET)
402 SOUTH KENTUCKY AVENUE • LAKELAND, FLORIDA 33801

TO: Fred G. Mullins

DATE October 30, 1984

FROM: Robert L. Harrison, Jr.

SUBJECT: Defluorination Kilns Nos. 6 and 7 SO_2 Test

A Method 8 compliance test for SO_2 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:

	Stack Conditions		Sulfur Dioxide Emissions
Run	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.

RLH/cw

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

2950 U/M2 PCTURL
SOOT EMISSIONS (MPM)

MEMORANDUM
Intent to Issue
Pats Processing No. 259884

TO: W.C. Thomas, P.E. **DATE:** January 18, 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 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 P2O5), to 24.30 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.

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 SO2 emissions are 307.6 pounds per hour and 1347.3 tons per year.

This SO2 emission rate **exceeds** the Ambient Air Quality Standards for SO2 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 SO2 emissions:

	SO2 (ug/m3) Hour				
Reference	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.

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 SO2 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 SO2 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 SO2 emissions with the new pollution control equipment in place. Based on the results of the SO2 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_2O_5 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: AO29-218854). 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 AO29-218851. 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 AO29-218851.

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 SO2 emissions are 307.6 pounds per hour and 1347.3 tons per year.

This SO2 emission rate **exceeds** the Ambient Air Quality Standards for SO2 as shown in the Air Toxic Working List, Version 3.0. Below is a summary of the SO2 emissions:

	SO2 (ug/m3) Hour				
Reference	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 SO2 emissions, a Specific Condition has been added to permit AC29-259884 to test for SO2 emissions. Based on the results of the SO2 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:

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

DEP File: AC29-259884
Hillsborough County

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.

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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;

(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

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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. The purpose of this construction modification project is to <u>increase</u>:

1. the combined prepared feed processing rate from 18 tons per hour (approximately 6.96 tons per hour P2O5), to 24.30 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 (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)

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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 AO29-218851

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.]

SPECIFIC CONDITIONS:

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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 P2O5). [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.]

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.]

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)

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 amended 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.]

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.]

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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.]

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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

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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:

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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.

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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.

Best Available Copy

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
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Do not use for International Mail
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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 it.
n Receipt Requested" on the mailpiece below the article number. eceipt 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.

4a. Article Number
P 648 752 800

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

7. Date of Delivery 1/25/95

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

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1993—352-714 DOMESTIC RETURN RECEIPT

01-12-95
12:55:46

*** 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
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TELEPHONE (813)272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813)272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813)272-7104

D.E.R.

DEC 2 1 1994

SOUTHWEST DISTRICT
TAMPA

M E M O R A N D U M

DATE: December 14, 1994

TO: John Taylor THRU: Jerry Kissel

FROM: Ben Kalra BNK 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_2O_5) to 24.3 TPH (8.66 TPH of P_2O_5). 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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D.E.R.

DEC 2 1 1994

SOUTHWEST DISTRICT
TAMPA

M E M O R A N D U M

DATE: December 14, 1994

TO: John Taylor THRU: Jerry Kissel

FROM: Ben Kalra BnK THRU: Jerry Campbell

SUBJECT: Kilns 6 and 7 - Coronet Industries, Inc.
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d) Submittal of the notice of report for the compliance test in a timely manner.

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. 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.

Printed on recycled paper.

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)

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 AO29-218851, 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 AO29-218851 permit conditions.

Pending review of the test data, the Department will acknowledge that the above conditions have been satisfied by amending permit AO29-218851. 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

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

FAX (813) 272-5157

D.E.R.
DEC 13 199
SOUTHWEST DISTRICT
TAMPA

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

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

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

Best Available Copy

CORONET INDUSTRIES, INC.
D.E.R.

NOV 10 1994

SOUTHWEST DISTRICT
TAMPA

November 9,1994

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(118) 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

P. O. Box 760 • Plant City, Florida 33564-0760 • Tel: (813) 752-1161 • Fax: (813) 754-8558

Best Available Copy

permit file

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 10/26/94

Subject

Time

Permit No.

County

M J Taylor, J Kissel – DEP
J Koogler, S Cullen – Koogler & Assoc's

Telephone No.

Representing Frank Lucas – Coronet Coronet

[ ] Telephoned Me [ ] Was Called [X] Scheduled Meeting [ ] Unscheduled Meet

(R Kirby Cullen invited)

Other Individuals Involved in Conversation/Meeting

Summary of Conversation/Meeting

Will be submitting appln re kilns. Thruput & hours will increase but this can be accomodated ~~for~~ w/ present app; just a matter of "turning up the dial" but will be adding control app to hold emissions below prior levels (FR comment; but for products of combustion like NO_x & CO, emissions would probably increase) actual

Their proposal will show this is not a mod'n because:
1) for NSPS (subpart FFF) not a mod'n because increase is prod w/o no capital exp's (see NSPS Ref 1)
2) NSR/PSD not applicable/because no prior const + permit

cc: R Kirby

(continue on another sheet, if necessary)

Signature J Kissel

Title APS

Florida Department of
Environmental Protection

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

Lawton Chiles
Governor

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 P2O5 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 [redacted] 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, [redacted]. 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), ~~since~~ there is no federally enforceable condition that would prohibit the requested rate increases.

Best Available Copy

MEMORANDUM

TO: FILE

THROUGH: BILL THOMAS, P.E.

THROUGH: HARRY KERNS, P.E.

FROM: GEORGE RICHARDSON

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_2O_5 RATE : 3.48 AV. TPH/KILN

X2

YIELDS → 6.96 TPH P_2O_5 INPUT MAX FEED RATE.

2/28/94 (DA).

APPLICATION TRACKING SYSTEM

DEC 10 1993

APPL NO:239608

APPL RECVD:10/13/93 TYPE CODE:AO SUBCODE:TO 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 - - - - - - - - - - - - 10/13/93

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 • 3804 Coconut Palm • Tampa, Florida 33619

Lawton Chiles, Governor 813-744-6100 Virginia B. Wetherell, Secretary

April 13, 1993

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

permitx.ltr

Recycled Paper
Printed with Soy Based Inks

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

FAX (813) 272-5157

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

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.

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

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_2O_5 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 P2O5 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.** A029-21885

COMPANY Consolidated Minerals COUNTY Ut.-Lls.

SOURCE DESCRIPTION/COMMENTS Defluorinating Kilns 6 & 7

DATE APPL. REC'D **(Day 1):** 9-4

CHECK ATTACHED: (Y) N
Not Required ( )

APPLICATION SUB TYPE CODE 2A

FEE SUBMITTED: (✓) correct ( ) incorrect - Should Be $ 1500.00
Submitted $- ~~2000~~ 5,000
Needed/Refund $ _____

FEE CHECKED BY: K. K. DATE 9-10

APPLICATION ASSIGNED TO: _____ DATE _____

PERMIT APPLICATION PROCESSING STATUS

	Completed	Initials
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:	NOV 2 4 1992	MQ

DATA FOLLOW UP

Issue Date Updated on PATS:	NOV 2 4 1992	MQ
Updated on Wang:	—	—

(PERMAPPL.SHT) (11/08/91)

APPLICATION TRACKING SYSTEM NOV 2 4 1992 09/10/92

APPL NO:218851
APPL RECVD:09/04/92 TYPE CODE:AO SUBCODE:2A LAST UPDATE:09/10/92
DER OFFICE RECVD:TPA DER OFFICE TRANSFER TO:___ APPLICATION COMPLETE:__/__/__
DER PROCESSOR:~~AIR~~ Kerns
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--10/08/92
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

D. E. R.
OCT 0 8 1992
SOUTHWEST DISTRICT
TAMPA

October 6, 1992

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

Air — Harry Kraus

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

FAX (813) 272-5157

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

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

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

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 P2O5. 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

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 11/10/87

FROM: George W. Richardson

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.

Best Available Copy

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

Enclosed is Permit Number A029-139056 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 wavier 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 Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which 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 DIST
TAMPA

Best Available Copy

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, 2600 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

GWR/mjh

Attachment: as stated

cc: ~~HSEPC~~
EPC file

CERTIFICATE OF 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(10), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

Best Available Copy

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: 11-5-92
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 Tellerett Packed Cross-Flow Wet Scrubber. Both kilns exhaust through a single stack.

Location: Coronet Road, Plant City, Fla.

UTM: 17-393.6E 3096.3N NEDS NO: 0075 Point ID: 05

Replaces Permit No.: A029- 61494

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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, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate 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 permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

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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 concern being investigated.

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

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

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

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

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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:

( ) Determination of Best Available Control Technology (BAT)

( ) 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. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of an unresolved enforcement action.

Best Available Copy

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 or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. As requested by the permittee, in order to exempt the source from Particulate RACT, maximum allowable particulate emissions shall not exceed 15 pounds per hour. [Subsection 17-2.650(2)(b)2., F.A.C.].

2. Pursuant to Section 17-2.600(3)(a)8., F.A.C., fluoride emissions shall not exceed 0.3 lbs/ton of P2O5 input or 2.5 lbs/hr based on a maximum P2O5 input rate of 17tph.

3. Visible emissions shall not be equal to or greater than 20% opacity in accordance with Subsection 17-2.610(3)(a), F.A.C.

Best Available Copy

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	( ) Sulfur Oxides*
(X) Fluorides	( ) Nitrogen Oxides
(X) Opacity	( ) 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 approximately the maximum P2O5 input rate stated in the permit application. The actual P2O5 input rate shall be specified in each test result. Failure to submit the input rates or operation at conditions which do not reflect actual operating conditions may invalidate the data [Section 403.161(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 per Section 17-4.16, F.A.C.

A) Annual amount of materials and/or fuels utilized.
B) Annual emissions (note calculation basis).
C) 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.

Best Available Copy

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 60 days prior to the expiration date.

12. Pursuant to Chapter 1-3.22(3) 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.

Best Available Copy

Note To File:

AO29-139056 : Nos. 6 & 7 Defluorinating Kilns
AO29-139061 : Feed prep. plant for Defluorinating kilns - Dryer

Rule: 17-2.600(3)(a)8.
Provides allowance of 0.37 lb. F per ton P_2O_5 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_2O_5 and kilns are allocated 0.32 lb F/ton P_2O_5

Feed Prep. Dryer	0.05
Kilns	0.32
Total	.37

11/13/87

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.

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-existant, 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.

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

Best Available Copy

PANY NAME AMAX, Phosphate, Inc. Processor KKD

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	10-18-82	SCM
5	Review by Sec. head and transfer to permitting Engineer	Held for DOEPC Inspection	
28	Completeness Review		
	request additional info *		
	information received *		
	Public Notice Published * (for Air Construction only)		
55	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	1-14-82	
90	Final Issuance/denial		

*If needed, If not indicate by N/A

Best Available Copy

TO: The Files

THROUGH: Bill Thomas 1/14/83

FROM: Bob Garrett

DATE: December 2, 1982

SUBJECT: AMAX, Application For Permit Renewal For Nos. 6 & 7 Defluorinating Kilns Scrubber, Hillsborough County, AP

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% suflur oil at a rate of 15 barrels an hour which translates to 220 lbs. of uncontrolled SO_2 per hour. There is no regulation for this emission at present.

Back-up fuel

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_2O_5. Allowables are ~~18.56~~ 15 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, ~~or~~ 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 kilns.

Best Available Copy

Air

Garrett

WD

AMAX Phosphate, Inc.
A SUBSIDIARY OF AMAX INC.
402 SOUTH KENTUCKY AVENUE • SUITE 600 • LAKELAND, FLORIDA 33801 • (813) 687-2561

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

November 16, 1982

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

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
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
TAMPA

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

Best Available Copy

File: Hills Co 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

MAR 10 1982
SOUTHWEST DISTRICT
TAMPA

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

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 Shut 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

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 X 24 Lbs./Hr. Total Combined Emission Rate = 9.6 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

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

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,

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

JJL:cr

Best Available Copy

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.

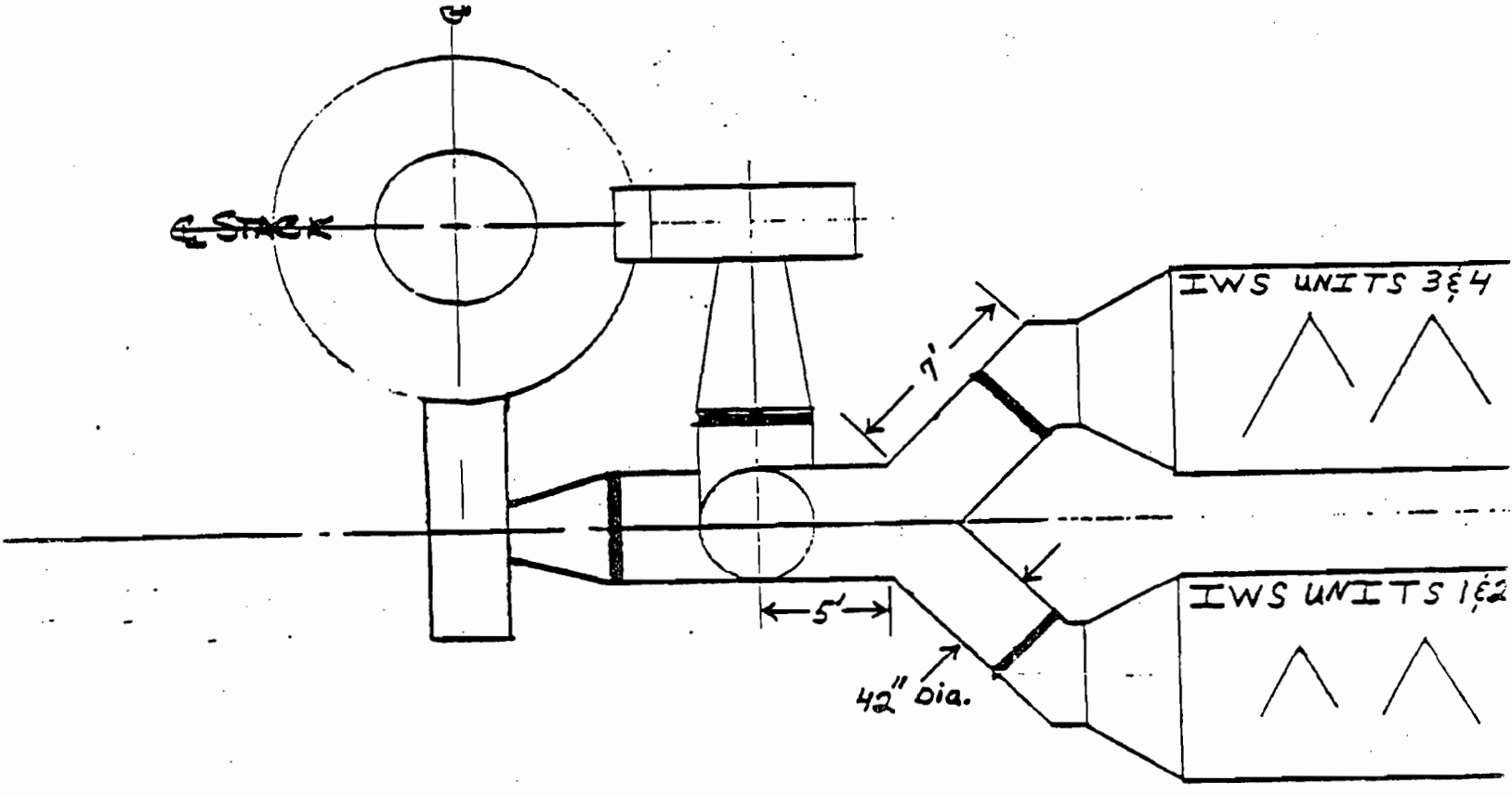
Sincerely,

George Townsend

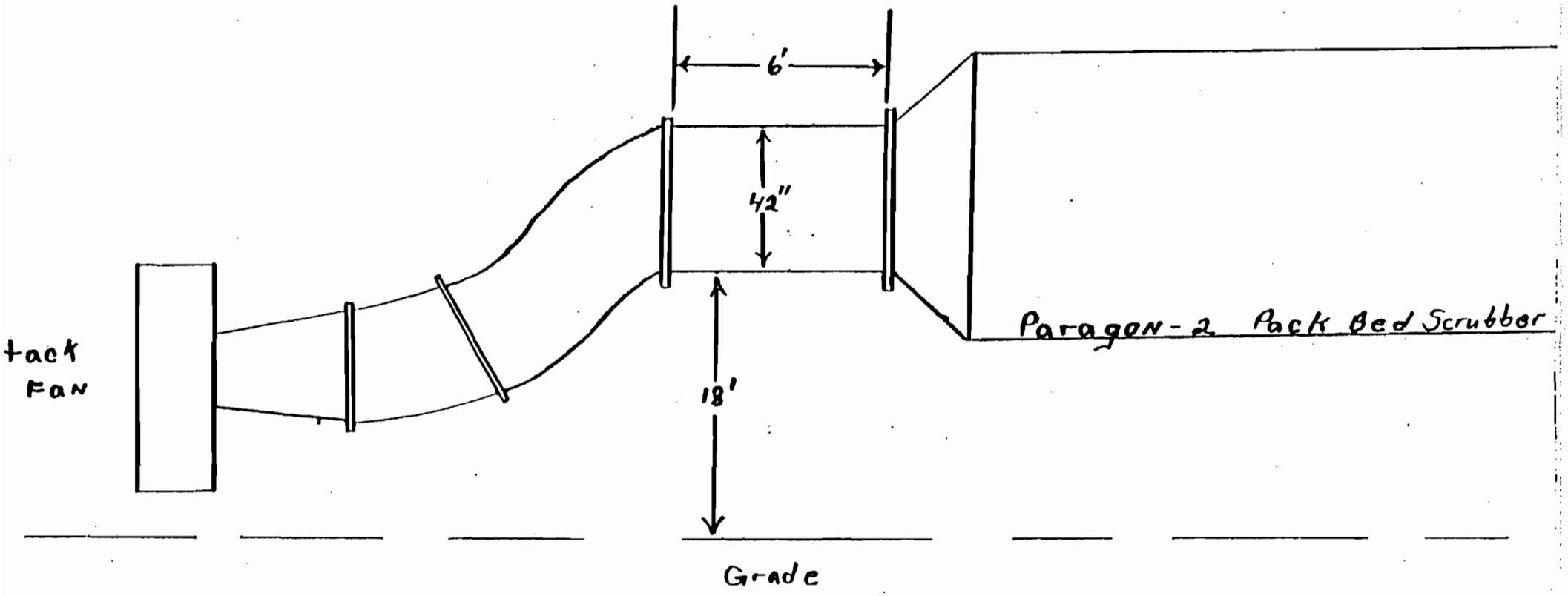
George Townsend
Stack Team Coordinator

GT/rit

bcc: [redacted]
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.

File with appli

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee

To:		Loctn.:	
To:		Loctn.:	
To:		Loctn.:	
From:		Date:	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]	
Date Due:	Date Due:		

TO: Clair Fancy
THROUGH: Dan Williams
FROM: Bob Garrett
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, AO29-6778, 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. 6th Street Gainesville, Florida 32601 (904) 377-5822

RECEIVED
AMAX Phosphate

March 19, 1982

MAR 2 2 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 Agnecy.

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 conducting 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 significant 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 & KOOGLER
ENVIRONMENTAL CONSULTANTS

John B. Koogler, Ph.D., P.E.

JBK:ls
Attachments

Best Available Copy

Recd. 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
4 Feed Prep., North 6/99: ?	~~0.57~~ 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	~~0.21~~ 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.

SHOLTES KOOGLER

```
PLANT NAME: AMAX - PLANT CITY          POLLUTANT: PART       EMISSION UNITS: GM/SEC    AIR QUALITY UNITS: GM/M**3
IMPACT ON HILLSBOROUGH CO. NON-ATTAINMENT AREA
TAMPA MET DATA    1972

             MET FILE      REQUESTED
           STN NO. YR    STN NO. YR
 SURFACE    12842  72     12842  72
 UPPER AIR  12842  72     12842  72
PLANT LOCATION: RURAL
NO TAPE OUTPUT
MET DATA WILL NOT BE PRINTED

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       0 1 1 1 1 1 0 0 1 0   0 0 1 1 1 1
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272 days

* N O T E *

ALL TABLES, INCLUDING SOURCE CONTRIBUTION, THAT CONTAIN "ANNUAL" IN THE HEADING ARE BASED ONLY ON THOSE DAYS MARKED BY "1" IN THE ABOVE TABLE

1972 MET DATA

Impact of Amax Plant City Facility on Hillsborough County NAA

Increase in Truck Loading emission (of 2/23/82) and Decrease in #C 47 kiln stack

RING DISTANCES(KM)= 12.70 25.00 31.50 35.00 40.00

STACK # 1--FEED PREP N&S
STACK # 2--FEED PREP SODA, BAG HSE E&W, TRUCK LDG
STACK # 3--LIME BIN, CDP BIN, DIKAL, BOOT BIN, BLK LDG
STACK # 4--MILLROOM 1 & 2
STACK # 5--CRANEWAY
STACK # 6--REACTOR PARABON & KILNS 3,4,&5
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

Best Available Copy

PLANT NAME: AMAX - PLANT CITY POLLUTANT: PART EMISSION UNITS: GM/SEC AIR QUALITY UNITS: GM/M**3

MAXIMUM MEAN CONC= 6.0659E-07 DIRECTION= 27 DISTANCE= 19.7 KM

YEAR= 72

ANNUAL MEAN CONCENTRATION AT EACH RECEPTOR

DIR	RANGE 19.7 KM	25.0 KM	31.6 KM	35.0 KM	40.0 KM
1	4.21606E-08	3.14421E-08	2.35900E-08	2.08371E-08	1.77162E-08
2	5.70232E-08	5.02413E-08	3.79798E-08	3.36847E-08	2.88096E-08
3	4.96555E-08	3.75230E-08	2.85669E-08	2.54011E-08	2.17948E-08
4	4.31730E-08	3.22720E-08	2.42838E-08	2.14772E-08	1.82952E-08
5	4.54753E-08	3.45253E-08	2.63811E-08	2.34811E-08	2.01722E-08
6	4.98567E-08	3.79559E-08	2.90836E-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-08	2.29658E-08	1.70993E-08	1.50845E-08	1.28231E-08
9	1.11264E-07	8.25150E-08	6.17943E-08	5.46033E-08	4.64759E-08
10	6.60699E-08	4.86687E-08	3.61927E-08	3.18912E-08	2.70235E-08
11	4.75320E-08	3.45206E-08	2.52492E-08	2.20721E-08	1.85157E-08
12	5.26949E-08	3.94315E-08	2.96807E-08	2.62555E-08	2.23710E-08
13	6.83475E-08	5.19125E-08	3.93608E-08	3.49115E-08	2.98483E-08
14	9.28585E-08	7.05518E-08	5.36603E-08	4.76132E-08	4.06954E-08
15	6.79820E-08	5.16532E-08	3.93673E-08	3.49767E-08	2.99579E-08
16	7.96460E-08	6.11930E-08	4.71167E-08	4.20394E-08	3.62032E-08
17	6.00496E-08	4.57003E-08	3.48533E-08	3.09602E-08	2.65019E-08
18	7.91143E-08	6.01893E-08	4.59036E-08	4.07982E-08	3.49539E-08
19	8.17443E-08	6.24977E-08	4.78416E-08	4.25711E-08	3.65271E-08
20	5.19161E-08	3.83478E-08	2.84642E-08	2.50128E-08	2.11225E-08
21	1.75589E-07	1.35842E-07	1.05198E-07	9.40732E-08	8.12417E-08
22	1.58304E-07	1.19368E-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	4.25683E-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	1.77667E-07
26	4.23416E-07	3.21437E-07	2.44458E-07	2.16924E-07	1.85447E-07
27	6.06595E-07	4.64478E-07	3.56273E-07	3.17333E-07	2.72638E-07
28	3.77756E-07	2.89154E-07	2.21881E-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	1.85384E-07	1.56035E-07	1.43676E-07
31	1.54727E-07	1.17294E-07	8.94005E-08	7.94900E-08	6.81878E-08
32	8.58739E-08	6.41692E-08	4.83404E-08	4.28074E-08	3.65451E-08
33	1.13860E-07	8.70639E-08	6.58145E-08	5.95526E-08	5.12237E-08
34	7.07347E-08	5.34980E-08	4.07243E-08	3.62031E-08	3.10546E-08
35	7.09018E-08	5.39814E-08	4.12427E-08	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**3

YEARLY MAXIMUM 24-HOUR CONC= 4.3390E-06 DIRECTION= 27 DISTANCE= 19.7 KM DAY= 1

YEAR= 72

HIGHEST 24-HOUR CONCENTRATION AT EACH RECEPTOR

DIR	RANGE 19.7 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 (89)	1.5741E-06 (89)	1.1723E-06 (89)	1.0317E-06 (89)	8.7250E-07 (89)
3	2.8733E-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	2.6233E-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)	1.3997E-06 (334)	1.2602E-06 (334)	1.1075E-06 (334)
7	1.1800E-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)	1.4978E-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)	1.7106E-06 (291)	1.5140E-06 (291)
14	1.6306E-06 (322)	1.2672E-06 (231)	1.0001E-06 (231)	9.0070E-07 (231)	7.8424E-07 (231)
15	2.5096E-06 (45)	2.0167E-06 (45)	1.6147E-06 (45)	1.4633E-06 (45)	1.2850E-06 (45)
16	2.0609E-06 (78)	1.6739E-06 (78)	1.3496E-06 (78)	1.2245E-06 (78)	1.0764E-06 (78)
17	2.1041E-06 (81)	1.7075E-06 (81)	1.3754E-06 (81)	1.2476E-06 (81)	1.0963E-06 (81)
18	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	3.7765E-06 (364)	3.0029E-06 (364)	2.3813E-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	2.6855E-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**3

YEARLY SECOND MAXIMUM 24-HOUR CONC= 4.3733E-06 DIRECTION= 27 DISTANCE= 19.7 KM DAY=275

YEAR= 72

SECOND HIGHEST 24-HOUR CONCENTRATION AT EACH RECEPTOR

DIR	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)	6.9844E-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	9.3946E-07 (58)	7.0183E-07 (58)	5.2099E-07 (58)	4.6055E-07 (74)	4.0114E-07 (74)
8	6.1932E-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)	1.2398E-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)	6.8554E-07 (314)	5.9788E-07 (314)
18	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	9.9465E-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)	1.2892E-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	3.1233E-06 (323)	2.5163E-06 (323)	2.0192E-06 (323)	1.8310E-06 (323)	1.6093E-06 (323)
24	2.6377E-06 (333)	2.0940E-06 (333)	1.6613E-06 (333)	1.4996E-05 (333)	1.3108E-06 (333)
25	2.4476E-05 (227)	1.8764E-06 (227)	1.4417E-06 (227)	1.2845E-06 (227)	1.1043E-06 (227)
26	2.7358E-05 (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)
28	2.6620E-06 (54)	2.1890E-06 (54)	1.7886E-06ﾂ (54)	1.6339E-06 (54)	1.4494E-06 (54)
29	2.4421E-05 (224)	1.9348E-06 (224)	1.5305E-06 (224)	1.3806E-06 (224)	1.2058E-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)	1.0064E-06 (317)	9.1323E-07 (317)	8.0348E-07 (317)
32	1.1833E-06 (152)	9.6034E-07 (152)	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-05 (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

D. E. R.
OCT 08 1992
SOUTHWEST DISTRICT
TAMPA

October 6, 1992

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

Air — Harry Kearns

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

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

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 11/13/87

FROM: George W. Richardson

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.

No. 1037

Charles MacDonald
Plant Foreman

File

Plant Inspection

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) 7521161

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 Jay B Robinson

Received by: R. L. Brodie
Operation Superintendant

Date: 31 July 78

D.E.R.
AUG 24 1978
SOUTHWEST DISTRICT
TAMPA

SMITH-DOUGLASS
Division of
BORDEN CHEMICAL, BORDEN INC

August 8, 1978

RECEIVED
AUG 9 1978
H.C.E.P.C.

Ms. Vilma Brueggemeyer
Hillsborough County Environmental
Protection Commission
7402 N. 56th St.
Building 500
Tampa, Fla. 33617

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 revealed 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 alterations.

If further action is required or you have comments, please advise.

Yours very truly,

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
SOUTHWEST DISTRICT
TAMPA

For each permitted emission point, please submit a separate report for calendar year 19 77 prior to March 1st of the following year.

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	
Prepared Feed	101,205	tons/yr
		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).

436.767	10^6 cubic feet Natural Gas	1,820.177	10^3 gallons No. 5 Oil, 1.75 - 1.90%S
	10^3 gallons Propane		10^3 gallons Kerosene
	tons Coal		10^5 lb Black Liquor Solids
	tons Carbonaceous		tons Refuse

Other (Specify type and units)

V EMISSION LEVEL (tons/yr):

A.

19.1	Particulates		Carbon Monoxide
	Nitrogen Oxide		Total Reduced Sulfur
	Hydrocarbon	2.0	Flouride
	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

REUBIN O'D. ASKEW
GOVERNOR

JOSEPH W. LANDERS, JR.
SECRETARY

No. 6&7 Defluorinating Kiln Scrubber
BORDEN, INC.
HILLSBOROUGH COUNTY - - A.P.
March 8, 1978

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. AO29-6316) 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