

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

Routing To District Offices And/Or To Other Than The Addressee	
To: _____	Loctn.: _____
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

TO: Jacob D. Varn

FROM: Steve Smallwood *SS*

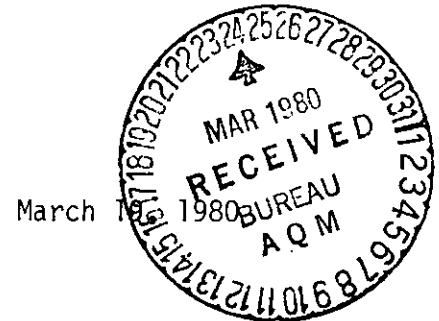
DATE: April 7, 1980

SUBJ: Revision of Agrico Big Bend Terminal Construction Permits

Agrico has requested that the construction permits that were issued by the Department are modified so that a Federal PSD permit may be obtained from EPA without any additional requirements. To remain as a Tier I PSD review, EPA requires the limitation that the source emits less than 1000 pounds per day. This was not included in the Departments construction permit.

Agrico has stated in their letter and consequent conversations that EPA would not require the Tier II review if the Department would amend the construction permits so that operating hours and the tonnage of material received and shipped were included in the annual operating report that is required by the Department. Jack Preece of TRW which is under contract to EPA to review the Federal PSD applications was contacted by the Bureau on this matter. Mr. Preece explained that the 1000 pounds per day particulate emission limitation would be included in the Federal PSD permit. What is requested by EPA is that the state's annual operating report would be the same report to verify compliance with the permit conditions to avoid duplication of reports. Therefore, daily operating hours and tonnage of material shipped and received is needed in the annual report. The permit modification suggested by Agrico would satisfy this need and not affect the Department's permit or intent.

SS:caa



Mr. Bill Thomas
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Thomas:

As discussed with you by telephone today, in order to qualify for PSD Tier I review by EPA and their consultant, TRW Corp., we find it necessary to bind ourselves with an enforceable permit condition that the proposed expansion of Agrico's Big Bend Terminal will not exceed EPA's limitation of 1000 pounds per day particulate emissions (F.R. 6/19/79).

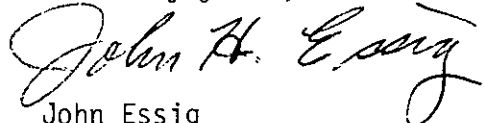
Accordingly, we request that you add the following sentence as an addendum to Condition 4 of Permits AC29-25142, AC29-25149, AC29-25160, AC29-25161, AC29-25162, AC29-25163 and AC29-25164 issued 1/28/80: "This annual report shall list daily operation hours and tonnage received and shipped."

As agreed to by you, this information applied to the permitted hourly emission limits would by simple calculation demonstrate the quantity of daily emissions.

If the Department approves this or a similar addendum of your own wording, please send us a revised page 3 that lists this change for each permit.

We appreciate your prompt attention to this matter.

Sincerely yours,



John Essig
Environmental Chemist

JE:gnc

cc: Mr. Tommie A. Gibbs
Mr. Jack Preece

Smallwood, J.

RECEIVED
MAR 8 1980

FEB 26 1980

Office of the Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REF: 4AH-AF

Mr. Ed Mayer
Agrico Chemical Company
South Pierce Chemical Works
P. O. Box 1969
Bartow, Florida 33830

RECEIVED
GENERAL INVESTIGATIVE
DIVISION
MAR 1980
A O M
21 22 23 24 25 26 27 28 29 30 31

Dear Mr. Mayer:

This letter acknowledges receipt of the SO₂ continuous emission monitor test report for units 10 and 11 sulfuric acid plants for your South Pierce Chemical Works which was conducted by your personnel in August 1979 and sent to this office under a cover letter dated September 7, 1979 as required by 40 CFR 60, Standards of Performance for New Stationary Sources.

This office, on the basis of the above report, has determined that the subject units have met the requirements of performance specification 2 under the above cited regulation (see Appendix B).

We would like to remind you that compliance with the Federal New Source Performance Standards does not exempt you from compliance with any State regulations and/or procedures governing your operation.

Also, it will be necessary for you to continually maintain and operate the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

We encourage you to review the regulations (40 CFR 60) previously supplied to you, particularly Subpart A, General Provisions, and we call your attention to Part 60.7, Notification and Record Keeping and Part 60.9, Availability of Information. Also, we remind you that under Section 114(a) of the Clean Air Act, the Administrator may require additional source tests at any time as deemed appropriate.

Mr. Ed Meyer
Page

I would like to thank you for your cooperation with our Air Facilities staff and request that you continue to contact me at 404/881-4552 should you have any questions or if we can be of assistance in any way.

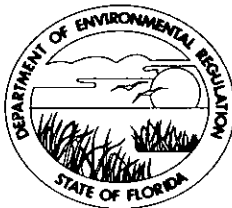
Sincerely yours,

Tommy A. Gibbs
Chief
Air Facilities Branch

cc: Mr. Steve Smallwood, Chief
FL Dept of Environmental
Regulation

bc: James T. Wilburn
Paul Amato

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

February 14, 1980

Mr. Harold W. Long, Jr., Manager
Environmental Control
Agrico Chemical Company
P. O. Box 1110
Mulberry, Florida 33860

Dear Mr. Long:

Attached please find three cover pages which reflect corrections of the typographical errors noted in your letter of February 1, 1980, attached, addressed to Steve Smallwood, Bureau Chief, Bureau of Air Quality Management.

Thank you for calling these errors to our attention.

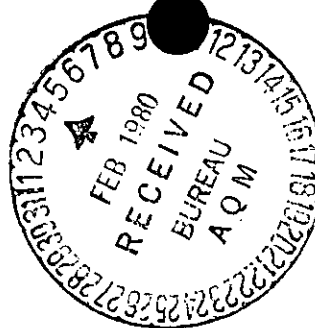
Sincerely,

Mark G. Hodges
Environmental Scientist

MGH:caa

cc: Mr. D. Puchaty, Tampa, DER
Mr. R. T. Schneider, Pridgen
Mr. R. Stewart, Tampa-HCEPC

Attachments



February 1, 1980

Mr. Steve Smallwood, Bureau Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Smallwood:

We have received the originals of the seven construction permits dated January 28, 1980, for our Big Bend Terminal. We note the following typographical errors:

1. Permit No. AC25142, UTM 320.085E should read:
UTM 362.085E.
2. Permit No. AC25161, Longitude $82^{\circ} 21' 25''$ W
should read: $82^{\circ} 24' 25''$ W.
3. Permit No. AC25162, UTM 3076.285N should read:
3076.284N.

Please send corrected cover pages for these three permits, or if you approve, we will ink in the corrections.

Please advise.

Sincerely yours,

Harold W. Long, Jr.
Manager, Environmental Control

HWL:gnc

cc: Mr. D. Puchaty, Tampa-DER
Mr. R. T. Schneider, Pridgen
Mr. R. Stewart, Tampa-HCEPC