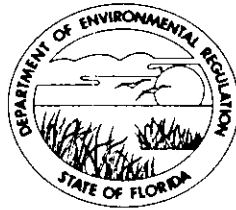


STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610-9544

BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

WILLIAM K. HENNESSEY  
DISTRICT MANAGER

June 2, 1982

Mr. Fred G. Mullins  
Regulatory Compliance Manager  
AMAX Phosphate, Inc.  
402 So. Kentucky Ave., Suite 600  
Lakeland, Fla. 33801

Dear Mr. Mullins:

In answer to your letter of May 21, 1982 to Mr. Hennessey, this District, we offer the following clarification to condition No.8 of permit A029-52245:

1. Due to the lack of specific detail when permit A029-6318 was examined by CAPS, they treated the new permit as a replacement for the old permit and its surrender would be the normal course of action.
2. Obviously, this is not the case as we have discussed locally, since we are promoting the separation of distinct controls from this original permit.
3. The District will honor A029-6318 for the remaining controls to its expiration date or until the 3 remaining baghouses are renewed or changed with additional covering permits.
4. Since this was a CAPS requirement, I am sending a copy of your letter and this response to them. In the interest of saving paper flow, if you do not hear from them to the contrary, condition No.8 may be considered void.

Sincerely, yours,

Robert R. Garrett, P.E.  
Air Engineer

RRG/jk

cc: Willard Hanks  
CAPS-Tallahassee

**AMAX** Phosphate, Inc.

A SUBSIDIARY OF AMAX INC.

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

*Marrett,  
Prepare  
letter D.K.ing  
SW*

May 21, 1982

**DER**  
MAY 22 1982  
SOUTHWEST DISTRICT  
TAMPA

Mr. William K. Hennessey  
District Manager  
Florida Department of Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610

RE: Permit No. A029-52245

Dear Mr. Hennessey:

AMAX Phosphate recently received the above referenced permit from your department for the construction of 7500 CFM Baghouse at the AMAX Plant City Feed Phosphates Facility. In reviewing the permit, we found that specific condition number eight on page three of the permit poses a problem. This specific condition states: "This permit replaces part of operating permit number A029-6318. The applicant shall return this operating permit to the Southwest District Office within three (3) months of startup of the new unit."

The permit referenced in specific condition number eight (A029-6318) is a collective permit allowing the operation of six dust collectors located in different process units at the AMAX Plant City facility. Two construction permits (AC29-52245 and AC29-50795) issued by your department will eliminate three of the dust collectors from the existing permit A029-6318. However, three of the original six dust collectors will remain operational under this permit.

It is possible that the three baghouses remaining on the existing permit will be modified or replaced as a part of the voluntary Plant City Environmental Improvement Program. However, it will not be possible to determine the fate of the baghouses until the engineering evaluation and definitive engineering on the overall program is completed. To re-permit these individual baghouses now, and then to possibly be faced with revising these same permits within twelve to eighteen months, would seem to be an unnecessary duplication of effort for both your department and AMAX Phosphate.

Letter to Mr. William K. Hennessey  
May 21, 1982  
Page Two

We are requesting that the three remaining baghouses be allowed to continue operation under permit number A029-6318 until the engineering of the environmental projects for those areas is completed. If, upon completion of the engineering, AMAX finds that the baghouses will not be modified or replaced, then new individual operating permit applications will be submitted for each of the three units. Upon receipt of the new operating permits, the existing permit A029-6318 will then be surrendered to the Southwest District office of the Florida Department of Environmental Regulation.

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

Sincerely,



Fred G. Mullins  
Regulatory Compliance Manager

FGM/rit

cc: Mr. Ivan Choronenko  
Mr. George Townsend  
Mr. Dan Williams

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: /Martha Hall, Office of General Counsel  
✓ Steve Smallwood, Chief, BAQM

FROM: Dan A. Williams *DW*

DATE: February 19, 1982

SUBJECT: Hillsborough County AP  
AMAX Phosphate, Inc.

DER

FEB 20 1982

BAQM

Attached are two letters concerning the AMAX Phosphate facility in Plant City. Several legal and/or policy questions have been brought up which need answering.

The first letter is from Ms. Rhea Law, Attorney for AMAX, discussing a request for a revision to an existing operating permit. As detailed in her letter, Operating Permit A029-6778 is for Fluid Bed Reactors #1 and #2 and Paragon Kiln #2. Each source has its own separate control system with a common stack containing the emissions from all three sources. The allowable emission rate on the operating permit is 20.03 lbs/hr of particulates and was calculated by summing the input weight rates to each process (4 + 4 + 8 = 16 T/Hr.) and then applying the process rate formula  $E = 3.59 (16) 0.62 = 20.03$  lb/hour.

AMAX is requesting two things. One is that individual permits be issued for each source with the allowable emission rate being calculated by separating the input process rate for each source. Using this method the allowable emission rates would be 8.48 lbs/hour for each reactor and 13.03 lbs/hour for the kiln. The total emission rate from the common stack would be 30 lbs/hour. Second is that AMAX is requesting the input process rates for the two reactors be increased to 9 tons/hour each. The allowable emission rate, using the process rate formula, would then be 14.02 lbs/hour for each reactor or a total of 41.07 lbs/hour from the common stack.

The increase over current allowable emissions with the increased production rates would be 92 tons per year. The increase over allowable emissions using separate input rates and the increased production would be 48 tons/year. AMAX has offered internal offsets from two other sources resulting in a net overall reduction of emissions.

My question on the above request are several:

1. Can DER hold them to the existing emission rate of 20.03 lbs/hour?

Martha Hall  
Steve Smallwood  
February 19, 1982  
Page two

2. If not, would the increase in allowable emissions for the increased production trigger a PSD review and new source permitting since the increased emission rate would be 48 tons/year of particulates? The question of increased fluoride emissions has not been considered.
3. Can we accept the offer of reduced emissions from other sources as a method to offset increased emissions thereby negating the PSD and NSR requirements?

The second letter is from Fred Mullins of AMAX Phosphates. They have undertaken a major voluntary effort to reduce fugitive particulate emissions at the Plant City facility. The entire program will require an expenditure of several million dollars before completion. Their concern is that each time a new baghouse or other control device is added the facility comes closer to being a significant impactor on the Hillsborough County nonattainment area. The current modelling work doesn't include anything for fugitive emissions. They don't want the facility to come under the RACT rules.

My questions on the second letter are:

1. If additional point sources are added at the facility to reduce fugitive dust emissions and through these additions they cause the facility to have a significant impact on a nonattainment area; does the facility then have to comply with RACT?
2. AMAX has verbally agreed to a BACT determination of 0.02 grains/dscf for each new control device installed to reduce fugitive emissions. Under what condition could BACT be applied in this case? If BACT can't be applied but if AMAX agrees to 0.02 grains/dscf as the emission standard for these sources, can it be made legally enforceable by permit proviso? Also, at some future date, if AMAX came back and ask for a higher allowable emission rate, what rule would apply?
3. If AMAX can quantify the fugitive emissions and verify a net reduction in emissions after control devices are added would PSD, NSR, BACT, LAER, or RACT be applicable?

AMAX has requested an answer as soon as possible because some of the answers may impact their further actions.

If my questions are unclear or if you need any additional information, please let me know.

DAW/rkt

cc: Hillsborough County EPC  
Fred Mullins  
Rhea F. Law

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: Permit File AC 29-52245

THRU: Clair Fancy  
Bill Thomas  
Larry George

FROM: Teresa M. Heron *T.H.*

DATE: February 24, 1982

SUBJ: Preliminary Rule Applicability Determination  
AMAX PHOSPHATE, INC., Hillsborough County

An application for a permit to construct was submitted to the Bureau of Air Quality Management on February 4, 1982 by AMAX PHOSPHATE, INC. The application is being reviewed for completeness; day 30 will be March 6, 1982.

The proposed project is the installation of a 7500 CFM Baghouse to replace the present unit (Mikro-Pulsaire 25-8-100 FDER Permit Number AO 29-6318).

AMAX PHOSPHATE, INC. complex is located in the area of influence of the Hillsborough County particulate nonattainment area. It is therefore potentially subject to the state nonattainment rule.

The potential emissions from this source are listed below:

Emission Point	Pollutant	Potential Emission Rates	
		lb/hr	ton/yr
7500 CFM Baghouse	PM	1.30	4.60

Page Two  
File

As the potential emission of 4.6 TPY PM will not cause a significant impact in the PM nonattainment area, the modification is exempt from the NSR requirements for nonattainment areas pursuant to 17-2-510(2)2.b, Areas of Influence of Nonattainment Areas and from Prevention of Significant Deterioration requirements pursuant to 17-2-500(2)(d), New and Modified Facilities.

The proposed source is subject to Emission Limiting and Performance Standard pursuant to 17-2-650(2)(c)5 Specific RACT Emission Limiting Standard for Phosphate Processing Operations.


Since the modification would result in no net emission increase of PM and the emission will not have a significant impact within the nonattainment area, the proposed source application shall be reviewed under Section 17-2.520(3), Permitting Requirements of Sources not subject to Prevention of Significant Deterioration or Nonattainment Requirements.

Approved

Disapproved


Signature and  
Date


  
\_\_\_\_\_  
Larry George

  
\_\_\_\_\_  
Bill Thomas

  
\_\_\_\_\_  
Clair Fancy

3/15/82

 3/11/82

 3/16

## BACKGROUND INFORMATION

The AMAX PHOSPHATE Feed Preparation dust control units (six baghouses) is an existing facility permitted under the collective FDER Permit No. AO 29-6318 which was issued on behalf of Borden Chemical, Inc. who sold this facility along with Borden's other active mining and processing operations to AMAX PHOSPHATE, INC.

Basically, the overall proposed modification includes three changes. The first change (Permit No. AC 29-46069 issued by our Southwest District Office) consisted of the replacement of dust collectors No. 1, 2 and 3 (Mikro-Pulsaire, Model 37-8-100) with a new 24,300 CFM baghouse and several new collection points. This modification involves the separation of a portion of the process area.

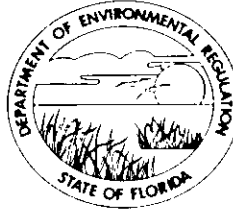
The second change is the installation of a new 7500 CFM baghouse (Permit No. 29-52245). This baghouse will control the portion of the Feed Preparation System that is not included with the 24,300 CFM baghouse system. The reason for the separation of the two systems was to improve the fugitive dust capture, to design for the loss of air flow from duct wall build-up, and to allow (in plant) operations the flexibility of being able to operate either system independently of the other.

The third change involves keeping and renovating the Mikro-Pulsaire baghouse, model 16-8-100. This renovation work will be handled as maintenance of the existing unit. A new operating permit will be submitted for this baghouse within sixty (60) days prior to the completion of the renovation work to the Southwest District Office.



STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

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



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

MEMORANDUM

TO: Dan Williams  
FROM: Teresa M. Heron *TH*  
DATE: February 23, 1982  
SUBJ: AMAX Construction/Modification Permit Application

This is to confirm our February 22, 1982 telephone conversation.

Do you have a list of Air permits transferred from Borden to Amax?

Could you send Section III, (Air Pollution Sources and Control Devices), Page 3 of the application of modification (construction) Permit No. AC 29-46069 and the specific conditions of this permit?

Do you have a copy of application and operating permit No. AO 29-6318 which will include allowable emission from the six baghouses (existing emissions)? I could not find this information in our record room.

I need the above information to determine whether or not there will be a net change in particulate matter emission as a result of this modification. If it is not possible for you to send me the data requested, please let me know so I can write an incompleteness letter before the 30th day review period will be over. This is on or before March 6.

TH/bjm