

2/18/83

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: Victoria J. Tschinkel
 FROM: Clair Fancy *[Signature]*
 DATE: February 15, 1983
 SUBJ: Approval of Attached Air Construction Permits

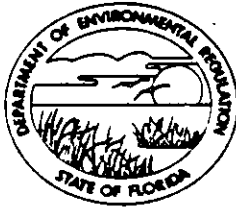
Attached for your approval and signature are three Air Construction Permits for which the applicant is AMAX Phosphate, Inc. The proposed project is for modification of three defluorinating kilns located at the company's Plant City chemical complex in Hillsborough County, Florida.

The waiver date, after which the permits would be issued by default, is February 16, 1983.

The Bureau recommends your approval and signature.

CF/pa
 Attachment

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



BOB GRAHAM
GOVERNOR

Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

February 18, 1983

CERTIFIED MAIL-RETURN REQUESTED

Mr. J. J. Lewis
Plant Manager
AMAX Phosphate, Inc.
Post Office Box 790
Plant City, Florida 33566

Dear Mr. Lewis:

AC 29-57072

AC 29-57073

Enclosed is Permit Number AC 29-57074, dated February 16, 1983
to AMAX Phosphate, Inc.
issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Enclosure

cc: Mr. Anthony R. Lenkei, AMAX Phosphate, Inc.
Mr. Dan Williams, DER Southwest District
Mr. Iwan Choronenko, Hillsborough County Environmental
Protection Commission

No. 0157973

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		Mr. J. J. Lewis	
STREET AND NO.		P. O. Box 790	
PS STATE AND ZIP CODE		Plant City, FL	
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	OPTIONAL SERVICES	CERTIFIED FEE	¢
		SPECIAL DELIVERY	¢
		RESTRICTED DELIVERY	¢
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE		2/21/83	

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL	● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.
	1. The following service is requested (check one.) <input checked="" type="checkbox"/> Show to whom and date delivered..... <input type="checkbox"/> Show to whom, date and address of delivery..... <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered..... <input checked="" type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery \$..... (CONSULT POSTMASTER FOR FEES)
	2. ARTICLE ADDRESSED TO: Mr. J. J. Lewis Post Office Box 790 Plant City, FL 33566
	3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO. 0157973
	(Always obtain signature of addressee or agent)
	I have received the article described above. SIGNATURE <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <i>J. J. Lewis</i>
	4. DATE OF DELIVERY: POSTMARK 2/24/83
	5. ADDRESS (Complete only if requested)
6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS	

Final Determination

AMAX Phosphate, Inc.
Hillsborough County, Florida

Defluorinating Units

Source	Permit Numbers
Fluid Bed Reactor No. 1	AC 29-57072
Fluid Bed Reactor No. 2	AC 29-57074
Paragon Kiln No.2	AC 29-57073

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

February 4, 1983

FINAL DETERMINATION
AMAX Phosphate, Inc.
AC 29-57072 thru 57074

The Technical Evaluation and Preliminary Determination for the modifications to three defluorinating units at AMAX Phosphate, Inc.'s Plant City chemical complex was available for public inspection at Hillsborough County Environmental Protection Commission and the department's Tampa and Tallahassee offices beginning in November, 1982. A legal notice informing the public of the proposed project, the location of the evaluation and procedure for submitting comments on the department's intent to issue the construction permits was published in the Tampa Tribune on November 29, 1982. The only comments received on the department's proposed action were from the applicant in their letter dated January 4, 1983. The Company made comments on nine items which are discussed below.

- 1) The applicant requested the fluid bed reactors not be referred to as kilns. The use of the noun kiln in the permits for fluid bed reactor 1 and 2 was changed as requested by the applicant.
- 2) The applicant informed the department that Hillsborough County would require only annual compliance tests instead of the semiannual test listed in the draft permits. The permits have been reworded to reflect this.
- 3) The applicant informed the Bureau that Paragon Kiln No. 2 is normally fired with natural gas and uses No. 5 fuel oil only as a standby fuel. The draft permit described No. 5 fuel oil as the primary fuel for this kiln. The permit has been reworded to clarify the fuels used by this kiln.
- 4) AMAX is unable to meet a specific condition requiring upgrading of the existing test facilities on the duct for Paragon Kiln No. 2 to meet test facility specifications listed Chapter 17-2.700(4), FAC. The Company will use the test facilities on the common stack for the compliance test on all three defluorination units. These facilities meet the specifications listed in our rules. The department needs the test facilities on the duct to allow the agency to test the source without having the Company shut down the two fluid bed reactors. Testing by the department on this source will, in all probability, be infrequent and we can accept "reasonable" facilities not meeting all the specifications. The draft permit has been reworded to reflect this.
- 5) The spelling of Paragon has been corrected.
- 6) The emission limits for both fluid bed reactors (1.56 lbs PM/T) was obtained by dividing the maximum allowable particulate matter emissions obtained from the process

weight table (17-2.610(1), FAC) by the maximum process weight input to the reactors. A standard in this form is necessary to allow the department to determine the compliance status of the fluid bed reactors when both are in operation. Our position was discussed with AMAX's Regulatory Compliance Manager. The emission standards in the permit were not changed.

- 7) The applicant commented on the 72 MMBTU/hr heat input limit and the statement in the draft permit that "prohibited" the use of No. 5 fuel oil and limited the use of No. 2 fuel oil in the fluid bed reactors. The wording in the permit was changed for clarification of the department's position.
- 8) In reviewing the applications for these modifications, the Bureau did not agree with AMAX's proposal to use reductions in unconfined particulate matter emissions for determining contemporaneous emission change which resulted in the proposed modifications not being subject to PSD. We believe the reductions could not be used because they were needed to comply with existing regulations and the reduced unconfined emission did not have the same health effect as those emitted from the defluorination units. However, the Bureau also concluded that the defluorination units' production was not limited by the existing permits and, because of this, the modification was not subject to PSD.

After reviewing the department's position, the Company asked that the paragraph stating the reductions of unconfined particulate matter emissions could not be used to compute contemporaneous emission change be deleted from the permit because it did not need to be considered to process these applications. They then presented arguments that the reductions in unconfined emissions should be allowed to compute contemporaneous emission change in the future.

The Bureau is not in agreement with the Company's positions. As the original applications for the modifications introduces the use of the reductions in determining contemporaneous emission change, the Bureau believes it is appropriate to address the subject in the Technical Evaluation, even when it was not needed to issue the permits. Although our position remains that these reductions are not available for contemporaneous changes, we will reconsider the position any time the Company provides information to reevaluate it. As the outcome of our differences on this subject will not affect the permits to modify the three defluorination units, we are leaving this matter unresolved to avoid a delay in issuing the permits to construct. The Company may pursue this subject any time they wish.

- 9) The TPY fluoride emissions listed in the January 4, 1983 letter are correct. These figures were not included in the permits. The permits list the emissions in lbs F/hr only.

The Bureau has revised the permits to construct as discussed above. None of the changes made are considered significant.

AMAX Phosphate, Inc.

A SUBSIDIARY OF AMAX INC.

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

1-10-83
Public notice 11/29/82
30th day ~ 12/29/82
Letter dated 1-4-83, thus
after 30 days of notice &
DER is not required to
consider.
WR

January 4, 1983

Bill Willard

JAN 7
2 2 2
Quality Management
DER
JAN 07 1983
BAQM

Mr. Clair Fancy
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

SUBJECT; Hillsborough County - AP
AMAX Phosphate, Inc.
Air Pollution Source Construction Permits
AC29-57072, AC29-57073 and AC29-57074

Dear Mr. Fancy:

Recently we received the document entitled, "Technical Evaluation and Preliminary Determination, AMAX Phosphate, Inc., Hillsborough County, Florida, Defluorinating Units", dated October 28, 1982, addressing the amendment of the following sources: Fluid Bed Reactor #1, Permit #AC29-57072; Fluid Bed Reactor #2, Permit #AC29-57074; and Paragon Kiln #2, Permit #AC29-57073. Our review has revealed some areas on which we would like to comment. These are as follows:

1. Throughout the document the three sources are referred to as "kilns". Because two of the sources are fluid bed reactors, such designation is inaccurate; therefore, a more appropriate designation would be "defluorinating units".
2. On page three, paragraph four, a reference is made to semi-annual sampling requirements by Hillsborough County. As a result of a recent agreement with the Hillsborough County Environmental Protection Commission, this sampling requirement has been amended to conform with DER's annual requirement. (See attached letter from John Egan to Bill Thomas.)
3. Page one of the Paragon Kiln No. 2 permit indicates that the unit is being fired with No. 5 fuel oil. This description is incorrect, as the unit is normally fired with natural gas and the No. 5 fuel oil is used only as a stand-by fuel.

Letter to Mr. Clair Fancy
January 4, 1983
Page Two

4. Specific condition #7 of the Paragon Kiln No. 2 permit requires that the sampling facilities between the scrubber and the fan be upgraded to meet the specifications found in 17-2.700(4) F.A.C. Unfortunately, this upgrading is physically impossible and the wording of the specific condition should be amended to read as follows: "Existing stack sampling facilities between the scrubber and the fan will be upgraded as close as reasonably possible to the specifications listed in Chapter 17-2.700(4) F.A.C."
5. Specific condition #2 contains a typographical error in the first sentence, wherein Paragon is spelled incorrectly.
6. Concerning specific condition #4 of both Fluid Bed Reactor permits, there is some question as to rationale for the particulate matter emission rate of 1.56 pounds per ton. Apparently the Process Weight Table was not applied in this case, as it was for the Paragon Kiln. Therefore, we would appreciate some clarification of the basis for this limitation.
7. Specific condition #6 of both Fluid Bed Reactor permits calls for a restriction of heat input to the reactors of 72 MMBTU per hour. Because the reactors are restricted from using fuel oil except during startup and the natural gas used for normal operations has a negligible effect on point source emissions, this limitation appears unnecessary. Therefore, we would suggest that sentence number three of these paragraphs be changed to read as follows: "Use of No. 5 fuel oil or No. 2 fuel oil for normal operations shall be considered as a modification."
8. Finally, we wish to respond to paragraph five on page two, which reads as follows:

"The reduction in PM emissions from unconfined sources achieved by the company (AMAX) cannot be used to determine contemporaneous emission changes, 17-2.500(2)(e)3, because the unconfined PM emissions were reduced to comply with 17-2.610(3) and the unconfined PM emissions do not have the same qualitative significance for public health and welfare as the smaller particulate matter particles emitted from the kilns (17-2.500(e)4.c.)."

Letter to Mr. Clair Fancy
January 4, 1983
Page Three

On the basis of the following information, it is suggested that this paragraph be deleted from the preliminary determination because the referenced paragraph does not apply to the permits as written or to the preliminary determination since emissions offsets are not required as a condition of issuing the permits.

The particulate matter emissions addressed in the above referenced paragraph were from the truck loadout facility at the AMAX Plant City, Florida plant, presently permitted under FDER Permit #A029-52854. The facility was voluntarily modified under FDER Construction Permit #AC29-43906 to reduce the unconfined emissions from the loadout operation even though the facility was operating under a valid FDER operating permit (#A029-6317) and was in full compliance with all conditions of the permit.

At the time of the issuance of the original permit (FDER #A029-6778), DER made a determination of "reasonable precautions" as required under F.A.C. 17-4.03 and 17-4.07 and included them as conditions of the permit. Specifically, the unit employed the use of hoods, fans, filters (in the form of a bag collector) and nonventilated steel covers over the conveyors to contain and capture unconfined emissions.

Since the source was properly permitted, the permit was current and valid, operations were in compliance with all specific conditions of the permit, and no Notice of Violation or Letter of Warning indicating the source was in noncompliance had been issued; it must be assumed that AMAX was in compliance with the permit conditions, and thereby taking the necessary "reasonable precautions" to prevent the emissions of unconfined particulate matter. As used herein, "unconfined particulate matter" is defined in accordance with the definition in the FDER memo of April 21, 1982, from Bill Thomas and Martha Hall through Steve Smallwood to Dan Williams regarding AMAX Phosphate, Inc.

Because there is no justification for alleging that AMAX was not taking "reasonable precautions" to prevent the emission of unconfined particulate matter from the truck loadout facility, it cannot be maintained, as stated in the referenced paragraph, that "the unconfined PM emissions were reduced to comply with 17-2.610(3). . .".

Letter to Mr. Clair Fancy
January 4, 1983
Page Four

The referenced paragraph also states: "the unconfined PM emissions do not have the same qualitative significance for public health and welfare as the smaller particulate matter particles emitted from the kilns . . .". This statement is made without benefit of actual measurements of the size range of particles from either the truck loadout facility or the kilns.

In considering the nature of the particles from the two sources strictly from a qualitative standpoint, it is reasonable to expect that some of the particles emitted from the truck loadout operation will be larger in diameter than the particles emitted from the kiln stack. On the same basis, it is also reasonable to expect that some of the particles emitted from the truck loadout operation will be in the same size range as particles emitted from the kiln stack. The fact that the emissions from the truck loadout operation are near ground level and will, therefore, have a greater impact on human health and welfare than particles emitted from the 152-foot height kiln stack was also not considered.

To fully evaluate the conditions set forth in Chapter 17-2.500(2)(e)4.c(iii), Florida Administrative Code, which states "It (quantifiable fugitive emissions) has approximately the same qualitative significance for public health and welfare as attributed to the increase in emission of the modification", a particulate size analysis must be conducted on the particles emitted from both sources and air quality modeling must be conducted, taking into consideration source height, source strength and other source parameters to evaluate the impact on ambient air quality.

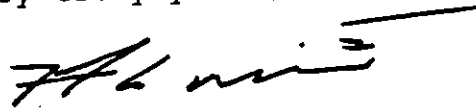
9. Page two, paragraph 3, under Rule Applicability, should be amended to correct Fluoride Potential Emissions as follows:

<u>Source</u>	<u>F</u>
Paragon Kiln #2	2.35
Fluid Bed Reactor #1	3.70
Fluid Bed Reactor #2	<u>3.70</u>
Total	9.75

Letter to Mr. Clair Fancy
January 4, 1983
Page Five

I appreciate the opportunity to make these comments and look forward to discussing them with you at your convenience.

Very truly yours,



Fred G. Mullins
Regulatory Compliance Manager

FGM/rit

Attachment

cc: (All With Attachment)
Mr. John Egan (HCEPC)
Mr. Jack Lewis
Mr. George Townsend
Mr. Dan Williams (FDER)

AMAX Phosphate, Inc.

A SUBSIDIARY OF AMAX INC

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

January 11, 1983

Mr. Willard Hanks
Central Air Permitting Section
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER

JAN 11 1983


DAQM

Dear Mr. Hanks:

Please find attached FDER Form 17-1.122(71) for the waiver of the 90-day time limit under Section 120.60(2) of the Florida Statutes. This waiver applies to the AMAX Plant City Permit Numbers AC29-57072, AC29-57073 and AC29-57074.

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

Sincerely,



Fred G. Mullins
Regulatory Compliance Manager

FGM/rit

Attachment

cc: (All With Attachment)
John Egan (HCEPC)
Dan Williams (FDER-Southwest District)
Jack Lewis
Nolan Lowrey
George Townsend

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTION 120.60(2), FLORIDA STATUTES

AC29-57072
AC29-57073
AC29-57074


License (Permit, Certification) Application No.
Applicant's Name: AMAX Phosphate, Inc.

The undersigned has read Section 120.60(2), Florida Statutes, and fully understands the Applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the Applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Section 120.60(2), Florida Statutes, waives the right under Section 120.60(2), Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Section 120.60(2), Florida Statutes. Said waiver is made freely and voluntarily by the Applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 16th day of February 1983.

The undersigned is authorized to make this waiver on behalf of the applicant.



Signature

Fred G. Mullins, III

Name of Signee

Sworn to and subscribed
before me this 10th day
of January 1983.

January 10, 1983

Date

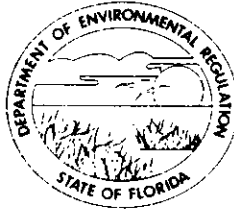


Notary Public

NOTARY PUBLIC STATE OF FLORIDA
J. L. K. ...
EXPIRES SEPTEMBER 30, 1983

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57073
Date of Issue:
Expiration Date: April 30, 1983
County: Hillsborough
Latitude/Longitude: 27° 59' 21"/82° 04' 48"
Section/Township/Range:
Project: Paragon Kiln No. 2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 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:

Modification to the existing natural gas fired (No. 5 fuel oil standby) Paragon kiln No. 2 that processes eight tons per hour prepared feed and is equipped with dust chambers, spray towers and a Tellerett packed cross flow wet scrubber to control fluoride and particulate matter emissions. The kiln discharges through a common stack with fluid bed reactors No. 1 and 2. The source is located at AMAX Phosphate, Inc. chemical complex on Coronet Road, Plant City, Hillsborough County, Florida. The UTM coordinates of the site are 17-393.8 E and 3096.3 N. Modification shall be in accordance with the application titled Paragon Kiln No. 2 (Defluorinating Unit) and signed by Mr. J. J. Lewis on 6/10/82.

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57073
Date of Issue:
Expiration Date: April 30, 1983

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 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 403.722(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 any 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 therefor 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.
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 may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose 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

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57073
Date of Issue:
Expiration Date: April 30, 1983

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

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, 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 (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. 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 any unresolved enforcement action.
 - 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.

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57073
Date of Issue:
Expiration Date: April 30, 1983

SPECIFIC CONDITIONS:

1. This permit replaces AO 29-6778 as it applies to Paragon kiln No. 2.
2. Maximum prepared feed input to Paragon kiln No. 2 will not exceed eight (8) tons per hour. Calibrated scales or an alternate method approved by the department will be available to determine the process weight input to the kiln.
3. Maximum operation time of the kiln will not exceed 7,900 hours per year.
4. Particulate matter emissions, as determined by EPA reference Method 5, will not exceed 13.03 lbs/hr or the quantity allowed by 17-2.610(1), FAC, whichever is lowest. When processing less than 8 TPH prepared feed, allowable particulate matter emission is determined by the following formula:

$$E = 3.59 P^{0.62}$$

where E is allowable emissions in lbs/hr and P is process feed input to the kiln in TPH.

5. Fluoride emission will not exceed 0.60 lbs/hr as determined by reference method 13A or 13B, 40 CFR 60, or other methods approved by the department.
6. Sulfur content of the No. 5 fuel oil used in this kiln will not exceed 2.08 per cent nor shall heat input to the kiln exceed 62 MMBTU/hr (24 HR AVG). The No. 5 fuel oil system will not be connected to the No. 2 fuel oil system at this facility.
7. Existing stack sampling facilities between the scrubber and the fan will be upgraded as close as reasonably possible to meet the specifications listed in Chapter 2.700(4), FAC.
8. The following data from the Tellerett packed cross flow wet scrubber serving Paragon kiln No. 2 will be obtained each day the kiln operates and records of the data kept for 2 years for regulatory agency inspection.
 - a. Pressure drop of the gas in inches of water;
 - b. Flow rate of scrubber water in GPM (a weir or similar device may be used to obtain this flow);
 - c. pH of the scrubber water;
 - d. Pressure of the scrubber water.
9. The Company shall conduct annual compliance tests at the common stack for the three defluorination units, while the reactors are not operating, at 90 to 100 percent permitted capacity for particulate matter and fluoride and submit an annual report of the actual operation of the kiln which will include, as a minimum: quantity (maximum and average) phosphate feed processed, amount and percent sulfur (maximum and average) No. 5 fuel oil used, total hours of operation of the kiln and current stack test report.
10. The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to Hillsborough County Environmental Protection Commission prior to 30 days before the expiration date of this permit. The applicant may continue to operate in compliance with all terms of this construction permit until its expiration or until issuance of an operating permit.

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57073
Date of Issue:
Expiration Date: April 30, 1983

SPECIFIC CONDITIONS:

Issued this 7th day of Feb, 1982

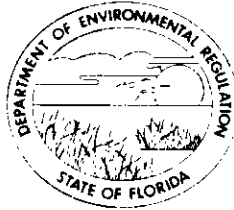
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Tony Cole

6 Attachments

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57072
Date of Issue:
Expiration Date: April 30, 1983
County: Hillsborough
Latitude/Longitude: 27° 59' 21"/82° 04' 48"
Section/Township/Range:
Project: Fluid Bed Reactor No. 1

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 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:

Increase feed input to 9 TPH in the existing natural gas fired fluid bed reactor No. 1. This reactor is controlled by a dust cyclone, spray tower, Tellerett packed cross flow scrubbers and Ceilcote double stage ionizing wet scrubbers (IWS) and discharges through a common 152 foot high stack with two other defluorination units (Paragon kiln No. 2 and fluid bed reactor No. 2). The source is located at AMAX phosphate, Inc. chemical complex on Coronet Road, Plant City, Hillsborough County, Florida. The UTM coordinates of the site are 17-393.8 E and 3096.3 N. Modifications shall be in accordance with the application titled Fluid Bed Reactor No. 1 (Defluorinating Unit) and signed by Mr. J. J. Lewis on 6/10/82.

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57072
Date of Issue:
Expiration Date: April 30, 1983

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 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 403.722(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 any 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 therefor 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.
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 may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose 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

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57072
Date of Issue:
Expiration Date: April 30, 1983

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

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, 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 (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. 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 any unresolved enforcement action.
 - 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.

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57072
Date of Issue:
Expiration Date: April 30, 1983

SPECIFIC CONDITIONS:

1. This permit replaces AD 29-6778 as it applies to Fluid Bed Reactor No. 1.
2. Maximum prepared feed input to Fluid Bed Reactor No. 1 will not exceed nine (9) tons per hour. Calibrated scales or an alternate method approved by the department will be available to determine the process weight input to the reactor.
3. Maximum operation time of the reactor No. 1 will not exceed 7,056 hours per year.
4. Particulate matter emission, as determined by EPA reference Method 5, will not exceed 14.02 lbs/hr or 1.56 lbs/ton phosphate feed input, whichever is more restrictive.
5. Fluoride emission will not exceed 1.04 lbs/hr as determined by reference method 13A or 13B, 40 CFR 60, or other methods approved by the department.
6. Heat input to the reactor No. 1 is limited to 72 MMBTU/hr (24 hr. avg). Only natural gas fuel may be used during production. Up to 50,000 gallons per year of virgin No. 2 fuel oil with a maximum of 1.0 percent sulfur may be used for startup only of this reactor. A new permit must be issued before the use of No. 5 fuel oil anytime or No. 2 fuel oil for other than startup is allowed in reactor No. 1. The No. 2 fuel oil system will not be connected to the No. 5 fuel oil system.
7. Sample ports in the 152 foot high common stack will be used for periodic compliance test required by this permit. All other sources of air pollution that use this common stack will cease operation when the periodic compliance test on Fluid Bed Reactor No. 1 is being performed.
8. The following data on the control devices serving fluid bed reactor No. 1 will be obtained each day the reactor operates and records of the data kept for 2 years for regulatory agency inspection.
 - a. Pressure drop of the gas through the scrubber;
 - b. Flow rate of scrubber water;
 - c. pH of the scrubber water;
 - d. Pressure of the scrubber water.
 - e. Voltage of the electrostatic precipitator (ESP);
 - f. Amps to the ESP;
 - g. Sparking rate of the ESP.

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification No.: AC 29-57072
Date of Issue:
Expiration Date: April 30, 1983

SPECIFIC CONDITIONS:

9. The Company shall conduct annual compliance test for particulate matter and fluoride while the reactor is operating at 90 to 100 percent of permitted capacity and submit an annual operation report for the reactor which will include, as a minimum: quantity (maximum and average) phosphate feed processed, amount and percent sulfur in the No. 2 fuel oil used for startup, total hours of operation of the reactor and current stack test report.
10. The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to Hillsborough County Environmental Protection Commission prior to 30 days before the expiration date of this permit. The applicant may continue to operate in compliance with all terms of this construction permit until its expiration or until issuance of an operating permit.

Issued this 11 day of Feb, 1983

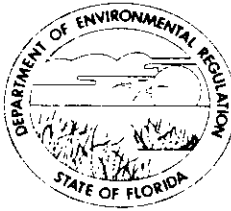
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Terry Cook

_____ Attachments

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57074
Date of Issue:
Expiration Date: April 30, 1983
County: Hillsborough
Latitude/Longitude: 27° 59' 21"/82° 04' 48"
Section/Township/Range:
Project: Fluid Bed Reactor No. 2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 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:

Increase prepared phosphate feed input to 9 TPH in the existing natural gas fired fluid bed reactor No. 2. This reactor is controlled by a dust cyclone, spray tower, Tellerett packed cross flow scrubbers and Ceilcote double stage ionizing wet scrubber (IWS) and discharges through a common 152 foot high stack with two other defluorination units (Paragon kiln No. 2 and fluid bed reactor No. 1). The source is located at AMAX phosphate, Inc. chemical complex on Coronet Road, Plant City, Hillsborough County, Florida. The UTM coordinates of the site are 17-393.8 E and 3096.3 N. Modifications shall be in accordance with the application titled Fluid Bed Reactor No. 2 (Defluorinating Unit) and signed by Mr. J. J. Lewis on 6/10/82.

PERMITEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57074
Date of Issue:
Expiration Date: April 30, 1983

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 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 403.722(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 any 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 therefor 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.
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 may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose 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

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57074
Date of Issue:
Expiration Date: April 30, 1983

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

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, 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 (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. 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 any unresolved enforcement action.
 - 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.

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification Number: AC 29-57074
Date of Issue:
Expiration Date: April 30, 1983

SPECIFIC CONDITIONS:

1. This permit replaces AD 29-6778 as it applies to Fluid Bed Reactor No. 2.
2. Maximum prepared feed input to Fluid Bed Reactor No. 2 will not exceed nine (9) tons per hour. Calibrated scales or an alternate method approved by the department will be available to determine the process weight input to the reactor.
3. Maximum operation time of the reactor No. 2 will not exceed 7,056 hours per year.
4. Particulate matter emission, as determined by EPA reference Method 5, will not exceed 14.02 lbs/hr or 1.56 lbs/ton phosphate feed input, whichever is more restrictive.
5. Fluoride emission will not exceed 1.04 lbs/hr as determined by reference method 13A or 13B, 40 CFR 60, or other methods approved by the department.
6. Heat input to the reactor No. 2 is limited to 72 MMBTU/hr (24 hr. avg). Only natural gas fuel may be used during production. Up to 50,000 gallons per year of virgin No. 2 fuel oil with a maximum of 1.0 percent sulfur may be used for startup only of this reactor. A new permit must be issued before the use of No. 5 fuel oil anytime or No. 2 fuel oil for other than startup is allowed in reactor No. 2. The No. 2 fuel oil system will not be connected to the No. 5 fuel oil system.
7. Sample ports in the 152 foot high common stack will be used for periodic compliance test required by this permit. All other sources of air pollution that use this common stack will cease operation when the periodic compliance test on Fluid Bed Reactor No. 2 is being performed.
8. The following data on the control devices serving fluid bed reactor No. 2 will be obtained each day the reactor operates and records of the data kept for 2 years for regulatory agency inspection.
 - a. Pressure drop of the gas through the scrubber;
 - b. Flow rate of scrubber water;
 - c. pH of the scrubber water;
 - d. Pressure of the scrubber water.
 - e. Voltage of the electrostatic precipitator (ESP);
 - f. Amps to the ESP;
 - g. Sparking rate of the ESP.
9. The Company shall conduct annual compliance test for particulate matter and fluoride while the reactor is operating at 90 to 100 percent of permitted capacity and submit an annual operation report for the reactor which will include, as a minimum: quantity (maximum and average) phosphate feed processed, amount and percent sulfur in the No. 2 fuel oil used for startup, total hours of operation of the reactor and current stack test report.
10. The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to Hillsborough County Environmental Protection Commission prior to 30 days before the expiration date of this permit. The applicant may continue to operate in compliance with all terms of this construction permit until its expiration or until issuance of an operating permit.

PERMITTEE: AMAX Phosphate, Inc.
P. O. Box 790
Plant City, Florida 33566

I.D. Number:
Permit/Certification No.: AC 29-57074
Date of Issue:
Expiration Date: April 30, 1983

SPECIFIC CONDITIONS:

Issued this 16 day of Feb, 1983

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Terry Cole

6 Attachments