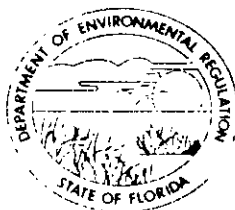


STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

November 22, 1983

Bill Thomas
Department of Environmental
Regulation
7601 Highway 301, N
Tampa, Florida 33610

Dear Bill:

The Bureau of Air Quality Management recently issued construction permit number AC 29-65834 to AMAX, Inc. which allows the company to convert an existing phosphate rock dryer from oil to COWM fuel. Hillsborough County Environmental Protection Commission asked the bureau to add a specific condition to this permit that would require AMAX, Inc. to continue to operate and report the data from three company ambient air monitoring stations. The construction permit was issued without this condition. Since then, the bureau has received a letter from AMAX, Inc. in which they agreed to the county's request.

As it is desirable to have this ambient air data and all parties are in agreement to supply and process it, the bureau requests that you add the following specific condition to any permit to operate issued for this phosphate rock dryer.

AMAX, Inc. shall continue to operate the ambient air monitoring stations and report the data collected to the Hillsborough County Environmental Protection as described in the county's letter dated September 20, 1983 and agreed to in the company's letter dated October 14, 1982.

Bill Thomas
November 22, 1983
Page Two

Please let us know if you concur with this condition.

Sincerely,



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

CHF/WH/bjm

Attachments: HCEPC letter dated 9/20/83
AMAX, Inc. letter dated 10/14/82

cc: Jerry Campbell, HCEPC
Fred Crabill, AMAX, Inc.

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 *COO*
THRU: Bill Thomas *BT*
FROM: Willard Hanks *wmh*
DATE: November 22, 1983
SUBJ: AMAX, Inc.

Hillsborough County Environmental Protection Commission asked the Department to include an ambient air quality monitoring requirement as a specific condition in the recently issued permit (AC 29-65834) that allowed AMAX to use an alternate fuel in an existing phosphate rock dryer. The county wanted this specific condition in the construction permit to assure the company would continue to supply the ambient air data from the company's monitors and to justify use of the county's resources in processing the data.

In reviewing the application for this modification, it was decided that post-construction monitoring was not necessary. As review engineer, I did not want to add an ambient air monitoring requirement to the construction permit because it might result in a violation of a specific condition of the permit in the future if any of the monitoring, QA or QC conditions were not followed. This could make the Department have to enforce a condition we did not believe was justified to begin with.

Since issuing the construction permit, the company has written that they have no objection to the ambient air monitoring requirement. You stated that the condition should be added as the company has agreed to the county's request. I have discussed this with the SW District and they are willing to add a specific condition to the operation permit, when issued, requiring ambient air monitoring by AMAX. The attached letter confirms this and has notified all personnel involved of the situation.

WH/bjm

Copy of Hillsborough County EPC's letter dated 9/20/83
was attached to ~~the~~ DER's letter dated 11/22/83

Copy of AMAX Chemical Corporation's letter dated 10/14/83
was attached to DER's letter dated 11/22/83